Franklin County Auditor Report

Investigating the appraisal process

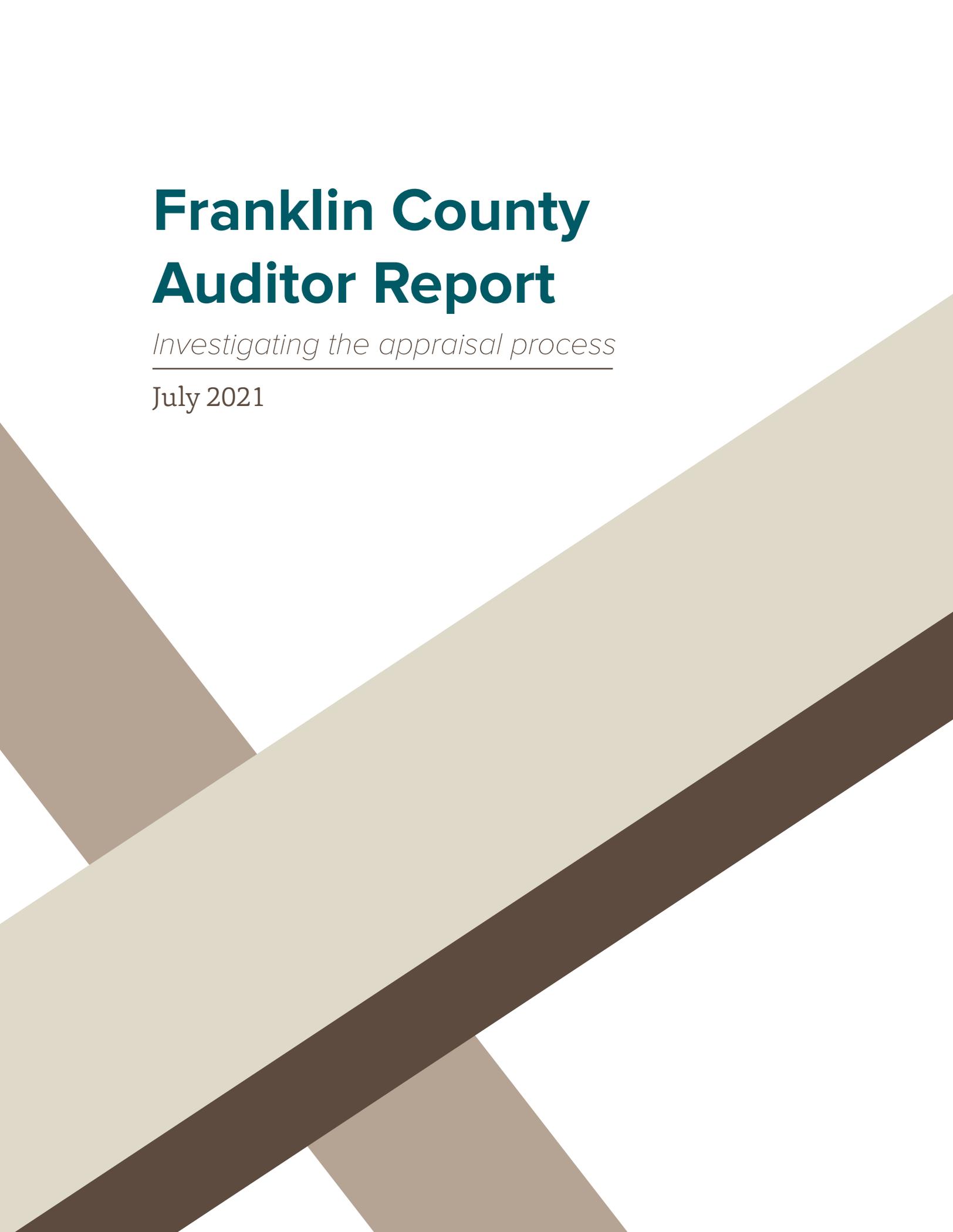July 2021

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EXECUTIVE SUMMARY

In the spring of 2020, Franklin County Auditor Michael Stinziano reached out to the Kirwan Institute with the goal of building a partnership aimed at (1) reviewing the 2017 reappraisal audit and offering recommendations based on those findings specific to the impacts of historic policies (including redlining) and racial bias in the real estate market, (2) assess the current triennial review through a racial justice lens focusing on accessibility, and (3) make recommendations for future triennial reviews to further address the negative impacts of historical and current policies that marginalize communities of color. The following executive summary highlights key findings and recommendations from this study. Each finding and recommendation listed below is also included in greater detail in the main body of the report. All recommendations offered in this report are aimed at addressing and eliminating instances of subjectivity and bias, **addressing systemic inequalities within the appraisal model and the appraisal process**, and/or **mitigating the disparate impact of historic policies**.

KEY FINDINGS & RECOMMENDATIONS

FOUR SECTIONS OF FOCUS:

- Appraisal Model
  Sales Analysis
  Property Grade Disparity
- Appraisal Process
- Board of Revision
- Tax Delinquency

APPRAISAL MODEL
KEY FINDING

Our review of the appraisal model found conclusively that lower income black majority neighborhoods are regularly overvalued for property tax assessments relative to their sales values while higher income white majority neighborhoods are regularly undervalued. This finding points not only to a racialized disparity, but one that disproportionately harms low-income households while at the same time benefitting high-income households.

» **Before 2015 neighborhoods that were 70% - 90% Black were overvalued 30 – 50% (Sale ratios 1.3 - 1.5) relative to sale prices compared to neighborhoods that were 70% - 90% White which were equivalently valued or undervalued slightly (Sale Ratios 0.91 - 1.07).**

» **Neighborhoods that are more than 90% White Non-Hispanic have always had a sales ratio value of less than 1.00 meaning homes in those neighborhoods are on average appraised below what they would sell for.**

Sales Ratio by Race/Ethnicity

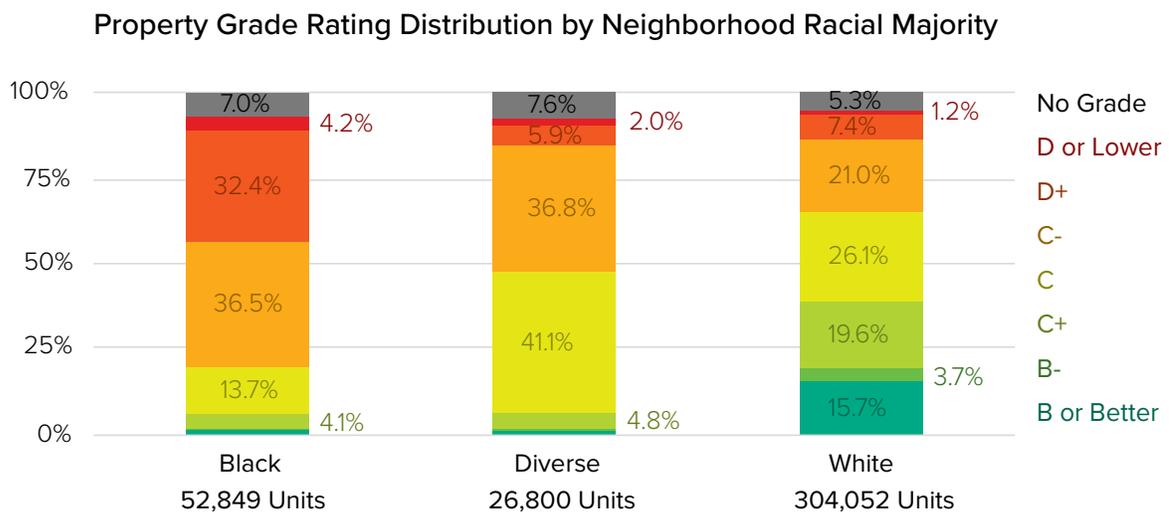| White >90% | White >70% - 90% | White >50% - 70% |
| Diverse | Black >50% - 70% | Black >70% - 90% |
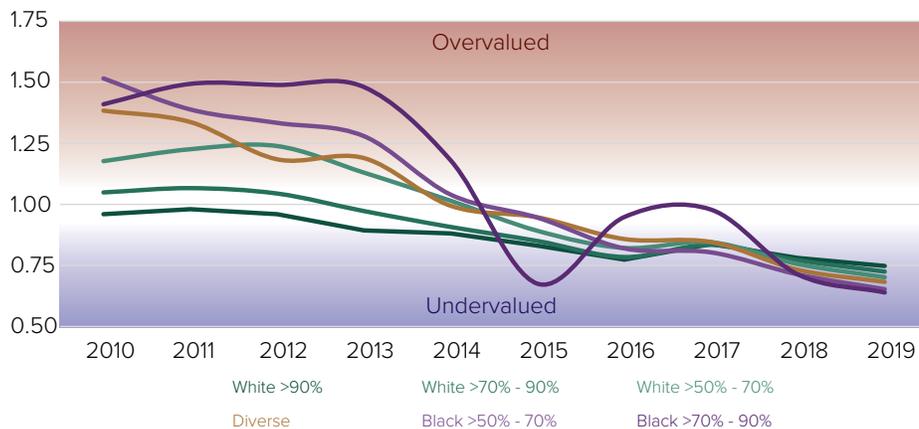
RECOMMENDATIONS

» **Utilize Statistical Methodology to derive neighborhoods.**
» **Define or Replace Subjective Variables in the data gathering process.**
» **Continue to improve internal cross-department data collaboration to enhance cross disciplinary collaboration within the Auditor's Office.**

In addition to disparities in valuations based on both class and race, our analysis found disparities in property grades by race even between neighborhoods with comparable characteristics.

> » When controlling for neighborhood income, there remains a ½ letter grade disparity between White and Black neighborhoods with similar income distributions. This affects replacement costs associated with the final valuation determination.

Property Grade Rating Distribution by Neighborhood Racial Majority

|	Black 52,849 Units	Diverse 26,800 Units	White 304,052 Units
No Grade	7.0%	7.6%	5.3%
D or Lower	4.2%	2.0%	1.2%
D+		5.9%	7.4%
C-	32.4%	36.8%	21.0%
C	36.5%	41.1%	26.1%
C+	13.7%		19.6%
B-		4.8%	3.7%
B or Better	4.1%		15.7%

RECOMMENDATIONS

> » Ensure solid criteria for deriving Plus and Minus grading is followed and applied uniformly.
> » Develop a sliding scale scoring criterion based on property grading indicators. This can ensure quality assurance / validation.

APPRAISAL PROCESS
KEY FINDING

Racial disparities persist and continue to grow between white and majority black neighborhoods. Highly segregated white neighborhoods saw the largest appraisal valuation increases between 2010-2019 while majority black and diverse neighborhoods saw the largest declines in appraisal values during this period.

