



Property Tax Assistance Division
2023 Report

Review of
Appraisal
District
Appraisal
Standards,
Procedures and
Methodology

TARGETED APPRAISAL REVIEW PROGRAM

KENDALL APPRAISAL DISTRICT



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2023 TARGETED APPRAISAL REVIEW

KENDALL APPRAISAL DISTRICT

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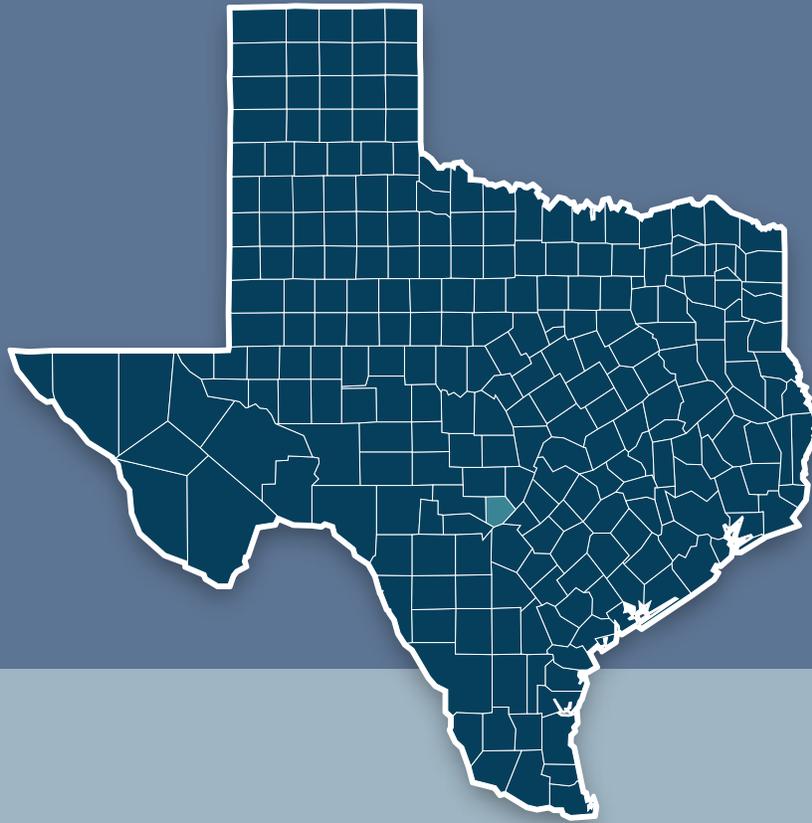




TABLE OF CONTENTS

Executive Summary 2

 Targeted Appraisal Review Program Overview 2

 Invalid School District Property Valuation 3

 Recommendations 3

Section 1 – Overview of County Appraisal District 4

 1.1 County History and Demographics 4

 1.2 Appraisal District Organization and Staffing 4

 1.3 Taxing Units 4

 1.4 Appraisal District Budget Information 5

 1.5 Appraisal District Staff Information 6

 1.6 Training 7

 1.7 Chief Appraiser 7

 1.8 Appraisal District Contracts 8

Section 2 – Appraisal Administration 9

 2.1 Appraisal District Parcel Data 9

 2.2 Property Classification 10

 2.3 Contracted Appraisal Services 11

 2.4 Mapping and/or Aerial Photograph. 11

 2.5 Ratio Studies 12

 2.6 Reappraisal Plan. 16

 2.7 Quality Control 17

Section 3 – Categories of Valuation in the SDPVS 18

 3.1 Category A – Single-Family Residential Property Valuation. 18

 3.2 Category (D) D1 – Qualified Open-Space Land Property Valuation and Category D2 –
 Farm and Ranch Improvements Special Use Valuation 19

 3.3 Category E – Rural Land, Not Qualified for Open-Space Appraisal Property Valuation 19

 3.4 Category F1 – Commercial Real Property Valuation. 21

APPENDICES 22

 APPENDIX 1 — Appraisal District Budget. 22

 APPENDIX 2 — Appraisal District Staffing 22

 APPENDIX 3 — Appraisal District Information. 23



Executive Summary

In September 2023, the Texas Comptroller of Public Accounts identified Boerne Independent School District (Boerne ISD), located in Kendall County, as one of 46 school districts meeting the criteria that initiates a Targeted Appraisal Review (TARP) of the appraisal district in which the school district is located. In 2023, the Property Tax Assistance Division (PTAD) conducted the review of the Kendall Appraisal District (Kendall).

TARGETED APPRAISAL REVIEW PROGRAM OVERVIEW

If a school district receives invalid School District Property Value Study (SDPVS) findings for three consecutive years, Government Code Section 403.302 (k-1) requires PTAD to conduct a review of the appraisal district to determine why a school district’s values are statistically invalid and provide recommendations to the appraisal district regarding appraisal standards, procedures and methodologies.

PTAD reviewers used the [Targeted Appraisal Review Program Guidelines](#) to perform this review. This report contains the findings of the 2023 TARP review of Kendall. Over the next year, TARP reviewers will work with Kendall to address and resolve recommendations outlined in this report. **Exhibit 1** provides a timeline for the TARP cycle.

Upon substantial compliance with all recommendations, PTAD will issue a formal letter of compliance to Kendall and its board of directors.

If the appraisal district fails to comply with recommendations provided in the report and PTAD finds the appraisal district board of directors failed to take remedial action reasonably designed to ensure substantial compliance with each recommendation before the first anniversary of the date the recommendations were made, PTAD will notify the Texas Department of Licensing and Regulation (TDLR), which takes action necessary to ensure the recommendations are implemented as soon as practicable.

EXHIBIT 1

TARP Process Timeline

- NOTIFICATION**
 - PTAD sends TARP notification letters and preliminary data requests to affected appraisal districts.
- REVIEWS**
 - Preliminary data is due to PTAD.
 - TARP reviewers complete onsite visits.
- RECOMMENDATIONS**
 - PTAD releases initial TARP reports.
 - Appraisal districts have one year to work with their TARP reviewers to substantially comply with TARP report recommendations. PTAD mails formal compliance letters when appraisal districts have substantially implemented all recommendations.
- REMAINING RECOMMENDATIONS**
 - PTAD notifies TDLR of remaining recommendations one year after the initial TARP report is released.
 - Appraisal districts have one year to work with TDLR, who determines substantial compliance and reports to the chief appraiser and appraisal district board of directors.



INVALID SCHOOL DISTRICT PROPERTY VALUATION

PTAD identified Boerne ISD in Kendall as having invalid SDPVS findings for three consecutive years. **Exhibit 2** highlights the impacted school district and categories with local values that fell outside the SDPVS statistical confidence interval in the applicable three-year period. PTAD determines the confidence interval using a 5 percent or greater margin of error around PTAD's determined market value. PTAD considers local values valid, or statistically acceptable, when they are within the confidence interval. Values outside this confidence interval are statistically invalid.

