
CITY OF MIAMI
OFFICE OF AUDITOR GENERAL



**AUDIT OF PROPERTY TAX
ASSESSMENT/REVENUE COLLECTIONS**

AUDIT NO. 04-005

Prepared By
Office of Auditor General

Victor I. Igwe, CPA, CIA
Auditor General

**JON GOODMAN, CPA, DEPUTY AUDITOR GENERAL
MELISSA ALI, STAFF AUDITOR**

City of Miami

VICTOR I. IGWE, CPA, CIA
Auditor General



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June 16, 2004

Honorable Members of the
City Commission
City of Miami
3500 Pan American Dr.
Coconut Grove, FL 33133-5504

Re: Audit of Property Tax Assessment/Revenue Collections
Audit No. 04-005

In accordance with the provisions of Section 48 of the City Charter, the Office of Independent Auditor General has performed an audit of Property Tax Assessment/Revenue Collections. Pursuant to Sections 192 through 200, Florida Statutes, the County Property Appraiser assesses the values of all properties within the County; authorizes/grants various exemptions to eligible taxpayers; and the County Tax Collector collects said taxes and remits same to the City.

This audit examined all aspects of the tax assessments, exemptions, collections and remittance processes. The audit covered the period of October 1, 2000, through September 30, 2003, and selected transactions prior and subsequent to this period.

Sincerely,

A handwritten signature in black ink that reads "Victor Igwe".

Victor I. Igwe, CPA, CIA
Auditor General
Office of Auditor General

C: The Honorable Mayor Manuel A. Diaz
Joe Arriola, Chief Administrator/City Manager
Members of the Audit Advisory Committee
Linda M. Haskins, CPA, Chief Financial Officer/Deputy Chief Administrator
Alicia Cuervo-Schreiber, Chief Operating Officer
Larry M. Spring, Chief of Strategic Planning, Budgeting and Performance
Peter W. Korinis, Chief Information Officer
Marie Chiaro, Interim City Attorney
Priscilla A. Thompson, City Clerk
Donald M. Riedel, Director, Office of Citistat
Keith A. Carswell, Director, Economic Development department
J. Scott Simpson, CPA, Director, Finance department
Hector R. Lima, Director, Building department
S. "Pete" Chircut, Treasurer
Rosa D. Brown, Assistant Director, Building department
Neyda M. Galvez, Assistant Director, Information Technology department
Joel Robbins, Miami-Dade County Property Appraiser
Christopher Mazzella, Inspector General, Miami-Dade County Office of the
Inspector General
Audit Documentation File

AUDIT OF PROPERTY TAX ASSESSMENT/REVENUE COLLECTIONS
OCTOBER 1, 2000 THROUGH SEPTEMBER 30, 2003

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AUDIT OF PROPERTY TAX ASSESSMENT/REVENUE COLLECTIONS
OCTOBER 1, 2000 THROUGH SEPTEMBER 30, 2003

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INTRODUCTION

This report details the results of our Audit of Property Tax Assessment/Revenue Collections. Property taxes are the City's largest source of revenue. In Fiscal Year 2003, the City recorded \$166,770,291 in property tax revenue, which represented approximately 33% of the City's total revenue.

Sections 192 through 200, Florida Statutes, provide that the County Property Appraiser assess the value of all property within the County. The taxing authority (such as the City of Miami Commission) sets the millage rate, and the County Tax Collector collects all property taxes from residents of the County and distributes said collections to the various taxing authorities (e.g. Municipalities, School District, County, Special districts). The millage rate is established by the City during its annual budgetary process and is based on projected revenue requirements. One mill is equal to \$1 per \$1,000 of tax assessed property. Section 200.081, Florida Statutes provides certain limits and restrictions on the millage levied by a municipality. Millage levied by the City is designated as either operating or debt service. The County Property Appraiser is charged with the administration of various exemptions from property taxes, such as the Homestead and Senior Exemptions.

According to Miami Dade Property Appraiser (MDPA) records, the 2003 tax assessed value of all taxable property in the City of Miami was \$20.7 billion. Based on City permitting, planning and zoning data, \$12.5 billion in major construction is currently in the construction or planning phase within the City of Miami. This would substantially increase the tax base, resident population, budget, and number of employees of the City. This probable growth elevates the importance of ensuring adequate controls over property tax revenues in order to ensure proper collection of property tax revenues to fund additional services required for an increased resident population.

SCOPE AND OBJECTIVES

This audit was performed pursuant to the authority set forth in Section 48, City of Miami Charter, entitled, “Office of the Independent Auditor General” (OIAG), and was conducted in accordance with the OIAG’s Fiscal Year 2004 Audit Plan. The audit covered the period of October 1, 2000, through September 30, 2003, and selected transactions prior and subsequent to this period. In general, the audit focused on the following objectives:

- Assessed the adequacy of the City’s controls and procedures associated with the assessment and collection of ad valorem (property) taxes.
- Ascertained, on a sample basis, whether properties located in the City of Miami had a proper tax assessed value, whether the assessments reflect all construction or additions to the property, and whether the City’s property tax roll is complete.
- Identified, on a sample basis, any property tax exemptions that were improperly claimed, in order for management to collect corresponding taxes, interest and penalties.
- Determined the propriety and legality of the property tax assessment process, and whether it is compliant with applicable Florida Statutes.

METHODOLOGY

We conducted the audit in accordance with Generally Accepted Government Auditing Standards, issued by the Comptroller General of the United States. The methodology included the following:

- Interviewed and inquired of appropriate City and County personnel, reviewed applicable Florida Statutes, ordinances, and procedures, in order to gain an understanding of the internal controls, assessed control risk, and planned substantive testing.
- Interviewed staff of other local governments to ascertain what issues they have encountered regarding assessment and collection of property taxes.
- Performed analytical review procedures.
- Performed substantive testing consistent with the audit objectives.
- Examined, on a test basis, applicable transactions and records.
- Drew conclusions based on the testing and made corresponding recommendations.

SUMMARY OF AUDIT FINDINGS

MIAMI-DADE PROPERTY APPRAISER'S (MDPA) OFFICE AND CITY OF MIAMI FINANCE DEPARTMENT

PROPERTY TAX EXEMPTIONS.