» Racial disparity between white and black majority neighborhoods in the housing market persists and has grown worse since 2010. This disparity is not explained by income or home size differences.
  » Disparity in 2010: $55/sqft
  » Disparity in 2019: $63/sqft

Average Sale Price Per Square Foot
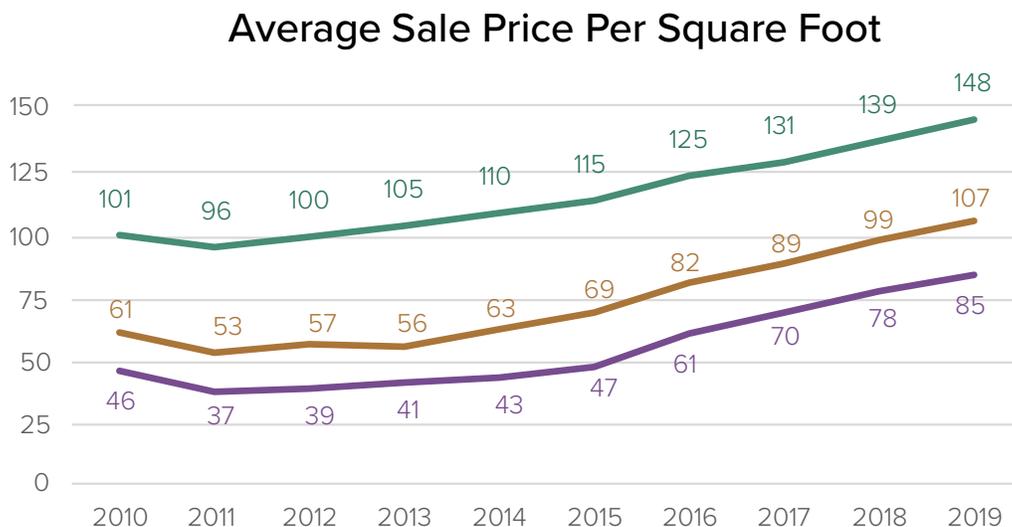
RECOMMENDATIONS

» Develop a two-tiered system for valuation determination emphasizing desk appraisals.
» Mitigate points of entry for bias during the appraisal process.
» Evaluate appraisers for quality assurance by screening for outlier valuations.
» Collect self-identified race/ ethnicity information of the property owner, the race / ethnicity of the property owner remains blind to the appraiser, data remains in the system on the back end, to only be used for assessing racial disparity and research applications aimed at reducing racial disparity.

BOARD OF REVISION
KEY FINDING

Our review of the Board of Revisions data suggest that low-income homeowners are underrepresented in board of revision claims in the 2014 and 2017 reappraisals.

» Moderate and Moderate Low Income Black majority neighborhoods are the most underrepresented for homesite property owners filing a Board of Revision Claim.

Owner Initiated Claims	% Homesite	% BOR Homesite	Homesite Deficit
High White	87.2	86.4	-0.8
High Moderate White	86.5	72.0	-14.5
Moderate High White	82.6	74.5	-8.1
Moderate White	75.4	44.7	-30.7
Moderate Diverse	72.6	34.2	-38.4
Moderate Black	**70.2**	**26.3**	**-43.9**
Moderate Low White	70.7	45.4	-25.3
Moderate Low Diverse	57.1	24.7	-32.3
Moderate Low Black	**69.0**	**15.2**	**-53.7**
Low Moderate White	61.4	30.7	-30.7
Low Moderate Diverse	59.4	27.3	-32.1
Low Moderate Black	57.9	21.9	-36.1
Low White	45.0	17.4	-27.5
Low Diverse	53.6	7.3	-46.3
Low Black	40.6	15.4	-25.2
Countywide	72.8	43.8	-29.1

RECOMMENDATIONS

» Better outreach strategy is needed in higher income black majority neighborhoods as well as low-income diverse neighborhoods.

KEY FINDING

Additionally, our findings strongly suggest that those investing in property as rentals are much more likely to submit board of revision claims than your average homeowner.

» **Countywide owners of properties that are not the owner's primary residence were overrepresented in the initial Board of Revision claims in both 2014 and 2017. The countywide homesite ownership rate was 74% in 2014, but only 26% of initial board of revision filings were on homesite parcels.**

Board of Revision Owner Claims

Year	% Homesite	% Homesite BOR
2014	74.3	25.9
2017	72.8	43.8
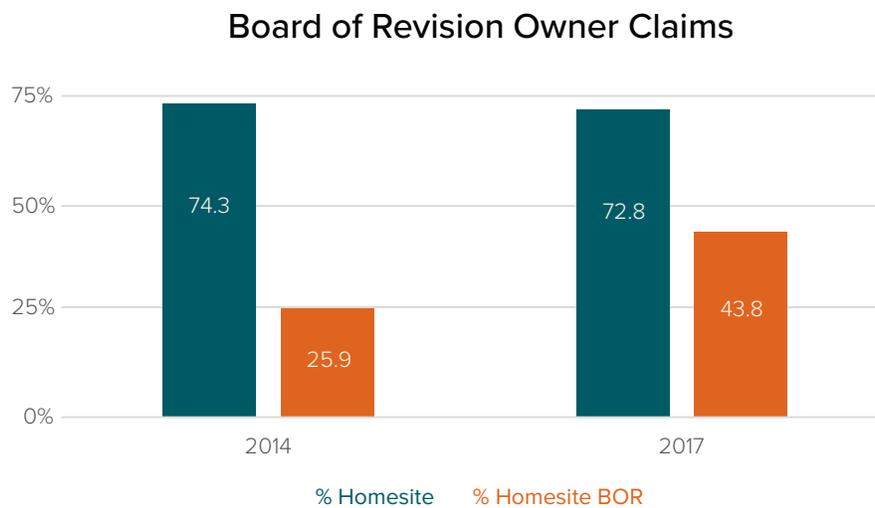
RECOMMENDATIONS

» **Ensure BOR Data is tracking information necessary to assess outreach**

improvements.

TAX DELINQUENCY
KEY FINDING

Our review of tax delinquencies found that their rate is correlated with economic conditions and are affected by each reappraisal. Without collaboration with the Treasurer's Office and Jobs and Family Services, it will be difficult for the Auditor to assess who is most impacted by property tax increases. The auditor knows which properties are delinquent, but more collaboration and data sharing are needed to create programming to assist those most at risk of tax delinquency in the face of property tax increases.

» **Countywide residential property tax delinquencies rise after every property tax reappraisal. The delinquency rate increases become less significant during stronger economic times.**

Residential Parcel Tax Delinquency
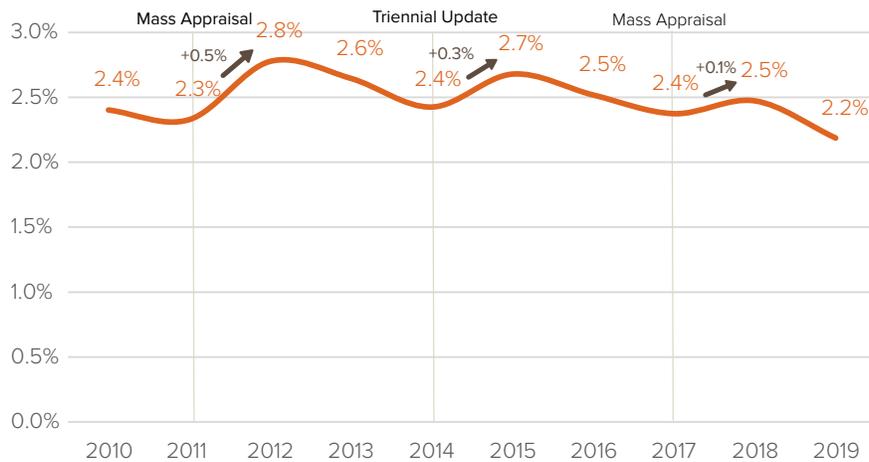
RECOMMENDATIONS

» **Further support and grow the property tax assistance program.**
» **Support House Bill 159 which caps annual property tax increases.**
» **Collaborate with the treasurer's office and other agencies to assist the tracking and interventions for those with property tax delinquencies.**

BACKGROUND

In 2019, Franklin County Auditor Michael Stinziano requested an audit of the 2017 reappraisal of property values. The report found issues with past appraisals that were thought to reflect the continuing impact of redlining and racial covenants on the home values in various areas in Franklin County. These findings include inconsistent application of physical condition ratings and significant conflation of the quality of design and construction with the desirability of the property's location. As a result, Auditor Stinziano reached out to the Kirwan Institute in the spring of 2020 with an interest in building a partnership aimed at (1) reviewing the 2017 reappraisal audit and offering recommendations based on those findings specific to the impacts of historic policies (including redlining) and racial bias in the real estate market, (2) assess the current triennial review through a racial justice lends focusing on accessibility, and (3) make recommendations for future triennial reviews to further address the negative impacts of historic and current policies that marginalize communities of color. Launching in June of that year, a team of Kirwan Institute researchers led by Michael Outrich began the twelve-month collaboration. The following paragraphs offer a contextual background to the work that the Kirwan team undertook. This section is followed by separate sections outlining each assessment conducted by the Kirwan team and recommendations to address racial inequity in the appraisal process.

INTRODUCTION

  In 2017, 71.8 percent of whites owned their homes while only 41.8 percent of blacks owned their homes nationwide.[1] This 30-percentage point disparity in homeownership rates reflects the cumulative impacts of 400 years of disparate treatment at the hands of the law. The history of U.S. housing policy in the twentieth century alone is illustrative of the intentional and downright immoral lengths that policymakers were willing to go to maintain their grip on power. The prolific use of restrictive covenants aimed at race, class, ethnicity, and religion; the blatantly racist implementation of redlining policy; racial, exclusionary, and expulsive zoning; the disparate impacts of highway construction and urban renewal policies; etc. The underlying theme of these policies was clear: an undeniable effort to disenfranchise African Americans in particular, but also First Nations, immigrants, and ethnic and religious minorities, from property ownership, the primary mechanism by which Americans built wealth in the twentieth century. The men who built restricted suburban enclaves and promoted residential segregation were many of the same people who informed the FHA underwriting manual that falsely stated that the mixing of races would lead to property devaluation. Many of these men lived in the same elite neighborhoods as the legislators who created and passed the laws governing how we value property to this day. And today racial disparities in home values, access to housing, and quality of housing persist and remain systemic.

  Much of the reason that property tax assessment disparities continue to persist is that the model used to assess the value of homes for point-of-sale and mass appraisals relies heavily on the sales prices in the "neighborhood" in which the home sits. This simple, yet prolific formulaic input perpetuates the racialized disparities in home values and is the standard methodology used across the country and here in Franklin County. In this way, the model used throughout the country and here in Franklin County is flawed and without thoroughly assessing and evaluating the model inputs and impact, racial disparities will persist in property tax assessments. By relying heavily on sales values, disinvestment policies as well as investment policies in neighborhoods have been perpetuated over time. For example, Upper Arlington experienced investment by the Home Owners Loan Corporation's Residential Security (Redlining) Map grading of A it received in 1934, facilitating access to federally insured mortgages for homes and businesses in the community. Meanwhile, the King-Lincoln neighborhood was redlined, closing the community off to investment through the denial of federally insured mortgages. As a result of this one policy, Upper Arlington flourished and continues to experience a development boom while the King-Lincoln neighborhood experienced a period of decline that lasted for over half a century. In the early twentieth century, prior to being Redlined, the King-Lincoln neighborhood was the hub of Black wealth in Franklin County. But the Redlining policy stripped these families of their wealth because

it devalued their properties, saying that these properties were too risky for loans. The ability of wealthy Black families to move out of the neighborhood after it was Redlined was handicapped by the prolific use of racially restrictive covenants in Franklin County, discriminatory lending practices, and real estate steering. As a result, many Black families lost their wealth.

