

PROPERTY TAX REFORM AND RELIEF - BACKGROUND MEMORANDUM

Section 13 of 2007 Senate Bill No. 2032 provides that the Legislative Management shall study in each interim through 2012 the feasibility and desirability of property tax reform and providing property tax relief to taxpayers of the state, with the goal of reduction of each taxpayer's annual property tax bill to an amount that is not more than 1.5 percent of the true and full value of property, and including examination of the proper measure of education funding from local taxation and state resources and the variability of funding resources among taxing districts and examination of improved collection and reporting of property tax information to identify residency of property owners with minimized administrative difficulty.

PROPERTY TAX DETERMINATION

The property tax liability of a property owner is determined by multiplying combined mill rates for all taxing districts in which the property is located times the taxable value of the property. Although this formula is relatively simple, complexities are involved in determining the mill rate, taxable value, and tax status for the property.

All locally assessed property taxes are collected by the county and distributed among appropriate taxing districts. Property taxes are due January 1 following the year of assessment and are payable without penalty until March 1 of the year they are due. If property taxes are paid in full by February 15, the taxpayer is entitled to a 5 percent discount. Penalties begin to accrue if property taxes are not paid by March 1. Taxpayers have the option of paying property taxes in installments.

Determination of Mill Rate

The mill rate for a taxing district is established through the budget process. Each taxing district prepares a proposed budget based on anticipated expenditures for the upcoming fiscal year. Hearings are held on the proposed budget and adjustments are made as needed. The deadline for amendments to budgets and for sending copies of the levy and budget to the county auditor is October 10. From October 10 to December 10, the county auditor prepares tax lists, which must be delivered to the county treasurer by December 10 and mailed to property owners by December 26.

The amount budgeted by a taxing district may not result in a tax levy exceeding levy limitations established by statute. Levy limitations for political subdivisions are summarized in the schedule of levy limitations prepared biennially by the Tax Commissioner's office. Since 1981 the Legislative Assembly has provided optional authority to levy taxes with a maximum amount determined by comparison with a base year levy in dollars. This method is an

alternative to the use of statutorily established mill levy limitations. From 1981 through 1996, percentage increases were allowed by law over the base year levy in dollars. The compounding of these increases allowed taxing districts to increase levies beyond the amount they would be able to levy under mill levy limitations. For taxable years after 1996, taxing districts may use the optional method to levy up to the amount levied in dollars in the base year without a percentage increase.

To determine the mill rate for a taxing district, the county auditor determines whether the amount levied is within statutory levy limitations and, if it is, the county auditor divides the total property taxes to be collected for the taxing district by the taxing district's total taxable valuation. This generates a percentage that is the mill rate for the district.

Assessment of Locally Assessed Property

All property in this state is subject to taxation unless expressly exempted by law (North Dakota Century Code Section 57-02-03). Real property must be assessed with reference to its value on February 1 of each year (Section 57-02-11). All property must be valued at the "true and full value" of the property (Section 57-02-27.1). True and full value is defined as the value determined by considering the earning or productive capacity, if any, the market value, if any, and all other matters that affect the actual value of the property to be assessed. For purposes of agricultural property, this includes farm rentals, soil capability, soil productivity, and soils analysis (Section 57-02-01). The assessed value of property is equal to 50 percent of the true and full value of the property (Section 57-02-01). Taxable valuation of property is determined as a percentage of assessed valuation, which is 9 percent for residential and 10 percent for agricultural, commercial, and centrally assessed property. The taxable valuation is the amount against which the mill rate for the taxing district is applied to determine the tax liability for individual parcels of property.

Residential and commercial property true and full value is established by local assessors. True and full value of railroad, public utility, airline property, and all oil or gas pipeline property is centrally determined by the State Board of Equalization.

