# Cook County Assessor's Office Practitioners' Meeting 2021

March 31, 2021



## Today's Agenda

- Changes to Appeal Rules
- Assessment Schedule and Documenting Vacancy / Occupancy Effects
- Changes to Online Appeal Process
- Lightning Round FAQs
- Q&A
  - Please put questions in the Q&A box; upvote the ones you'd like to see answered

# **Changes to Appeal Rules 2021**

Tatia Gibbons, Chief Legal Counsel



## 2021 Appeal Rules – Key Changes

The CCAO received helpful feedback on the 2020 Appeal Rules, which are posted online.

Our 2021 Appeal Rules incorporate numerous suggested revisions from internal and external sources.

The following information highlights changes for 2021 Rules.

#### Rules 3 and 5

Appeal Rules are designed to provide clarity and promote accurate assessments, not to create a stumbling block.

- Relief will not be denied summarily if appeal submissions substantially comply with the requirements of these Rules.
- Rule 3: Clarifies that notarization is not required unless the PDF form specifies it. (This generally stems from statutory or ordinance requirement for affidavits).
- Rule 5: Requires every appeal to specify the estimated fair market value sought by the appeal.

#### Rule 6: Use Authorized Forms

If a practitioner determines that an authorized Form must be modified to reflect a unique circumstance, they may revise the Authorization Form accordingly, but must ensure that revisions are clearly visible and briefly explain reasons for the revision.

#### Rule 7: Certificate of Error Applications

#### Rule 7

Certificate of Error applications that seek a reduction for prior years only (not associated with a current-year appeal) must be emailed to onlineappeals@cookcountyassessor.com

These C of Es, may be filed outside of the window in which appeals are permitted to be filed for properties in the relevant Township and must include "Prior year-only Certificate of Error" in the subject line of the email.

Certificate of Errors seeking reductions for prior assessment years in addition to a current-year appeal must be filed through SmartFile as part of the current-year appeal.

#### Rule 9: Primary PIN

#### Rule 9

- Requires that appeals on multi-PIN properties must list the PIN with the highest assessed value first
- Intended to help the CCAO process files effectively

#### SmartFile-related rules

#### Rule 4

SmartFile appeals in lieu of paper complaints

New this year: Additional documents MAY be submitted through SmartFile after an Appeal has been submitted.

#### Rule 13

 Additional documentation in support of a complaint should be filed by the official appeal deadline for the relevant Township. If additional evidence is submitted after the appeal deadline, the CCAO cannot guarantee that it will be considered.

#### Appraisals and Tax Documents

#### Rule 18

Eliminates the requirement that appraisals be submitted with Appraisal Cover Sheets.

#### Rule 19

Clarifies that while relevant tax documents must be submitted, depreciation schedules are not required.

#### No Appeal on Exempt Property

- No Appeal is required to implement an exemption for a property declared partially or 100% exempt by IDOR.
- Practitioners should send the IDOR letter and applicable deed directly to the Exempt Department as soon as possible. (Rule 25).

# Assessment Schedule and Documenting Vacancy / Occupancy Effects

Marty Paulson, Chief Valuations Officer



#### Town Opening Schedule

- Still a bit in flux, as we are implementing new internal technologies – calendar posted online when available
- Our intent is to begin our 2021 mailings with a number of Non—Tri Towns within the next few days
- The tentative order for the next 3 weeks will be as follows: River Forest, Riverside, Evanston, Oak Park, Palos, Norwood Park and Rogers Park
- Followed by Hanover, Berwyn, New Trier, Cicero and West
- Our intent is to get West mailed in early May.

# There are the concepts of Vacancy, Occupancy, Pandemic Effects

Each are different and need to be handled in different manners.



# Vacancy, Occupancy, Pandemic Effects

- We look at these as short term impacts to value
- Our vacancy policy is posted online
- Occupancy of a new building and ramp up periods to stabilization are another very different situation
- Let's call it what it is: the "market absorption period"
- The pandemic effects are real, have already waned in some instances, others continue today
- Our office has previously used a policy that would treat these all the same - we feel that is not the best practice

#### For Occupancy and Pandemic Effects

- We need to know the story of the various circumstances
- Occupancy is a rather straight forward consideration once we know about the actual date a project is open for business
- If we can get information on the projected path to stabilization of the property, we can use that information to make better estimates of fair cash value
- For pandemic effects: we are aware of the severity, we are not aware of the tenant/occupancy in every building
- Here again, getting more information from you will help us refine our work on pandemic affected properties