The following report will highlight several disparities that are rooted in historic (and some contemporary) policies and practices, and we urge the County to broadly consider supporting statutes at the State and Federal level that address the role that reparations might play in addressing these historic injustices, as it relates to the overvaluation of majority black neighborhoods during the Great Recession. The undeniable role of racial bias in informing the policies which created disparities in homeownership, wealth, and a myriad of other issues in the United States today is recognized by the authors of this report. Likewise, the powerful role housing policy has played in shaping the patterns of metropolitan segregation in Franklin County today is recognized by the authors of this report. We understand that creating a new model for assessing value is outside of the scope or ability of the County Auditor due to State-level statutes and appraisal industry standards, but we encourage the support of policies that can address this issue and encourage the Franklin County auditor to be a national leader in reducing appraisal disparity. As a result, all recommendations offered in this report are therefore aimed at **addressing and eliminating instances of subjectivity and bias, addressing systemic inequalities within the appraisal model and the appraisal process, and/or mitigating the disparate impact of historic policies**.

Eliminating subjectivity and bias:
Recommendations aimed at eliminating subjectivity and bias in the auditing process will seek to remove opportunities for subjectivity in the auditing process, often with an emphasis on automation and instituting additional checks and balances in the process.

Addressing systemic inequalities:
Recommendations aimed at addressing systemic inequalities will seek to change institutional policies and practices that may be perpetuating inequities in housing valuations.

Mitigating the disparate impact of historic policies:
Recommendations aimed at mitigating the disparate impact of historic policies will seek to create protections for the most vulnerable homeowners in Franklin County and increase homeownership among minoritized populations historically disenfranchised from property ownership.

DEFINITIONS AND METHODS
Definitions

SALES RATIO: The ratio of appraisal price to sale price. Values greater than 1 mean appraisal price is higher than the sale price. Used to evaluate assigned appraisal values (IAAO Ratio Standards 2013)

APPRAISAL VALUE: The value of the property determined by the assessor for property tax purposes.

CAMA: Computer-Assisted Mass Appraisal: A system of appraising property, usually only certain types of real property, that incorporates computer-supported statistical analyses such as multiple regression analysis and adaptive estimation procedure to assist the appraiser in estimating value. (IAAO Glossary)

MASS APPRAISAL: The process of valuing a group of properties as of a given date, using standard methods, employing common data, and allowing for statistical testing." (IAAO Glossary)

REAPPRAISAL: Ohio law requires a full reappraisal every six years, generally referred to as a reappraisal or sexennial reappraisal. This process involves field appraisers visiting properties across Franklin County and the integration of comparable sales and other property attributes to derive an assessed property value.

TRIENNIAL UPDATE: A value update largely based on sales review that occurs three years after a reappraisal.

NEIGHBORHOOD: A neighborhood is the environment of a subject property that has a direct and immediate impact on its value- International Association of Assessing Officers (IAAO). The largest geographic grouping of properties where the significant economic forces of those properties are generally uniform.

GRADE: A subjective classification of a structure by an appraiser, intended to describe materials used, workmanship, architectural attractiveness, functional design, and the like. Quality class, or its synonym "grade," is the key variable in most cost schedules used to derive property value. (IAAO Glossary)

BOARD OF REVISION (BOR): Established to primarily review the valuation of real property as of the tax lien date (January 1) for the tax year in question. The BOR considers all available valid evidence in support of a complaint against the valuation of real property. The BOR does not hear complaints regarding taxes. The objective of the BOR is to provide the property owner with a fair review of the property's valuation. Review the Valuation of Your Property The BOR is a three-member property valuation review panel consisting of the County Auditor, County Treasurer, and a member of the Board of County Commissioners or their representatives. (FCAO BOR Brochure)

TAX DELINQUENCY: The existence of past due or "Delinquent taxes" Delinquent taxes are defined in Ohio Revised Code Section 323.01 "(1) Any taxes charged against an entry on the general tax list and duplicate of real and public utility property that were charged against an entry on such list and duplicate for a prior tax year and any penalties and interest charged against such taxes. (2) Any current taxes charged on the general tax list and duplicate of real and public utility property that remain unpaid after the last day prescribed for payment of the second installment of such taxes without penalty, whether or not they have been certified delinquent, and any penalties and interest charged against such taxes."

TAX FORECLOSURE: The legal process for enforcement of collecting a tax delinquency which can culminate in the tax sale of the property often after a significant period of delinquency or sale of the related tax liens.
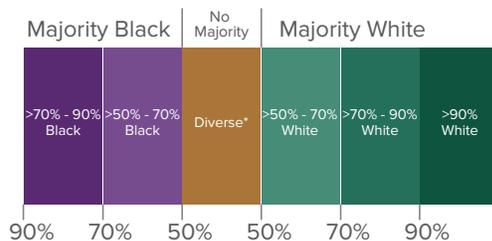
Additional Online Resources:
https://www.iaao.org/media/Glossary_Ed2_Web/IAAO_GLOSSARY_2015.pdf
https://treasurer.franklincountyohio.gov/Delinquent-Taxes/Foreclosure

Methods

In this report, neighborhood level income and race data are used to assess disparity because we do not know the race or income levels of individual homeowners necessary to fully evaluate racial or class discrimination or bias in the appraisal process. To assess the impact racial and class segregation has on the appraisal process, census tracts (proxy to neighborhoods but different from those derived for assessment purposes) were chosen as the spatial geography because they provide the best detail and are publicly available. Race and income data from the American Community Surveys 5-Year estimates are used to derive neighborhood racial composition and neighborhood income classifications used to examine racial or class disparities in the appraisal process. Each census tract income or racial classification may change from year to year because people move and so the areas evaluated within each racial or income class may change. The census tract classification method is outlined in below.

Race Classification

Majority Black		No Majority	Majority White		
>70% - 90% Black	>50% - 70% Black	Diverse*	>50% - 70% White	>70% - 90% White	>90% White

90%   70%   50%   50%   70%   90%

*While other racial or ethnic groups may live in these neighborhoods, no census tracts in Franklin County had large enough concentrations of other racial or ethnic groups to be classified but, many are identified as "Diverse".

Income Classification

High — Earning >$100,000	Majority are High Income
High-Moderate	Majority are High Income Some are Moderate Income
Moderate-High	Majority are Moderate Income Some are High Income
Moderate — Earning >$35,000 - $100,000	Majority are Moderate Income
Moderate-Low	Majority are Moderate Income Some are Low Income
Low-Moderate	Majority are Low Income Some are Moderate Income
Low — Earning $35,000 or Less	Majority are Low Income

"Some" is considered to be within 15% of the Majority Category

Appraisal Model

SECTION OF FOCUS 1: APPRAISAL MODEL

Part A. Sales Analysis
Overview

Review of appraisal process revealed that 'neighborhood' is an important part of the property evaluation process. After the neighborhood code is assigned during data collection process as one of general property characteristics for a parcel[2], it is revisited during pre-review process (to review soundness of the current neighborhood boundaries), property appraisal review process (to review all available data relative to the neighborhood), and post review analysis (to measure the uniformity of values within each neighborhood). This calls for re-examination of how 'neighborhood' is defined and whether this process entails any bias towards certain neighborhoods in the county. Below we outline a recommendation to derive neighborhood boundaries statistically, which will remove subjectivity from the neighborhood delineation process and provide a replicable methodology that can be evaluated for accuracy and accountability.

Lack of clear scoring guidelines likewise creates room for subjectivity and bias. Data, being collected by humans cannot be fully objective because human beings subjectively assign meanings to the data through lenses fogged with biased inferences and interpretations.[3] The current data collection manual offers some level of systematic data collection protocol, but there is room for improvement through closer examination of potential inequities. If biases get into data during collection process, it can affect subsequent phases of the data life cycle while data gets cleaned, processed, and analyzed[4,5]. Below we outline a recommendation aimed at removing subjective variables in the data gathering process to be incorporated into the next mass appraisal in 2023.

While CAMA (Computer Assisted Mass Appraisal System) appears to be at the heart of the county's property (re)appraisal process, the exact data life cycle around CAMA is not clear in terms of what goes into the system (input) and how those input data are processed (data processing algorithm). The importance of CAMA for the county's property (re)appraisal process calls for deeper understanding of it through a closer examination to determine whether and how the (re)appraisal process is biased against certain types of property or certain groups of homeowners. Data, analytical models, and institutional processes are fundamentally intertwined with historic social hierarchies and racial prejudice.[6] Evidence for racial bias built in data collection and analysis are well documented throughout the history of U.S. social policy, and in housing policy, in particular.[7,8,9,10] In addition to examination of potential racial inequity in data collection process, it is important to focus on how data is processed. Unlike many other uses of data-driven decision-making systems, the analytical process behind CAMA appears to be hidden or black-boxed from users, let alone from property owners.[11] To properly address a model's potential for inequity, the model needs to be examined regarding three traits of the system - opacity, scale, and damage -- by checking if the model is opaque or invisible, has a potential for growth in its capacity, or works against people's interest and causes damage[12].

FINDINGS

- The Countywide Average appraisal value relative to the sales value have continually declined since 2012 (1.07 in 2012 vs 0.71 in 2019) – Progressively more undervalued.
- Before 2015 neighborhoods that were 70% - 90% Black were overvalued 30 – 50% (Sale ratios 1.3 - 1.5) relative to sale prices compared to neighborhoods that were 70% - 90% White which were equivalently valued or undervalued slightly (Sale Ratios 0.91 - 1.07).
- Neighborhoods that are more than 90% White Non-Hispanic have always had a sales ratio value of less than 1.00 (Undervalued for taxation).
- Significant improvement in appraisal valuation relative to sale values occurred after 2017. Minor disparities persist.
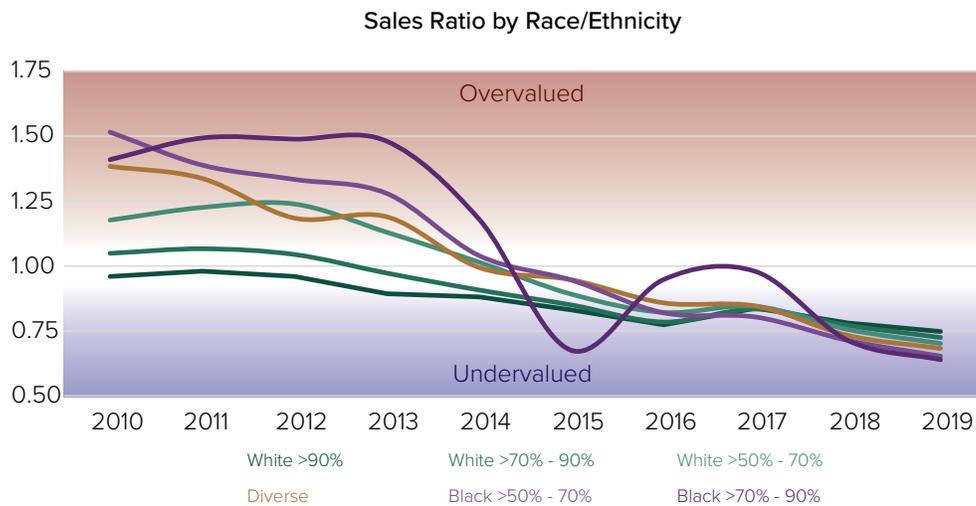
Sales Ratio by Race/Ethnicity

White >90%	White >70% - 90%	White >50% - 70%
Diverse	Black >50% - 70%	Black >70% - 90%

Figure 1.   Sales Ratio

FINDINGS (CONT.)