EXHIBIT 2

Kendall SDPVS Results 2020-2022

SDPVS Year	County	School District	Findings	Category*	Ratio
2020	Kendall	Boerne ISD	Invalid	A	0.9389
2020	Kendall	Boerne ISD	Invalid	D1	0.7227
2020	Kendall	Boerne ISD	Invalid	F1	0.845
2021	Kendall	Boerne ISD	Invalid	A	0.9492
2021	Kendall	Boerne ISD	Invalid	D1	0.8377
2021	Kendall	Boerne ISD	Invalid	E	0.908
2022	Kendall	Boerne ISD	Invalid	A	0.8926
2022	Kendall	Boerne ISD	Invalid	D1	0.8361
2022	Kendall	Boerne ISD	Invalid	E	0.9029
2022	Kendall	Boerne ISD	Invalid	F1	0.7721

*Categories are defined in the [Texas Property Tax Assistance Property Classification Guide](#).

Source: Texas Comptroller of Public Accounts, [School District Property Value Study](#)

RECOMMENDATIONS

Based on our findings in the TARP review of Kendall, PTAD makes the following recommendations, which are discussed in greater detail throughout this report:

- Conduct staff evaluations annually.
- Evaluate the chief appraiser annually.
- Categorize property correctly according to the *Texas Property Tax Assistance Property Classification Guide*.
- Ensure mapping changes are updated in a timely manner.
- Gather available real estate transfer documents and apply sales data in the CAMA system.
- Conduct ratio studies at timely intervals by market area, neighborhood, property class or stratum and make appropriate adjustments based on results.
- Use Kendall's local ratio studies to make reappraisal decision necessary to produce accurate values.
- Amend the reappraisal plan to address problematic areas.
- Develop and follow written quality control procedures to ensure work is completed accurately and timely.
- Develop valuation procedures and cost schedules for manufactured homes and use ratio study results to annually review and update the schedules.
- Calculate net to land for each of the five years in the appropriate period, determine a five-year average net to land and use calculated values for land designated as agricultural use.
- Maintain market value for vacant land properties and review and update land schedules annually.
- Document land valuation procedures.
- Review and update commercial cost schedules.

Section 1 – Overview of County Appraisal District

1.1 COUNTY HISTORY AND DEMOGRAPHICS

According to *The Handbook of Texas Online*, Kendall County was established by the Texas State Legislature in 1862 and named after George Wilkins Kendall, a journalist and pioneer.

Kendall County is located in south central Texas and is bordered to the north by Gillespie County, to the west by Kerr County, to the southwest by Bandera County, to the southeast by Bexar and Comal Counties and the northeast by Blanco County.

The county includes Boerne and Comfort Independent School Districts and portions of Blanco, Comal and Fredericksburg Independent School Districts. The county population in 2020, according to the United States Census Bureau, was 44,279. The major population center is the city of Boerne, with a 2020 population of 19,698.

Based on this population data, PTAD classifies Kendall as Tier 2 for comparison with appraisal districts of similar population size. **Exhibit 3** shows the population brackets for each tier.

1.2 APPRAISAL DISTRICT ORGANIZATION AND STAFFING

Kendall became active in January 1980. As of July 2024, it has 14 full-time staff positions and no part-time positions, of which five positions are supervisory and five positions are full-time appraisers. Kendall contracts with a vendor for professional appraisal services. **Exhibit 4** presents Kendall’s general organizational structure.

1.3 TAXING UNITS

Local taxing units, including the school districts, counties, cities, junior colleges and special districts, decide how much money they require to effectively provide public services. They adopt property tax rates based upon taxing unit financial needs (budget). Some taxing units have access to other revenue sources, such as a local sales tax. School districts must rely on the local property tax, in addition to state and federal funds.

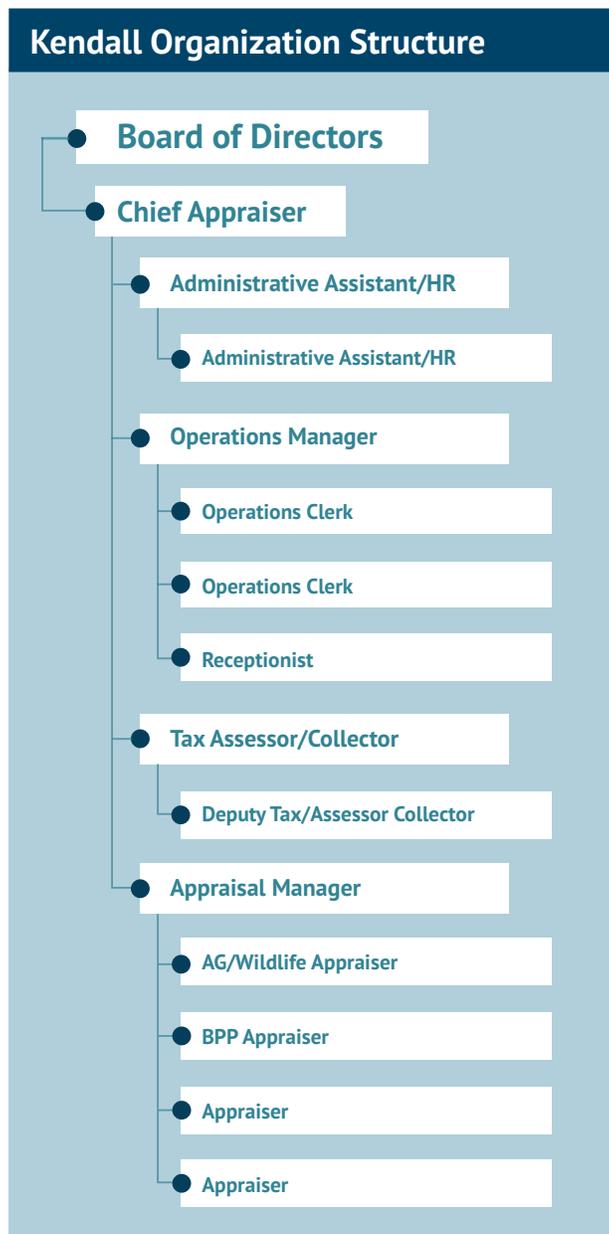
Kendall provides appraisal services for 12 taxing units, as shown in **Exhibit 5**.

EXHIBIT 3

County Population by Tier	
Tier	Total Population Range
1	120,000 +
2	Less than 120,000 to 20,000
3	Less than 20,000

Source: Texas Comptroller of Public Accounts

EXHIBIT 4



Source: Kendall Appraisal District



EXHIBIT 5

Kendall Taxing Units and Collections

Name of Taxing Unit	Appraisal District Collects Property Taxes
Blanco Independent School District	No
Boerne Independent School District	Yes
City of Boerne	Yes
City of Fair Oaks	No
Comal Independent School District	No
Comfort Independent School District	Yes
Cow Creek	Yes
KCWCID #1	Yes
KCWCID #2A	No
Kendall County	Yes
Kendall County MUD #1	Yes
Miralomas MUD	Yes

Source: Texas Comptroller of Public Accounts

1.4 APPRAISAL DISTRICT BUDGET INFORMATION

Taxing units fund the appraisal district through an annual budgeting process. Tax Code Section 6.06 requires the chief appraiser to develop the budget and the board of directors to hold a public hearing to consider the budget. Each participating taxing unit in the appraisal district must contribute a portion of the budget amount equal to the proportional amount of taxes levied in the taxing unit.