#### Vacancy as a Policy

- The concept of a vacancy adjustment to an assessed value is not codified in the Property Tax Code
- It is a policy that should intend to get to a temporary fair cash value estimate
- It should not be something used in a property for the long term
- If a property has reached the end of its useful life, it is not a vacancy problem, likely a value problem

#### Vacancy Adjustments in Prior Years

- Vacancy adjustments have been overly generous; taken advantage of by those with means/access to appeal
- Created a disincentive to fixing up buildings and did not reflect the "market value" of the building
- Prior policies led to an impact on neighboring property owners when it came to tax burden
- Past policy was criticized by knowledgeable assessment professionals and those who understand appraisal science

#### The Vacancy Policy Today

- There is a reporting and documentation mechanism required, typically done through the appeal process
- Our forms annualize the vacancy the building has had in the past 12 months
- Our valuation process includes market vacancy in our initial calculations
- We are granting an additional vacancy reduction based on documentation from an owner

#### **Documentation Needed**

- Vacancy/Occupancy Affidavit a month by month summary of the vacant space in the subject building for the last twelve months
- Rent roll report that validates the vacancy claim covering the last twelve months
- Proof of the property being marketed for rent or sale
- Utility bills from the vacancy time period, insurance claim document and other information validating the claim as required by the Assessor Appeal Rules
- Representatives Authority to Represent Form
- Photographs attesting to vacancy or where applicable the uninhabitable condition of property, that are dated or are accompanied by an affidavit attesting to the date and the condition of the property on such date.

#### Our Review Process Today

- Review the current estimate of the property's market value and assessed value determination and gather the amount of vacancy used in that calculation
- Determine if property has an assessment value that already represents an additional vacancy revision from a prior tax year.
  - If the current assessed value already accounts for vacancy, a decision will be made whether any further vacancy reduction is appropriate.
- Review all information supplied
- Determine if any additional vacancy reduction is appropriate in view of evidence and adjust the current year assessed value

#### The Vacancy Policy Today

Example: We value a building with 10% as the initial vacancy

- Appeal says property is vacant for 60% of the year
- We multiply that by 50% (0.5) halving the impact: 30%
- Since we already provided a level of vacancy at the initial valuation - 10% - the additional granted vacancy is 20%

#### Rationale:

- We want to represent the short-term impact of vacancy on market value
- This policy encourages effective management and a motivation to timely leasing

#### Newly Constructed Buildings

- We want to treat these differently
- There are lease up periods that we can account for, provided we have information from the property owner
- The ramp up period to full occupancy or stabilization of a property takes time
- This is not "vacancy" it is a part of the development process – that we can account for in our valuations – a recognition of the market absorption period
- We also recognize new projects can take multiple years to ramp up to stabilization
- Again, we welcome the opportunity to get insights on the actual occupancy date and projection to full stabilization

#### **Changes to Online Appeals Process**

Mirella Villafuerte, Director of Special Projects



# CCAO Online Appeals – Updates to Existing Filings

(iasW) CCAO Appeals - Real Estate Assessed Valuation Appeal (Commercial)

Cook County Assessor's Office Commercial Real Estate Assessed Valuation Appeal

(iasW) CCAO Appeals - Real Estate Assessed Valuation Appeal (Condo/Coop)

Cook County Assessor's Office Condo/Coop Real Estate Assessed Valuation Appeal

(iasW) CCAO Appeals - Real Estate Assessed Valuation Appeal (Incentive)

Cook County Assessor's Office Real Estate Assessed Valuation Incentive Appeal

(iasW) CCAO Appeals - Real Estate Assessed Valuation Appeal (Residential)

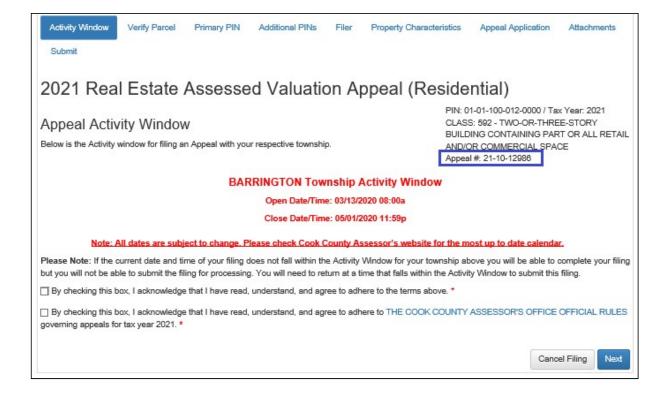
Cook County Assessor's Office Residential Real Estate Assessed Valuation Appeal