- Columbus neighborhoods like North and South Linden, Eastmoor, Southfield, Vassor Village, Southern Orchards, and South-Central Hilltop have been regularly overvalued for property tax assessments relative to their sale value assessments relative to their sale value.
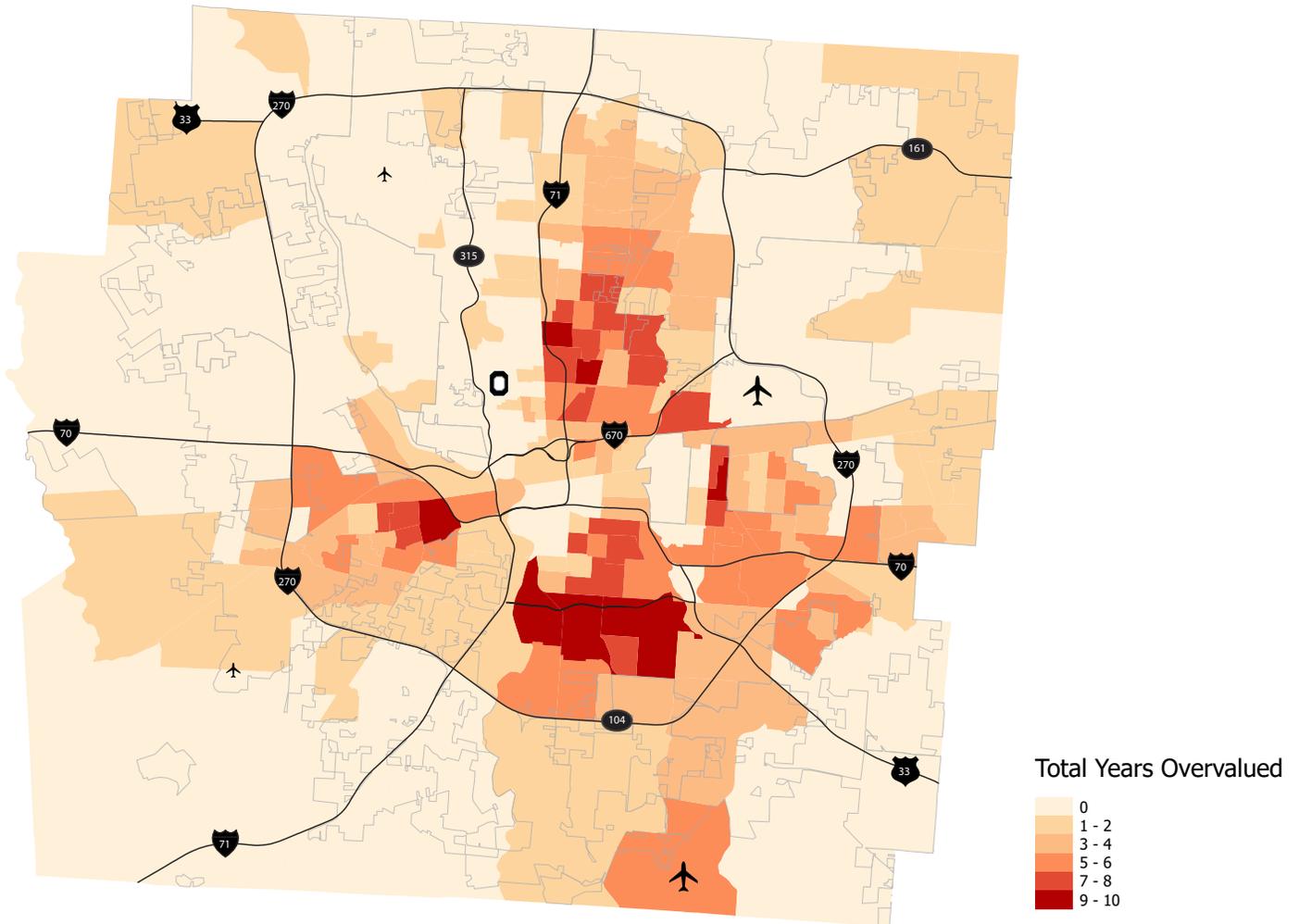
Total Years Overvalued

- 0
- 1 - 2
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10

Figure 2.   Franklin County Overvaluation Map

FINDINGS (CONT.)

- Conversely, Columbus neighborhoods like Italian Village, Victorian Village, Olde Towne East, and Merion Village and suburbs like Upper Arlington, Grandview Heights and Marble Cliff have been regularly undervalued for property tax assessments relative to their neighborhood sales.
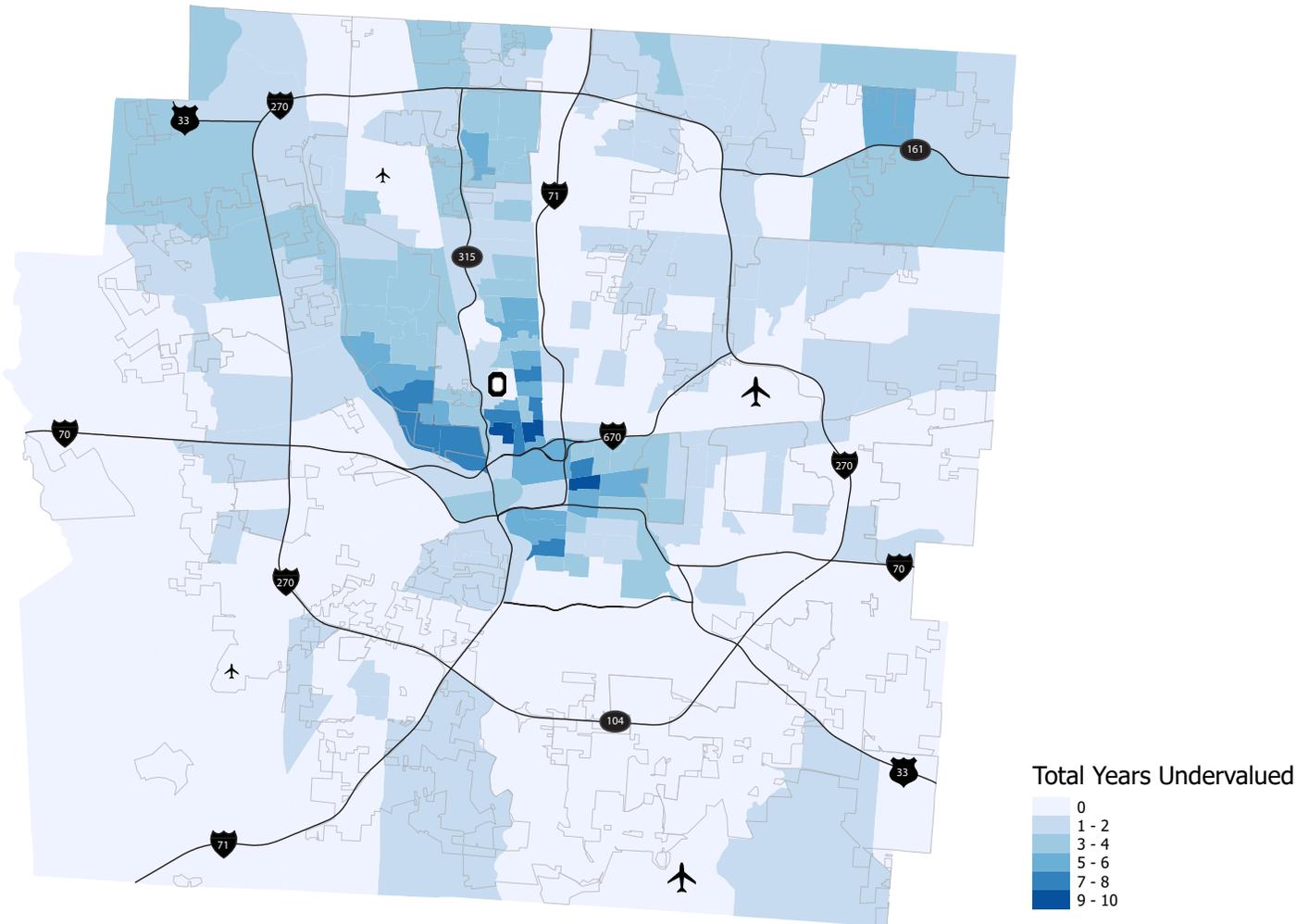

Total Years Undervalued
- 0
- 1 - 2
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10

Figure 3. **Franklin County Undervaluation Map**

RECOMMENDATIONS

Three of the five recommendations for the sales analysis outlined below are focused on eliminating instances where subjectivity or bias can inform an outcome. We were not able to prove racial bias in the mass appraisal process because we do not know the race of the assessors who acquired the data or the race of the homeowner. While mass appraisals do not look inside the home and are thus considered to be "race neutral," neighborhood characteristics and interactions can influence appraiser bias when in those environment.[13] The fourth recommendation is aimed at creating better future datasets to assist with equity assessments. To address instances where bias could influence the sales analysis, we focus the following recommendations on defining "neighborhoods," removing subjectivity in data collection, and the CAMA process. The final recommendation is aimed at addressing systemic inequities.
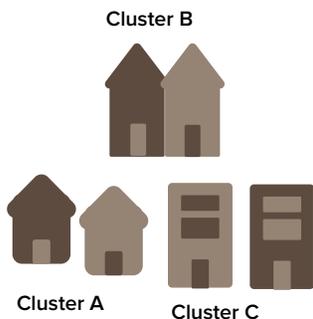
1.A.1. Utilize Statistical Methodology to derive neighborhoods

1 START WITH TAXING DISTRICTS
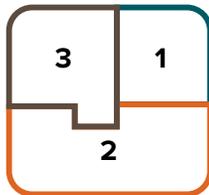
2 PROPERTY CHARACTERISTICS
» Use a Clustering algorithm (K-Means) based on property characteristics to classify properties with similar characteristics together
 • *Age*
  • *Square Feet*
  • *# of Rooms/Beds/Baths*

3 MARKET SALES DYNAMICS
» Use K-Means clustering based on sales, market trends
» Combine property characteristic cluster assignments and property market clustering assignments
  • *Property price/SF*
  • *Price growth/trends*
  • *# of Additions/Infill*
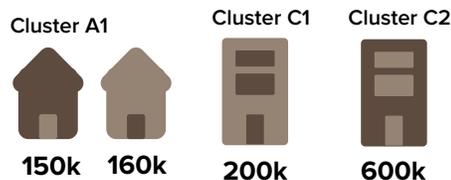
4 REFINING CLUSTERS
» Combine property characteristic cluster assignments and property market clustering assignments
» Use a geospatial density-based clustering to derive neighborhood boundaries
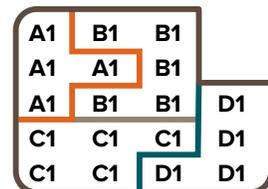
5 FIND NEIGHBORHOOD
» Evaluate final neighborhoods using Coefficient of Dispersion and Coefficient of Concentration, combine clusters with small sample sizes with similar clusters that are contiguous to solve low sale problem for mass appraisal.
» Locations with similar clusters of properties are grouped together to derive the neighborhood geography

RECOMMENDATIONS (CONT.)

**1.A.2. Examine of Subjective Variables in the data gathering process.**

- For data items lacking clear guidelines[14], refine the data collection manual and provide solid and clear criteria to address room for interpretation by different appraisers.
- For variables with subjective values, reexamine the rationale for collecting them to determine inclusion or exclusion in the reappraisal system.