True and full value of agricultural property is based on productivity as established through computations made by the North Dakota State University Department of Agricultural Economics based on the capitalized average annual gross return of the land. Annual gross return is determined from crop share rent, cash rent, annual gross income, or annual gross income potential. Average annual gross return for each county is determined by taking annual gross returns for the county for the most recent 10 years,

discarding the highest and lowest annual gross return years, and averaging the remaining 8 years. Statistics from the most recent 10 years for prices paid by farmers are used to adjust annual gross return. Annual gross return is then capitalized using a 10-year average of the most recent 12-year period for the gross agribank mortgage rate of interest. However, the minimum capitalization rate under the formula was set at 9.5 percent for tax year 2004, 8.9 percent for tax year 2005, and 8.3 percent for tax years 2006 through 2008. Under a 2009 amendment, the minimum capitalization rate is 8 percent for 2009, 7.7 percent for 2010, and 7.4 percent for 2011. After 2011 there will be no minimum capitalization rate. Personnel from North Dakota State University determine an average agricultural value per acre for cropland and noncropland on a statewide and countywide basis. This information is provided to the Tax Commissioner by December 1 of each year and then provided by the Tax Commissioner to each county director of tax equalization. The county director of tax equalization provides each assessor within the county an estimate of the average agricultural value of agricultural lands within the assessor's assessment district. The local assessor must determine the relative value of each assessment parcel within that assessor's jurisdiction. In determining relative values, local assessment officials are to use the following considerations, in descending order of significance--soil type and soil classification data, a schedule of modifiers approved by the state supervisor of assessments, and actual use of the property by the owner.

Assessment of Centrally Assessed Property

The owner of centrally assessed property must file an annual report with the Tax Commissioner by May 1. The Tax Commissioner prepares a tentative assessment for the property by July 15. Notice of the tentative assessment is sent to the property owner at least 10 days before the State Board of Equalization meeting. On the first Tuesday in August, the State Board of Equalization meets to receive testimony on the value of centrally assessed property and to finalize assessments. The Tax Commissioner certifies the finalized assessments to the counties to reflect the portion of centrally assessed property for each property owner which is taxable in that county.

Airlines serving North Dakota cities pay a property tax computed by averaging mill levies in all the cities served by an airline and applying the average levy against the taxable valuation of property of the airline in North Dakota. Taxes imposed on an airline are collected by the State Treasurer and distributed to the cities in which the airline operates, to be used exclusively for airport purposes.

Payments In Lieu of Taxes

State law provides that some enterprises make payments in lieu of taxes rather than paying property taxes. Mutual or cooperative telephone companies

and investor-owned telephone companies pay a tax of 2.5 percent of adjusted gross receipts. This tax is paid to the Tax Commissioner and allocated among counties.

Through 2009 rural electric cooperatives pay a 2 percent gross receipts tax in lieu of property taxes for all property except land. Beginning in 2010, enactment of 2009 Senate Bill No. 2297 changes taxation of rural electric cooperatives from a gross receipts tax to a transmission line mile tax and a tax of \$1 per megawatt-hour for retail sales to consumers in this state. Revenues from the tax will be allocated to political subdivisions based on location of transmission lines and, for distribution lines, based on location of distribution lines and sales from those lines. Rural electric cooperatives with generating facilities are subject to a transmission line tax of \$225 to \$300 per mile in lieu of property taxes on transmission lines of 230 kilovolts or more.

Coal conversion facility taxes are paid in lieu of property taxes. These taxes are allocated by state law and provide revenues to affected taxing districts.

Property owned by certain state agencies and certain agencies and instrumentalities of the federal government is subject to payments in lieu of property taxes.

PROPERTY TAX STATISTICS AND POLITICAL SUBDIVISION REVENUES

In taxable year 2008, political subdivisions levied over \$786 million in property taxes and special taxes. The constitutional one-mill levy for the State Medical Center was imposed in the amount of \$2 million, bringing the total property and special taxes imposed to more than \$788 million. The following table shows the percentage of this amount levied by each type of political subdivision and the percentage increase in property taxes and special taxes levied by each type of political subdivision from 1995 through 2008. Because the State Medical Center levy is always imposed at a rate of one mill, the 89.1 percent increase shown in the table for the State Medical Center can be assumed to be approximately equal to the increase in taxable valuation in property statewide.

	Percentage of Statewide Property Taxes and Special Taxes ¹ Levied in 2008	Percentage Increase in Property Taxes and Special Taxes ¹ Levied 1995 Through 2008
School districts	55.62%	89.3%
Counties	23.24%	80.7%
Cities	13.20%	81.1%
City park districts	4.77%	132.9%
Townships	1.76%	41.9%
Rural fire protection	.61%	78.0%
Garrison Diversion	.20%	133.1%
Soil conservation districts	.22%	174.7%
State Medical Center	.26%	89.1%
Other ²	.12%	68.8%

¹"Special taxes" include mobile home taxes, rural electric cooperative taxes, woodland taxes, and payments in lieu of taxes.