Chapter 5 of the International Association of Assessing Officer’s (IAAO’s) *Assessment Administration* explains that the budget is the crucial link in an appraisal district’s ability to make set rational priorities. A budget typically details how resources will be used to accomplish the appraisal district’s goals and objectives. IAAO’s *Standard on Property Tax Policy* states that to accomplish its responsibilities in a fair and professional manner, the appraisal district should have a budget that provides for a well-organized staff, sufficient computing recourses and necessary data.

Exhibit 6 provides a comparison between Kendall’s 2022 budget (excluding collections) versus the Tier 2 average 2022 budget (excluding collections) to show how Kendall’s budget aligns with the tier average.

EXHIBIT 6

Kendall 2022 Budget vs. Tier 2 Average

Kendall Appraisal District Budget (2022)	Tier 2 Average Budget (2022)
\$1,299,528	\$1,541,215

Source: Texas Comptroller of Public Accounts, *Appraisal District Operation Survey*



In 2022, Kendall operated with a budget of \$1,299,528, lower than the 2022 Tier 2 average budget of \$1,541,215. This budget comparison highlights relatively smaller financial resources compared to other Tier 2 appraisal districts, as reported by Kendall in the 2022 *Appraisal District Operation Survey*. A four-year budget history and tier average comparison is available in **Appendix 1**.

1.5 APPRAISAL DISTRICT STAFF INFORMATION

The geographic size of the appraisal district and number of parcels to be appraised directly reflect the number of staff necessary to perform the appraisal district’s responsibilities. The complexity of the appraisals and the experience and expertise of the staff also impact appraisal district needs.

Exhibit 7 provides a comparison between Kendall’s 2022 staffing (excluding collections) and the Tier 2 average (excluding collections) to determine how Kendall staffing and salaries compare with the tier average.

EXHIBIT 7

Kendall 2022 Staffing and Salaries vs. Tier 2 Average

	2022	2022 Tier 2 Average
Full Time Staff	14	13
Part Time Staff	0	N/A
Full Time Appraisers	5	7
Lowest Appraiser Salary	\$48,320	\$40,040
Highest Appraiser Salary	\$62,331	\$59,181

Source: Texas Comptroller of Public Accounts, *Appraisal District Operation Survey*

From 2019 to 2022, Kendall has consistently maintained a full-time staff of 12 to 15 employees, which is greater than the 2022 Tier 2 average of 13. There have been no part-time staff members during this period. From 2019 to 2022, the appraisal district employed five to seven full-time appraisers each year, slightly lower than the 2022 Tier 2 average. The lowest appraiser salary increased from \$44,113 in 2019 to \$48,320 in 2022, higher than the 2022 Tier 2 average of \$40,040. The highest appraiser salary rose from \$57,144 in 2019 to \$62,331 in 2022, which is higher than the 2022 Tier 2 average of \$59,181. A four-year staff and salary history and Tier 2 average comparison is available in **Appendix 2**.

Q FINDING

Kendall fails to conduct staff evaluations annually.

IAAO’s *Introduction to Assessment Administration*, Chapter 3, Organization for Assessment Administration, specifies that evaluating each employee’s performance is a necessary and important function in office administration. It is only fair to the employee to be told regularly how their supervisors perceive their job performance.

The chief appraiser began her role as interim chief appraiser at the appraisal district in June 2023. She was officially appointed chief appraiser in August 2023. According to discussions with administration, the previous chief appraiser, who served from March 2022 to May of 2023, did not conduct any management or supervisor evaluations in 2022.

A chief appraiser is responsible for overseeing the operations of the appraisal district, including evaluation of staff. Conducting annual evaluations is essential, as it provides employees with feedback on their performance and highlights areas needing improvement. Without yearly performance reviews, employees may lack the opportunity to address and correct deficiencies in their work.



RECOMMENDATION 1

Conduct staff evaluations annually.

1.6 TRAINING

IAAO’s *Standard on Professional Development* follows the principle that “assessment jurisdictions benefit when they have knowledgeable and adequately trained personnel to preserve the public’s trust; therefore, it is of the utmost importance.” **Exhibit 8** provides Kendall’s annual training budget and number of trainings attended for the past three years. Appraisal districts should maintain adequate training budgets to allow for certification and continued education of staff.

EXHIBIT 8

Kendall Training Budget and Number of Trainings			
	2022	2021	2020
Training Budget	\$23,071	\$22,071	\$21,271
Number of Trainings Attended	112	209	64

Source: Kendall Appraisal District

In 2022, Kendall’s training budget increased from \$21,271 to \$23,071 over the previous two years. The number of trainings attended by appraisal district staff also increased over the three-year review period.

1.7 CHIEF APPRAISER

The board of directors is responsible for hiring and periodically evaluating the chief appraiser, who coordinates and oversees appraisal district operations. In organizing and administering an appraisal district, the chief appraiser is responsible for hiring, firing and training personnel; for ensuring compliance with a wide range of legal requirements; and for maintaining policies and procedures for the effective operation of the appraisal district. **Exhibit 9** provides detailed information regarding Kendall’s chief appraiser.



EXHIBIT 9

Kendall Chief Appraiser Information**Chief Appraiser**

Is the Chief Appraiser permanent, temporary or interim?	Permanent
Does the Chief Appraiser perform appraisals?	Yes
2022 Base Salary	\$92,000
Chief Appraiser – Years at appraisal district	1
Chief Appraiser – Years as a Chief Appraiser	1
Does the Chief Appraiser receive a car allowance?	Yes
What is the amount of the car allowance? (If applicable)	\$8,400
Does the Chief Appraiser receive retirement benefits?	Yes
Does the Chief Appraiser receive medical insurance benefits?	Yes

Source: Texas Comptroller of Public Accounts, *Appraisal District Operation Survey* and Kendall Appraisal District

FINDING

The Kendall board of directors does not annually evaluate the chief appraiser.

Tax Code Section 6.05(c) explains that the chief appraiser is the chief administrator of the appraisal office and is appointed by and serves at the pleasure of the appraisal district board of directors.

IAAO's *Introduction to Assessment Administration*, Chapter 3, Organization for Assessment Administration, specifies that evaluating each employee's performance is a necessary and important function in office administration. Organizations and employees benefit from a regular performance evaluation process.

The chief appraiser was evaluated in 2022. However, no evaluations were done for the chief appraiser in 2019, 2020 or 2021.

