

PROPERTY TAX VALUATION STUDY PROCEDURES

OVERVIEW

Section 401.5 of the Revenue and Taxation Code requires that the Board issue to county assessors data relating to costs of property and other information to promote uniformity in appraisal practices and in assessed values throughout the state. In an effort to comply with section 401.5, the Board annually publishes Assessors' Handbook Section 581, *Equipment and Fixtures Index, Percent Good and Valuation Factors* (AH 581). Currently, AH 581 contains tables of valuation factors for non-production computer equipment, semiconductor manufacturing equipment, and biopharmaceutical industry equipment and fixtures. In June 2008, the Board directed staff to develop further valuation factors for AH 581 by conducting valuation studies for various industries that petition Board staff for a study of their industry property/equipment.

The purpose of these procedures is to provide guidelines to interested parties in identifying, gathering, and verifying data to submit to Board staff for the purpose of conducting a valuation study of their tangible personal property/equipment. The goal of interested parties is to provide enough quality data to enable Board staff to develop valuation factors that the local county assessors can apply to the historical cost of property/equipment in determining the fair market value for property tax purposes. Depending on the type and scope of a study, the data and source participants will vary.

Generally, there are two types of valuation studies for ad valorem personal property tax purposes: *industry group* and *assets specific*. *Industry group* studies involve a group of assets that are deployed within a particular industry. Biopharmaceutical equipment and semiconductor manufacturing equipment are examples of industry group types. *Asset specific* studies have a very narrow scope and involve assets that are typically owned by a diverse set of property owners and can be found in many operational settings. Computers and copiers are examples of asset specific types.

The findings of a study will be determined by the analysis of market data and will not be influenced by opinions of either industry or counties. Once a study has begun and sufficient quality market data has been received by Board staff, the study will be completed, even in the event that the original petitioner decides to withdraw their petition.

MARKET DATA

The successful outcome of a study will be completely dependent on the availability of good market data. The industry will be expected to provide verifiable market data in a sufficient quantity to be statistically representative of the property/equipment within the industry.

Market data submitted must include the following fields (see Table 1 below):

- Make
- Model name
- Model number
- Description
- Configuration
- Serial number
- Manufacture date, ship date, or acquisition date
- Price sold to end user and date of sale
- Discount price new

TABLE 1

MAKE	MODEL NAME	MODEL NUMBER	DESCRIPTION	CONFIGURATION	SERIAL NUMBER	DISCOUNT PRICE NEW DATE ¹	DISCOUNT PRICE NEW	DATE SOLD TO END USER ²	PRICE SOLD TO END USER
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¹ The decision as to what date to provide for the purpose of establishing vintage age is driven by the available data and the source of the data. If, for example, you are receiving price sold to the end user along with a full description of the asset from an industry reseller and you have received cooperation from the manufacturer, the manufacturer can provide ship dates. Another example is where you are able to obtain the used sales prices to items listed on a fixed asset listing (FAL). (When using this method, take care to avoid items on a FAL that were purchased used.) In this case, you will provide the acquisition date listed on the FAL.

² Enter the date of the related subsequent market transaction that corresponds to the price sold to the end user. Market data related to price sold to end user should be limited to a 12-month period. When your petition is approved, Board staff will provide you with the 12-month range.

If the reseller incurred refurbishing costs in readying equipment for sale to the end user, you should include a field for refurbishing costs and provide the refurbishing costs for the related market transactions.

Discount price new and price sold to end user should contain the same components (for example, installation cost, sales tax, and transportation cost). Ideally, discount price new and price sold to end user should only contain the price of the property/equipment.

CONFIDENTIALITY OF DATA

Government Code section 15619 prohibits divulgence of information obtained by Board of Equalization employees. Section 15619 provides, in part:

Any member or ex-member of the State Board of Equalization, or any agent employed by it, or the Controller, or ex-Controller, or any person employed by him or her, or any person who has at any time obtained such knowledge from any of the foregoing officers or persons shall not divulge or make known in any manner not provided by law, any of the following items of information concerning the business affairs of companies reporting to the board:

(a) Any information concerning the business affairs of any company that is gained during an examination of its books and accounts or in any other manner, and is not required by law to be reported to the State Board of Equalization.

(b) Any information, other than the assessment and the amount of taxes levied, obtained by the State Board of Equalization in accordance with law from any company other than one concerning which that information is required by law to be made public.

(c) Any particular item of information relating to the disposition of its earnings contained in the report of a quasi-public corporation that the corporation, by written communication specifying the items and presented at the time when it files its report, requests shall be treated as confidential.

