

**Comprehensive Organizational and Appraisal Operations Review
Johnson County Appraisal District**

Findings, Compliance Assessment, Analysis, & Recommendations

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Section 1 – Executive Summary

Purpose and Context

The Johnson County Appraisal District (JCAD) is responsible for appraising more than 400,000 parcels across 38 taxing entities within a rapidly growing suburban county. The district’s statutory mission is to deliver accurate, equal, and uniform property valuations in compliance with the Texas Property Tax Code and the Uniform Standards of Professional Appraisal Practice (USPAP), while providing transparent, accessible service to taxpayers and stakeholders.

In response to sustained organizational instability, leadership turnover, technology challenges, and growing concern from staff, taxing entities, and the Board of Directors, JCAD engaged Mackenzie Eason to conduct an independent, holistic evaluation of district operations. This review assessed the factors that influence mass appraisal accuracy and uniformity, customer service and transparency, human resources and staffing, policies and internal controls, data collection and technology, value defense, governance and ethics, property discovery, intergovernmental relations, strategic planning, data security, and facilities.

The purpose of this evaluation was not only to test compliance with statutory and professional standards, but also to identify systemic risks, operational gaps, and practical opportunities to strengthen JCAD’s capacity, credibility, and resilience over the next decade.

Key Findings

Operational Strengths

- JCAD’s frontline employees demonstrate a strong commitment to public service and to preserving public trust, consistent with USPAP’s core principles.
- Despite inefficient methods, appraisal outcomes have generally met state validity thresholds, including recent Property Value Study certifications.
- Customer service and Support staff consistently perform under difficult conditions and are viewed as one of the district’s strongest functions.
- The district has begun corrective efforts in response to this review, including initial development of SOPs and renewed attention to governance discipline.

Material Gaps and Risks

- Mass appraisal practices rely heavily on outdated schedules, manual adjustments, and legacy workarounds that undermine uniformity and defensibility.
- The absence of income-based valuation models for commercial property represents a significant methodological gap.
- Organizational culture has been strained by inconsistent and poor leadership, poor communication, and a lack of accountability, contributing to turnover exceeding 100 percent over three years.
- Policies, procedures, and internal controls were largely absent at the outset of the review, exposing the district to operational and compliance risk.
- Technology modernization efforts, particularly the stalled GSA CAMA conversion, are constrained by the absence of leadership, lack of internal IT capacity, and unclear project ownership.
- Governance and ARB oversight weaknesses have eroded stakeholder confidence and increased reputational risk.

Compliance Outcomes

- JCAD is largely compliant with USPAP Standards 5 and 6 and applicable provisions of the Texas Property Tax Code.
- Compliance risks exist where documentation, training, income modeling, internal controls, and ARB procedures fall short of best practice and, in some cases, statutory expectations.
- While not systemic violations, these weaknesses increase exposure to legal challenge, audit findings, and loss of public trust if left unaddressed.

Strategic Recommendations: Top Five Priorities

- 1. Stabilize and Modernize Mass Appraisal Practices**
Update cost, depreciation, and land schedules; eliminate non-measurable adjustments; and implement income-based models for commercial appraisal.
- 2. Build Internal Technology and Data Governance Capacity**
Hire dedicated IT leadership, complete the GSA CAMA conversion with structured training, and reduce reliance on ad hoc vendor support.

3. Restore Organizational Structure, Culture, and Accountability

Realign departments, hire a Deputy Chief Appraiser, implement performance metrics, strengthen leadership oversight, and formalize HR and training functions to improve retention and morale.

4. Institutionalize Policies, Procedures, and Internal Controls

Adopt comprehensive SOPs, multi-level approval workflows, and internal quality assurance processes to support consistency and audit readiness.

5. Strengthen Governance, Transparency, and Stakeholder Trust

Reinforce Board oversight, ARB ethics and training, and proactive engagement with taxing entities to restore confidence in JCAD's independence and integrity.

Implementation Outlook

The roadmap developed in this report outlines a phased, achievable path forward:

- **Immediate Actions (0–12 months):**

Focus on risk mitigation and stabilization, including appraisal schedule updates, removal of discretionary adjustments, hiring for IT leadership, hiring for the Deputy Chief Appraiser, departmental realignment, and structured training tied to the CAMA transition.

- **Mid-Term Actions (1–2 years):**

Institutionalize modernization through income modeling, expanded land schedules, workforce development, performance management systems, and governance maturity.

- **Long-Term Actions (3+ years):**

Position JCAD for sustained excellence through facilities planning, advanced analytics, automation, benchmarking, and continuous independent review.

If implemented as designed, this roadmap will materially improve appraisal equity, operational efficiency, employee engagement, and public trust—positioning JCAD to meet both its statutory obligations and the expectations of a growing and increasingly sophisticated constituency.

Section 2 – Introduction and Methodology

Introduction

The Johnson County Appraisal District (JCAD) engaged Mackenzie Eason & Associates to conduct an independent, comprehensive operational evaluation of the district’s appraisal, administrative, governance, and support functions. This engagement was authorized by the JCAD Board of Directors and executed pursuant to a formal consulting agreement and Scope of Work dated July 13, 2025.

The evaluation was initiated in response to sustained operational challenges, leadership transitions, stalled technology modernization efforts, elevated staff turnover, and increasing concern among taxing entities and stakeholders regarding appraisal consistency, transparency, and organizational capacity. Given Johnson County’s continued population growth and expanding tax base, the Board sought an objective assessment not only of current compliance, but also of the district’s readiness to meet future statutory and service demands.

This report reflects an independent professional judgment based on direct observation, documentary evidence, quantitative analysis, and extensive interviews. It is designed to support informed Board oversight, guide executive leadership, and provide a defensible framework for corrective action and long-term improvement.

Engagement Overview and Objectives

The objectives of this engagement were derived directly from the approved Scope of Work and were organized around five overarching goals:

1. **Validate appraisal accuracy, equity, and uniformity** across all major property classes, with specific attention to mass appraisal methodologies, schedules, and valuation models.
2. **Evaluate customer service, public transparency, and protest processes**, including the operation and independence of the Appraisal Review Board (ARB).
3. **Assess organizational structure, staffing, and talent management**, particularly in light of turnover, succession risk, and projected county growth.
4. **Test the robustness of policies, procedures, and internal controls**, including data security, disaster recovery, and governance discipline.
5. **Confirm compliance** with applicable professional standards and statutory requirements, including USPAP Standards 5 and 6, the Texas Property Tax Code, TDLR Chapter 94, Comptroller MAP standards, and IAAO best practices.

In addition to diagnosing current-state conditions, the engagement required the development of actionable recommendations, a multi-year implementation roadmap, and performance metrics to support sustained improvement and accountability.

Methodological Approach

The evaluation was conducted using a mixed-methods approach combining quantitative analysis, qualitative inquiry, and compliance testing. The methodology emphasized triangulation, corroborating findings across multiple sources to ensure accuracy and reliability.

Key components of the approach included:

- **Document and Record Review**
The team reviewed board agendas and minutes, appraisal roll data, ratio studies, appraisal schedules, ARB records, HR files, budget documents, contracts, and internal correspondence. Particular attention was given to identifying gaps between documented policy and actual practice.
- **Interviews and Stakeholder Input**
Structured and semi-structured interviews were conducted with all current employees who were available to participate, multiple former employees, members of the Board of Directors, and ARB members. These interviews provided critical insight into operational realities, cultural dynamics, and governance effectiveness that are not visible through documentation alone.
- **Quantitative Analysis and Ratio Studies**
Sales ratio studies, Coefficient of Dispersion (COD), and Price-Related Differential (PRD) analyses were reviewed where data availability permitted, consistent with Comptroller and IAAO guidance. These were used to assess the factors for appraisal level, uniformity, and systemic risk.
- **Process Mapping and Workflow Analysis**
Core processes, including property inspection, data entry, exemption processing, protest preparation, and ARB hearings, were mapped to identify bottlenecks, control gaps, and reliance on informal practices.
- **Benchmarking and Comparative Review**
JCAD's practices were compared against peer appraisal districts in Texas, using IAAO benchmarks, PTAD MAP criteria, and observed best practices in similarly situated jurisdictions.