Chief appraisers should regularly evaluate staff to ensure work completion and correct performance issues. Similarly, the board of directors should evaluate the chief appraiser's performance to ensure adequate performance of the position's duties and responsibilities.

RECOMMENDATION 2

Evaluate the chief appraiser annually.

1.8 APPRAISAL DISTRICT CONTRACTS

PTAD reviews appraisal district contracts for compliance according to IAAO's *Standard on Contracting for Assessment Services*. **Exhibit 10** lists Kendall's contracts, which are discussed in more detail in throughout this report.

Project control is important for the stakeholders of both the government agency and the contractor. Having control can help the project manager/program manager compare actual performance against planned performance. The project manager can identify potential problems, evaluate alter-native actions and plan for appropriate corrective action.



Project leaders typically create a project plan that includes the tasks to be performed, the project timeline, a budget and project resources. By monitoring the plan and the actual work performed, the project manager can measure both qualitative and quantitative progress.

If the project is deviating from the project timeline, corrective action may be necessary. Deviations can be caused by a number of issues such as change in the project scope or project resources or other setbacks. The corrective plan should be created with input from all project stakeholders.

An appraisal district is a political subdivision of the State of Texas and is subject to the same requirements and has the same purchasing and contracting authority as a municipality under Chapter 252, Local Government Code.

EXHIBIT 10

Kendall Contracts

Type of Contract	Contract Dates	Years with Same Vendor	Does appraisal district actively monitor contract?
Appraisal of Minerals, Industrial, Utility and Personal Property	2019-2024	8 years	Yes
Software	2023	17 years	Yes
Mapping	2016-2023	8 years	Yes
GIS	2016-2023	8 years	Yes
Pictometry	2012-2024	12 years	Yes

Source: Kendall Appraisal District

Section 2 – Appraisal Administration

2.1 APPRAISAL DISTRICT PARCEL DATA

PTAD collects appraisal district parcel data to determine the ratio of appraisers to parcel count and to compare it with the typical parcel per appraiser average in Exhibit 11.

EXHIBIT 11

2022 Kendall Parcel Information vs. Tier 2 Average

Parcel Information	Kendall	Typical Parcel Per Appraiser (Rounded)
Parcel Count	32,081	10,001 – 70,000
Parcels per Appraisal Staff	6,644*	6,400**

Source: Texas Comptroller of Public Accounts, *Electronic Appraisal Roll Submission*

* Excludes parcels for contracted appraisal services:
** Includes all property categories



In 2022, Kendall managed 32,081 parcels placing it with appraisal districts in its typical parcel per appraiser range of 10,001 to 70,000 parcels. Kendall contracts for appraisal services in Categories F2, G, J and L2. Parcels in these categories are removed from the total parcel count to determine the parcels per appraiser of 6,644. This indicates that Kendall’s parcels per appraiser is in line with the tier average, which includes all property categories.

From 2019 to 2022, Kendall managed parcel counts ranging from 30,854 to 32,081 (including all property categories) and the parcels assigned per appraiser for properties appraised in house ranged from 4,558 to 6,644. The total market value of certified parcels increased from \$9,038,404,241 to \$14,585,305,893 between 2019 and 2022. **Appendix 3** provides the appraisal district’s parcel data over the four-year review period.

2.2 PROPERTY CLASSIFICATION

Appraisal districts should consider current property use to determine the appropriate property classification. Misclassified property leads to inaccurate taxable value estimates. Appraisal districts should review property classifications annually and make corrections within their systems prior to submitting their EARS to PTAD. PTAD publishes the [Texas Property Tax Assistance Property Classification Guide](#) that includes property categories and examples.

FINDING

Kendall incorrectly categorizes property according to the *Texas Property Tax Assistance Property Classification Guide*.

The *Texas Property Tax Assistance Property Classification Guide* assists appraisal districts in classifying property for value analysis and use in the biennial SDPVS. EARS, a process of submitting appraisal roll data on electronic media, has improved reporting accuracy. Proper use of the classification guide also improves reporting accuracy.

In conducting the SDPVS and estimating value, PTAD analyzes property by category. Appraisal district reporting of misclassified local value – value reported in the wrong category – may lead to inaccurate taxable value estimates. The Texas Education Agency (TEA) uses the Comptroller’s taxable value estimates in determining state funding for school districts. Consequently, misclassification by appraisal districts impact school funding.

A review of a random sample for Boerne ISD of 15 properties each from Categories A, D1, E and F1 indicate the appraisal district is not in compliance with the *Texas Property Tax Assistance Property Classification Guide*. **Exhibit 12** shows the incorrectly categorized property found in the review.

EXHIBIT 12

Incorrectly Categorized Property

Category	No. of Accounts	Misclassification
A	1	<ul style="list-style-type: none"> account 38016 land D1
D	2	<ul style="list-style-type: none"> account 36495 improvement E1 account 291713 improvement E1

Source: Kendall Appraisal Cards

RECOMMENDATION 3

Categorize property correctly according to the *Texas Property Tax Assistance Property Classification Guide*.



2.3 CONTRACTED APPRAISAL SERVICES

From 2019 to 2022, appraisal district staff appraised 93 percent of the total appraised value within the appraisal district, specifically for Categories A, B, C, D, E, F1, L1, M, O and S. From 2019 to 2022, Kendall contracted for appraisal services for property Categories F2, G, J and L2. Each year, these contracted firms appraised 7 percent of the total appraised value within the appraisal district. The cost of these services varied from \$23,000 to \$25,000 over four years. Additionally, the appraisal district uses a geographic information system (GIS) and aerial technology systems.

Exhibit 13 lists Kendall’s contracted appraisal services.

EXHIBIT 13

Kendall’s Contracted Appraisal Services

	2022	2021	2020	2019
Appraisal Services Contract	Yes	Yes	Yes	Yes
Contracted Property Categories	F2, G, J and L2			
Percentage of total appraised value appraised by contracted appraisal firms	7%	7%	7%	7%
Appraisal Contract Cost	\$25,000	\$25,000	\$25,000	\$23,000

Source: Texas Comptroller of Public Accounts, *Appraisal District Operation Survey*

2.4 MAPPING AND/OR AERIAL PHOTOGRAPH

IAAO’s *Standard on Digital Cadastral Maps and Parcel Identifiers* (2015), Section 3.7, states basic information contained on maps should include parcel boundaries, identifiers, dimensions and area, subdivision or plat information, block and lot numbers, jurisdictional boundaries, locations and names of streets, railroads, rivers, lakes and other geographic features, situs addresses and geographic boundaries.

Comptroller Rule 9.3002 requires all appraisal offices and tax offices appraising property for ad valorem purposes to develop and maintain a system of tax maps covering the entire area of the taxing units for whom each office appraises property. Tax maps should be drawn to scale and delineated for lot lines or property lines or both, with dimensions or areas and identifying numbers, letters, or names for all delineated lots or parcels. Each parcel must be assigned parcel identification numbers (PIN) and the PIN recorded on the corresponding appraisal card. The tax map system should be updated annually.