²"Other" includes West River/Southwest Water Authority, hospital districts, rural ambulance districts, and recreation service districts.

State Funding to Political Subdivisions

A schedule showing major state appropriations and revenue allocations for direct assistance to political subdivisions covering biennial assistance from 1999-2001 through 2009-11 is attached as an [appendix](#). Comparison of appropriations and revenue allocations for 1999-2001 and 2009-11 shows an increase of 104.5 percent in state appropriations and revenue allocations to political subdivisions over that time period. This can be compared with an increase of 45.7 percent in political subdivisions' property taxes and special taxes levied from 2001 to 2008. Appropriations by the state in 2009 mark the first time in many years that state appropriations and revenues to political subdivisions increased at a faster rate than political subdivisions' property taxes and special taxes levied. For example, from 1994 to 2007 property taxes and special taxes levied by political subdivisions increased 95.9 percent while state appropriations and revenue allocations to political subdivisions increased by 83.6 percent. Most of the increase in 2009 appropriations and revenue allocations to political subdivisions is attributable to enactment of Senate Bill No. 2199, which provided property tax relief by appropriating \$295 million for the 2009-11 biennium for allocation to school districts to reduce school district property taxes.

Home Rule Sales Taxes

Another significant source of revenue for 113 cities and three counties is revenue from home rule sales taxes. Grand Forks imposed the first city home rule sales tax in 1985. In 1990 six cities imposed home rule sales taxes. By 2006 home rule sales taxes had become a significant revenue source. The following table illustrates the growth in home rule sales tax collections:

Fiscal Year	Local Sales and Use
1996	\$36,534,413
1997	\$45,184,127
1998	\$48,929,646
1999	\$54,058,001
2000	\$58,711,263
2001	\$66,961,363
2002	\$65,368,838
2003	\$73,666,551
2004	\$68,644,864
2005	\$78,761,154
2006	\$87,563,544
2007	\$92,143,032
2008	\$96,566,720

SPECIAL ASSESSMENTS

A growing source of revenue to cities is from special assessments imposed. From 1999 to 2008,

special assessments imposed statewide have increased by 92.9 percent and it appears there are varying levels of reliance on special assessments revenue among cities. For example, on a statewide basis almost \$10 in property taxes is collected for every \$1 collected in special assessments. In almost one-fourth of counties, the ratio is more than \$50 in property tax collections for each \$1 in special assessments collections. In Stark County, the ratio is 75-to-1; Ward County 36-to-1; Morton County about 5.5-to-1; and Cass County about 5.25-to-1.

RESOURCES

The statistical information in this memorandum was drawn from the *2008 Property Tax Statistical Report* and *State and Local Taxes 2008* (Red Book) prepared by the Tax Commissioner's office. These publications contain a wealth of information about property taxes and other tax types in North Dakota.

PROPERTY TAX RELIEF LEGISLATION

2007 Senate Bill No. 2032

Senate Bill No. 2032 (2007) was introduced upon the recommendation of the 2005-06 interim Finance and Taxation Committee. As introduced, the bill provided a general fund appropriation of approximately \$74 million for property tax relief and provided for allocation of the appropriated amount among school districts. The bill provided adjustments to reduce school district property tax levy authority by the amount of property tax relief to be received by each school district. The bill established an allocation process based on the number of mills levied by each school district above 111 mills.

Senate Bill No. 2032 was the subject of extensive discussion and amendments. On the final day of the legislative session, the bill was passed in a form substantially different from the bill as introduced. The bill as enacted contained the following provisions regarding property taxes, income taxes, and funding:

Property Tax

1. Homestead property tax maximum income eligibility for persons 65 years of age or older or permanently and totally disabled was increased from \$14,500 to \$17,500. The maximum value of property exempt under the homestead property tax credit was increased from \$67,511 to \$75,000.
2. The amount of an assessment increase for property which triggers the requirement for written notice to a property owner was reduced from a 15 percent increase to a 10 percent increase. The time the notice of assessment increases must be delivered to property owners was increased from 10 days to 15 days before the meeting date of the local board of equalization.
3. After June 30, 2007, in any school district election for approval by electors of unlimited

or increased general fund levy authority, the ballot must specify the number of mills, percentage increase in dollars levied, or that unlimited levy authority is proposed for approval and the number of taxable years for which the approval is requested. Approval by electors of unlimited or increased school district general fund levy authority may not be effective for more than 10 taxable years. The number of petition signatures required to place the question of discontinuing increased or unlimited school district general fund levy authority on the ballot was reduced from 20 percent of the persons in the school census to 10 percent of the number of electors who cast votes in the most recent school district election.