During the course of the review, staff rosters and organizational data were found to be inconsistent across departments. Mackenzie Eason & Associates reconciled multiple spreadsheets and informal records to assemble a provisional staffing inventory sufficient to support analysis of workload, turnover, and span of control.

Data Sources

The evaluation relied on data and materials provided by JCAD in response to a detailed inquiry and document request list, including but not limited to:

- Board agendas, minutes, and policy actions
- Appraisal roll extracts and historical value data
- Land, improvement, and depreciation schedules
- ARB hearing records and evidence packets
- Personnel files, job descriptions, and training records
- Budget documents and financial summaries
- Technology contracts, system documentation, and access logs

Where documentation was incomplete or unavailable, findings were informed by corroborated interview testimony and observed operational practices, with such limitations explicitly noted.

Evaluation Criteria and Standards

Findings and conclusions in this report were evaluated against the following professional and statutory standards:

- **Uniform Standards of Professional Appraisal Practice (USPAP), Standards 5 and 6**
- **Texas Property Tax Code**, including Chapters 6, 23, 25, and 41
- **Texas Department of Licensing and Regulation (TDLR), Chapter 94**
- **Texas Comptroller Property Tax Assistance Division (PTAD) – MAP Standards**
- **International Association of Assessing Officers (IAAO) Standards and Best Practices**

These standards provided the framework for assessing compliance, effectiveness, and risk exposure.

Limitations and Assumptions

As with any operational evaluation, certain limitations were encountered:

- At the outset of the engagement, formal SOPs, an organizational chart, and centralized policy documentation largely did not exist, limiting the ability to validate processes through written controls.
- Data availability varied by department, and some historical records were incomplete or maintained informally.
- The evaluation was conducted within a defined timeframe and did not include forensic testing or transaction-level reappraisals.
- Findings reflect conditions observed during the engagement period and may evolve as corrective actions are implemented.

Despite these limitations, the evaluation team believes the evidence reviewed is sufficient to support the findings, conclusions, and recommendations presented in this report.

The findings, analyses, and recommendations contained in this report are based solely on information, documentation, and data made available to the evaluation team at the time of the organizational review. This includes records provided by the district, quantitative data extracts, and interviews with current and former employees and stakeholders. The factors that affect mass appraisal accuracy were reviewed; however, a value appraisal was not performed. As with any organizational assessment, the accuracy and completeness of certain information, particularly interview-based observations, may be limited by recollection, perspective, or incomplete documentation. Accordingly, all findings and recommendations should be reviewed, validated, and confirmed by the incoming Chief Appraiser before implementation to ensure alignment with current conditions, statutory requirements, and operational priorities.

Section 3 – Organizational Overview

A. Overview and Purpose

Johnson County Appraisal District (JCAD) is responsible for appraising more than 400,000 parcels across 38 taxing entities within a 734-square-mile jurisdiction. The district's portfolio includes approximately 203,000 mineral accounts, 100,000 real property accounts, 7,500 business personal property accounts, 5,500 mobile homes, and 1,900 utility properties based on the 2025 Chief Appraisers Report. The remaining parcels are distributed across additional property categories, including dealer inventory and exempt property accounts. This workload profile is operationally complex and requires strong cross-functional coordination among customer-facing operations, appraisal functions, exemptions processing, data management, and governance support.

This section evaluates JCAD's organizational structure, leadership practices, staffing environment, internal communication, and governance dynamics to determine whether internal operations and organizational capacity support appraisal accuracy, equity, transparency, and public trust under the Texas Property Tax Code. A central contextual factor is the Board's decision to move to a three-year reappraisal cycle and sustain 2024 values for the 2025 and 2026 tax years, except for property types and situations requiring annual review or statutorily required adjustments. That shift materially changed the district's operational cadence, introduced interpretive challenges, and created internal misalignment regarding how to execute Board policy while still meeting statutory appraisal obligations and professional standards.

The organizational model is anchored by three primary operating areas that collectively shape taxpayer experience and operational reliability.

Support Services functions as the district's operational intake and service backbone, carrying a very broad portfolio of responsibilities including counter service, phones, emails, returned mail processing, ownership changes, deeds, high-volume data entry, GIS support, exemptions processing support, tech support, and special projects. The team's operational model relies heavily on cross-coverage and informal "floater" roles to maintain continuity during peak periods such as protest season. While this flexibility has helped sustain service delivery, it has also created role ambiguity, inconsistent expectations, person-dependent processes, and uneven workload distribution. While cross-training is a strength and provides additional training for employees, the training and onboarding in Support Services is overwhelmingly peer-driven and undocumented, with staff relying on shadowing, personal notes, and ad hoc "cheat sheets." Multiple interviewees described being trained only to complete immediate tasks, without a broader understanding of upstream or downstream impacts. This contributes to quality and consistency risks,

particularly where Support Services performs data-intensive functions that influence appraisal accuracy and taxpayer notices.

Appraisal operations include residential and commercial appraisers, trainees, appraisal clerks, and ARB. Interviews indicate that appraisal execution is supported by committed and knowledgeable professionals, but it remains heavily dependent on informal norms, individual judgment, and legacy practices rather than standardized written procedures and uniformly applied quality controls. Several appraisers perform hybrid functions such as mapping, routing, training, protest preparation, or supervisory support, often without clearly defined role boundaries. Workflow handoffs between Support Services, Appraisal, and Data Entry are informal and assumption-based, and there is limited organizational infrastructure to track errors, corrections, or recurring data issues identified during fieldwork or protest preparation. Uniformity risks are elevated where quality and condition coding, structure values, depreciation methodology, and documentation practices are inconsistent across appraisers. Analytical practices also vary widely, with some appraisers performing ratio analysis and others relying on limited standardized expectations or shared formats.

Administration includes HR functions, exemptions, accounting, and administrative clerk operations, which have experienced recent instability and operational disruption. The former Director of Administration held oversight responsibility for HR, exemptions, and broader administration, including budget and finance support, despite lacking relevant exemptions and HR expertise. This created downstream operational consequences, such as exemptions staff relying on Support Services for core guidance, and the absence of consistent HR infrastructure, including KPIs, structured performance management, updated evaluation formats, and documented methodology for pay decisions. Board-facing administrative functions were also impacted, most notably through delays in budget development and review attributable to insufficient supporting documentation, repeated errors requiring correction, and impediments to committee access and transparency. Interviews and board interactions indicated that information flow related to personnel changes, policy updates, and operational risks was inconsistent and at times withheld, which contributed to confusion, delayed governance action, and extended operational vacancies in critical roles such as the Taxpayer Liaison Officer.

Across these operating areas, recurring organizational themes emerged that cut across functions and materially affect performance, defensibility, and service quality. These include inconsistent and informal communication practices, weak documentation and SOP adoption, limited transparency around performance metrics and expectations, fragmented cross-departmental coordination, and a culture marked by guardedness and

uneven psychological safety. Power dynamics and perceptions of retaliation or preferential treatment appear to influence how staff communicate, what information is shared, and whether employees feel able to raise concerns. These conditions are operationally consequential because they reduce error detection, increase rework, heighten turnover risk, and constrain the district's ability to scale to future growth.