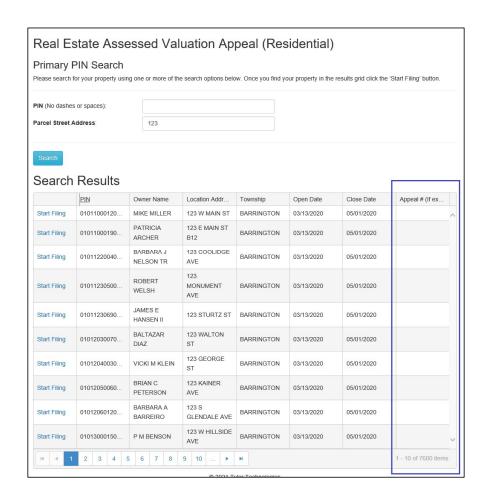
(iasW) CCAO Appeals - Real Estate Assessed Valuation Appeal (Vacant Land)

Cook County Assessor's Office Vacant Land Real Estate Assessed Valuation Appeal

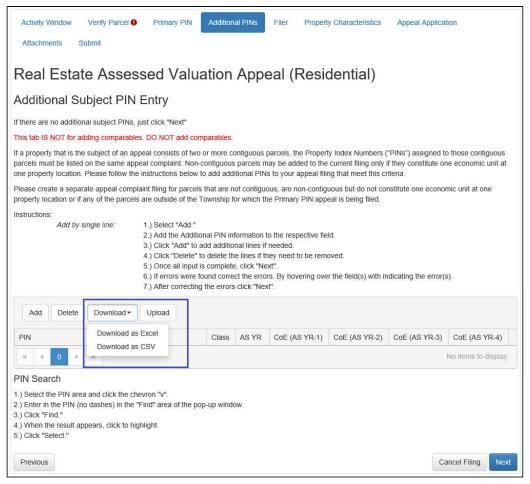
Appeal number will now be available as soon as the filing

is begun





Appeal number will also be available for display in the PIN search once the filing has been committed to the database

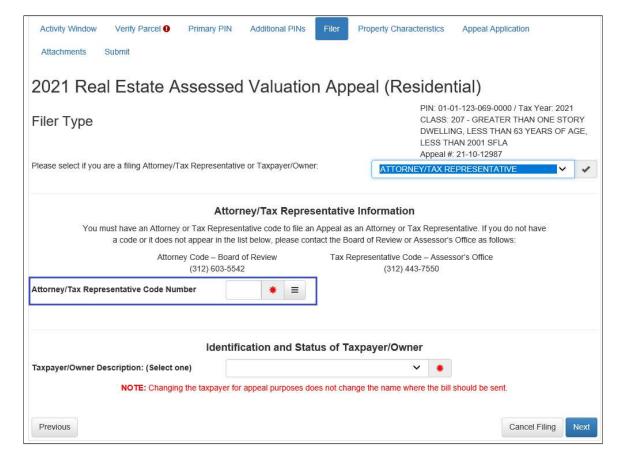


Ability to export/import additional related parcels using a downloadable template

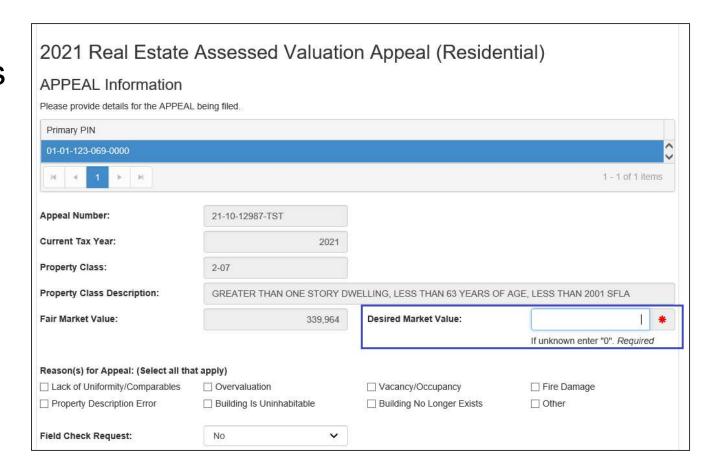
 Previously only available for Condo and Incentive appeal filings