Chapters 196.002 through 196.32, Florida Statutes, specify the terms and conditions of various property tax exemptions, including the \$25,000 homestead exemption, \$25,000 senior exemption, disability exemptions, widow/widower's exemptions and institutional/governmental exemptions. Qualified owners are required to file their exemption application with the County Property Appraiser by March 1 of the tax year (January 1 through December 31) in order to receive the exemption for that year. Our request for access to certain exemption records and review of other pertinent records disclosed the following exceptions:

- **SCOPE LIMITATION ON PROPERTY TAX EXEMPTIONS.**

We requested but were denied access to the supporting source documents pertaining to a sample of 197 exemptions that were granted to property owners in the City of Miami. The City Attorney indicated that the City's Auditor General should have the right to review the said records, under certain conditions, such as the auditors maintaining the confidentiality of said records. On April 7, 2004, written correspondence from the City Attorney was sent to an Assistant County Attorney, indicating the City Attorney's position. However, on April 20, 2004, we contacted the Assistant Division Director of the MDPA's Office, and he indicated there was no change in the Property Appraiser's position that the aforementioned records are confidential in the hands of the Property Appraiser. Absent MDPA's authorization to review tax exemption records and supporting documentation for properties within the City of Miami boundaries, the City's ability to ensure it is collecting all property taxes it is due, is limited.

- **INAPPROPRIATE HOMESTEAD TAX EXEMPTIONS.**

We extracted from the City's ARPS System report a list of approximately 48,000 properties that were granted homestead exemption during the fiscal year 2002. Our review of said listing disclosed a total of 66 property owners that appeared to have been granted double property tax homestead exemptions. In order to ascertain whether each of the 66 was a case of the same individual inappropriately taking two homestead exemptions, we requested from the Miami-Dade Property Appraiser (MDPA), but were denied access to the appropriate records due to confidentiality relating to the social security numbers of these apparent duplicate exemptions. MDPA, instead, opted to review the applicable records pertinent to the 66 potential duplicate exemptions as noted above. Based on MDPA's review of the said 66 exceptions, MDPA confirmed that 11 exemptions were indeed inappropriate duplicate homestead exemptions. MDPA indicated to us that the other 55 exemptions, which appeared as duplicates on the City's ARPS System report, were not duplicates. Our request to obtain and review the basis for such conclusion was also denied. MDPA back assessed the owners of the 11 properties that received duplicate exemptions, including applicable penalties and interest. As shown on Exhibit I (see page 32), \$24,535.60 in back assessments, penalties and interest for the 11 duplicate exemptions, will accrue to the City as a result of this audit procedure.

**BUILDING, INFORMATION TECHNOLOGY, FINANCE DEPARTMENTS,
AND CITY CLERK'S OFFICE**

**PROCESS OF UPDATING TAX ROLLS TO REFLECT NEW
CONSTRUCTIONS, ADDITIONS, AND ZONING CHANGES.**

Miami Dade Property Appraiser (MDPA) procedures require the various municipalities within the County to communicate new constructions, additions/improvements and/or zoning changes to existing structures, to MDPA to ensure that increases in values of properties are timely recorded on the property tax rolls. Our test of the process of updating the property tax roll to reflect new construction, additions/improvements, and zoning changes, disclosed the following.

- Zoning changes for property within the City of Miami were timely communicated to and received by MDPA.
- The process of communicating certificates of occupancy and building permits to MDPA is generally effective. Backup controls exist at MDPA to help ensure that new construction and additions/improvements that add value to the City's property tax rolls are timely recorded.
- However, in our test of 637 properties that had new construction or additions/improvements completed during the audit period, we noted one new home that was not timely recorded on the property tax roll. On folio number 01031240134411, a certificate of occupancy was issued for a new home on November 7, 2002. Therefore, this should have been reflected on the property tax roll for the 2003 tax year (January 1 through December 31, 2003). Although the value of the land was reflected on the property tax roll, the value of the newly constructed building was not reflected on the property tax roll as of March 2004, when the applicable audit test was performed. According to the MDPA staff, this was not timely recorded due to clerical error. After we brought this exception to

the attention of MDPA staff, they back assessed this property owner \$2,742.66, of which \$1,001.07 is due to the City of Miami.

MIAMI-DADE PROPERTY APPRAISER

TAX ASSESSED VALUES OF PROPERTIES IN CITY OF MIAMI.

Section 193.1142, Florida Statutes, requires each county property appraiser to submit their assessment roll to the State Department of Revenue (DOR) for approval by July 1 of each year. Section 195.096, Florida Statutes, requires DOR to conduct an in-depth review of the assessment rolls of each county, no less than once every two years. Section 195.0985, Florida Statutes, requires DOR to annually conduct and publish ratio studies for each county whereby the assessed value of properties are compared to the sales prices, less selling costs, for qualified properties sold. In order to adjust a property's sales price to reflect selling costs, DOR uses 85% of the sales price in the sales ratio calculation. Further, depending on the type of property sold, DOR considers an assessment to be within an acceptable range if its assessment to adjusted sales ratio is between 90% and 105%.

We analyzed a sample of 30 properties located in the City that were sold in the 2002 tax year. Please see Exhibit II on page 33. We divided the tax assessed value as of January 1, 2003, by the selling price less 15% selling costs to arrive at the adjusted sales ratio. Although the adjusted sales ratio for 6 of the 30 sampled properties reviewed fell below the 90% threshold and 4 of the 30 properties had adjusted sales ratios in excess of 105% upper end of the acceptable range, the overall average sales ratio for the 30 sampled items was 96.12%, which is within the acceptable range as determined by DOR. Finally, our review of the DOR's 2003 Assessment/Sales Ratio by County report, disclosed a statewide average adjusted ratio of 97.7% compared to Miami-Dade County's average of 98.2%.

ECONOMIC DEVELOPMENT DEPARTMENT

AD VALOREM TAX DUE FROM MIAMI ROWING CLUB (MRC).