B. Findings

1. JCAD's transition to a three-year reappraisal cycle has created internal misalignment regarding appraisal expectations, operational cadence, and the practical interpretation of Board policy versus statutory valuation obligations.
2. Support Services performs a broad portfolio of customer-facing and operational processing responsibilities and relies heavily on informal cross-training and "floater" coverage to maintain continuity, resulting in role ambiguity, inconsistent expectations, and workload strain.
3. Training and onboarding in Support Services and other non-appraisal functions is predominantly informal, peer-driven, and undocumented, with limited evidence of standardized curricula, proactive SOP adoption, or consistent reinforcement.
4. Communication deficiencies are pervasive across all departments. Staff cited inconsistent messaging, procedure changes without documentation, silo behavior, and reliance on informal coworker networks for awareness of policy or staffing changes.
5. Cultural conditions reflect inconsistent psychological safety. Overwhelmingly, employees described hesitation in raising concerns due to fear of repercussions, perceptions of favoritism, and inconsistent enforcement of expectations.
6. Operational metrics and performance expectations are not clearly defined or communicated to staff, limiting accountability and impeding process improvement.
7. Appraisal operations rely on individual judgment and legacy practices, with limited standardized written guidance for workflow execution, settlements, rollbacks, error correction, supervisory review, and appraisal uniformity controls.
8. Appraisal uniformity is at risk due to inconsistent application of quality and condition codes, inconsistent documentation practices, limited photographs of parcels, and limited structured quality control processes.

9. Interdepartmental workflow integration is weak. Handoffs among Customer Service, Appraisal, and Data Entry are informal and assumption-based, with limited mechanisms to track errors, corrections, and recurring process breakdowns.
10. Administration and HR practices lacked standard infrastructure, including structured performance management, documented pay methodologies for increases in pay, consistent KPI reporting, and effective cross-department policy communication.
11. Budget development and governance support functions were disrupted by incomplete documentation, repeated errors, and impediments to committee review, delaying board action and creating governance friction.
12. Data integrity vulnerabilities were identified in areas requiring statutory compliance assurance, including capped homestead limitation accounts and Circuit Breaker limitation processing, where manual correction processes were discontinued without replacement controls.
13. Records management and transparency practices appear inconsistent, including instances where board documentation was incomplete or not publicly accessible until prompted.

C. Analysis

JCAD's organizational condition reflects an agency that operated under the same leadership for decades with little or no change, and a recent wave of senior leadership changes has left outdated legacy systems in place, with no succession planning or transfer of knowledge and procedures. This has led to operating under strain, with rapid policy shifts, limited infrastructure, and fragmented leadership practices undermining operational consistency and staff confidence. The three-year reappraisal policy change intensified the need for disciplined written guidance and process clarity. However, interviews suggest that the district's reliance on informal communication, undocumented SOPs, and person-dependent practices created interpretive gaps and inconsistent application of Board directives, especially when staff believed policy prevented the correction of errors or the recognition of observable property changes.

Support Services has remained resilient through adaptability and peer teamwork, but resilience has become a substitute for structure. The lack of documented training, standard workflows, and shared performance expectations increases the risk of error, rework, and service inconsistency, particularly given the team's role in processing ownership changes, exemptions support, and data entry functions that influence appraisal outcomes and notice accuracy. Additionally, interviews revealed that the Support Services

Director, while very knowledgeable of the Appraisal District operations and history, often hoards knowledge and requires staff to direct all questions to her instead of developing clear SOPs to disseminate knowledge to both tenured and new employees.

Appraisal's heavy dependence on individual norms rather than standardized calibration and quality control is a defensibility risk. The absence of consistent ratio analysis expectations, documentation standards, and supervisory review checkpoints increases the likelihood of inequitable valuations and weakens JCAD's ability to defend values in protests and hearings. The cultural dynamic described in interviews, where appraisers are perceived as insulated from accountability and able to treat other staff dismissively, compounds cross-functional friction and undermines service quality.

Administration and HR instability has had a direct governance impact, particularly in budgeting, transparency, and policy communication. Where directors or administrators hoard information or impede access to operational data, staff replicate those behaviors, reinforcing silos and eroding trust. The resulting culture of guardedness and fear makes change management materially more difficult, especially as the district faces technology modernization, staffing turnover, and future county growth pressures.

Despite these challenges, the district retains meaningful organizational assets. Many employees expressed pride in public service and a desire for greater clarity, training, and structure. Through interviews and observation, it is clear that JCAD has some talented employees who have persevered and continue to take pride in their role despite the systemic issues uncovered in the organizational review. With consistent executive leadership and disciplined governance boundaries, JCAD has an opportunity to rebuild foundational infrastructure, stabilize culture, and improve defensibility and public trust.

D. Compliance Check

JCAD's organizational and governance dynamics raise compliance and best-practice concerns.

Texas Property Tax Code § 6.05(c) places responsibility for district operations with the Chief Appraiser. Board actions that extend into operational decision-making or management instruction beyond formal policy direction create a governance separation risk and may undermine statutory role clarity. This risk is heightened when board-staff communication occurs informally, through verbal directives, or when individual directors act outside of collective board action. However, the Board has a statutory obligation to ensure the District operates properly in terms of compliance and budgeting. If Directors or staff withhold information, data, or communications, it hampers the Board's ability to fulfill this duty, increasing the risk that the Board will fail to meet its statutory obligations.

From a professional standards perspective, the IAAO Standard on Effective Property Tax Administration emphasizes the need for documented procedures, defined organizational hierarchy, consistent training, and effective internal controls. Based on interview themes indicating limited SOP adoption, inconsistent onboarding and training, weak workflow integration, and limited metric transparency, JCAD appears partially aligned with these practices but does not yet demonstrate full institutionalization.

Several notes also suggest potential statutory compliance vulnerabilities requiring confirmation and remediation, including the management of Circuit Breaker and capped homestead limitation accounts and the absence of a formalized data integrity correction process for those accounts. These issues warrant structured testing in the later sections of the report, tied to internal controls and data quality.

E. Recommendations

1. Formalize governance boundaries and reinforce the governance-management separation. Adopt and publish a governance policy framework that clarifies directors act collectively through formal board action and do not direct staff individually in operational matters. Establish a documented communication protocol defining how board directives are issued, tracked, and implemented through the Chief Appraiser, with written memoranda replacing informal verbal guidance for major policy directives.
2. Implement core organizational infrastructure to stabilize accountability and scalability. Approve and publish a current organizational chart under the Chief Appraiser's authority and establish a standardized reporting structure with defined supervisory responsibilities. Create a centralized SOP library for primary functions, prioritize high-risk taxpayer-facing and appraisal-related workflows first, and require periodic bi-annual review and re-approval to prevent SOP decay.
3. Standardize onboarding, training, and cross-functional readiness. Create formal onboarding plans by function, including minimum training requirements, standardized curricula, and role-specific competencies. Introduce structured cross-training that includes field exposure for support staff to improve understanding of upstream and downstream workflow dependencies. Expand training beyond online modules to include targeted, in-person or facilitated training in customer conflict management, appraisal fundamentals for support staff, and role-specific statutory requirements.
4. Establish clear appraisal workflow controls and uniformity practices. Implement written appraisal SOPs addressing settlements, rollbacks, corrections, supervisory

sign-off requirements, and standard documentation expectations. Introduce calibration sessions focused on quality and consistency in condition coding, and require periodic uniformity validation using shared ratio and gain-loss reporting standards. Define consistent naming conventions for work file storage, naming, and retention files so that analysis and defensibility are not person-dependent.