Variable	Manual Section	Issue	Recommendation
Location	General Property Characteristics	View is Subjective	Derive solid criteria to define what is a good / bad view
Status	General Property Characteristics	Over/Under Improved is not defined	Align score with property grade/ property attributes
Influence Factors	General Property Characteristics	Proximity to negative economic influence	Define standards based on distance for the negative economic influence/ Quantify loss/gain in value
Condition	Dwelling Data	Based on Composite Judgement	Use scoring criteria to define all components that influence scoring
Interior Condition	Dwelling Data	Visual Based Subjectivity	Define scoring standards for interior and exterior to compare
Overall Composite	Dwelling Data	Judgement determined by appraiser, can be subjective	Assign weights to each individual component based on importance, then summate variables to derive overall condition on a sliding scale
Cost / Design Factors	Dwelling Data	Thresholds defining "Exceptional Home" etc. are not well defined	Assign and quantify value add / lost based on unique factors
% Good Functional	Dwelling Data	Weights and definitions are not clear and up to appraiser	Define standards for function, weight based on factor's importance
% Good Economic	Dwelling Data	Weights and definitions are not clear and up to appraiser	Align factors with research that quantifies positive or negative economic influences
Quality Grade	Other Building and Yard Improvements	Terms assigned are subjective to each appraiser	Define scoring standards that align with IAAO methods using sliding scale factors that are well defined

RECOMMENDATIONS (CONT.)

1.A.3. Examine CAMA along data life cycle.[15]

- Design and input: examine data elements being collected for rationales for inclusion into the appraisal system and potential for bias.
- Analysis: examine data processing algorithm as to how collected data are translated into the CAMA through value assignments or calculation; e.g., how the values of 'Very Poor' or 'Excellent' on 'Composite Rating of Overall Condition' are translated when entered into CAMA.
- Output: examine results of data processing after analysis; e.g., how do the different values assigned for different data elements, in combination, affect the outcome of the appraisal system or the resulting appraisal values.
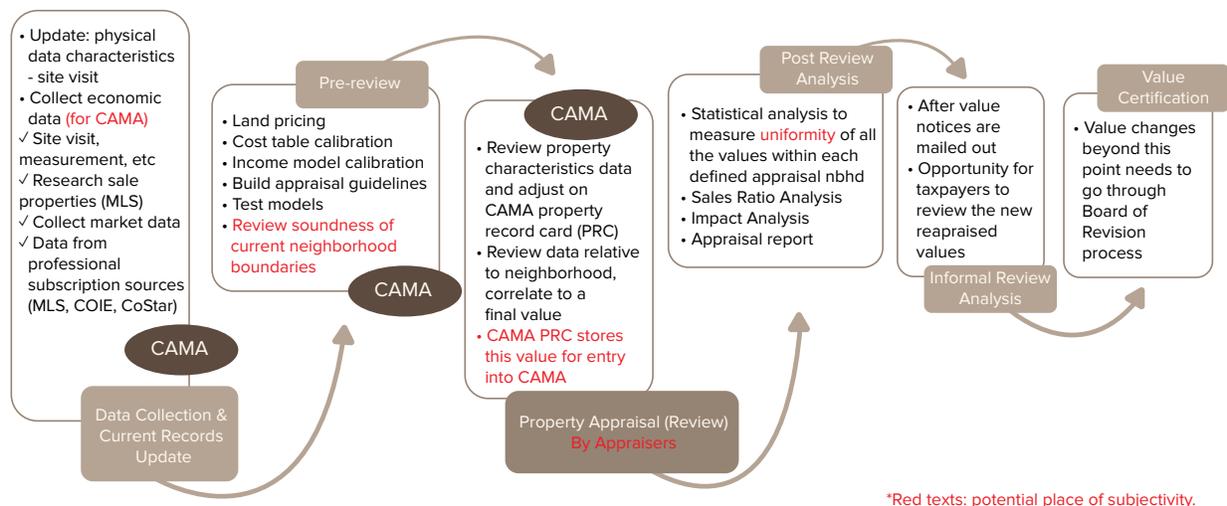
Figure 4.   Appraisal Process Overview

- » **Continue to improve cross internal department data collaboration to enhance cross disciplinary collaboration within the auditor's office.**
- » **Better quantify the negative impact of foreclosures in appraisal valuations in areas with high foreclosure rates.**

As sheriff sales and other non-arms-length transactions are excluded in the appraisal model, areas with numerous foreclosures further amplify the negative effects on comparable sales in the neighborhood. While some of the effect is reflected in the sales of properties that do sell, high densities of foreclosures substantially affect the neighboring valuations of properties[16]. Additionally, the number of valid sales to pull from is limited in high density foreclosure neighborhoods, meaning comparable sales would likely come from properties further away. This could be one reason lower income and black majority neighborhoods were overvalued during the Great Recession as many of these neighborhoods were disproportionately impacted by foreclosures.

Part B. Property Grade Disparity
Overview

Our review of property grades found persistent and racialized disparities. As expected, new construction and historic neighborhoods received some of the highest property grades. Likewise, historically Black settlements received the lowest property grades. Many historically Black settlements like American Addition or Urbancrest were founded on the periphery of settled urban space. Historically, these communities were often unplanned and unregulated, meaning that many of the homes were built by hand by their owner/occupants. There is a good deal of documentation outlining the history of unplanned suburban Black communities across the country. Many of these settlements, like American Addition here in Franklin County, resisted infrastructure updates, annexation, and zoning regulations that would influence what could be done with the property or potentially lead to an increase in property taxes, as these communities were often extremely low income[17]. Likewise, many of these homes were used to generate supplemental income that residents feared would be threatened by additional zoning regulations[18]. As a result of this history, many peripheral historically Black settlements require investments in infrastructure and housing beyond what the typical community might need. The ongoing infrastructure upgrades in American Addition are a prime example of this need. The Franklin County Auditor should consider this history when supporting infrastructure and housing investment throughout the county.

FINDINGS

- When controlling for income, there remains a ½ letter grade disparity between with and black neighborhoods with similar income distributions.
- Properties in black majority neighborhoods are most likely given C- or D+ grades (68.9%) versus (28.4%) in white majority neighborhoods.
- White majority neighborhoods are more than 6 times as likely to have C+ or better properties compared to black majority neighborhoods.

Property Grade Rating Distribution by Neighborhood Racial Majority

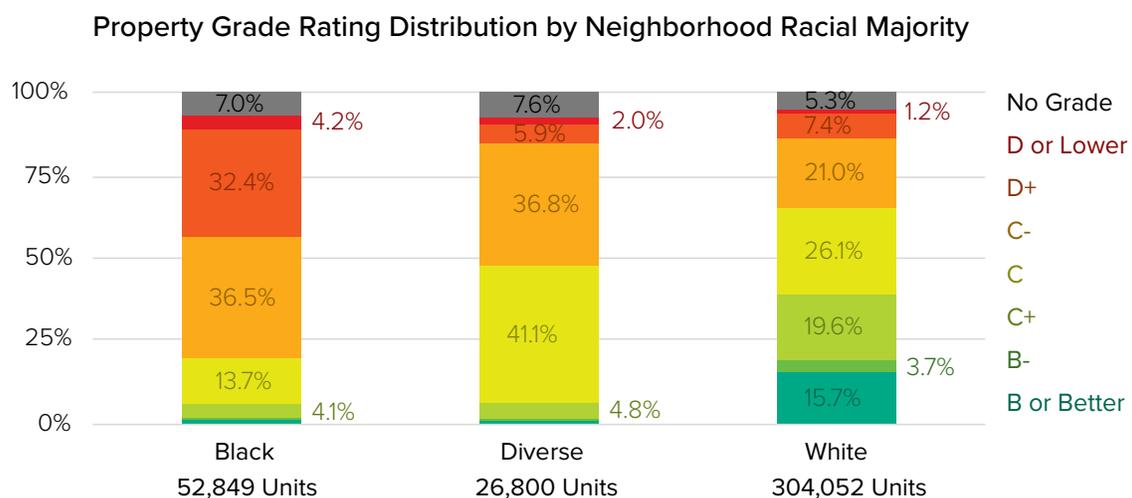**Figure 5.** **Property Grade Rating Distribution by Neighborhood Racial Majority**

FINDINGS (CONT.)

- Highest Grade properties exist in new construction and in expensive, historical locales.
- Lowest grade clusters located in many historically black settlements (American Addition, Urbancrest, Crossroads, Staumbaugh- Elwood).
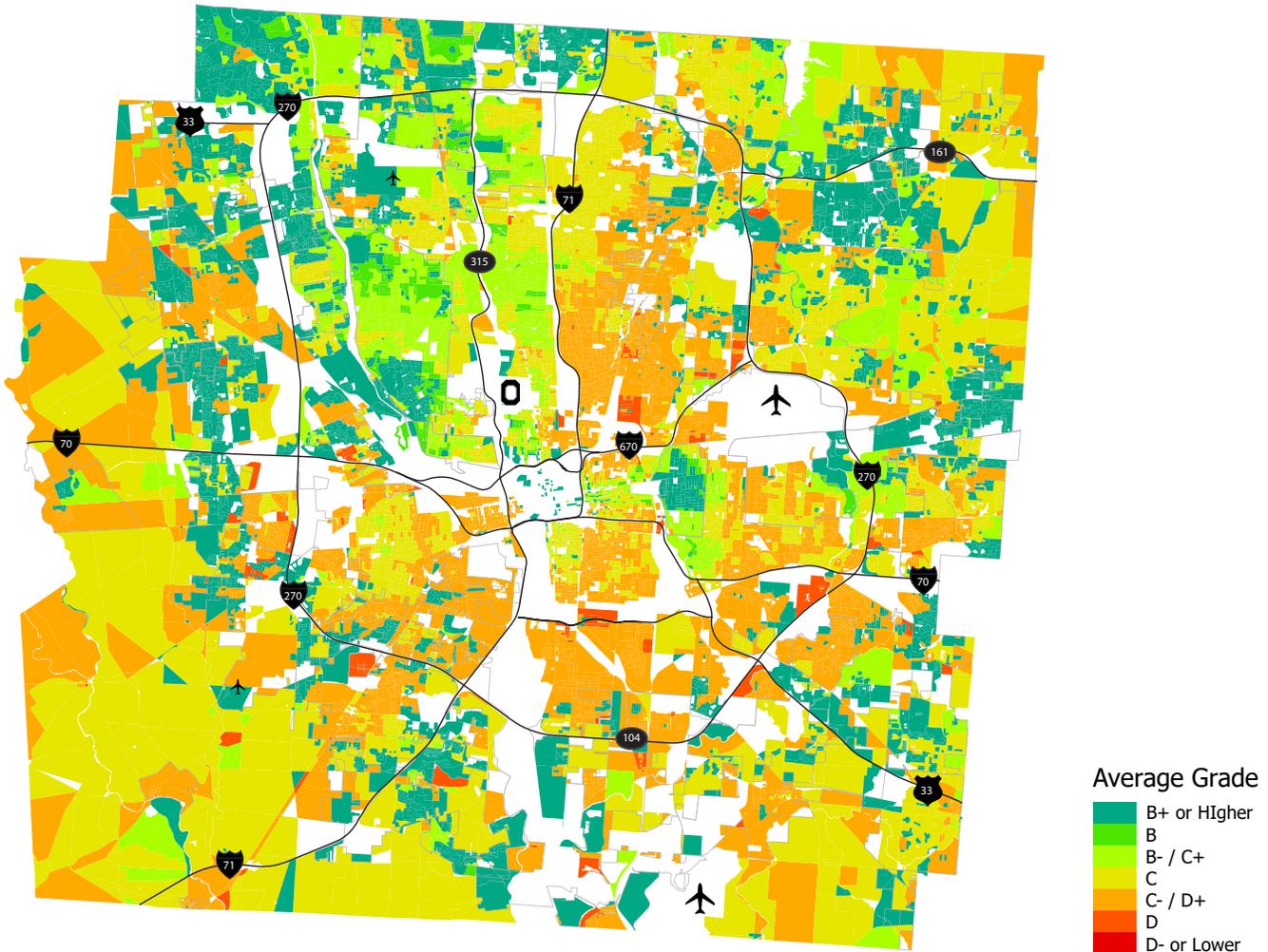
Figure 6.   Franklin County Grade Disparity Map

RECOMMENDATIONS

As illustrated above in the property grade findings, there are systemic inequities in the neighborhood grading system. All four recommendations listed below are aimed at eliminating these systemic inequalities. The first recommendation is key to eliminating these inequities in property grades.