As reported in Office of Internal Audits report number 01-006, dated November 20, 2000, approximately \$144,000 of ad valorem taxes including interest and penalties was due to the Miami-Dade County Tax Collector from MRC as of November 1, 2000. The report further stated that the City annexed the location of the property (land and building leased to MRC) in 1994, which was located in unincorporated Miami-Dade County at the inception of the lease agreement between the City and MRC. Due to said annexation, a total of \$51,556 of property taxes was due to the City from the County for ad valorem taxes and accrued interest for the land and building located on said property for the years 1995 through 2000. The report recommended and Office of Asset Management (now Economic Development) agreed to resolve this matter. However, our current audit indicated that the \$51,556 of property taxes due to the City from the County for ad valorem taxes is yet to be resolved. Additionally, we noted that MRC currently owes Miami Dade tax collector \$13,217.85 in past due taxes, penalties and interest for said property attributable to 1998 and 2000.

AUDIT FINDINGS AND RECOMMENDATIONS

MIAMI-DADE PROPERTY APPRAISER'S (MDPA) OFFICE AND CITY OF MIAMI FINANCE DEPARTMENT

PROPERTY TAX EXEMPTIONS.

Chapter 196.001, Florida Statutes, requires all real and personal property of persons residing in the State, except those expressly exempt from taxation, to be subject to taxation in the manner provided by law. Chapters 196.002 through 196.32, Florida Statutes, specify the terms and conditions of various property tax exemptions, including the \$25,000 homestead exemption, \$25,000 senior exemption, disability exemptions, widow/widower's exemptions and institutional/governmental exemptions. Qualified owners are required to file their exemption application with the County Property Appraiser by March 1 of the tax year (January 1 through December 31) in order to receive the exemption for that year. Some exemptions require the owner to file every year while others, such as the \$25,000 homestead exemption, require only an initial filing. Subsequent to the initial year the \$25,000 homestead exemption is automatically renewed until the property is sold or no longer the primary residence. In order to be eligible for the \$25,000 homestead exemption, the property must be the primary residence of the owner; therefore, an individual may not claim multiple \$25,000 homestead exemptions.

Sections 196.131 and 196.161, Florida Statutes, prescribe that it is the duty of the owner of any property to notify the Property Appraiser promptly, whenever the use of the property or the status or condition of the owner changes, and/or the exempt status of the property changes. If any owner fails to notify the Property Appraiser and the Property Appraiser determines that the owner was not entitled to receive such exemption for any year within the prior ten years, the owner of the property would be required to pay those taxes that were improperly exempt, plus 15 percent interest per annum, and a penalty of 50 percent of the taxes that were improperly exempt. Our request for access to certain

exemption records and review of other pertinent records disclosed the following exceptions:

- **SCOPE LIMITATION ON PROPERTY TAX EXEMPTIONS.**

In order to test the validity and appropriateness of certain exemptions claimed and granted to City property owners by the MDPA's Office, we requested access to those applications and other supporting records. We requested access to records such as Ad Valorem Tax Exemption Application and Return, Physician's Certificate of Total and Permanent Disability, Letter of Permanent Disability from U.S. Government or Department of Veteran Affairs, and Death Certificates, supporting a sample of 197 exemptions that were granted to property owners in the City of Miami, relative to three separate audit tests. In a written response to our audit inquiry, the Assistant Division Director of the Exemptions Division of MDPA, indicated:

“The City of Miami is requesting to view documents, which legal counsel advises are confidential in the hands of the Property Appraiser. The Miami-Dade County Property Appraiser's Office falls directly under the jurisdiction of the State of Florida Department of Revenue, which is charged with and periodically conducts audits. The Department of Revenue's audits provides for examination of these types of documents to determine compliance. The Property Appraiser's Office cannot make these records available to the City of Miami.”

Upon consultation, the City Attorney indicated that the City's Auditor General should have the right to review the said records, under certain conditions, such as the auditors maintaining the confidentiality of said records. On April 7, 2004, written correspondence from the City Attorney was sent to an Assistant County Attorney, indicating the City Attorney's position. On April 20, 2004, we contacted the Assistant Division Director of MDPA's Office, and he indicated there was no change in the Property Appraiser's position that the aforementioned records are confidential in the hands of the Property Appraiser. Absent MDPA's authorization to review tax exemption records and supporting documentation for

properties within the City of Miami boundaries, the City's ability to ensure it is collecting all property taxes it is due, is limited.

- **INAPPROPRIATE HOMESTEAD TAX EXEMPTIONS.**

We extracted from the City's ARPS System report a list of approximately 48,000 properties that were granted homestead exemption during the fiscal year 2002. Our review of said listing disclosed a total of 66 property owners that appeared to have been granted double property tax homestead exemptions. In order to ascertain whether each of the 66 was a case of the same individual inappropriately taking two homestead exemptions, we requested from the Miami-Dade Property Appraiser (MDPA), but were denied access to the appropriate records due to confidentiality relating to the social security numbers of these apparent duplicate exemptions. MDPA, instead, opted to review the applicable records pertinent to the 66 potential duplicate exemptions as noted above. Based on MDPA's review of the said 66 exceptions, MDPA confirmed that 11 exemptions were indeed inappropriate duplicate homestead exemptions. MDPA indicated to us that the other 55 exemptions, which appeared as duplicates on the report reviewed, were not duplicates. Our request to obtain and review the basis for such conclusion was denied. MDPA back assessed the owners of the 11 properties that received duplicate exemptions, including applicable penalties and interest. As shown on Exhibit I (see page 32), \$24,535.60 in back assessments, penalties and interest for the 11 duplicate exemptions, will accrue to the City as a result of this audit procedure.

In a written response to our audit inquiry, the Assistant Division Director of the Exemptions Division of MDPA indicated that it employs 4 full time exemptions investigators who oversee more than 400,000 parcels with homestead exemptions. It periodically uses various methods, including, anonymous tips, multiple name listings, duplicate social security lists and returned renewal cards, to conduct research and detect wrongful exemptions. However, please note that none of the

11 exemptions that we identified were timely detected by MDPA and we were not provided with any records to substantiate the conclusions relating to the 55 potential duplicates, as noted above.

In response to our recommendation as noted below, the Finance Director stated that his department could only ensure that the 11 inappropriate homestead exempt properties have been properly assessed by MDPA, but that the Finance Department should not follow up as to the collection of assessments and remittance to the City because the County is assigned these responsibilities by Florida Statute. He indicated that the Finance Department has no collection authority over said assessments. Further, the Finance Department relies on the internal controls of MDPA and the County Tax Collector as to remittances made to the City. See pages 14 and 15 for written response. However, please note that Section 27 of the City's Charter, which outlines the duties of the Finance Department, reads: "the director of Finance shall have charge of the department of finance and shall administer the financial affairs of the City, including the keeping and supervision of all accounts, the levy, assessment and collection of revenues, the making and collection of special assessments...." Therefore, we believe it is incumbent on the Finance Department staff to ensure that properties located in the City of Miami are assessed the correct tax levies, and all assessed tax levies due to the City are collected and properly accounted for in the financial statements.