5. Strengthen administrative governance, budgeting discipline, and HR management systems. Require budget development to include supporting schedules, position tables, narrative assumptions, and explanations of documented variances. Adopt a formal HR operating framework that includes a probationary period for new hires, standardized evaluation cycles, documented pay adjustment criteria, and defined performance expectations by role. Centralize personnel and training records in a secure HR system with auditable controls. Annually compare JCAD against similar Appraisal Districts for salary schedules, job descriptions, organizational charts, policies, SOPs, budget, and headcount.
6. Improve metric transparency and operational performance management. Identify a core set of operational KPIs by department, including customer service responsiveness, processing cycle times, error correction rates, protest season volumes, and staffing utilization metrics. Share metrics routinely with staff in a way that clarifies expectations and builds accountability without punitive application, eventually developing a Dashboard for both internal and external transparency. Use metrics to identify bottlenecks and rework patterns and to support staffing forecasts.
7. Restore culture through consistent leadership modeling and structured communication. Implement recurring all-staff briefings led by the Chief Appraiser, followed by documented summaries and Q&A responses accessible to all employees. Reinforce psychological safety by establishing formal channels for issue escalation and ensuring consistent application of the retaliation policy. Prioritize leadership behavior expectations and accountability for respectful, cross-department collaboration, recognizing that cultural restoration depends on daily modeling and reinforcement rather than policy statements alone.
8. Address immediate operational barriers impacting service delivery and data quality. Evaluate scanner capacity and implement workstation-level scanning where it materially improves exemptions throughput. Establish a documented process to permanently correct mineral mailing addresses and transmit updates to Capital Appraisal Group in a way that persists year-to-year. Stabilize appraiser availability

protocols during on-site periods so taxpayer questions can be resolved promptly and consistently.

F. Summary

JCAD's organizational health has been compromised by inconsistent administrative infrastructure, weak process documentation, strained cross-department coordination, and governance behaviors that have blurred the separation between oversight and management. Staff demonstrate a strong commitment to public service and significant technical capability, but these strengths are constrained by an operating environment that relies heavily on informal knowledge, inconsistent communication, and person-dependent workflows.

The district's move to a three-year reappraisal cycle is a major governance and operational shift that requires disciplined implementation, clear written directives, and a shared understanding of how board policy interacts with statutory valuation obligations.

Stabilization will require foundational infrastructure, consistent executive leadership, clear governance boundaries, standardized workflows, and deliberate cultural restoration. With those elements in place, JCAD can leverage its committed workforce to rebuild trust, improve appraisal consistency, and strengthen transparency and compliance over the coming reappraisal cycles.

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Section 4- Evaluation Findings by Domain

Section 4.1 – Mass Appraisal Accuracy and Uniformity

A. Overview and Purpose

Mass appraisal is the core operational function of the Johnson County Appraisal District (JCAD) and the primary driver of value equity, public confidence, and defensibility across the appraisal roll. In Texas, mass appraisal is expected to be conducted through systematic, market-reflective methodologies that produce values that are equal and uniform while also being supportable in informal reviews, ARB hearings, and litigation. For residential property, the predominant approach begins with an estimate of replacement cost new, applies standardized depreciation based on age and condition, and then applies market-based modifiers to reflect location and neighborhood desirability. For income-producing commercial properties, mass appraisal relies heavily on the income approach, using market rent, expense assumptions, capitalization rates, and validated local market intelligence to estimate value based on the property's income-generating capacity. These methods are operationalized through appraisal schedules, market area structures, ratio study validation, and documented procedures that allow values to be replicated and defended consistently.

This section evaluates whether JCAD's mass appraisal system produces accurate, equitable, and uniform outcomes across property classes and whether the district's appraisal infrastructure supports compliance with Texas Property Tax Code §25.18 and USPAP Standards 5 and 6. The review focuses on model calibration practices, ratio study usage, schedule governance, quality and condition coding consistency, market area construction, and the identification of systemic valuation issues. It also considers how organizational policies, technology tools, and workflow constraints influence appraisal quality and consistency.

A defining contextual factor for JCAD is that mass appraisal operations are occurring in a constrained and unsettled operating environment shaped by three interrelated forces.

First, the district is operating under a Board-directed policy framework that moved JCAD to a three-year reappraisal cycle and directed the district to sustain 2024 values for the 2025 and 2026 tax years except for property types that require annual review and for statutorily required adjustments such as increases to certain capped homestead values and circuit breaker accounts. In practice, appraisers reported that implementation of this policy has created uncertainty over whether and when staff may correct errors from prior years or recognize observable physical changes to real property while conducting their regular field observations. The result is that field discovery and error correction may not consistently

translate into timely valuation updates, which can cause values to drift away from market reality and reduce uniformity over time or between similar properties. This policy environment has also contributed to internal frustration among appraisal staff and confusion among other departments when communicating valuation decisions to taxpayers.

Second, the district's mass appraisal system is operating in the context of incomplete modernization and technology instability. JCAD has attempted to transition to the GSA CAMA platform since 2018. Yet, the conversion remains incomplete, and the system does not consistently support core appraisal functions required for effective mass appraisal. Interviews about operational reviews indicate that the system does not reliably handle key valuation components, including the valuation of additional square footage beyond first-floor structures, comparative sales analysis, and income modeling.

In the current CAMA system, appraisers have developed workarounds that include manual calculations, spreadsheets, localized practices, and email-based data requests. While these workarounds have allowed appraisal work to continue, they also introduce subjectivity, reduce repeatability, and complicate quality control. Importantly, the absence of system-driven modeling capability means that many valuation decisions that should be standardized at scale become dependent on individual judgment and local practice variation.

Third, JCAD's appraisal methodology infrastructure has not been consistently refreshed or governed through a disciplined calibration cycle. Multiple interviews and data review indicate that key schedules, including residential improvement cost schedules, are materially outdated, and that land schedules do not reflect economies of scale across acreage size ranges. This creates a structural mismatch between schedule-driven values and current market behavior. Staff indicated awareness that schedules do not reflect market conditions, but they reported that they were not given authority to update them. In the residential environment, the existence of two classification systems and multiple schedule sets for similar quality levels further complicates standardization and increases the likelihood of inconsistent treatment between neighborhoods or appraisal zones. In commercial appraisal, the lack of a robust income approach capability and the reliance on cost schedules as the default method introduce systematic risk of undervaluation for income-producing properties, particularly where the market prices such assets based on income rather than replacement cost.

Within this overall environment, residential appraisal presents specific structural issues that affect uniformity and accuracy. The district is using inconsistent schedule frameworks, has limited use of systematic depreciation schedules, and has applied broad adjustment

tools, including “Eco” adjustments, to reconcile values to individually perceived market conditions rather than developing current and defensible models. Additionally, documentation practices such as taking property photographs of every parcel during field observations are inconsistently applied, limiting defensibility and contributing to uneven account documentation quality. Operational choices also affect throughput and coverage, including the use of paired field appraisal “teams” where one appraiser drives and the other documents from the passenger seat, while all appraisers receive vehicle stipends. While staff cited a safety rationale for this model, the practice reduces field productivity and creates financial inefficiencies, particularly when appraisers are not independently driving and therefore not incurring the costs that allowances are intended to offset.

Commercial appraisal conditions create even higher methodological exposure. Interviews indicate commercial and business personal property functions lack specialized expertise, formal training, and modern tools to collect and validate income and cap rate information. The income approach is not applied proactively and is instead used reactively when property owners introduce income evidence during ARB proceedings, often to argue for reductions. This dynamic produces uneven treatment across the commercial roll and increases the likelihood that well-represented taxpayers receive more favorable outcomes than those who do not challenge values. In addition, market intelligence is fragmented, with cap rates obtained informally through individual requests rather than through a standardized, validated district methodology.

Finally, appraisal performance monitoring is hindered by inconsistent analytical expectations. Ratio studies and gain-loss analysis are not uniformly produced, not consistently stored, and not institutionalized as a recurring validation requirement across all appraisal staff. This reduces the district’s ability to identify inequities early, correct schedule misalignments, and demonstrate defensible, systematic valuation practices aligned with Comptroller MAP expectations.

In short, JCAD’s mass appraisal function is being delivered in a context where the core building blocks of the mass appraisal discipline, current schedules, reliable system functionality, standardized modeling, consistent documentation, routine ratio validation, and clear authority to correct errors, are not consistently established. That context is essential to understanding why the findings below reflect not isolated issues but systemic weaknesses that compound across property classes and appraisal cycles.