FINDING

Kendall fails to update mapping changes in a timely manner.

IAAO’s *Standard on Digital Cadastral Maps*, Section 5.1, Ownership Maintenance, states that the current owner and parties of interest for each parcel should be identified. In addition, the basis of ownership (recorded deed, contract, court decree and so on) should be documented, should cite an instrument number, record book, page, volume and so on of the source document and should be linked to the cadastral parcel via a unique parcel identifier. A record of prior ownership (ownership history) should be maintained. Deeds and other ownership documents should be processed within two weeks of recording. Ownership information should then be published. Procedure manuals should provide detailed step-by-step instruction.

A review of 10 sample properties requiring mapping changes revealed that some updates were not completed within 180 days. Three properties in the sample were not updated within 180 days of receipt.



Appraisal districts must update their maps promptly to reflect changes. Delays in updating maps can result in important property changes not being reflected, leading to inaccuracies in the data.

RECOMMENDATION 4

Ensure mapping changes are updated in a timely manner.

2.5 RATIO STUDIES

An appraisal district should perform ratio study analyses to evaluate appraisal performance. Per IAAO’s *Standard on Ratio Studies*, there are several key uses of ratio studies including: measurement and evaluation of the level and uniformity of mass appraisal models, internal quality assurance and identification of appraisal priorities, determination of whether administrative or statutory standards have been met, determination of time trends and adjustment of appraised values between reappraisals.

Exhibit 14 presents Ratio Study Uniformity Standards indicating acceptable general quality.

EXHIBIT 14

Ratio Study Uniformity Standards

Type of property - General	Type of property - Specific	COD Range*
Single-family residential (including residential condominiums)	Newer or more homogeneous areas	5.0 to 10.0
Single-family residential	Older or more heterogeneous areas	5.0 to 15.0
Other residential	Rural, seasonal, recreational, manufactured housing, 2–4 unit family housing	5.0 to 20.0
Income-producing properties	Larger areas represented by large samples	5.0 to 15.0
Income-producing properties	Smaller areas represented by smaller samples	5.0 to 20.0
Vacant land	N/A	5.0 to 25.0
Other real and personal property	N/A	Varies with local conditions

Source: IAAO’s *Standard on Ratio Studies*

These types of property are provided for guidance only and may not represent jurisdictional requirements.

** Coefficient of Dispersion (CODs) lower than 5.0 may indicate sales chasing or non-representative samples.*

KENDALL RATIO STUDIES

FINDING

Kendall fails to gather available real estate transfer documents and apply sales data in the CAMA system.

IAAO’s *Standard on Verification and Adjustment of Sales*, Section 3.3, Parties to the Sale and Third-Party Sources, advises that appraisal districts contact buyers and sellers of real property directly to secure or confirm sales data. When buyers or sellers are parties to the sale, contacting all parties to verify agreement on the data is essential.



Third-party sources are a source of sales data and are especially important when transfer and disclosure documents do not provide full disclosure or omit essential data. The following is a partial listing of third-party sources:

- i. Multiple listing services
- ii. Title companies
- iii. Financial institutions
- iv. Leasing agencies
- v. Property managers
- vi. Real estate brokers and agencies
- vii. Government and private fee appraisers
- viii. Attorneys
- ix. Appraisal organizations

Kendall failed to provide the source of sales in the CAMA system for properties in categories A, C and F. A review of the spreadsheet revealed sales listed, however no supporting data was found in the CAMA system. Sales documentation was available for review for only four out of five properties in categories A, C and F.

RECOMMENDATION 5

Gather available real estate transfer documents and apply sales data in the CAMA system.

FINDING

Kendall does not conduct ratio studies at timely intervals during the valuation process. They do not run ratio studies by market area, neighborhood, property class, or stratum and they do not use ratio study results to determine if adjustments should be made.

IAAO's *Standard on Ratio Studies and Frequency of Ratio Studies*, Section 4.2, recommends that the appraisal district conduct at least four ratio studies to establish the following:

- i. a baseline of current appraisal performance
- ii. preliminary values so that they can correct any significant deficiency
- iii. values used in assessment notices sent to taxpayers
- iv. final values after completion of the first informal phase of the appeals process

The appraisal district can use the final study to plan for the following year. In addition, it can conduct ratio studies as needed to evaluate appraisal procedures, investigate a discrimination complaint, or answer a specific question.

IAAO's *Standard on Ratio Studies*, Section 2.3, Uses of Ratio Studies, states the critical uses of ratio studies are as follows:

- i. measurement and evaluation of the level and uniformity of mass appraisal models
- ii. internal quality assurance and identification of appraisal priorities
- iii. determination of whether the appraisal district has met administrative or statutory standards
- iv. determination of time trends
- v. adjustment of appraised values between reappraisals

IAAO's *Standard on Ratio Studies*, Section 3.3, Stratification states: Stratification divides all the properties within the scope of the study into two or more groups or strata. Stratification facilitates a complete and detailed picture of appraisal performance and can enhance sample representativeness.

Each type of property subject to a distinct level of assessment could constitute a stratum. Other property groups, such as market areas, school districts and tax units, could constitute additional strata.



The appraisal district should choose strata consistent with factors in the mass appraisal model. When the study's purpose is to evaluate appraisal quality, flexibility in stratification is essential. The general goal is for the appraisal district to identify areas where the assessment levels are too low or lack uniformity and property groups for which the appraisal district may require additional reappraisal work. In such cases, it is also highly desirable to simultaneously stratify based on more than one characteristic.

Stratification can help identify differences in appraisal levels between property groups. In large jurisdictions, stratification by market areas is generally more appropriate for residential properties. In contrast, stratification of commercial properties by either geographic area or property subtypes (e.g., office, retail and warehouse/industrial) can be more effective.

Kendall did not conduct proper ratio studies analyses from 2020 to 2022. Market areas such as Comal ISD and Fredericksburg ISD were missing ratio studies, making it unclear whether they conducted them at appropriate intervals during the valuation process. Sales data is listed in Excel spreadsheets. A review of ratio studies run for 2021 and 2022 indicated only the mean was included as a measure of central tendency. Kendall did not incorporate the median or weighted mean, or measures of uniformity.

It is crucial to collect regular sales data, conduct ratio studies and evaluate cost schedules based on these findings to accurately assess reliable market trends and establish developing market values.

RECOMMENDATION 6

Conduct ratio studies at timely intervals by market area, neighborhood, property class or stratum and make appropriate adjustments based on results.

PTAD'S APPRAISAL DISTRICT RATIO STUDY (ADRS)

Tax Code Section 5.10 requires PTAD to conduct a ratio study to measure the performance of each appraisal district in Texas at least once every two years and to publish the results.

The purpose of the Appraisal District Ratio Study (ADRS) is to measure the uniformity and median level of appraisals performed by an appraisal district within each major category of property.