Recommendation

We recommend that the Finance department follow up to ensure the collection and remittance of the \$24,535.60 in back assessments, penalties and interest to the City. We further recommend that Finance department work with the Offices of the City Attorney and Auditor General to determine the costs and benefits of pursuing the ability to have access to the confidential exemption records for future audits and reviews.

Auditee's Response and Action Plan

Please see written responses on pages 14 through 19.

CITY OF MIAMI, FLORIDA
INTER-OFFICE MEMORANDUM

TO: Victor Igwe, Auditor General

DATE: June 9, 2004

FILE:

SUBJECT: Property Tax Audit

FROM: Scott Simpson, Finance Director

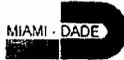
REFERENCES: Inappropriate Homestead
Tax Exemptions

ENCLOSURES:

Finance Department Response and Action Plan:

The Finance Department can insure that the eleven exceptions mentioned in the Auditor General's report referenced above have been properly assessed by MDPA; however, follow-up action such as reviewing payment status on-line (as suggested by the Auditor General's Staff) would provide no value as to the proper collection or remittance to the City by MDPA, since the Finance Department can not affect a change in payment status by the taxpayer. By Florida Statute, MDPA is the agent assigned to assess, collect and properly remit tax assessments, penalties and interests imposed on the taxpayers of the City of Miami and remit them accordingly. The Finance Department relies on the internal controls of MDPA as to the remittances made. The Finance Department has no collection authority over such assessments; collection efforts are enforced by MDPA by billing the taxpayer and/or imposing liens on the property if not paid. MDPA subsequently remits the portion due to the City once it has been received by the taxpayer or upon sale of property and enforcement of the lien. Therefore, follow-up action on the part of the Finance Department could never change the status and would be a futile effort. Please note however, the Finance Department records in the CAFR all amounts due to the City from MDPA in order to fairly present the City's assets as of the end of the fiscal year.

The Finance Department will be willing to work with the Offices of the City Attorney and the Auditor General to determine the costs and benefits of pursuing the ability to have access to the confidential exemption records for future audits and reviews. Additionally, the Finance Department, in conjunction with the City Attorney and Auditor General would like to explore other available resources to ensure the proper application of the Homestead Exemption and capture duplicates that are sure to exist.



MIAMI-DADE COUNTY
DEPARTMENT OF PROPERTY APPRAISAL
EXEMPTIONS DIVISION



March 17, 2004

Fredenell Honeywell, CPA
Senior Staff Auditor
City of Miami
444 SW 2 AVE Suite 715
Miami FL 33130-1910

Dear Ms. Honeywell:

The Miami-Dade County Property Appraiser's office maintains an ongoing investigations unit with four full time investigators overseeing 400,000 + parcels with Homestead exemption. This unit researched, examined, and inspected approximately 800 properties during 2003. To date, this unit has issued liens totaling over \$4.1million in revenue recovery since the fall 1998. The investigation unit employs multiple tools and reports to research exempt properties. The following is a list of reports and leads used frequently during investigations:

1. Anonymous tips
2. Multiple name listing
3. Duplicate social security list from the State
4. Internal property follow up reports
5. Returned Renewal cards
6. Mailing/property address audits

The City of Miami has requested and received non-confidential documents in possession of the Property Appraiser's Office. As a result, the City of Miami has cited some specific findings as outlined in a letter dated February 25, 2004.

Item 1

Specifically, Item 1 cites 6 out of 66 persons were found to have double homestead exemptions. The criteria used on this list was similar to one already employed by the Property Appraiser's Office in that name matches are used to examine the roll periodically.



MIAMI-DADE COUNTY
DEPARTMENT OF PROPERTY APPRAISAL
EXEMPTIONS DIVISION



Item 2a

In granting a Homestead exemption there are a list of items the Property Appraiser may use to determine eligibility per section 196.015, Florida Statutes. These items are:

196.015 Permanent residency; factual determination by property appraiser.--

Intention to establish a permanent residence in this state is a factual determination to be made, in the first instance, by the property appraiser. Although any one factor is not conclusive of the establishment or nonestablishment of permanent residence, the following are relevant factors that may be considered by the property appraiser in making his or her determination as to the intent of a person claiming a homestead exemption to establish a permanent residence in this state:

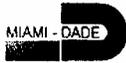
- (1) Formal declarations of the applicant.
- (2) Informal statements of the applicant.
- (3) The place of employment of the applicant.
- (4) The previous permanent residency by the applicant in a state other than Florida or in another country and the date non-Florida residency was terminated.
- (5) The place where the applicant is registered to vote.
- (6) The place of issuance of a driver's license to the applicant.
- (7) The place of issuance of a license tag on any motor vehicle owned by the applicant.
- (8) The address as listed on federal income tax returns filed by the applicant.
- (9) The previous filing of Florida intangible tax returns by the applicant.

History.--s. 2, ch. 81-219; s. 990, ch. 95-147.

For application 01-4121-194-0840 Ms. Shatz's Homestead Exemption was granted based on a moving van receipt, which clearly indicated she moved to the subject property prior to January 1, 1999. The moving van receipt falls under the first consideration, "formal declarations of the applicant" and therefore the application was granted.

Item 2b

For application 01-4138-003-1400 Ms. Decado's application noted a green card which is used to determine US residency not Florida residency. The application also denotes a Florida Drivers license and school records to establish Florida residency. The second item, the Childs School records, also fall under applicant's formal declarations.



MIAMI-DADE COUNTY
DEPARTMENT OF PROPERTY APPRAISAL
EXEMPTIONS DIVISION



Item 2c

For application 01-4139-038-0570 Mr. Pepping's application was granted based on a Florida Drivers License. Section 196.015, in fact, does not state that two proofs are required for consideration in determination of permanent residency.