B. Findings

1. The district’s mass appraisal environment reflects the internal weaknesses of outdated software, poor internal documentation, training deficiencies, board-driven

operational barriers, and over-reliance on legacy practices. These conditions are acutely reflected in valuation modeling, schedule maintenance, workflow documentation, and uniformity controls.

2. The GSA CAMA conversion remains incomplete, and critical appraisal functions are partially functional or non-operational, leading to reliance on manual calculations, spreadsheets, and workaround methods that introduce subjectivity and increase error risk.
3. Residential appraisal relies on inconsistent classification systems, including two sets of improvement schedules for the same quality level. Staff reported that one schedule set is used when needed, which reduces standardization and increases variability in outcomes, undermining the standard of equal and uniform.
4. Residential improvement cost schedules are materially outdated. Staff cited a base cost of \$51.80 per square foot for a class 7 home (2,000 square feet) and indicated schedules are approximately ten years old and not reflective of current market conditions. Staff also stated that they were not authorized to change the schedules.
5. Land schedules do not recognize economies of scale and instead use singular unit pricing by foot or acre without size-range pricing and interpolation. This diverges from market behavior, where larger tracts trade at lower unit prices than smaller tracts.
6. Depreciation practices appear inefficient and non-standardized. The district was unable to provide depreciation schedules from the CAMA and indicated that depreciation is manually entered rather than calculated using year built and condition. This introduces inequity risk and increases the likelihood of inconsistency among appraisers, and inconsistency in equal and uniform standards for property owners.
7. Market area definitions are fragmented. The district uses map number and/or neighborhood identifiers to form market groupings that can contain fewer than 20 accounts, creating volatility in ratio performance and reducing the effectiveness of mass appraisal modeling.
8. “Eco” adjustments and other non-model-based adjustments are applied as tools to achieve target values rather than developing and maintaining current, validated appraisal models. This practice reduces transparency and may mask underlying model deficiencies.

9. Commercial appraisal practices rely primarily on the cost approach and generally do not use income modeling except defensively during ARB when owners provide income evidence to support reductions. Cap rate intelligence appears decentralized and not institutionalized.
10. Commercial valuation support systems and training are insufficient. Staff noted limited use of TREP and the need for a structured system to collect commercial data from ARB outcomes, brokers, and market data sources.
11. Photos are inconsistently taken for parcels in both residential and commercial appraisal, reducing documentation quality and defensibility.
12. A sample of 112 accounts flagged as potentially low or frozen did not show evidence of intentional misconduct, but it revealed process gaps. One account was missing a house built in 2022, and several accounts reflected prolonged value stasis. The review suggests operational shortcomings rather than nefarious intent.
13. Ratio study practices and performance monitoring are inconsistent. Some appraisers run their own ratio studies manually; others do not regularly pull ratio reports, limiting uniformity validation and proactive correction.
14. Appraisal fieldwork is performed in paired teams (Teams X, Y, and Z) where one drives and one documents, while all appraisers receive a car stipend even when not actively driving. This reduces productivity and creates cost inefficiency.
15. Cross-department communication weaknesses affect mass appraisal operations, including difficulty for taxpayer-facing staff to reach appraisers for real-time taxpayer inquiries.

C. Analysis

JCAD's mass appraisal outputs are achieving outward compliance indicators in certain state-level measures, but internal appraisal mechanics are not optimized and contain multiple structural weaknesses that create inefficiency, limit uniformity, and elevate defensibility risk. The presence of passing local value determinations in the 2023 School District Property Value Study indicates that aggregated outcomes can meet state validity thresholds. However, those results do not mitigate the operational risks created by outdated schedules, inconsistent classification systems, fragmented market areas, manual depreciation practices, and adjustment-driven valuation behavior.

The residential valuation workflow illustrates a central issue: rather than using current schedules and systematic modeling, staff often rely on legacy schedules and corrective "Eco" adjustments to reconcile values with individually perceived market conditions. This

approach may achieve acceptable value levels in some neighborhoods, but it is not transparent, is difficult to audit, and makes it challenging to demonstrate that values are equal and uniform across similarly situated properties. The use of multiple classification and schedule systems further erodes standardization, increasing the probability that similar homes in different areas receive different base cost treatment unrelated to measurable market factors.

Land valuation practices present a similar structural gap. When schedules fail to reflect economy of scale, the valuation model becomes misaligned with observed market pricing behavior. This can create predictable inequities where certain parcel sizes are systematically over- or under-valued relative to market norms. Implementing size-range schedules with interpolation is a standard mass appraisal modernization step that improves both accuracy and defensibility.

Depreciation methodology, as described, introduces significant equity and control risks. Manual entry of depreciation rather than schedule-driven calculation based on year built and condition increases the likelihood of inconsistent treatment between appraisers, makes quality control more difficult, and reduces the district's ability to demonstrate systematic methodology under professional review. In metro-adjacent counties, automated depreciation schedules are typical because they enable standardization at scale.

Commercial and income-producing valuation is the largest methodological exposure. The absence of institutionalized income modeling and centralized cap rate development increases the likelihood that income-producing properties are systematically undervalued relative to market behavior. The practice of applying the income approach only when owners provide data at ARB creates an asymmetric pattern where well-represented taxpayers may receive value reductions while other properties remain cost-based and potentially distorted. This weakens equity and uniformity across the commercial roll and increases risk of litigation, arbitrations, or credibility challenges. However, it was beyond our scope to review the actual effects of the current methods. As a result, two risks exist at the same time:

- Some cost-based values may be higher than an income approach would indicate.
- Other properties may receive below-market reductions because income arguments are accepted without a reliable internal framework to test them.

The core issue, therefore, is uniformity and equity, not a single directional error. The recommendation is to develop and apply income models uniformly so that all income-

producing properties are valued using the same market-supported methodology from the outset, rather than only when challenged in protest.

Finally, organizational and governance constraints materially affect the appraisal function. Where appraisers believe they are not permitted to correct known errors due to reappraisal-zone constraints, the district's values can drift from market reality, and inequities can compound over time. Similarly, inefficient fieldwork practices and insufficient training pipelines reduce the district's ability to modernize, adopt system tools effectively, and scale to future growth.

D. Compliance Check

JCAD's appraisal practices, while inefficient and structurally weak in several areas, do not appear to be categorically out of compliance based on the evidence provided to date. The district has received passing measures on appraisal level and uniformity in the most recent reporting available, and the 2023 School District Property Value Study indicated that school districts wholly within Johnson County were found valid and certified at local value.

At the same time, the operational practices described introduce compliance risk relative to the intent and expectations embedded within the Texas Property Tax Code and professional standards. Texas Property Tax Code §25.18 requires a written reappraisal plan and systematic reappraisal processes; the application of that plan in a manner that prevents correction of observable errors or changes may create risk depending on how values are treated for omitted improvements, physical changes, and statutory required increases. USPAP Standards 5 and 6 emphasize credible development and reporting in mass appraisal, including consistent methodology and sufficient documentation. The degree of schedule staleness, inconsistent classification systems, heavy reliance on ad hoc adjustments, and lack of a uniform appraisal manual or standardized practices may challenge defensibility under USPAP expectations if not corrected, even if state-level outcome measures remain within acceptable ranges.

This compliance assessment should be treated as preliminary and should be validated through direct testing of reappraisal plan execution, model documentation practices, ratio study procedures, and schedule governance during the final evaluation phase.

E. Recommendations

JCAD should modernize mass appraisal practices through a structured program focused on schedule governance, model integrity, system stabilization, and uniform methodology.

- Implement land schedules that recognize economies of scale. Land schedules should be redesigned to include unit value ranges by size tier and automated

interpolation to reflect market pricing behavior. JCAD should adopt a defined cycle for schedule review and calibration to prevent long-term staleness.