To conduct the ADRS, PTAD applies appropriate standard statistical analysis techniques to data collected through the SDPVS required by Government Code Section 403.302.

The published report provides ratio study results for each appraisal district studied that year and includes:

- the median levels of appraisal for each major property category.
- the coefficient of dispersion (COD) around the median level of appraisal for each major property category; and
- other appropriate statistical measures.

Exhibit 15 shows the data from PTADs Appraisal District Ratio Study for Kendall in 2021.



EXHIBIT 15

PTAD's Appraisal District Ratio Study, Kendall 2021

Category	Number of Ratios**	2021 CAD Reported Appraisal Value	Median Level of Appraisal	Coefficient of Dispersion	% Ratios within (+/-) 10 % of Median	% Ratios within (+/-) 25 % of Median	Price - Related Differential
A. SINGLE-FAMILY RES	301	5,204,864,826	0.97	9.14	70.76	91.03	1.01
B. MULTI-FAMILY RES	0	116,866,961	*	*	*	*	*
C1. VACANT LOTS	51	270,986,098	*	*	*	*	*
C2. COLONIA LOTS	0	0	*	*	*	*	*
D2. FARM/RANCH IMP	0	42,964,982	*	*	*	*	*
E. RURAL-NON-QUAL	55	860,635,362	0.88	15.06	38.18	85.45	0.94
F1. COMMERCIAL REAL	74	668,313,970	0.98	14.18	52.70	83.78	1.02
F2. INDUSTRIAL REAL	0	26,714,140	*	*	*	*	*
G. OIL, GAS, MINERALS	0	0	*	*	*	*	*
J. UTILITIES	1	148,001,570	*	*	*	*	*
L1. COMMERCIAL PER	0	182,383,230	*	*	*	*	*
L2. INDUSTRIAL PER	0	83,944,210	*	*	*	*	*
M. OTHER PERSONAL	0	10,127,560	*	*	*	*	*
O. RESIDENTIAL INV	0	58,142,930	*	*	*	*	*
S. SPECIAL INVENTORY	0	68,345,950	*	*	*	*	*
OVERALL	482	7,742,291,789	0.96	13.82	59.96	80.08	0.98

Source: Texas Comptroller of Public Accounts, *Appraisal District Ratio Study 2021 Tax Year Findings*

* Category result not calculated. Calculation requires a minimum of five ratios from either of the following:

- Categories representing at least 25 percent of total appraisal district category value.
- Five school districts or half the school districts in the appraisal district, whichever is less.

** Statistical measures may not be reliable when the sample is small.

FINDING

Kendall is not appraising property uniformly or equitably.

Ratio Study standards provide a means of measuring whether appraisal efforts have met appropriate expectations. To determine reappraisal priorities, appraisal districts should use ratio studies to measure the level of appraisal and uniformity of appraisal for the overall jurisdiction, for individual mass appraisal neighborhoods or market areas, by types of properties, or any other significant segment that assists in that determination.

The median measures the accuracy of an appraisal district's appraisals in relation to the standard of 100 percent of market value. According to IAAO, the median is the appropriate measure of central tendency for evaluating appraisal performance. The median level of appraisal standard is 0.95-1.05 to indicate accurate market value appraisals. **Exhibit 15** shows Kendall has an overall median level of appraisal (0.96) slightly below the standard of 1.00. This slightly low median is influenced by categories such as E (0.88), which shows a significantly lower median level of appraisal. Other categories, such as A (0.97) and F1 (0.98) perform closer to the ideal standard.



The Coefficient of Dispersion (COD) is a measure of appraisal uniformity. **Exhibit 14** shows the IAAO suggested COD standards. **Exhibit 15** shows uniformity issues are evident in certain categories in Kendall. The COD for Category E (15.06) indicates excessive deviation from the median and a lack of uniformity. Category A (9.14) demonstrates better uniformity but still exceeds the IAAO’s recommended thresholds for residential properties. The overall COD (13.82) suggests that Kendall struggles with consistent appraisal uniformity across property categories.

The Price-Related Differential (PRD) is a measure of vertical equity, comparing the appraisal of higher valued properties to the appraisal of lower valued properties. IAAO states that anything outside of the PRD range of 0.98-1.03 indicates vertical inequity or treating higher and lower priced properties differently. **Exhibit 15** shows the PRD for Category E (0.94) suggests slight regressivity, where higher-value properties may be appraised at lower ratios compared to lower-value properties. The overall PRD for Kendall (0.98) falls within the acceptable range of 0.98 to 1.03, indicating minimal systemic bias across the appraisal district as a whole.

Overall, Kendall demonstrates mixed performance in its appraisal practices. While categories like A and F1 are closer to acceptable standards, significant deficiencies in uniformity and vertical equity in Category E require attention to ensure compliance with IAAO’s *Standard on Ratio Studies* and the Tax Code.

RECOMMENDATION 7

Use Kendall's local ratio studies to make reappraisal decision necessary to produce accurate values.

2.6 REAPPRAISAL PLAN

Tax Code Section 6.05(i) requires the appraisal district board of directors to develop a biennial reappraisal plan in even numbered years and to hold a public hearing to adopt the plan. The plan must indicate how the appraisal district will comply with Tax Code Section 25.18 which requires the reappraisal of all real and personal property in the appraisal district at least once every three years to ensure that all property is appraised at 100 percent of market value as on Jan. 1.

FINDING

Kendall does not amend its reappraisal plan to address problematic or critical areas of need.

IAAO’s *Standard on Mass Appraisal*, Section 4.8, Frequency of Reappraisals, states the analysis of ratio study data can suggest groups or strata of properties in greatest need of physical review. Market adjustments can effectively maintain equity when appraisals are uniform within strata and recalibration can provide even greater accuracy. However, only physical reviews can correct data errors and, as stated in Sections 3 .3 .4 and 3 .3 .5, property characteristics data should be reviewed and updated at least every four to six years. The appraisal district can accomplish this in at least three ways:

- i. Reinspecting all property at periodic intervals (i.e., every 4 to 6 years)
- ii. Reinspecting properties on a cyclical basis (e.g., one-fourth or one-sixth each year)
- iii. Reinspecting properties on a priority basis as indicated by ratio studies or other considerations while ensuring that they examine properties at least every sixth year.

Kendall’s 2023-24 reappraisal plan references problematic areas but does not specifically identify them. Areas not addressed include Boerne ISD’s categories A and D1. A review of records revealed that no ratio studies were conducted on problematic areas.

It is imperative to maintain and implement an effective reappraisal plan that addresses problematic areas and conduct ratio study analysis to maintain fair and uniform property values. Performing ratio study analyses is essential in determining reliable market trends and developing market values.



RECOMMENDATION 8

Amend the reappraisal plan to address problematic areas.