Item 2d

For application 01-3231-048-0467 Mr. Latterner's application was granted based on a Florida Driver's License. Initial search of records did indicate the drivers license section as being blank, however, a valid Florida license is held Mr. Latterner.

Item 3

For application 01-4207-001-0880 Ms. Lopez applied for Homestead and widow exemptions in 1999. The homestead exemption portion of this application was granted accordingly but the widow exemption was not. Further research also determined that this was in fact an error in processing the application. It should also be noted that this application was processed under a system no longer in use, which relied entirely on manual processing from posting to verification. The new system utilizes a combination of manual and computer based checks no longer relying solely on a single person to process.

In the final paragraph, The City of Miami is requesting to view documents, which legal counsel advises are confidential in the hands of the Property Appraiser. The Miami-Dade County Property Appraiser's Office falls directly under the jurisdiction of the State of Florida Department of Revenue, which is charged with and periodically conducts audits. The Department of Revenue's audits provides for examination of these types of documents to determine compliance. The Property Appraiser's Office cannot make these records available to the City of Miami.

Sincerely,

Michael J. Postell
Assistant Division Director, *Exemptions*
Miami-Dade County Property Appraisal

Cc: Joel Robbins, Property Appraiser
Herbert Parlato, Deputy Property Appraiser
Jim Kracht, Assistant County Attorney



MEMORANDUM

Miami-Dade County Property Appraisal

TO: Jon Goodman, CPA
Deputy Auditor General
City of Miami

FROM: Michael J. Postell
Assistant Division Director, *Exemptions*

SUBJECT: City of Miami Letter of Understanding Dated May 25, 2004

DATE: May 26, 2004

CC: Herbert Parlato
Deputy Property Appraiser

In response to your letter dated May 25, 2004 you have asked to confirm your analysis of revenue recovery for the city of Miami based on 11 actual violations out of a possible 66 improper homestead exemptions you forwarded previously. I have attached a spreadsheet, which indicates the city's recovery is \$23,28685. This analysis differs from the one you provided for the following reasons:

1. Folio 01-3127-012-0180 was not included in your analysis, which also encompasses penalties and interest.
2. Taxes due for folio 01-3133-024-0841 were misstated for 1997, 1998, 1999, 2000, 2001, 2002, and 2003.
3. Taxes for folio 01-3231-048-0428 were misstated for 2002 and 2003.
4. Taxes for folio 01-3230-046-0190 were misstated for 2002 and 2003.
5. Penalties and interest do not attach to folios 01-3133-024-0841 and 01-3127-012-0180.

There is also a discrepancy between the folios identified on your spreadsheet and my attachment. Please note that the correct violation folios are incorporated in our analysis.

**BUILDING, INFORMATION TECHNOLOGY, FINANCE DEPARTMENTS,
AND CITY CLERK'S OFFICE**

**PROCESS OF UPDATING TAX ROLLS TO REFLECT NEW
CONSTRUCTIONS, ADDITIONS, AND ZONING CHANGES.**

Miami Dade Property Appraiser (MDPA) procedures require the various municipalities within the County to communicate new constructions, additions/improvements and/or zoning changes to existing structures, to MDPA to ensure that increases in values of properties are timely recorded on the property tax rolls. Each month, the City of Miami Information Technology department e-mails files of certificates of occupancy and building permits to the MDPA in order to communicate new construction and additions/improvements. Also, the City Clerk's Office mails (return receipt) to the MDPA any zoning changes for property within the City. In addition to these regular actions by the City, the MDPA has other backup controls to ensure that new construction, additions/improvements and zoning changes that would increase the value of the City's property tax rolls, are timely recorded on the property tax rolls. These back up procedures include periodic site visits and canvassing of neighborhoods by MDPA inspectors. Our testing of the process of updating the property tax roll to reflect new construction, additions/improvements, and zoning changes, yielded the following.

- Zoning changes for property within the City of Miami were timely communicated to and received by MDPA.
- The process of communicating certificates of occupancy and building permits to MDPA is generally effective. Backup controls exist at MDPA to help ensure that new construction and additions/improvements that add value to the City's property tax rolls are timely recorded.
- However, in our test of 637 properties that had new construction or additions/improvements completed during the audit period, we noted one new home that was not timely recorded on the property tax roll. On folio number

01031240134411, a certificate of occupancy was issued for a new home on November 7, 2002. Therefore, this should have been reflected on the property tax roll for the 2003 tax year (January 1 through December 31, 2003). Although the value of the land was reflected on the property tax roll, the value of the newly constructed building was not reflected on the property tax roll as of March 2004 when the applicable audit test was performed. According to the MDPA staff, this was not timely recorded due to clerical error. After we brought this exception to the attention of MDPA staff, they back assessed this property owner \$2,742.66, of which \$1,001.07 is due to the City of Miami.

In response to our recommendation as noted below, the Finance Director stated that his department could only ensure that the exception noted with property folio number 01031240134411 has been properly assessed by MDPA, but that the Finance Department should not follow up as to the collection of assessment and remittance to the City because the County is assigned these responsibilities by Florida Statute. He indicated that the Finance Department has no collection authority over said assessments. Further, the Finance Department relies on the internal controls of MDPA and the County Tax Collector as to remittances made to the City. See pages 23 and 24 for written response. However, please note that Section 27 of the City's Charter, which outlines the duties of the Finance Department, reads: "the director of Finance shall have charge of the department of finance and shall administer the financial affairs of the City, including the keeping and supervision of all accounts, the levy, assessment and collection of revenues, the making and collection of special assessments...." Therefore, we believe it is incumbent on the Finance Department staff to ensure that properties located in the City of Miami are assessed the correct tax levies, and all assessed tax levies due to the City are collected and properly accounted for on the financial statements.

Recommendation

We recommend that the Finance department follow up to ensure the collection and remittance of the \$1,001.07 in back assessments as identified above, to the City.

Auditee's Response and Action Plan

Please see written response on pages 23 and 24.