1.B.1. Ensure solid criteria for deriving Plus and Minus grading is followed and applied uniformly.
- Property grades should be assigned to the individual property, not the grade of the neighborhood. Assigning uniform property grades to the neighborhood level leaves out homes and properties that are statistically different in size, structure, era, etc. and can negatively affect appraisal valuations in infill, and in neighborhoods experiencing significant new investment and construction.
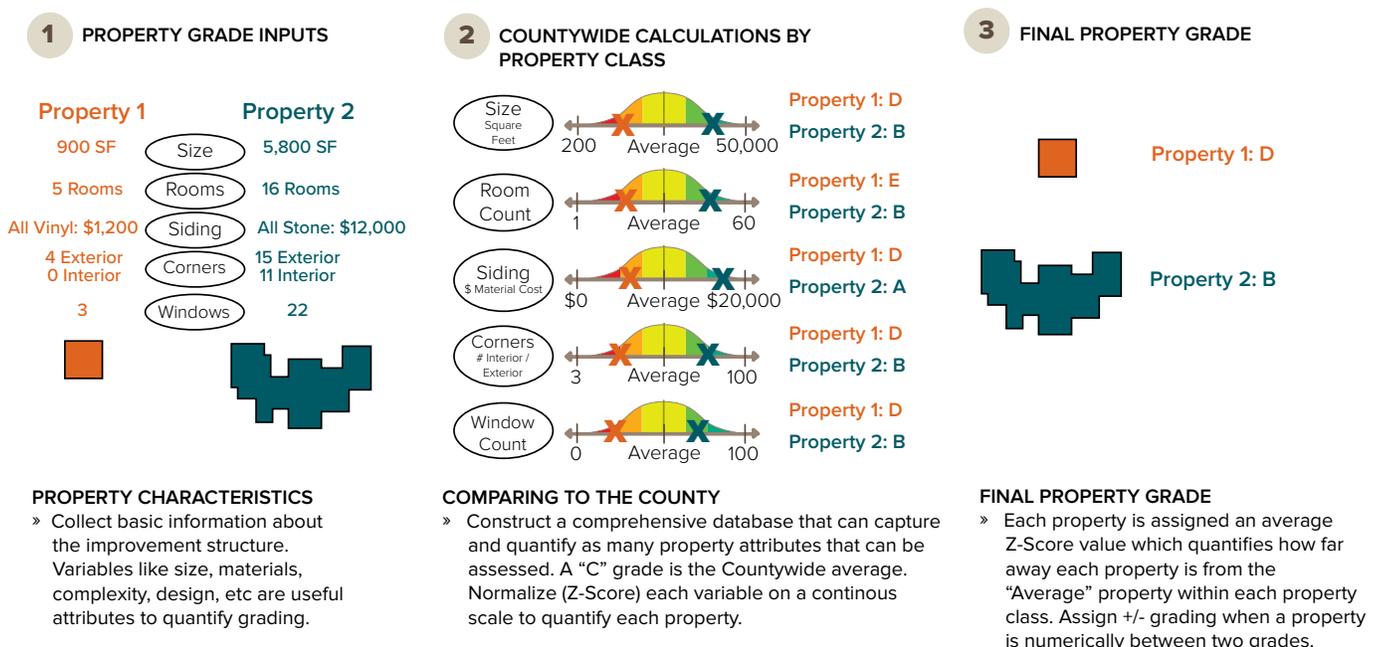
1.B.2. Pay particular attention to new construction grading in non-white neighborhoods.
- Utilize the standard sliding scale criteria to validate and clarify property grades that may be on the cusp of a letter grade. This ensures that the determination can be proven and evaluated.

1.B.3. Ensure property grades are completed at the property level, not neighborhood – 2017 Triennial Audit Finding.
- In the property grade appraisal maps, many newly constructed neighborhoods had average grades that exceeded the countywide average grading. As white majority neighborhoods are 6 times more likely to have a grade assigned B or better, new construction in black or more diverse neighborhoods run the risk of receiving a lower property grade.

1.B.4. Develop a sliding scale scoring criterion based on property grading indicators.   This can ensure quality assurance / validation.

1 PROPERTY GRADE INPUTS

Property 1   **Property 2**

	Size	
900 SF		5,800 SF
5 Rooms	Rooms	16 Rooms
All Vinyl: $1,200	Siding	All Stone: $12,000
4 Exterior	Corners	15 Exterior
0 Interior		11 Interior
3	Windows	22

PROPERTY CHARACTERISTICS
» Collect basic information about the improvement structure. Variables like size, materials, complexity, design, etc are useful attributes to quantify grading.

2 COUNTYWIDE CALCULATIONS BY PROPERTY CLASS

Size Square Feet   200 Average 50,000
Property 1: D
Property 2: B

Room Count   1 Average 60
Property 1: E
Property 2: B

Siding $ Material Cost $0 Average $20,000
Property 1: D
Property 2: A

Corners # Interior / Exterior   3 Average 100
Property 1: D
Property 2: B

Window Count   0 Average 100
Property 1: D
Property 2: B

COMPARING TO THE COUNTY
» Construct a comprehensive database that can capture and quantify as many property attributes that can be assessed. A "C" grade is the Countywide average. Normalize (Z-Score) each variable on a continous scale to quantify each property.

3 FINAL PROPERTY GRADE

Property 1: D

Property 2: B

FINAL PROPERTY GRADE
» Each property is assigned an average Z-Score value which quantifies how far away each property is from the "Average" property within each property class. Assign +/- grading when a property is numerically between two grades.

Section of Focus 2:
Appraisal Process

SECTION OF FOCUS 2: APPRAISAL PROCESS

Appraisal Disparity
Overview

Racial disparities persist and continue to grow between white and majority black neighborhoods. Highly segregated white neighborhoods saw the largest valuation increases between 2010-2019 while majority black and diverse neighborhoods saw the largest declines in values during this period. To ensure more accurate appraisal valuations, it is necessary to remove appraisers who over or under value properties dependent on the communities being evaluated. This ensures better data inputs that reduce disparities between neighborhoods that could be magnified by appraiser outlier's bias.

Unconscious biases describe attitudes or stereotypes that affect our understanding, actions, and decisions in an unconscious manner. These unconscious biases are based on associations that our unconscious mind makes over our lifetime that help us make sense of our world and navigate through life.[19] These associations can sometimes be based on harmful racial stereotypes, resulting in unconscious biases related to racial minorities that we may not be aware are operating in our decision-making, even within our professional lives. Specifically, unconscious biases become more prevalent during those times where it is more difficult for us to use our conscious judgement. This can happen for a variety of reasons such as a lack of concrete information to rely on, moments of pressure or fatigue, or in times where we are not able to think twice about our judgements.[20]

Addressing unconscious biases involves both working to bring attention to and change harmful biases, as well as mitigating their role in our decision-making process. Within organizations, leaders can develop policies to help staff members mitigate the presence of unconscious bias within decision-making by creating an environment for greater awareness of biases, and to guard against biased decision-making.[21]

FINDINGS

- Racial disparity between white and black majority neighborhoods in the housing market persists and has grown worse since 2010 it is not explained by income or home size differences.
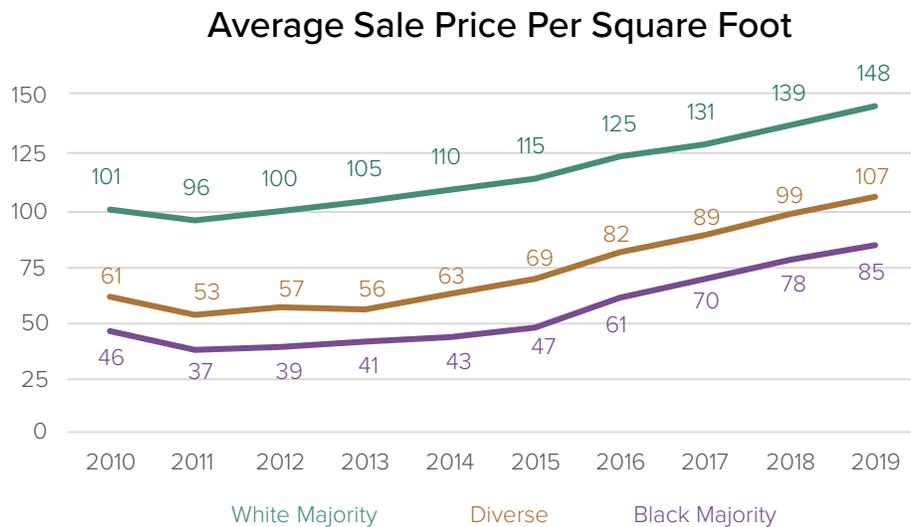 - » Disparity in 2010: $55/sqft
  - » Disparity in 2019: $63/sqft