4. Real estate and mobile home tax statements must include, or be accompanied by a separate sheet with, three columns showing for the year of the tax statement and the two preceding tax years the property tax levy in dollars against the property by the county and school district and any city or township that levied taxes against the property.

Income Tax

1. An income tax marriage penalty credit of up to \$300 per couple was provided to offset any marriage penalty incurred for couples with incomes up to \$154,200. The credit is determined by comparing the tax on the couples' joint North Dakota taxable income and the tax that would apply if the couples' income were separated and taxed at the single filer rate.
2. A homestead income tax credit was provided for individuals for taxable years 2007 and 2008 in the amount of 10 percent of property taxes or mobile home taxes that became due during the tax year and have been paid on the individual's homestead. This credit was effective only for the 2007 and 2008 taxable years and was not extended by any 2009 legislation. It appears this credit can now be repealed. Property taxes eligible for the credit do not include special assessments. For purposes of the credit, "homestead" means the dwelling occupied as a primary residence in this state and any residential or agricultural property owned by the individual in this state. The amount of the homestead income tax credit for a year may not exceed \$1,000 for married persons filing a joint return or \$500 for a single individual or married individuals filing separate returns.

The amount of the homestead income tax credit exceeding the taxpayer's income tax liability may be carried forward for up to five years or the taxpayer may request that the

Tax Commissioner issue the taxpayer a certificate in the amount of the excess. A certificate issued to a taxpayer may be used by the taxpayer against property or mobile home tax liability during the ensuing taxable year by delivering the certificate to the county treasurer of the county in which the taxable property or mobile home is subject to taxes. The county treasurer is to forward certificates redeemed in payment of tax obligations to the Tax Commissioner, who will issue payment to the county in the amount of the certificates.

Persons owning property together are entitled to only one credit for that parcel of property, so the credit may be shared between or among them. Persons owning property together are each entitled to a percentage of the credit for a single individual equal to their ownership interests in the property. There is no limit on the number of parcels of taxable property for which an individual may claim the credit.

3. A commercial property income tax credit was provided for an individual or corporation for taxable years 2007 and 2008 in the amount of 10 percent of commercial property taxes or commercial mobile home taxes that became due during the income tax year and have been paid. This credit was effective only for the 2007 and 2008 taxable years and was not extended by any 2009 legislation. It appears this credit can now be repealed. Property taxes eligible for the credit do not include any special assessments. The amount of the credit for commercial property for a year may not exceed \$1,000 for any taxpayer and is limited for individuals to \$1,000 for married persons filing a joint return or \$500 for a single individual or married individual filing separate returns.

The amount of the commercial property income tax credit exceeding the taxpayer's tax liability may be carried forward for up to five years.

Persons owning property together are entitled to only one credit for that property, so the credit may be shared between or among them. Persons owning property together are each entitled to a percentage of the credit equal to their ownership interests in the property. There is no limit on the number of parcels of taxable property for which a corporation or individual may apply.

A passthrough entity entitled to the commercial property income tax credit will allocate the amount of the credit to the partners, shareholders, or members in proportion to their respective interests in the passthrough entity.

Funding

1. An appropriation of \$3,604,000 was provided to the Tax Commissioner for enhanced funding for the expansion of the homestead tax credit for the 2007-09 biennium.
2. An appropriation of \$1,100,000 was provided to the Tax Commissioner for the administrative costs related to the property tax and income tax changes made by the bill.
3. A transfer of \$115 million was made from the permanent oil tax trust fund to the state general fund to offset the anticipated revenue loss to the state general fund from the income tax credits provided by the bill for the 2007-09 biennium.