CITY OF MIAMI, FLORIDA
INTER-OFFICE MEMORANDUM

TO: Victor Igwe, Auditor General

DATE: June 9, 2004

FILE:

SUBJECT: Property Tax Audit

FROM: Scott Simpson, Finance Director

REFERENCES: Process of updating tax rolls to reflect new constructions, additions, and zoning changes

ENCLOSURES:

Finance Department Response and Action Plan:

The Finance Department can insure that the exception mentioned in the Auditor General's report referenced above has been properly assessed by MDPA; however, follow-up action such as reviewing payment status on-line (as suggested by the Auditor General's Staff) would provide no value as to the proper collection or remittance to the City by MDPA, since the Finance Department can not affect a change in payment status by the taxpayer. By Florida Statute, MDPA is the agent assigned to assess, collect and properly remit tax assessments, penalties and interests imposed on the taxpayers of the City of Miami and remit them accordingly. The Finance Department relies on the internal controls of MDPA as to the remittances made. The Finance Department has no collection authority over such assessments; collection efforts are enforced by MDPA by billing the taxpayer and/or imposing liens on the property if not paid. MDPA subsequently remits the portion due to the City once it has been received by the taxpayer or upon sale of property and enforcement of the lien. Therefore, follow-up action on the part of the Finance Department could never change the status and would be a futile effort. Please note however, the Finance Department records in the CAFR all amounts due to the

City from MDPA in order to fairly present the City's assets as of the end of the fiscal year.

MIAMI-DADE PROPERTY APPRAISER

TAX ASSESSED VALUES OF PROPERTIES IN CITY OF MIAMI.

Sections 193.011 and 193.023, Florida Statutes, prescribe requirements for county property appraisers to assess all real property in the county and provide that the property appraiser shall take into consideration the following factors:

- The present cash value of the property.
- The highest and best use for which the property can be expected to be put in the immediate future and the present use.
- The location of said property.
- The size of said property.
- The cost of said property and the present replacement value of any improvements thereon.
- The condition of said property.
- The income from said property.
- The net proceeds of the sale of the property.

Section 193.1142, Florida Statutes, requires each county property appraiser to submit their assessment roll to the State Department of Revenue (DOR) for approval by July 1 of each year. Section 195.096, Florida Statutes, requires DOR to conduct an in-depth review of the assessment rolls of each county, no less than once every two years. Section 195.0985, Florida Statutes, requires DOR to annually conduct and publish ratio studies for each county whereby the assessed value of properties are compared to the sales prices, less selling costs, for qualified properties sold. In order to adjust a property's sales price to reflect selling costs, DOR uses 85% of the sales price in the sales ratio calculation. Further, depending on the type of property sold, DOR considers an assessment to be within an acceptable range if its assessment to adjusted sales ratio is between 90% and 105%.

In order to ascertain whether properties located in the City of Miami were properly valued, we selected a sample of 30 properties located in the City that were sold in the 2002 tax year. Please see Exhibit II on page 33. We divided the tax assessed value as of January 1, 2003, by the selling price less 15% selling costs to arrive at the adjusted sales ratio. Although the adjusted sales ratio for 6 of the 30 sampled properties reviewed fell below the 90% threshold and 4 of the 30 properties had adjusted sales ratios in excess of 105% upper end of the acceptable range, the overall average sales ratio for the 30 sampled items was 96.12%, which is within the acceptable range as determined by DOR.

Also, we obtained and reviewed DOR's 2003 In-Depth Study report, which is an in-depth statistical analysis of a sample of several of the seven stratum (or property types) in Miami Dade County for the 2003 tax year. The DOR in-depth analysis calculates the adjusted sales ratio for all qualified sales, which are generally sales that were an arm's length transaction. The DOR's 2003 In-Depth Study report for 2003 disclosed that all of the stratum analyzed/tested indicated an average adjusted sales ratio that is within the acceptable range of 90% to 105%. Finally, our review of the DOR's 2003 Assessment/Sales Ratio by County report, disclosed a statewide average adjusted ratio of 97.7% compared to Miami-Dade County's average of 98.2%.

Based on our test of 30 properties, the DOR's required approval of each county's tax roll every year, the DOR's in-depth analysis/review of the assessment rolls of each county every two years (of which, as indicated above, the latest such review was for the 2003 tax year), and the DOR's published 2003 Assessment/Sales Ratio by County report, it appears that there are adequate controls and procedures in place, particularly at the State and County levels, to ensure that aggregate assessments for real property within the City of Miami, are sufficiently valued in accordance with applicable Florida Statutes.

Recommendation

None.

Auditee's Response and Action Plan

In response to the 6 of the 30 sampled properties for which adjusted sales ratio fell below the 90% threshold, the Assistant Chief, Information Services, Miami-Dade Property Appraiser, stated that there are variations in selling prices due to motivations of the market participants, differences in location, architectural design, condition, financing, etc. and one can plainly see why mass appraisal accuracy must be measured with a great deal of care. Please see entire text of his written response on page 28.

-----Original Message-----

From: Rooney, David (PA)

Sent: Monday, June 07, 2004 10:55 AM

To: 'Ali, Melissa'; Goodman, Jon

Cc: Robbins, Joel W. (PA); Parlato, Herbert (PA); Jacobs, Frank (PA)

Subject: RE: Folio #s for Audit

In response to your request for information regarding 6 properties of 30 reviewed and sold in 2002. As you have indicated, your sampling produced average levels of assessment in excess of 96% which is well above the minimum threshold (90%) required for tax roll approval by the Florida Department of Revenue. Typically averages involve observations with ratios above and below the indicated mean. The distance from the mean (median) or dispersion reflected by the observed ratios can be greatly affected by the variation in property characteristics. Consequently, the Florida Department of Revenue employs measures of dispersion or variability which relate to the uniformity of the level of assessment ratios. Further, in an effort to increase representativeness, the Florida Department of Revenue stratifies samples by property type and value to properly measure the level of assessment and uniformity of a tax roll. From your sample you have included in your 6 properties: a 9th floor residential condominium unit constructed in 2001; a 1936 warehouse located near NW 12th Ave; and a 1925 residence in Coconut Grove. It is clear that your sampling did not include any attempt at stratification.

The real estate market has long been described as an "imperfect" market because it is made up of many individual properties, each unique in some way, and market participants who are not always equally informed or rational. In other words, in a hypothetical sample where all properties were essentially the same, there would be variations in selling prices due to motivations of the market participants. Add to those variations, differences in location, architectural design, condition, financing, etc. and one can plainly see why mass appraisal accuracy must be measured with a great deal of care.