Average Sale Price Per Square Foot

Figure 7. **Racial Disparity in Home Sale Prices/Square foot**

- Highly segregated white neighborhoods have increased 18% in valuation since 2010.
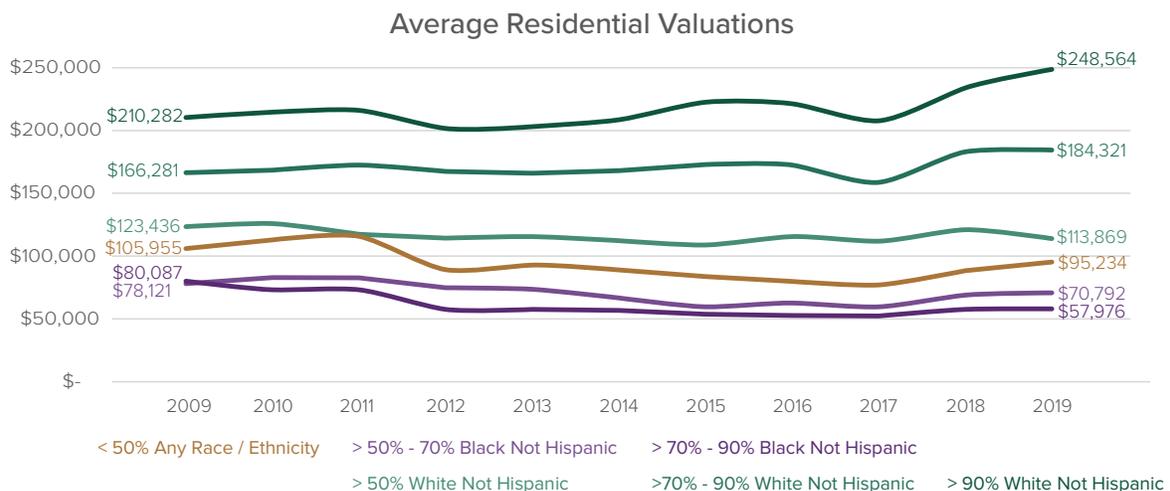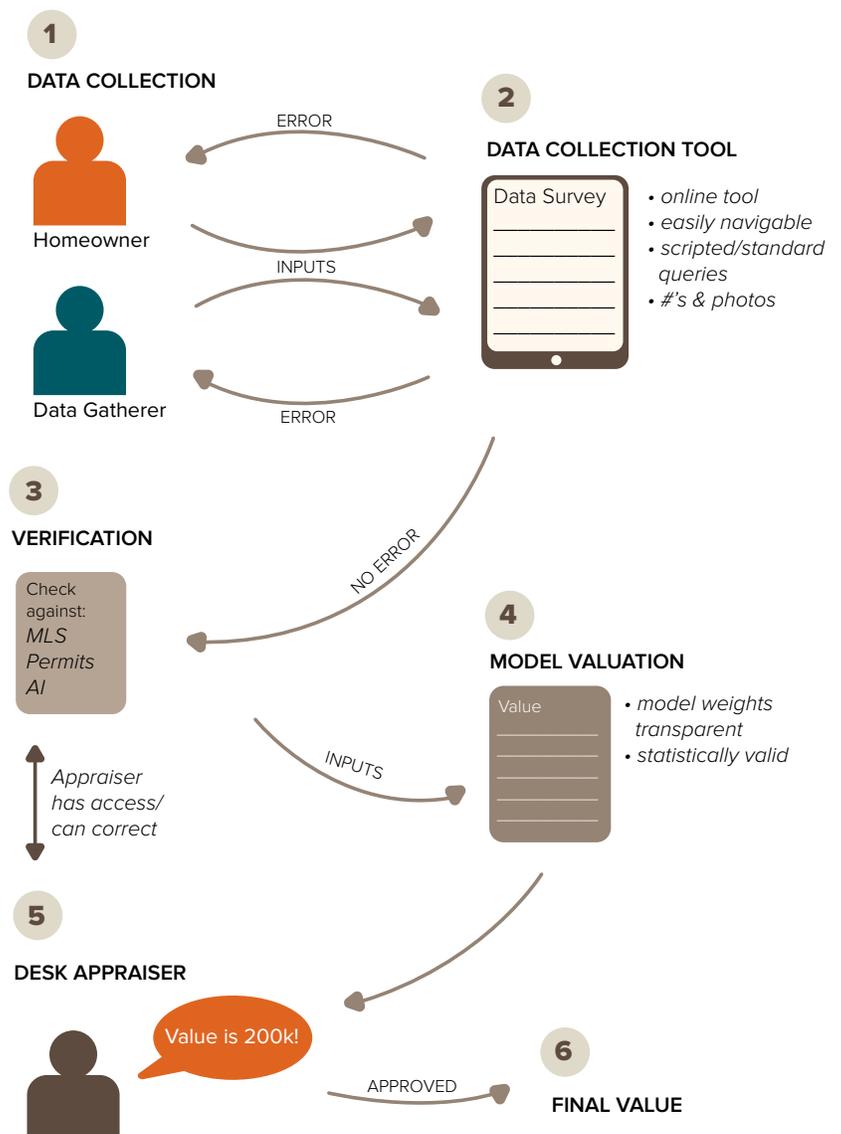- Majority black and diverse neighborhoods have lost value since 2010.

Average Residential Valuations

Figure 8. **Appraisal Valuation**

RECOMMENDATIONS

All recommendations are aimed at eliminating instances of bias in the appraisal process. The first focuses on restructuring the appraisal process into two distinct portions, one with field data gatherers and desk appraisers. The educational requirements of data gathers would be less than those of a property appraiser and could be more diverse to mitigate bias and reflect the communities being evaluated. Additionally, the appraiser would have little knowledge of being in the neighborhoods but is solely looking at photos, and data points to remove additional entry-points for bias.

2.1. Develop a two-tiered system for valuation determination emphasizing desk appraisals.

- Encourage homeowner participation to provide property attributes and then verify using photo-verification and existing data sources.
- Employ data gathers using a computer tablet program that is a simple check the box system with well-defined data variables to remove subjectivity.

1

DATA COLLECTION

Homeowner

Data Gatherer

ERROR

INPUTS

ERROR

2

DATA COLLECTION TOOL

Data Survey

- *online tool*
- *easily navigable*
- *scripted/standard queries*
- *#'s & photos*

NO ERROR

3

VERIFICATION

Check against:
MLS
Permits
AI

Appraiser has access/ can correct

INPUTS

4

MODEL VALUATION

Value

- *model weights transparent*
- *statistically valid*

5

DESK APPRAISER

Value is 200k!

APPROVED

6

FINAL VALUE

2.2.   Mitigate points of entry for bias during the appraisal process.

- Be aware of unconscious bias, you cannot eliminate it but you can reduce incidents where time pressures increase the likelihood of unconscious cognitive processing.
- Time constraints, ambiguous situations, being distracted, and over-confidence in professional experience can increase the likelihood of bias influencing valuations.
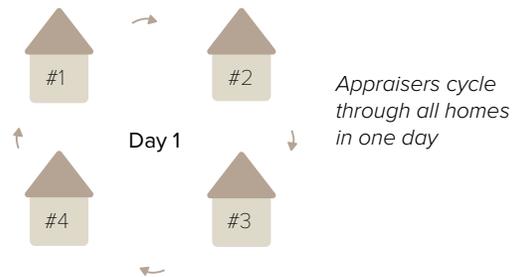
2.3.   Evaluate appraisers for quality assurance by screening for outlier valuations.

- Develop volunteers that have homes in varying communities across Franklin County to evaluate the appraisal valuations of individual appraisers. Appraisers with outlier valuations (particularly in low income, or majority minority communities) can be removed from site appraisals and put to desk appraisals instead.
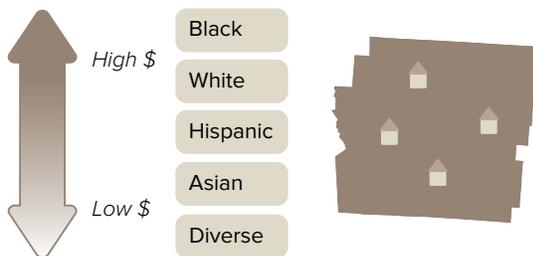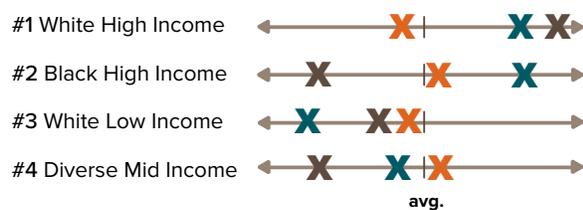
1 VOLUNTEERS

3 APPRAISER TRAINING

#1   #2

Day 1

#4   #3

Appraisers cycle through all homes in one day

2 TEST PROPERTIES IN DIVERSE NEIGHBORHOODS

High $

Low $

Black

White

Hispanic

Asian

Diverse

4 APPRAISER VALUE & VALUATION REVIEW

#1 White High Income

#2 Black High Income

#3 White Low Income

#4 Diverse Mid Income

avg.

5 QUALITY ASSURANCE

Appraiser 1: Near Average ➜ Proceed

Appraiser 2: Racial Disparity ➜ Desk

Appraiser 3: Class Disparity ➜ Desk

Section of Focus 3:
Board of Revision

SECTION OF FOCUS 2: BOARD OF REVISION

Overview

A community-based outreach strategy can ensure underrepresented homeowners can have access to the Board of Revision process. When people lack the ability to meaningfully engage with civic processes, the result can be a further entrenchment of existing inequities and a deepening distrust between residents and the community officials that serve them.[22] In order to ensure that all homeowners and residents are able to interact fully with the Board of Revision process, the County Auditor's Office must build on its existing community information efforts to develop a more substantial outreach strategy aimed at making the process more accessible to traditionally underrepresented groups, gaining a greater understanding of community assets and challenges related to homeownership, and empowering community members to understand and utilize the process to ensure their access to important resources and opportunities while benefiting from the collective community knowledge and wisdom of community members.[23]

Furthermore, for community engagement strategies to better empower residents within the BOR process, engagement opportunities should be used to empower residents to fully engage in the process and play a meaningful role in amending it for greater inclusivity. Activities that aid in this type of empowerment include restorative investment of resources and supports targeted to communities burdened by current and historical structural inequities, connections to networks of empowerment within the appraisal system and beyond, and aiding community members in building empowering coalitions with others dealing with similar circumstances.[24] Ultimately, using community engagement opportunities to empower residents can help build trust and buy-in within for the BOR process by changing the power structure to allow for a more authentic partnership with community members.[25]

FINDINGS

- Only High-Income White neighborhoods have close to an equal representation of homesite cases in the Board of Revision (87% Homesite Owners, 86% of Board of Revision Owner Cases are homesites).
- Moderate and Moderate Low Income Black majority neighborhoods are the most underrepresented for homesite property owners filing a Board of Revision Claim. This suggests that a better outreach strategy is needed in higher income black majority neighborhoods as well as low-income diverse neighborhoods to determine if there is an engagement issue, or the process is not worth pursuing because of the cost of the process.

Owner Initiated Claims	% Homesite	% BOR Homesite	Homesite Deficit
High White	87.2	86.4	-0.8
High Moderate White	86.5	72.0	-14.5
Moderate High White	82.6	74.5	-8.1
Moderate White	75.4	44.7	-30.7
Moderate Diverse	72.6	34.2	-38.4
Moderate Black	**70.2**	**26.3**	**-43.9**
Moderate Low White	70.7	45.4	-25.3
Moderate Low Diverse	57.1	24.7	-32.3
Moderate Low Black	**69.0**	**15.2**	**-53.7**
Low Moderate White	61.4	30.7	-30.7
Low Moderate Diverse	59.4	27.3	-32.1
Low Moderate Black	57.9	21.9	-36.1
Low White	45.0	17.4	-27.5
Low Diverse	53.6	7.3	-46.3
Low Black	40.6	15.4	-25.2
Countywide	72.8	43.8	-29.1

Table 1.   2017 Owner Initiated Claims Homesite vs Not Homesite by Neighborhood Income & Race

- Countywide owners of rental properties, or those who own second homes were overrepresented in the initial Board of Revision claims in both 2014 and 2017. The countywide homesite ownership rate was 74% in 2014, but only 26% of initial board of revision filings were on homesite parcels.
- The disparity was reduced but remains significant in 2017 with 73% of countywide residential parcels considered homesites, but only 44% of initial board of revision filings were on homesite parcels.
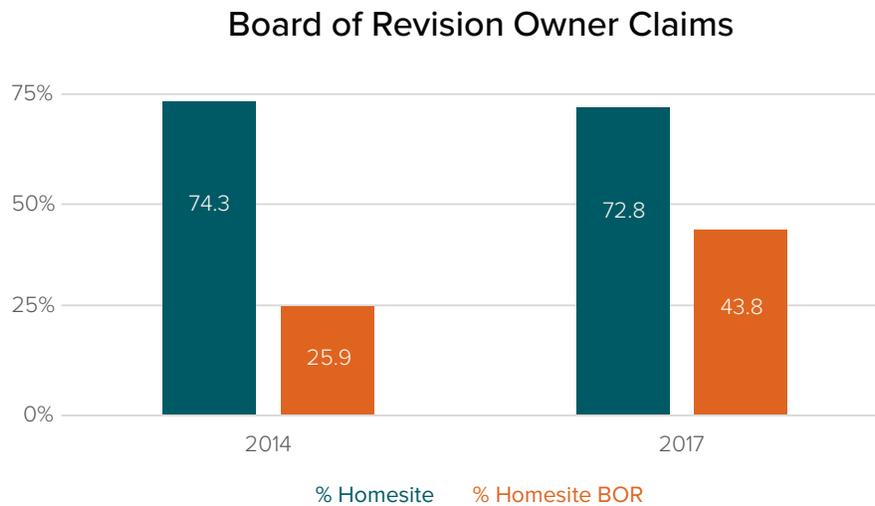
Board of Revision Owner Claims

Figure 9.   **Board of Revision Property Homesite Owner Claim Trends**

FINDINGS (CONT.)