Administrative Difficulties

The 2007-08 interim Taxation Committee monitored the delivery of property tax relief under 2007 Senate Bill No. 2032. The Tax Department was given the responsibility of administering the income tax credits. During the interim, the Tax Department expressed the opinion that the department does not believe that the income tax is the proper vehicle to provide property tax relief. The Tax Department identified the following difficulties:

1. Property tax was restricted to individuals with a primary residence in North Dakota. Residential and agricultural property held by a trust, estate, or corporation or other entity other than an individual was ineligible for relief. The homestead income tax credit did not provide statutory language to allow owners or members of a passthrough entity to claim a credit. Many property owners in the farming industry did not receive property tax relief for agricultural property because partnerships, S corporations, or limited liability companies owning agricultural property were ineligible for the credit.
2. Individuals residing outside North Dakota were not eligible for the property tax relief even though they own residential or agricultural property in this state, pay property taxes, and pay income taxes in this state. Many negative comments were received from nonresidents. A nonresident was allowed to claim the credit for commercial property in North Dakota.
3. For individuals not subject to a North Dakota income tax filing requirement or whose income tax liability is exceeded by the property tax relief credit, certificates had to be developed to be redeemed by the county treasurer. This certificate was available only for residential or agricultural property owners and not for commercial property owners. Administration of the certificate and redemption process was complicated and for property consisting of a combination of commercial and agricultural or residential property, eligibility for the credit was uncertain.

4. Property owned by joint owners created difficulty because property tax statements are mailed to only one of the owners of jointly held property. As a result, one or more owners may not have had access to the information they needed to claim the credit for their share of the property taxes.
5. Property tax classification issues created confusion for taxpayers and administrators of the credit.
6. Tax Department efforts to notify taxpayers of potential eligibility for the homestead credit were complicated for those individuals owning property in the state and paying property taxes but not subject to an income tax filing requirement. Because these individuals had not filed income tax returns in the recent past, they were not in the Tax Department "system," so it is likely the Tax Department was unable to advise these individuals directly of the possible eligibility for the credit.

The 2007-08 interim Taxation Committee made no recommendation on extending property tax relief. During the interim, the Governor announced the intention to introduce legislation to provide \$200 million or more for statewide school district mill levy reductions in 2009-11. In addition, the option of providing property tax relief through the income tax credit was complicated by the pending initiated measure No. 2 on the 2008 general election ballot which would have reduced individual income tax rates by 50 percent and greatly increased the number of certificates issued to taxpayers who have property tax credits exceeding income tax liability. Measure No. 2 on the general election ballot was defeated, but the election was held after the final meeting of the interim Taxation Committee.

Remedial legislation (House Bill No. 1448) was enacted in 2009 to allow estates and passthrough entities to claim the credit to which they would have been entitled under the 2007 legislation by claiming the credit against 2009 tax liability. There was no legislation considered in 2009 to extend the income tax credit for property tax payments other than the remedial legislation.

2009 Senate Bill No. 2199

Senate Bill No. 2199 (2009) was not introduced at the request of the Governor but was the product of the Governor's previously announced intention to introduce legislation to provide funding from the state for statewide school district mill levy reductions.

Senate Bill No. 2199 provided property tax relief by appropriating \$295 million for the 2009-11 biennium for allocation to school districts to reduce school district property taxes. The bill provided for a reduction of up to 75 mills in school district property tax levies and replacement of the revenue to school districts through mill levy reduction grants. The bill eliminated authority for unlimited levy approval for school districts. The bill established a deadline of

2015 for school districts with existing voter-approved excess levies or unlimited levies to obtain voter approval for continuation of a levy of up to a specific number of mills. If voter approval is not obtained by 2015, the school district levy limitation will be subject to statutory provisions allowing the option of a levy based on the number of dollars levied by the school district in the highest of the most recent three years or a levy within the 185-mill general fund levy limitation.

The bill also provided for transfer of \$295 million in 2010 from the permanent oil tax trust fund to the property tax relief sustainability fund to be used for property tax relief allocations after the 2009-11 biennium.

Other 2009 Property Tax Legislation

House Bill No. 1400 reduced from 18 percent to 12 percent the amount by which a school district may increase its general fund levy from the previous taxable year, within the 185-mill general fund levy limitation.