2.7 QUALITY CONTROL

An appraisal district should follow a quality control process to ensure that accuracy standards are achieved and maintained. Proper quality control analysis is essential in determining reliable market trends and developing market values. An appraisal district should have written procedures outlining how to perform a proper quality analysis to prevent errors in the process.

FINDING

Kendall does not have a written quality control process to verify the accuracy and uniformity of property valuations.

IAAO's *Standard on Mass Appraisal*, Section 3.3.2.5, Data Collection Quality Control, states a quality control program is necessary to ensure data accuracy standards are achieved and maintained. The appraisal should perform independent quality control inspections immediately after the data collection phase begins. The inspections should review random samples of finished work for completeness and accuracy and keep tabulations of items coded correctly or incorrectly so that the appraisal district can use the statistical tests to determine whether accuracy standards have been achieved. Stratification by geographic area, property type, or individual data collector can help detect patterns of data error.

IAAO's *Standard on Mass Appraisal*, Section 5, Model Testing, Quality Assurance and Value Defense, states mass appraisal allows for model testing and quality assurance measures that provide feedback on the reliability of valuation models and the overall accuracy of estimated values. Appraisal district staff must be familiar with these diagnostics to evaluate valuation performance properly and make improvements where needed.

IAAO's *Standard on Data Quality*, Section 3, Data Quality Management, states monitoring and reviewing data quality is fundamental to a successful mass appraisal process. The rate at which the quality of assessment data erodes is highly variable. However, the gap between what exists in the world and what is in the appraisal district's records grows over time. In addition to maintaining data to a specified standard and determining areas of strength and/or weakness of data, the results may be used to determine how raw data, stratification of data, data sources, or data collection efforts can be enhanced to produce better future performance.

The standard states the appraisal district should document all data quality management functions as part of a broader enterprise-level quality management framework that contains quality assurance and quality control elements related to (1) the quality of the data itself, (2) the quality of data collection and (3) the quality of data analysis:

Clear, up-to-date policy and procedures documentation that includes:

- i. Specifications for the data elements to be collected and stored;
- ii. Specifications for the data elements to be collected and stored;
- iii. Standard definitions for all data elements and related terms;
- iv. Acceptable methods for the uniform collection and recording of all assessment data;
- v. Controls on the output for each data-related process or subprocess;
- vi. Standards for the ongoing testing and maintenance of existing data as they age;
- vii. Policy compliance testing and reporting function; and
- viii. Regular procedural reviews.

The chief appraiser confirmed that no written quality control procedures for the appraisal process are currently in place.



RECOMMENDATION 9

Develop and follow written quality control procedures to ensure work is completed accurately and timely.

Section 3 – Categories of Valuation in the SDPVS

PTAD found Boerne ISD’s Categories A, D1, E and F1 to be invalid in the years indicated in **Exhibit 16**. Because these property categories had invalid ratios in at least one of the three review years, these property categories are the basis of this TARP review.

PTAD found Categories B, C1, F2, G, J and L1 in Boerne ISD to be valid and they are *not* included in the scope of this TARP review.

EXHIBIT 16

SDPVS Invalid Property Categories 2020-22

ISD	2020	2021	2022
Boerne ISD	A, D1 and F1	A, D1 and E	A, D1, E and F1

Source: Texas Comptroller of Public Accounts, [School District Property Value Study Final Findings](#)

3.1 CATEGORY A – SINGLE-FAMILY RESIDENTIAL PROPERTY VALUATION

The Comptroller’s [Texas Property Tax Assistance Property Classification Guide](#) states Category A property includes single-family residential improvements and land on which the improvements are situated. They may or may not be within the city limits or in close proximity to a city.

FINDING

Kendall does not have procedures in place for the valuation of mobile/manufactured homes.

IAAO’s *Standard on Mass Appraisal*, Section 4.6.2, *Manufactured Housing*, states the appraisal district can value manufactured or mobile homes in several ways depending on the local market and ownership status. Often, mobile homes are purchased separately and situated in a rented space in a mobile home park. In this case, the best strategy is to model the mobile homes separately from the land. At other times, mobile homes are situated on individual lots and bought and sold similarly to stick-built homes. The mobile homes may be intermixed with stick-built homes, particularly in rural areas. In these cases, they can be modeled like that for other residential properties and included in the same models, if the model includes variables to distinguish them and recognize any relevant differences from other homes (e.g., mobile homes may appreciate at a rate different from that for stick-built homes).

Kendall failed to conduct ratio studies to verify if adjustments were made to mobile homes. A discussion with a staff appraiser revealed that the schedules have not been adjusted in at least eight years and are currently valued using the cost approach. The appraisal district verified that it possesses tables and formulas for valuing mobile and manufactured homes.

RECOMMENDATION 10

Develop valuation procedures and cost schedules for manufactured homes and use ratio study results to annually review and update the schedules.



3.2 CATEGORY (D) D1 – QUALIFIED OPEN-SPACE LAND PROPERTY VALUATION AND CATEGORY D2 – FARM AND RANCH IMPROVEMENTS SPECIAL USE VALUATION

The Comptroller’s *Texas Property Tax Assistance Property Classification Guide* states Category D1 includes all acreage qualified for productivity valuation under Texas Constitution, Article VIII, 1-d or 1-d-1 and Tax Code Chapter 23, Subchapters C, D, E and H.

It also states Category D2 includes improvements, other than residences, associated with land reported as Category D1. These improvements include all barns, sheds, silos, garages and other improvements associated with farming or ranching.

FINDING

Kendall does not calculate net to land for each of the five years in the appropriate period and determine a five-year average net to land.

Tax Code Section 23.51(4) states that the chief appraiser shall calculate net to land by considering the income that would be due to the owner of the land under cash lease, share lease, or whatever lease arrangement is typical in that area for that category of land and all expenses directly attributable to the agricultural use of the land by the owner shall be subtracted from this owner income and the results shall be used in income capitalization.

The agricultural appraiser indicated that net to land calculations have not been calculated since 2012. A review of the 2023 calculations, which were received late, indicated that the appraiser also plans to use them for 2024. The values produced from the net to land calculations for 2023 did not match the appraisal district’s CAMA values.

Conducting net to land analysis is essential for determining reliable market trends and developing productivity values. An appraisal district should use calculated values on properties designated for agricultural use.

RECOMMENDATION 11

Calculate net to land for each of the five years in the appropriate period, determine a five-year average net to land and use calculated values for land designated as agricultural use.

3.3 CATEGORY E – RURAL LAND, NOT QUALIFIED FOR OPEN-SPACE APPRAISAL PROPERTY VALUATION

The Comptroller’s *Texas Property Tax Assistance Property Classification Guide* states Category E includes only rural land that is not qualified for productivity valuation and the improvements on that land, including residences. Appraisal districts may report any size tract in Category E.

As always, primary use is the determining factor in classifying property. If the land is used as residential inventory, commercial, industrial, or other purposes, classify the property by that use. Likewise, if the land qualifies as open-space land for productivity appraisal, the use determines its classification as Category D1. If the land does not fit in these other categories, report it in Category E.