- High Income white homesite property owners received $83,000 in valuation reduction on average which is more than double the county average of all residential parcels.
- 42.7% of all homesite property valuation reduction came from high income white majority neighborhoods despite making up only 12.6% of homesite parcels countywide
- Counter Claims and non-owner-initiated claims have resulted in an average increase in property valuation for non-homesite parcels located in Moderate High income white majority neighborhoods.
- Despite most Board of Revision cases being filed on parcels that are not the owner's primary residence, the average amount of valuation change per unit is smaller than primary residences. This indicates that non-owner filers are not pursuing homeowner parcels to recoup or counter valuation claims.

Total Changes	Total Homesite	Average Homesite	Total Not Homesite	Average Not Homesite
High White	(46,642,900.00)	(82,994.48)	(2,986,700.00)	(21,487.05)
High Moderate White	(12,284,600.00)	(34,998.86)	688,800.00	1,214.81
Moderate High White	(22,189,600.00)	(45,941.20)	(287,900.00)	(710.86)
Moderate White	(12,419,000.00)	(22,296.23)	(8,054,400.00)	(6,684.15)
Moderate Diverse	(1,541,200.00)	(26,122.03)	(2,017,600.00)	(17,244.44)
Moderate Black	(444,400.00)	(18,516.67)	(1,404,000.00)	(21,937.50)
Moderate Low White	(4,085,900.00)	(24,176.92)	(1,546,400.00)	(4,988.39)
Moderate Low Diverse	(601,200.00)	(23,123.08)	(1,320,800.00)	(10,915.70)
Moderate Low Black	(596,500.00)	(22,092.59)	(2,541,400.00)	(16,610.46)
Low Moderate White	(1,938,300.00)	(18,285.85)	(3,981,300.00)	(13,271.00)
Low Moderate Diverse	(230,300.00)	(11,515.00)	(884,300.00)	(15,246.55)
Low Moderate Black	(1,709,300.00)	(19,205.62)	(4,815,900.00)	(11,891.11)
Low White	(1,337,600.00)	(19,108.57)	(6,654,200.00)	(15,297.01)
Low Diverse	(298,600.00)	(27,145.45)	(2,626,300.00)	(16,414.38)
Low Black	(2,726,200.00)	(24,560.36)	(7,228,100.00)	(3,219.64)
Countywide	(109,045,600.00)	(40,917.67)	(45,660,500.00)	(6,831.31)

Table 2.   2017 Board of Revision Valuation Changes

RECOMMENDATIONS

The Board of Revision recommendations listed below are aimed primarily at increasing minoritized participation and empowering minoritized residents through the BOR process. The first two recommendations are therefore aimed at addressing systemic inequalities and eliminating subjectivity and bias through increased participation. The final recommendation is aimed at facilitating the collaborative cross-agency data-sharing necessary to both understand inequalities within the BOR system as well as create new policies and practices to eliminate systemic inequalities.

3.1. Continue to improve community engagement and outreach strategies.
- Outreach to churches and community centers.
- Include grassroots, community leaders to decide placement of mobile outreach centers.
- Grow community partnerships beyond Urban League.
- Include Community & Refugee Services to ensure outreach and engagement strategies include different languages.
- Continue to expand remote options for mediation meetings, using a number of different technologies and community settings.
- Create mechanisms to track effectiveness of community outreach efforts in respect to BOR visibility and resident understanding of processes and supports.

3.2. Resident empowerment.
- Recruit residents of color into a series of working groups aimed at providing policy tools and expertise and include working group input into amendments for BOR process.
- Partner with other educational, philanthropic, and economic partners in order to deepen policy knowledge and implement strategies.
- Consider contracting mediation professionals of color or those who have demonstrated experience or knowledge related to working with communities of color.
- Develop regularized accountability protocols to existing and appropriate community entities within communities of color related to efforts to address racial inequities within the BOR process.

3.3. Ensure BOR Data is in a format to be able to be analyzed for equity characteristics.
- One limitation of the report was that we could only evaluate Board of Revision disparities by looking at neighborhood characteristics. This is insufficient to prove any racial bias. Data on race and ethnicity should be gathered to evaluate racial disparity and bias at an individual level.

Section of Focus 4:
Tax Delinquency

SECTION OF FOCUS 3: TAX DELINQUENCY

Overview

Property tax delinquencies can often result in a property tax foreclosure. Studies have shown that rapid changes in property taxes can negatively impact those on fixed incomes and those with lower incomes, placing them at higher risk of tax foreclosure.[26,27,28] The following recommendations are aimed at ensuring that the most vulnerable Franklin County residents are protected from displacement due to rapidly appreciating property values. The Auditor can work to protect Franklin County homeowners by creating new programs, supporting existing programs, advocating to support legislation that caps annual property tax increases, and collaborating with the Treasurer's Office and Jobs and Family Services to ensure that no Franklin County resident falls through the cracks. Not only will collaborative data-sharing protect residents, it will also facilitate future equity assessments by linking and centralizing key data, making Franklin County a leader in data-informed decision-making in the region.

FINDINGS

- Countywide residential property tax delinquencies rise after every property tax reappraisal.
- The delinquency rate increases become less significant during stronger economic times.
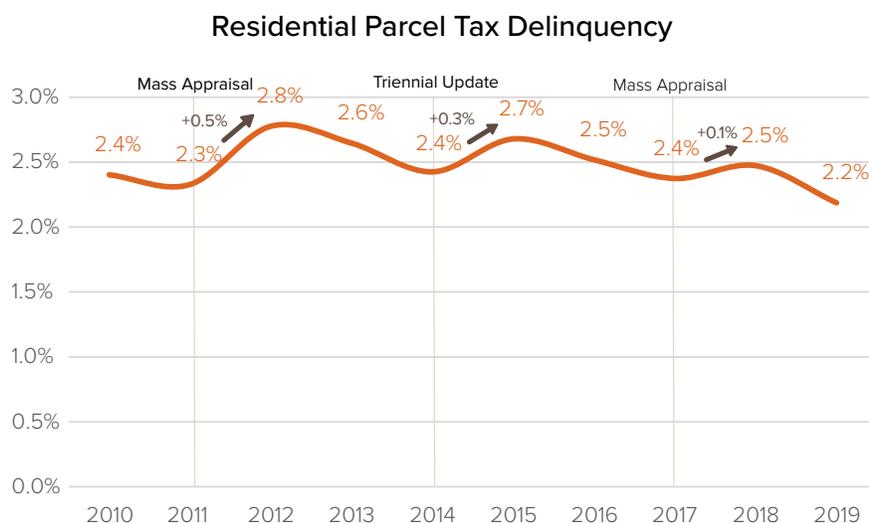
Residential Parcel Tax Delinquency

Figure 10.   Tax Delinquency Rate

- The average property tax delinquency amount in white majority neighborhoods is consistently around twice the amount than black majority neighborhoods.
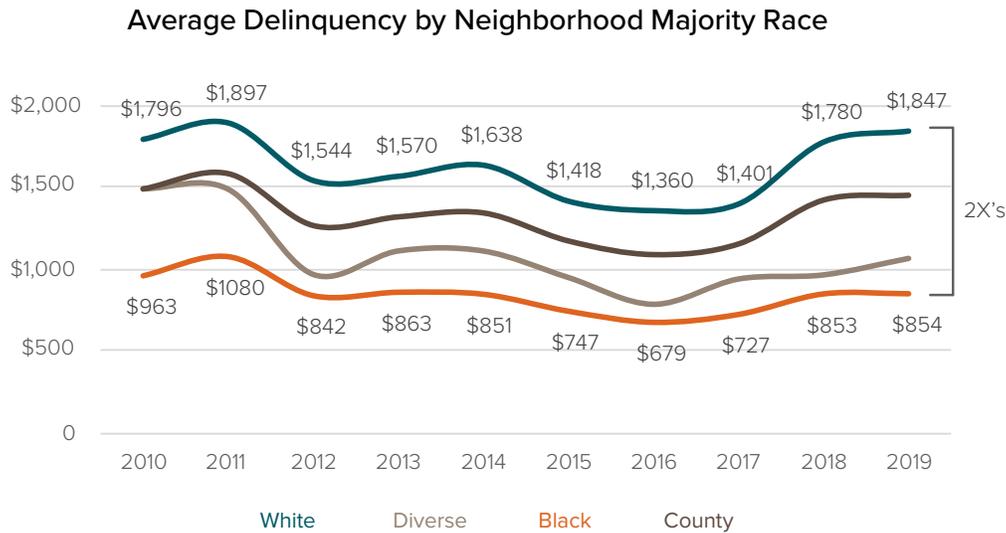
Average Delinquency by Neighborhood Majority Race

Figure 11.   Tax Delinquent Average Amount

RECOMMENDATIONS

All the recommendations for tax delinquency listed below are aimed at addressing systemic inequalities and are intended to target the low-income, seniors, and minoritized populations.

3.1.   Further support and grow the property tax assistance program.
- This program already in existence assists seniors over 60 years of age or older whose income is below 150% of the poverty line for the relevant tax year. The program is donation based and is limited in its ability to assist a larger pool of those in need. Currently, those who are property tax delinquent are not eligible for this program, but the Treasurer's office is working to address this issue. Growing such a program would support more low or fixed income and first-time homeowners who may be slightly behind on their property taxes. In addition, the resource connections offered in the program are valuable to those struggling with their property taxes and could benefit others if the program is expanded to include others on limited income who are slightly behind in their property taxes.

3.2. **Support House Bill 159 which caps property tax increases to reduce the amount of tax delinquency after triennial valuation updates and shock to property owners.**

- This Bill caps property tax increases at 5% per year for homeowners whose incomes are at or below the median income for Franklin County. This bill would provide additional support for residents in rapidly appreciating neighborhoods who may face the sticker shock of valuation growth in assessed values exceeding 10% per year.

3.3. **Collaborate with the treasurer's office to assist the tracking and interventions for those with property tax delinquencies, build database with Jobs & Family Services.**

- As the auditor's office is responsible for the list of property tax delinquent parcels and the countywide tax residential tax delinquency rate rises after each reappraisal, working in partnership with the treasurer's office and Jobs and Family Services can better target interventions to identify at-risk populations and to support struggling homeowners. Additionally, having data agreements and systems that can talk to each other can assist those offering the assistance.

3.4. **Raise awareness during engagements with the public about the STAR Program, once the program ready for participants.**

- The STAR Program is in the process of being created that is designed to help struggling Franklin County residents avoid tax foreclosure by connecting them to resources needed to stave off tax foreclosures. Raising awareness of the program would reduce the likelihood of property tax foreclosures as many facing foreclosure are unaware of the resources available to them.

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For More Information

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