- Apply a single, updated set of improvement cost schedules aligned to current construction costs. The district should eliminate dual classification and schedule frameworks for similar residential property types and replace them with a standardized, countywide schedule structure supported by market evidence and periodic recalibration.
- Implement automated depreciation schedules within CAMA. Depreciation should be calculated systematically using the year built and condition, rather than manual entry or manipulation of the effective year. This will improve uniformity, reduce staff time, and strengthen defensibility.
- Redesign and expand market areas to create meaningful modeling groups. Market areas should be redesigned to group subdivisions that compete directly, creating sufficiently sized datasets for ratio studies and defensible adjustments. This will also position the district to use CAMA modeling tools more effectively once stabilized.
- Stabilize CAMA functionality before expanding features. The district should halt further expansion efforts until baseline functionality is operational, tested, and documented, including square-footage handling, sales-comparison capability, and income modeling. Hands-on, onsite training by GSA should be secured and structured around actual work processes, not generic system demonstrations.
- Reduce reliance on ad hoc adjustments. The district should remove broad “Eco” and similar adjustment types used to force value outcomes and instead transition properties into validated models and schedules. Adjustments should be limited to objectively measurable conditions such as verified flood hazard impacts or other clearly documented factors. Adjustments that are incongruent with these conditions should be subject to Quality Control by a Director or Chief Appraiser.
- Establish commercial income modeling capability and centralize cap rate development. JCAD should build and maintain income models for income-producing properties, supported by a structured data collection program drawing from ARB outcomes, brokers, CoStar, and other market sources. This will improve equity across the commercial roll and reduce reliance on owner-provided data during ARB.
- Strengthen commercial and BPP staffing and training. The district should provide formal commercial and BPP training and ensure role coverage is adequate for both

functions. Reliance solely on Comptroller schedules without market verification should be reduced through training, tools, and supervisory review.

- Improve appraisal documentation and create a uniform appraisal manual. JCAD should develop a standardized appraisal manual and SOP library that defines classification, coding, documentation standards, ratio study expectations, file conventions, and supervisory review requirements.
- Improve cross-department communication practices that affect appraisal performance. Regular coordination among Support Services, Exemptions, and Appraisal should be institutionalized to address taxpayer inquiries, track corrections, and manage workflow handoffs, particularly during protest season.
- Improve fieldwork productivity and align car allowances to actual vehicle use. The paired fieldwork “team” model should be re-evaluated. If safety concerns persist, JCAD should adopt targeted safety protocols rather than universal paired driving, and car allowances should be structured to reflect actual driving responsibilities to avoid unnecessary costs.

F. Summary

JCAD’s mass appraisal function is staffed by committed professionals but is constrained by outdated schedules, incomplete system modernization, inconsistent classification and documentation practices, and insufficient commercial income modeling capability. These conditions drive inefficiency and elevate risk to uniformity and defensibility, even where recent state-level outcome measures have met validity thresholds.

A disciplined modernization program, focused on schedule updates, depreciation automation, market area redesign, CAMA stabilization, and commercial income modeling, would significantly improve accuracy, equity, and transparency. These reforms will also reduce reliance on subjective adjustments and manual workarounds, strengthen defensibility in protests and litigation, and improve public confidence in the district’s valuation outcomes.

Section 4.2 – Customer Service and Public Transparency

A. Overview and Purpose

Customer service and public transparency represent the most visible and reputationally sensitive functions of the Johnson County Appraisal District (JCAD). For most taxpayers, interactions with front-counter staff, phone representatives, the website, and the Appraisal Review Board (ARB) constitute their primary, and often only, experience with the district. These touchpoints shape public perceptions of fairness, professionalism, and trust in the property tax system. Accordingly, the effectiveness of customer service operations and the integrity of public-facing processes are critical not only to service delivery but also to statutory compliance and institutional credibility.

This section evaluates how JCAD communicates with the public, administers taxpayer services, manages the protest and appeal process, and fulfills transparency obligations under the Texas Property Tax Code, the Open Meetings Act, and the Public Information Act. The review examines customer service performance and capacity, communication consistency, notice clarity, website accessibility, records management, and the conduct and oversight of the Appraisal Review Board as the independent safeguard of taxpayer due process.

Contextually, interviews consistently identified customer service as one of the district's strongest operational functions in terms of employee dedication and public-facing professionalism. Current and former staff uniformly described customer service as the function most committed to helping taxpayers and the one in which employees often derive the greatest sense of purpose. At the same time, the same interviews revealed that customer service staff operate in a high-stress environment marked by hostile interactions, inconsistent guidance from leadership, and limited managerial support during confrontational encounters. These conditions are compounded by the broader organizational challenges identified in Section 3, including unclear authority, inconsistent communication, and cultural fragmentation.

The Appraisal Review Board occupies a central role in public transparency and procedural fairness. While transparency is often understood as access to records, interviews underscored that it is equally defined by the impartiality of appeal hearings, ethical conduct of ARB members, consistency of procedures, and the extent to which taxpayers feel heard and respected. Interviews with ARB members, staff, and former participants suggest that weaknesses in ARB training, oversight, and accountability have undermined confidence in the protest process and contributed to perceptions of bias and inconsistency.

Operationally, customer service and transparency functions are also affected by practical process gaps. These include limited technology support for high-volume exemptions intake, inconsistent access to appraisal staff for real-time taxpayer questions, the absence of standardized scripts and FAQs, and the lack of a defined process for handling returned mail for mineral and industrial accounts. Collectively, these issues increase frustration for taxpayers and staff alike, reduce efficiency, and weaken the district's ability to demonstrate fairness and responsiveness.

This section, therefore, considers customer service and public transparency not as isolated functions, but as extensions of the district's governance culture, operational discipline, and commitment to equitable treatment.

B. Findings

1. Customer service was consistently identified by current and former staff as the strongest and most mission-driven function within JCAD. Employees expressed pride in assisting taxpayers and described customer-facing work as central to the district's public purpose.
2. Customer service and ARB operations represent the most visible public-facing functions of the district and therefore have a disproportionate influence on public trust, reputational risk, and perceptions of fairness.
3. Staff in customer-facing roles reported elevated stress due to hostile and, at times, abusive taxpayer interactions, including incidents where employees were verbally harassed and called derogatory names. Staff expressed concern for physical safety and requested the presence of a public safety officer to protect against escalation.
4. Several employees described feeling caught between the public and leadership, lacking consistent guidance or backup when disputes escalated. This dynamic mirrors broader cultural issues identified across departments.
5. Interviews with current and former ARB members indicate frustration that legitimate complaints about ARB conduct were not investigated or resolved, reinforcing perceptions that concerns "went nowhere."
6. Evidence from interviews indicates that some ARB members may have engaged in unprofessional conduct, including inattentiveness during hearings and verbal intimidation of dissenting members.
7. Multiple interviewees raised concerns about conflicts of interest involving ARB members who were active or former real estate professionals, including

undisclosed ties to protest agents. These conditions create, at a minimum, the appearance of bias.

8. Records management related to ARB proceedings is deficient. ARB members reported that meeting recordings and documentation were incomplete or selectively stopped during sensitive discussions, including those related to the organizational review.
9. The documented process for lodging, investigating, or resolving complaints related to ARB misconduct, ethics violations, or procedural irregularities is unclear, especially given prior inaction by the former TLO.
10. Customer service communication is inconsistent. Frontline staff reported outdated scripts, missing FAQs, and uneven training, resulting in taxpayers receiving different answers depending on which employee they contact.
11. Appraisers are not consistently responsive to phone calls or inquiries from support staff during on-site work, limiting customer service's ability to resolve taxpayer questions efficiently.
12. Exemptions intake and processing are constrained by insufficient scanning capacity. Staff reported that issuing desk scanners at each workstation and front counter would allow applications to be scanned immediately, reduce backlog, and provide taxpayers with immediate proof of submission.
13. Returned mail for mineral and industrial accounts is a recurring issue, and no documented process exists to validate corrected addresses or ensure updates are communicated back to the mineral appraisal vendor, Capital Appraisal Group.