FINDING

Kendall does not conduct ratio studies regularly for vacant land properties and does not review and update land schedules.



IAAO’s *Standard on Mass Appraisal*, Section 4.5, Land Valuation, states that state or local laws may require the appraisal district to separate the value of an improved parcel into land and improvement components. When the appraisal district uses the sales comparison or income approach, an independent land value estimate can be subtracted from the total property value to obtain a residual improvement value. Some computerized valuation techniques separate total value into land and building components.

The appraisal district should annually review and adjust values. Each appraisal office must implement the plan for periodic reappraisal of property and the plan must provide for the reappraisal activities for all real and personal property in the appraisal district at least once every three years. The sales comparison approach is the primary approach to land valuation and is always preferred when sufficient sales are available. In the absence of adequate sales, the appraisal district can use other techniques in land appraisal including allocation, abstraction, anticipated use, capitalization of ground rents and land residual capitalization.

Kendall’s 2022 spreadsheet for sales by subdivision labeled properties as vacant land, but it did not organize the sales by land category. A review of sales, including those by abstract and subdivision land sales revealed a total of 226 sales, none of which were labeled by a state category. In 2021, a review of land sales in a file labeled as “all sales” identified six sales that were not Category E properties. Another file, also labeled as “all” included only 19 sales from a different subdivision. The specific property categories included in this file could not be determined. The sales file, created in Excel, did not specify the state category of properties. An abstract file labeled “BISDN” contained four land sales, with only one being Category E property. The review of 2021 sales did not identify any Category E sales for Boerne ISD and no land sales were available for 2020.

Collecting sales data and performing ratio studies analysis regularly is essential for determining reliable market trends and developing market values.

 **RECOMMENDATION 12**

Maintain market value for vacant land properties and review and update land schedules annually.

 **FINDING**

Kendall does not clearly document land valuation procedures.

IAAO’s *Property Assessment Valuation*, Chapter 7 on Land Valuation, states that land valuation is a vital step in the assessment process. Accurate land values form the base of an effective appraisal system. In the cost approach, land values are determined separately and added to estimated building values to produce an appraisal. In the sales comparison and income approaches, the appraisal district should use land values to allocate the total estimated value between land and improvement.

During the onsite review, Kendall did not provide any documentation detailing its land valuation process. No evidence was found of stratification and market delineation, highest and best use determinations, units of comparison, adjustments, years of sales used, or land appraisal in areas with few vacant land sales.

 **RECOMMENDATION 13**

Document land valuation procedures.



3.4 CATEGORY F1 – COMMERCIAL REAL PROPERTY VALUATION

The Comptroller’s *Texas Property Tax Assistance Property Classification Guide* states Category F property includes land and improvements associated with businesses that sell goods or services to the public. Businesses considered commercial businesses include wholesale and retail stores, shopping centers, office buildings, restaurants, hotels and motels, gas stations, parking garages and lots, auto dealers, repair shops, finance companies, insurance companies, savings and loan associations, banks, credit unions, clinics, nursing homes, hospitals, marinas, bowling alleys, golf courses and mobile home parks.

FINDING

Kendall does not annually review and update commercial cost schedules.

IAAO’s *Standard on Mass Appraisal*, Section 4.2, The Cost Approach states that the cost approach applies to virtually all improved parcels and, if used properly, can produce accurate valuations. The cost approach is more reliable for newer standard materials, design and workmanship structures. It produces an estimate of the value of the fee simple interest in a property.

A review of commercial sales maintained in a spreadsheet revealed insufficient information to determine how values were derived.

Reliable cost data is imperative in any successful application of the cost approach. The data must be complete, typical and current. Current construction costs should be based on the cost of replacing a structure with one of equal utility, using current materials, design and building standards.

In addition to specific property types, cost models should include the cost of individual construction components and building items to adjust for features that differ from base specifications. The appraisal district should incorporate these costs into a construction cost manual and related computer software. The software can perform the valuation function. The appraisal district can use the manual when non-automated calculations are required and provide additional documentation.

The appraisal district can develop construction cost schedules in-house based on a systematically studying local construction costs, either obtained from specialized firms or custom-generated by a contractor. To ensure accuracy, the cost schedules should be verified by applying them to recently constructed improvements with known costs. Construction costs should also be updated before each assessment cycle.

RECOMMENDATION 14

Review and update commercial cost schedules annually.



APPENDICES

APPENDIX 1

Appraisal District Budget

	2022	2021	2020	2019	Tier 2 Average 2019-2022	Tier 2 Average 2022
Total Budget (Excluding Collections)	\$1,299,528	\$1,144,024	\$1,144,891	\$1,107,875	\$1,404,998	\$1,541,215
Total Property Taxes Levied (All Jurisdictions)	\$128,351,708	\$159,336,546	\$117,623,387	\$141,939,087	\$114,774,433	\$181,458,903
Does the appraisal district collect taxes?	Yes	Yes	Yes	Yes	Yes	Yes
Number of Taxing Units Appraisal District Collects For (If Applicable)	8	8	8	8	N/A	N/A

Source: Texas Comptroller of Public Accounts, *Appraisal District Operation Survey*

APPENDIX 2

Appraisal District Staffing

Appraisal District Staff

	2022	2021	2020	2019	Tier 2 Average 2019-2022	Tier 2 Average 2022
Full Time Staff	14	13	12	15	13	13
Part Time Staff	0	0	0	0	N/A	N/A

Appraisal Staff

	2022	2021	2020	2019	Tier 2 Average 2019-2022	Tier 2 Average 2022
Full Time Appraisers	5	6	6	7	7	7
Lowest Appraiser Salary	\$48,320	\$45,646	\$44,971	\$44,113	\$41,834	\$40,040
Highest Appraiser Salary	\$62,331	\$59,144	\$59,144	\$57,144	\$57,417	\$59,181

Source: Texas Comptroller of Public Accounts, *Appraisal District Operation Survey*



APPENDIX 3

Appraisal District Parcel Information

Kendall	2022	2021	2020	2019
Parcel Count*	32,081	31,918	31,518	30,854
Number Taxing Units	12	12	12	12
Parcels per Appraisal Staff**	6,644	5,509	5,437	4,558
Total Market Value Certified	\$14,585,305,893	\$10,357,451,739	\$9,544,689,647	\$9,038,404,241

Parcels per Appraisal Staff Averages

Parcels	Parcels/Appraiser
Under 10,000	5,300 parcels/appraiser
10,001 – 70,000	6,400 parcels/appraiser
70,001 – 200,000	6,700 parcels/appraiser
Over 200,000	7,100 parcels/appraiser

Source: Texas Comptroller of Public Accounts, *Appraisal District Operation Survey and Electronic Appraisal Roll Submission*

* Parcel count includes contracted appraisal services.

**Parcels per appraiser does not include contracted appraisal services.

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