Senate Bill No. 2297 changed the taxation of rural electric cooperatives from a tax on gross receipts to a transmission line mile tax and a tax of \$1 per megawatt-hour for retail sales to consumers in this state. Cooperative electrical generating plants will remain subject to coal conversion facilities taxes. The taxes are in lieu of real or personal property taxes and an option is provided for investor-owned utilities to opt-in to the taxing system established by the bill. Revenue from the taxes are allocated among political subdivisions based on the location and tax rate for transmission lines and, for distribution companies, are allocated equally based on retail sales locations and the location and tax rate for distribution lines.

Senate Bill No. 2247 increased from \$75,000 to \$150,000 the value of new single-family and condominium and townhouse residential property which may be exempted from property taxes by the city or county. The bill retained the length of the allowable exemption of up to two taxable years but changed the commencement of the two-year exemption from the year construction is begun to the year construction is completed and the residence is owned and occupied for the first time.

Senate Bill No. 2239 established a property tax exemption for new single-family residential property for the year in which construction began and the next two taxable years, if the property remains owned by the builder, remains unoccupied, and the city or county has approved the exemption and special assessments and property taxes on the property are not delinquent. The bill provided that a builder is eligible for exemption of no more than 10 properties under this provision in a taxable year within each jurisdiction that has approved the exemption.

Senate Bill No. 2402 increased the maximum income for individuals aged 65 or older or permanently and totally disabled to qualify for the homestead property tax credit from \$17,500 to \$26,000. The bill also increased the maximum

amount of the homestead credit from \$3,375 to \$4,500 of taxable valuation. The bill increased the maximum annual refund available to renters who otherwise qualify for the homestead credit from \$240 to \$400. The bill increased from \$50,000 to \$75,000 the value of assets of a person that would disqualify the person from the homestead credit.

Senate Bill No. 2201 provided for state payment to political subdivisions for the property tax credit for disabled veterans with an armed forces service-connected disability of 50 percent or greater. The credit is applied to the first \$120,000 of true and full value of the individual's homestead and the reduction is equal to the percentage of the individual's disability compensation rating certified by the United States Department of Veterans Affairs. The bill eliminated the option for a county to disallow the property tax credit for disabled veterans.

Senate Bill No. 2244 allowed continuation of the farm residence exemption for the surviving spouse of a deceased farmer. The exemption remains available for up to five years after the death of an individual who was an active farmer. The exemption applies for as long as the residence is continuously occupied by the surviving spouse of an individual who was a retired farmer at the time of death. The bill was amended to also reduce the capitalization rate used in the agricultural property valuation formula from 8.3 percent in 2008 to 8 percent in 2009, 7.7 percent in 2010, and 7.4 percent for 2011. After 2011 the capitalization rate will not be subject to a statutory minimum rate.

Senate Bill No. 2052 extended the deadline from 2009 to 2011 for counties to fully implement use of soil type and soil classification data from detailed or general soil surveys in agricultural property assessments. Failure to meet the deadline will subject the county to a reduction of 5 percent in allocations from the state aid distribution fund until the county has fully implemented soil survey use in agricultural property assessments.

House Bill No. 1234 increased the amount of the property tax exemption for the home owned and occupied by a blind person from a maximum of \$5,000 of taxable valuation to a maximum of \$7,200 of taxable valuation.

House Bill No. 1401 provided that the State Board of Equalization may not approve valuation and assessment of property in any taxing district if the true and full value for residential and commercial property as assessed in that district exceeds the true and full value for those property classifications as determined by the sales ratio study.

Senate Bill No. 2031 extended from 2011 to 2015 the deadline for completion of construction of a wind turbine electric generation unit with a generation capacity of 100 kilowatts or more to qualify for valuation at 1.5 percent of assessed value to determine taxable valuation of the property.

House Bill No. 1382 provided that all taxable oil or gas pipeline property must be assessed by the State Board of Equalization.

SUGGESTED STUDY APPROACH

In addition to considering property tax reform and property tax relief issues, the study directive requires the committee to consider these issues:

1. Monitoring property tax effects of 2009 Senate Bill No. 2199. This will require careful review of 2009 property tax levy data, which should become available by the next committee meeting.
2. The goal of reduction of each taxpayer's annual property tax bill to an amount that is not more than 1.5 percent of the true and full value of property. This will also require analysis of 2009 property tax levies and relative tax burden for different property types.
3. The proper measure of education funding from local taxation and state resources.
4. The variability of funding resources among taxing districts.
5. Improved collection and reporting of property tax information to identify residency of property owners with minimized administrative difficulty.

ATTACH:1