Accordingly, all data obtained from industry in the course of a valuation study will be held confidential and will not be made available to competitors or counties. When Board staff provides results of their analysis of data during and at the conclusion of a study, the data will be masked and/or arrayed in a manner that will preclude identification of the source of any specific data.

INDUSTRY GROUP STUDIES

MARKET DATA FOR GROUP STUDIES

See the section *Market Data* above for an expanded discussion and required formatting parameters for market data. For an industry group type study, provide the most current FAL for the companies you listed in your petition (form BOE-401). The FAL will permit you and Board staff to identify classes of assets and to determine the distribution of investments over time. Only through this analysis can Board staff identify the classes, distribution, and volume of market data needed for your study. You should submit this item soon after your petition has been approved. The FAL should include the following fields:

- General ledger account number
- Asset number
- Description
- Serial number
- Location code

- Acquisition date
- Acquisition cost

Additionally, you will be required to provide:

- Descriptions of each general ledger account
- A schedule describing the location codes

The FAL should correspond to the general ledger. These accounting records will be subject to audit by Board staff. Full cooperation of the industry group is a condition of your study's success.

Once Board staff has analyzed your accounting records, you will be notified of the different asset classes and the amount of market data you must obtain. Board staff will provide you with specific information regarding the market data needed, which should eliminate the collection of unnecessary or redundant data.

ACCOUNTING RECORDS FOR ECONOMIC LIFING STUDY

If you are requesting that Board staff conduct an economic lifing study, you should be prepared to provide FAL's for the most current seven years for each of the companies listed in your petition. Each of the FAL's should contain:

- General ledger account number
- Asset number
- Description
- Serial number
- Location code
- Acquisition date
- Acquisition cost

Additionally, you will be required to provide:

- Descriptions of each general ledger account
- A schedule describing the location codes
- End of year (whether fiscal or calendar) general ledger balances that correspond to the FAL

ASSET SPECIFIC STUDIES

MARKET DATA FOR ASSET SPECIFIC STUDIES

See the section *Market Data* above for an expanded discussion and required formatting parameters for market data. Market data for asset specific type studies should reflect the market (according to market share). Therefore, immediately after your petition is approved, the industry

representative should submit to Board staff a schedule of market share according to manufacturer for each year dating back seven years. Sources of data should be representative of the users of the property/equipment in California.

Once Board staff has analyzed the market share information, you will be notified of the amount of market data that must be submitted to Board staff.

ACCOUNTING RECORDS FOR ECONOMIC LIFING STUDY

If you are requesting that Board staff conduct an economic lifing study, you should be prepared to provide FAL's for the most current seven years from a wide variety of companies. Each of the FAL's should contain:

- General ledger account number
- Asset number
- Description
- Serial number
- Location code
- Acquisition date
- Acquisition cost

Additionally, you will be required to provide:

- Descriptions of each general ledger account
- A schedule describing the location codes
- End of year (whether fiscal or calendar) general ledger balances that correspond to the FAL

VERIFICATION OF DATA

ACCOUNTING RECORDS

Prior to submitting a FAL, industry should verify that the FAL corresponds to the general ledger amounts. After Board staff reviews the accounting records submitted, Board staff may elect to audit the accounting records. The industry participants should be fully aware of this requirement and be prepared to cooperate in a timely manner. The lack of cooperation or delays in responding to Board staff requests can negatively impact the process and ultimately may lead to the termination of the study.

MARKET DATA

Industry should be able to verify each field in the market data by way of a source document, such as an invoice. Price sold to the end user can be obtained from industry resellers and from companies within the industry that have sold directly to an end user. In each case, the invoice of the transaction should be available for inspection by Board staff. Discount price new may prove to be the most difficult to obtain. If, for example, you are able to match used price sold to the end

user to discount price new reflected on a FAL, the invoice for that item listed on the FAL should be available. Make sure that the descriptions of your matches are of such detail to reasonably conclude that both items are the same make, model, and configuration. Matching configurations is the most difficult step of this task depending upon the sophistication of the equipment. When obtaining data on the price to the end user, ensure that you obtain all of the fields outlined in Table 1 above for each line item. Failure to secure the necessary fields may render your used price to the end user invalid.

TIMELINE FOR SUBMITTING DATA

Once a petition has been accepted, the industry will be provided with a timeline for their study which will include specific times to submit accounting records and, after analysis of the accounting records, when market data must be submitted. Generally, a maximum of six months will be allowed for industry to provide sufficient, quality data in order for the study to move forward. If industry does not produce the required data timely, the study will be terminated.