C. Analysis

JCAD's customer service and transparency challenges are not rooted in employee effort or intent, but in structural, procedural, and governance deficiencies that undermine otherwise strong frontline performance. Customer service staff demonstrate commitment and professionalism, yet they operate without consistent guidance, standardized communication tools, or adequate support when facing hostile or complex interactions. In such an environment, even well-trained employees are forced to improvise, which leads to uneven taxpayer experiences and increased complaint volume.

The ARB-related findings are particularly consequential. The ARB is intended to function as an independent, impartial safeguard for taxpayer appeals. Where ARB members engage in inattentive behavior, intimidation, or vote without feeling like they have heard all the evidence, due process is compromised. The lack of formal oversight, complaint resolution

mechanisms, and consistent training allows these behaviors to persist without correction. This erodes public confidence not only in ARB outcomes but also in the integrity of the appraisal system as a whole.

Operational process gaps further exacerbate transparency and service issues. Without standardized scripts, FAQs, and escalation protocols, customer service becomes reactive and dependent on individual knowledge rather than institutional standards. Technology limitations, such as insufficient scanners and fragmented returned-mail handling processes, create avoidable inefficiencies that frustrate taxpayers and staff and contribute to backlogs and data quality risks.

Taken together, these issues reflect the broader organizational patterns identified in Section 3: informal communication, unclear authority, lack of documentation, and limited accountability. Without addressing these systemic conditions, incremental improvements in customer service or transparency will be difficult to sustain.

D. Compliance Check

Based on interviews, document review, and operational observations, JCAD demonstrates mixed compliance in the area of customer service and public transparency.

Under Texas Property Tax Code § 6.052, the Taxpayer Liaison Officer's role is limited to facilitating communication and assisting taxpayers in understanding procedures, and investigating and reporting complaints to the board and Texas Comptroller. Interview evidence and documents suggest that reported complaints may not have been investigated or reported to the Board or Texas Comptroller.

Texas Property Tax Code § 41.45 requires fair and impartial ARB hearings. The behaviors described by ARB members and staff, including inattentiveness, intimidation, and voting without hearing evidence, indicate partial compliance and raise due process concerns. Beyond the Texas Property Code, it is essential that residents feel listened to, and interviews and recordings show a recurring pattern of the former ARB Chair being curt, cutting off residents, and failing to bring a culture of customer service to the ARB.

IAAO standards related to public relations and transparency emphasize consistent communication, accessible information, and professionalism. Based on staff interviews and observed gaps in scripts, website tools, and documentation, JCAD does not appear fully aligned with these standards.

Open Meetings Act and Public Information Act requirements related to recording, documentation, and timely public access appear partially met. Incomplete recordings and

delayed or missing documentation create compliance exposure and should be addressed promptly.

E. Recommendations

To restore public confidence and reduce legal and reputational risk, JCAD should pursue structural reforms that strengthen consistency in customer service, ARB integrity, and transparency controls.

- Reconstitute the Appraisal Review Board under clear ethics, disclosure, and training standards. ARB appointments should require verified conflict-of-interest disclosures, annual ethics certifications, background checks where appropriate, and enhanced training focused on impartiality, hearing procedures, and professional conduct.
- Clarify and limit the Taxpayer Liaison Officer role. Adopt a written policy defining the TLO's responsibilities as administrative coordination and public assistance only, with expectations on how the TLO will communicate and report complaints and investigations to the Board.
- Establish a formal ARB oversight and complaint resolution process. Create a documented mechanism for lodging, investigating, and resolving ARB-related complaints, with outcomes reported transparently and, where appropriate, escalated to the State Comptroller.
- Modernize customer service communication protocols. Develop and maintain a centralized library of scripts, FAQs, and escalation pathways to ensure consistent taxpayer responses, regardless of point of contact.
- Improve staff safety and support. Evaluate security needs at public-facing facilities and implement appropriate measures, including the presence of a Supervisor or Security personnel during high-volume or high-tension periods.
- Enhance transparency through timely publication. Require all meeting recordings, signed minutes, and key procedural updates to be posted online within five business days to reinforce public trust and compliance.
- Improve operational technology support. Issue desk scanners to all exemptions processing staff and front-counter stations to enable immediate scanning, reduce backlog, and provide taxpayers with proof of submission.
- Formalize returned mail handling for mineral and industrial accounts. Implement a documented process to validate corrected addresses and ensure updates are

communicated back and incorporated by Capital Appraisal Group in a consistent, trackable manner.

- Strengthen cross-department responsiveness. Establish expectations for appraiser availability to support customer service inquiries and define escalation procedures when immediate assistance is needed.

These reforms should be coordinated with the broader organizational restructuring outlined in Section 3 and aligned with later compliance and risk mitigation recommendations.

F. Summary

Customer service is one of JCAD's most committed and capable functions, yet it operates within an environment that exposes staff to stress, inconsistent guidance, and limited institutional support. At the same time, weaknesses in ARB conduct, oversight, and documentation materially undermine transparency and public confidence in the protest process.

Restoring credibility in customer service and public transparency will require more than incremental adjustments. It demands structural reform that clarifies roles, enforces ethical standards, standardizes communication, protects staff, and ensures that the ARB functions as an independent, impartial, and well-governed body. With these changes, JCAD can rebuild trust, reduce compliance risk, and deliver a taxpayer experience that is fair, consistent, and transparent.

Section 4.3 – Human Resources, Staffing and Talent

A. Overview and Purpose

Human resources capacity is a foundational determinant of the Johnson County Appraisal District's (JCAD) ability to deliver accurate mass appraisal, consistent taxpayer service, and defensible outcomes during protest and litigation. In a Central Appraisal District, staffing effectiveness is not defined solely by headcount; it is driven by role clarity, leadership capability, compensation competitiveness, training pipelines, certification compliance, workforce planning, and the organization's ability to retain institutional knowledge over time.

This section evaluates JCAD's staffing levels, span of control, compensation and classification structures, recruitment and onboarding practices, training and certification compliance, performance management, succession readiness, and overall workforce stability. The analysis considers both quantitative indicators, such as turnover and staffing ratios, and qualitative indicators, including leadership practices, employee experience, and organizational culture.

The current environment is shaped by several conditions described in earlier sections. The district has experienced leadership instability, inconsistent internal communication, incomplete documentation, and cultural fragmentation. These conditions have had direct workforce consequences: high turnover, limited institutional knowledge retention, inconsistent training, and reduced trust in management. Staff interviews and former employee outreach indicate that many workforce challenges are not merely operational; they are systemic, cultural, and structural, with perceptions of inconsistent treatment, unclear expectations, and limited psychological safety. These conditions are particularly damaging in a technical agency that depends on experienced appraisers, reliable support services, and coordinated ARB-facing operations.

JCAD currently employs approximately 35 staff members across appraisal, support services, and administrative functions. While staffing ratios may appear lean or adequate depending on how parcel counts are interpreted, workforce stability has been severely disrupted in recent years. Over the past three years, the district has experienced turnover exceeding 100 percent, resulting in substantial loss of institutional knowledge and repeated disruption to operations. These workforce conditions exist alongside leadership instability, inconsistent policy enforcement, and limited HR infrastructure, all of which compound retention challenges and compliance risk.

The district's talent model has largely relied on hiring entry-level employees and promoting from within. While this approach can be effective in mature organizations with strong

processes, standardized training, and consistent leadership, it is high-risk in an environment where documentation, calibration, and managerial discipline are underdeveloped. As a result, the district faces both immediate workforce stability challenges and longer-term succession and capability risks, particularly in specialized appraisal disciplines.

Finally, this review includes a policy and compliance lens. As a public agency, the district must operate with clear hiring practices, consistent documentation, and defensible employment decisions. It must also maintain professional certification compliance for appraisal personnel. The HR function is the control point for these requirements; where HR is informal, decentralized, or incomplete, the district's operational risk increases materially.