With all due respect, for the reasons cited, utilizing a sample of 30 unstratified properties to measure the level of assessment for the entire City of Miami tax roll is statistically unsound. There is a general relationship between the accuracy of a statistical study and the number of observations sampled from the population. The larger the sample, the more accurate the results will be. In this case, the small, unstratified sample has produced what may amount to nothing more than 6 statistical outliers.

It appears that your conclusion as to the adequacy of the controls represented by the Florida Department of Revenue oversight responsibilities is well based and should be sufficient to satisfy your client.

Sincerely,

David Rooney

Assistant Chief, Information Services
Miami-Dade County Property Appraiser
305-375-3829
gtr@miamidade.gov

ECONOMIC DEVELOPMENT DEPARTMENT

AD VALOREM TAX DUE FROM MIAMI ROWING CLUB.

As reported in Office of Internal Audits report number 01-006, dated November 20, 2000, the property located at 3601 Rickenbacker Causeway, in Miami, and owned by the City of Miami, was leased to the Miami Rowing Club (MRC) from December 1980 through December 2000. There was a dispute as to whether the MRC's activities for all or part of the period 1985 through 2000 were exempt from property taxes under Internal Revenue Service Code and applicable case law. Report number 01-006, dated November 20, 2000, disclosed that approximately \$144,000 of ad valorem taxes including interest and penalties was due to the Miami-Dade County Tax Collector from MRC as of November 1, 2000. The report further stated that the City annexed the location of the property (land and building leased to MRC) in 1994, which was located in unincorporated Miami-Dade County at the inception of the lease agreement between the City and MRC. Due to said annexation, a total of \$51,556 of property taxes was due to the City from the County for ad valorem taxes and accrued interest for the land and building located on said property for the years 1995 through 2000.

The report recommended and Office of Asset Management (now Economic Development) agreed that the Office of Asset Management would attempt to resolve this issue with MRC if the lease was renegotiated or request the assessments to be waived by Miami Dade County and other government entities. However, rather than renegotiating the lease with MRC, the City entered into a management agreement with Barry University for certain academic programs for the period July 2001 through December 2003. As allowed in the Agreement, Barry University entered into a professional service agreement which allowed MRC to use a portion of the said property. At the conclusion of the management agreement, Barry University opted to vacate the said property in favor of another location. MRC stayed on the property and the City Commission passed Resolution number 04-00150, dated April 4, 2004, authorizing the City Manager to execute a revocable license agreement with Miami Rowing and Watersports Center (the

new name for MRC), the licensee, to occupy and use approximately 1.03 acres of City Owned property located at 3601 Rickenbacker Causeway. The agreement provides for a one year term to commence on the effective date with an option to extend for five additional one year terms. The licensee shall pay the City an initial use fee not to exceed \$500 per month, and 12% of monthly gross revenues.

On April 30, 2004, the City's Economic Development (ED) department sent a letter to the Miami Rowing and Watersports Center (MRWC) indicating that the City had received, subsequent to the City Commission's approval of the Resolution 04-00150, a copy of a Final Summary Judgment dated April 27, 2001, from Miami-Dade County Finance Department, Tax Collection Division, against Miami Rowing Club, Inc. for failure to pay prior years' ad valorem taxes. This letter sent by the ED department provides that MRWC must resolve this ad valorem tax judgment and any other past due ad valorem taxes by no later than May 31, 2004, in order for the revocable license agreement to be executed.

Based on Miami Dade Property Appraiser's records and discussions with the Assistant Property Appraiser, MRC currently owes Miami Dade tax collector \$13,217.85 in past due taxes, penalties and interest for said property attributable to 1998 and 2000.

Recommendation

We recommend that, prior to executing the said revocable license agreement, the Economic Development department consult with the City Attorney's Office to ensure that the above noted past due tax balance of \$13,217.85 is paid to the County. Additionally, we recommend that the \$51,556 of property taxes that is due to the City as noted above are resolved, and that no liability will accrue to the City.

Auditee's Response and Action Plan

The Director of the Economic Development department via an email stated: “As indicated in your review, the Department of Economic Development has been pursuing the recommended course of action which includes consultation with the City Attorney’s Office and the Finance department. Prior to executing the revocable license agreement, the issues relative to the taxes will be resolved with no liability accruing to the City and, to that extent, the MRWC has been assisting in this endeavor.”

Exhibit I
City of Miami
Schedule of Back Assessments for Duplicate Homestead Exemptions
October 1, 2000, Through September 30, 2003

City of Miami		Tax Years										Total Due by Folio #
		1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	
Folio #s (Without Penalty & Interest)	01-4140-026-1840									\$1,768.85	\$1,723.94	\$3,492.79
	01-3230-054-0130									\$1,248.04	\$2,188.79	\$3,436.83
	01-3230-046-0190									\$2,726.90	\$4,539.23	\$7,266.13
	01-3231-048-0428									\$1,091.34	\$1,087.52	\$2,178.86
	01-3218-053-0100									\$4,714.87	\$4,730.19	\$9,445.06
	01-4128-011-0010									\$670.52	\$672.96	\$1,343.48
	01-3136-066-0250				\$498.24	\$422.01	\$398.61	\$386.66	\$381.81	\$378.70	\$380.07	\$2,846.10
	01-4122-011-0430						\$857.41	\$930.88	\$1,156.48	\$1,119.70	\$1,740.08	\$5,804.55
	01-3133-024-0840	\$777.77	\$768.21	\$759.10	\$1,913.74	\$1,929.59	\$1,857.09	\$1,958.42	\$2,145.55	\$2,455.48	\$2,631.91	\$17,196.86
	01-4116-023-1631							\$684.63	\$1,683.08	\$2,581.82	\$3,415.63	\$8,365.16
	<i>Subtotal A (by year)</i>	<i>\$777.77</i>	<i>\$768.21</i>	<i>\$759.10</i>	<i>\$2,411.98</i>	<i>\$2,351.60</i>	<i>\$3,113.11</i>	<i>\$3,960.59</i>	<i>\$5,366.92</i>	<i>\$18,756.22</i>	<i>\$23,110.32</i>	<i>\$61,375.82</i>
Folio #s (With Penalty & Interest)	01-3127-012-0180									\$1,172.74	\$1,380.94	
	<i>Interest- 19.3642%</i>										\$494.50	
	<i>Penalty</i>									\$586.39	\$690.51	
	<i>Subtotal B (by year)</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$1,759.13</i>	<i>\$2,565.95</i>	<i>\$4,325.08</i>
	<i>Total Due (A + B)</i>	<i>\$777.77</i>	<i>\$768.21</i>	<i>\$759.10</i>	<i>\$2,411.98</i>	<i>\$2,351.60</i>	<i>\$3,113.11</i>	<i>\$3,960.59</i>	<i>\$5,366.92</i>	<i>\$20,515.35</i>	<i>\$25,676.27</i>	<i>\$65,700.90</i>
	<i>**City of Miami Percentage</i>	<i>37.63%</i>	<i>38.09%</i>	<i>38.55%</i>	<i>38.40%</i>	<i>39.45%</i>	<i>38.61%</i>	<i>37.52%</i>	<i>37.77%</i>	<i>37.54%</i>	<i>36.56%</i>	
	<i>Portion due to the City (by year)</i>	<i>\$292.67</i>	<i>\$292.61</i>	<i>\$292.63</i>	<i>\$926.20</i>	<i>\$927.71</i>	<i>\$1,201.97</i>	<i>\$1,486.01</i>	<i>\$2,027.09</i>	<i>\$7,701.46</i>	<i>\$9,387.24</i>	<i>\$24,535.60</i>