Anonymized Filings

 Attorneys/Tax
 Practitioners will
 use their registered
 code to submit their
 filing, in conjunction
 with required
 supporting
 documentation



 Appeal complaints must specify the estimated fair market value that the filer asserts should be applied to the subject property. (Rule 5)



#### New and Upcoming Filings for 2021

- Omitted Assessments Appeal Filing
- Supplemental Attachments Filing
- Special Property Pre-Filings
- Residential Characteristics Update Form

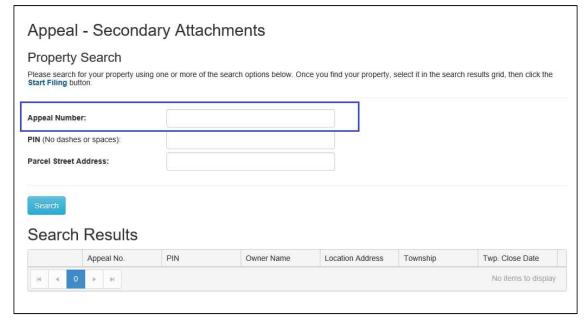
#### Omitted Assessments Appeal Filing

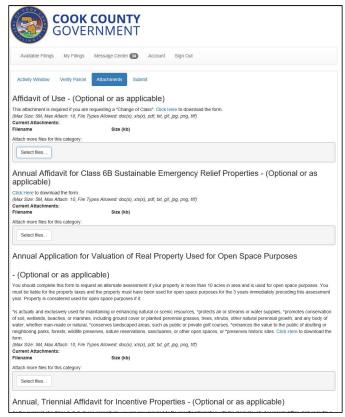
Ability to submit an omitted assessment appeal on a dedicated form



## Supplemental Attachments Filing

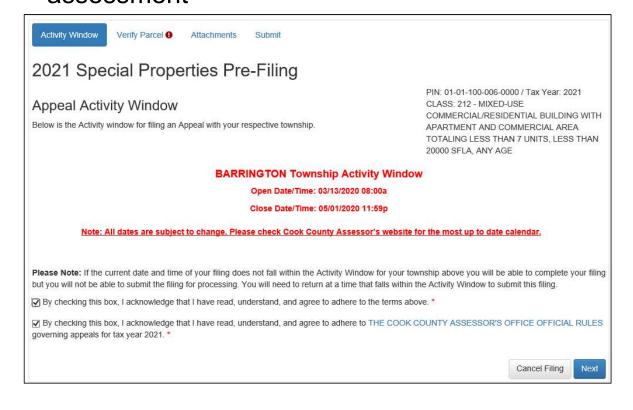
Ability to submit additional documentation in support of a complaint should be filed by the official appeal deadline for the relevant Township. (*Rule 13*)

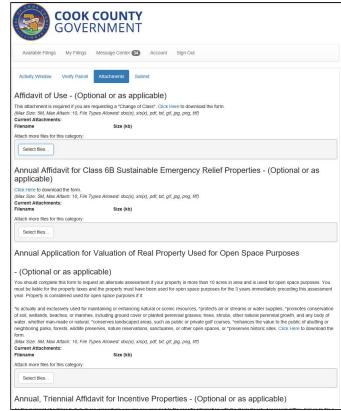


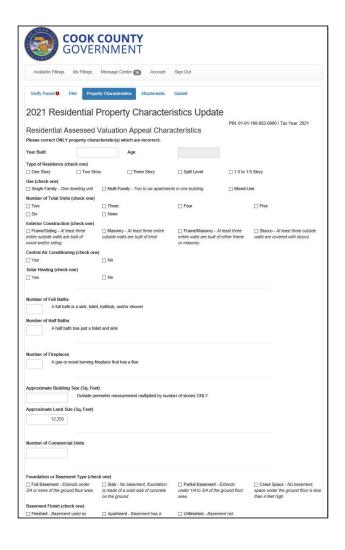


## Special Property Pre-Filing

Ability to submit requested documentation in support of a special property assessment







# Residential Characteristics Update Form

Ability to submit updates to the characteristics of residential properties



## **Lightning Round**

Scott Smith, Chief Communications Officer



#### **FAQs**

- Exemption deadline: Extended to April 9th
- Will 2020 COVID adjustments remain in place?
  - Yes, except for Chicago, which will be reassessed.
- Will broad, category-based COVID adjustments be made in 2021?
  - No, these will be considered within assessments and appeals.
- 2020 results letters: Address problems fixed
- Office re-opening plans: Still TBD, but looking at June

Q&A