Exhibit II

City of Miami
Schedule of Assessments to Sales Ratios
October 1, 2000, Through September 30, 2003

Sales Ratio Schedule								
Sample #	Type of Property	Folio #	2003 Assessed Value	2002 Sales Price	Sales Ratio	85% of Sales Price	Revised Sales Ratio	Assessed Value above Threshold of 90% of 85%
1	Condo/Coop	01-4140-032-1180	\$294,600.00	\$335,000.00	87.94%	\$284,750.00	103.46%	Yes
2	Condo/Coop	01-4139-031-0900	\$337,050.00	\$410,000.00	82.21%	\$348,500.00	96.71%	Yes
3	Condo/Coop	01-4121-216-1200	\$373,440.00	\$500,000.00	74.69%	\$425,000.00	87.87%	No
4	Condo/Coop	01-4206-062-0630	\$408,720.00	\$508,000.00	80.46%	\$431,800.00	94.65%	Yes
5	Condo/Coop	01-4139-055-1190	\$498,170.00	\$639,000.00	77.96%	\$543,150.00	91.72%	Yes
6	Condo/Coop	01-4121-231-0710	\$520,250.00	\$640,000.00	81.29%	\$544,000.00	95.63%	Yes
7	Single Family Residence	01-3135-027-1260	\$357,618.00	\$390,000.00	91.70%	\$331,500.00	107.88%	Yes
8	Single Family Residence	01-4139-001-0440	\$354,429.00	\$410,000.00	86.45%	\$348,500.00	101.70%	Yes
9	Single Family Residence	01-4115-015-0310	\$368,428.00	\$415,000.00	88.78%	\$352,750.00	104.44%	Yes
10	Single Family Residence	01-4138-001-1190	\$334,440.00	\$435,000.00	76.88%	\$369,750.00	90.45%	Yes
11	Single Family Residence	01-3218-036-0490	\$291,921.00	\$450,000.00	64.87%	\$382,500.00	76.32%	No
12	Single Family Residence	01-4114-007-0400	\$419,647.00	\$450,000.00	93.25%	\$382,500.00	109.71%	Yes
13	Single Family Residence	01-4115-038-0210	\$407,198.00	\$490,000.00	83.10%	\$416,500.00	97.77%	Yes
14	Single Family Residence	01-4114-006-0120	\$406,917.00	\$495,000.00	82.21%	\$420,750.00	96.71%	Yes
15	Single Family Residence	01-4115-024-0490	\$440,786.00	\$520,000.00	84.77%	\$442,000.00	99.73%	Yes
16	Single Family Residence	01-4114-010-0350	\$442,508.00	\$542,333.00	81.59%	\$460,983.05	95.99%	Yes
17	Single Family Residence	01-4138-001-5520	\$340,500.00	\$575,000.00	59.22%	\$488,750.00	69.67%	No
18	Single Family Residence	01-3219-008-1430	\$508,104.00	\$590,000.00	86.12%	\$501,500.00	101.32%	Yes
19	Single Family Residence	01-4139-001-1080	\$495,290.00	\$615,000.00	80.53%	\$522,750.00	94.75%	Yes
20	Single Family Residence	01-4114-010-0780	\$645,047.00	\$720,000.00	89.59%	\$612,000.00	105.40%	Yes
21	Single Family Residence	01-4115-023-0260	\$579,688.00	\$725,000.00	79.96%	\$616,250.00	94.07%	Yes
22	Single Family Residence	01-4139-001-0350	\$579,402.00	\$735,000.00	78.83%	\$624,750.00	92.74%	Yes
23	Single Family Residence	01-4115-011-0080	\$543,367.00	\$825,000.00	65.86%	\$701,250.00	77.49%	No
24	Single Family Residence	01-4140-031-0030	\$810,765.00	\$1,000,000.00	81.08%	\$850,000.00	95.38%	Yes
25	Multi-Family Residence	01-4115-039-0020	\$327,699.00	\$449,000.00	72.98%	\$381,650.00	85.86%	No
26	Multi-Family Residence	01-4139-001-0260	\$1,440,000.00	\$1,650,000.00	87.27%	\$1,402,500.00	102.67%	Yes
27	Multi-Family Residence	01-3135-004-0310	\$1,597,500.00	\$1,775,000.00	90.00%	\$1,508,750.00	105.88%	Yes
28	Non-Residential	01-3126-045-0080	\$225,373.00	\$350,000.00	64.39%	\$297,500.00	75.76%	No
29	Non-Residential	01-3219-001-0060	\$790,000.00	\$950,000.00	83.16%	\$807,500.00	97.83%	Yes
30	Non-Residential	01-3136-037-0300	\$1,233,250.00	\$1,450,000.00	85.05%	\$1,232,500.00	100.06%	Yes
Totals			\$16,372,107.00	\$20,038,333.00	81.70%	\$17,032,583.05		80.00% Above Threshold
Average			\$545,736.90	\$667,944.43	81.70%	\$567,752.77	96.12%	20.00% Below Threshold