B. Findings

1. Turnover has exceeded 100 percent over the past three years, with approximately 37 employees departing through retirement, resignation, and separation. Former employee outreach indicated that the primary drivers included a toxic culture, poor leadership, low entry-level wages, and limited visible pathways for wage growth and advancement.
2. JCAD employs approximately 35 staff members across administrative, appraisal, and support divisions. Staffing ratios appear lean, but comparisons against total parcel counts are misleading due to the large number of mineral accounts. When normalized to "active" parcel workloads, ratios may align more closely with IAAO mixed-jurisdiction benchmarks, though operational maturity and skill distribution remain concerns.
3. JCAD lacks a unified HR management function. Personnel records are described as incomplete or inconsistent, and there is no formal HR professional on staff responsible for standardized processes, compliance oversight, and workforce planning.
4. Recruitment is haphazard and not anchored to a strategy for attracting experienced CAD talent from external markets. The district relies heavily on hiring entry-level staff and promoting internally, despite simultaneously lacking the standardized processes, training infrastructure, and leadership consistency typically required to make that model successful.
5. Job descriptions are outdated, with many predating 2020, and do not reflect actual duties. Job descriptions are not centralized and normalized through HR, which limits consistency in expectations, classification discipline, and internal equity.

6. There is no structured onboarding program. There is no standardized onboarding checklist, onboarding packet, or clear explanation of benefits, and no structured onboarding plan for new employees.
7. There is no defined probationary period for new hires. Implementing a 90-day probationary period would align JCAD with common public-sector practice and strengthen early performance management.
8. Training and professional development are not institutionalized beyond required appraiser training. There is no district-wide training calendar, no defined internal training modules for processes, policies, governance, and career development, and limited participation in off-site training. Staff noted that online training is the only training primarily used, which is insufficient for skill development and institutional learning.
9. Continuing education and certification compliance for Registered Professional Appraisers appears inconsistent. Documentation of required continuing education, ethics training, and USPAP coursework is incomplete in multiple personnel files.
10. Performance management lacks structure. Employees do not have clearly defined annual goals, routine coaching, or consistent evaluation criteria. Merit increases have occurred without a documented, uniform methodology.
11. Leadership capability and manager coaching are not systematically developed. Leadership capability varies significantly across departments. Inconsistent management practices, unclear expectations, and uneven accountability have contributed to mistrust, disengagement, and perceptions of favoritism or retaliation.
12. Budgeted staffing does not consistently translate into filled roles. The most recent budget included approximately 42 positions, while the district operated at approximately 35–37 positions for much of 2025, with continued turnover and extended vacancies. This creates ambiguity over whether positions are genuinely needed, mis-scoped, or being held without strategic rationale.
13. Several workforce structure adjustments were identified as operational opportunities, including the need to professionalize the ARB clerk role with improved pay to reduce turnover, remove the appraisal “buddy system” to improve productivity, and add senior-level appraisal talent with external experience in mass land appraisal, residential calibration, and commercial income appraisal.

14. The District's benefits are comparatively rich and may be functioning as a retention lever, but the overall value proposition may be misallocated if wage competitiveness is insufficient at key entry and mid-level roles.
15. A legal/policy clarification is necessary regarding leave practices. As a public agency, the CAD is a covered employer under FMLA; however, employee eligibility is subject to the statutory threshold of at least 50 employees within a 75-mile radius at the worksite. JCAD is currently below that threshold, meaning employees may not be eligible for FMLA leave until the threshold is met, though other leave obligations and policies still apply. Policies must accurately reflect eligibility while ensuring compliant alternative leave practices.

C. Analysis

JCAD's workforce challenges are structural rather than cyclical. Turnover at the scale experienced by the district is inconsistent with stable public-sector operations and indicates systemic breakdowns in leadership, culture, compensation strategy, and employee experience. Even where staffing ratios appear reasonable, high attrition erodes productivity, increases training burden, and weakens appraisal consistency and service delivery.

The absence of a professional HR function is a critical control gap. Without centralized ownership of recruitment, onboarding, training administration, performance management, and compliance documentation, the organization is unable to enforce consistency or protect itself from legal and regulatory exposure. In technical agencies such as appraisal districts, HR functions serve as operational risk controls as much as administrative support.

The district's reliance on internal-only talent development further magnifies risk. Without external hiring at senior levels, legacy practices persist unchecked, and appraisal methodologies can drift away from evolving professional standards. This is particularly consequential in commercial and BPP appraisal, where specialized expertise and market exposure are essential for defensible valuation.

Compensation and career progression design also undermine retention. While benefits are competitive, the lack of defined pay steps within grades, transparent advancement criteria, and visible career pathways encourages skilled employees to seek opportunities elsewhere once they acquire minimal experience. Inconsistent performance management and merit practices further weaken trust in fairness and predictability. Finally, a culture that has lacked leadership, developed departmental silos, and treated employees unequally has led to increased turnover.

Leadership behavior is a decisive factor. In small organizations, inconsistent or ineffective management practices have an outsized cultural impact. Without structured coaching, accountability mechanisms, and clear expectations for managers, negative behaviors replicate, and turnover accelerates. Conversely, targeted leadership stabilization can produce rapid improvements if paired with clear HR infrastructure and policy enforcement.

D. Compliance Check

The HR and talent domain presents several compliance and risk concerns.

Personnel file maintenance and certification documentation are not consistently aligned with TDLR and TALCB requirements. Missing continuing education, ethics, and USPAP documentation represents a compliance deficiency that must be corrected.

Cooperation with board-authorized evaluations and governance oversight has been impaired by inconsistent information sharing and access, creating statutory and ethical risk for the Chief Appraiser and the Board.

Anti-harassment and anti-retaliation protections exist in policy form, but inconsistent enforcement and low employee confidence indicate partial compliance and elevated legal exposure.

Succession planning, workforce development, and professional training practices do not align with IAAO standards for valuation personnel and represent a material best-practice gap.

Leave policy compliance requires clarification to ensure statutory accuracy and consistent application.

The lack of consistent application of Policies and Procedures across departments poses a potential human resource risk, as employees may receive unequal treatment within the organization.

E. Recommendations

1. Establish a formal HR function with accountable leadership

Create a dedicated HR function led by a credentialed HR professional reporting to the Chief Appraiser. This role should own recruitment, onboarding, training administration, performance management, policy maintenance, employee relations, and compliance documentation. In a small agency, this may begin as a single HR leader with shared administrative support, but responsibility and authority must be clearly centralized.

2. Implement an annual workforce plan and three-year outlook

Develop an annual workforce plan that projects staffing needs, identifies mission-critical roles, anticipates retirements, and defines succession coverage for technical positions. Extend the outlook three years to align with reappraisal cycles, technology milestones, and county growth. Use the workforce plan to justify which budgeted positions should be filled, re-scoped, or eliminated.

3. Fix the talent mix through targeted external hiring and role redesign

Add senior-level appraisers with external CAD experience, focused on mass land appraisal, residential calibration, and commercial income appraisal. These hires should be positioned as technical leaders who help standardize practices, mentor staff, and institutionalize best-practice modeling. Redesign the ARB clerk role as a higher-skilled, higher-paid position to reduce turnover and strengthen continuity during protest season.

4. Modernize compensation architecture and progression pathways

Centralize and update job descriptions through HR and normalize them across departments. Refresh pay grades and salary ranges using peer CAD benchmarking and market data, then implement step progression within grades tied to skill attainment, certifications, performance, and tenure. Rebalance total rewards by evaluating whether a portion of rich benefits can be redirected to wage competitiveness where retention is most at risk, while preserving core public-sector benefits that remain recruitment assets.

5. Build structured onboarding, probation, and offboarding controls

Implement a standardized onboarding packet and checklist, a benefits overview, and a structured 180-day onboarding plan with role-specific training milestones. Adopt a 90-day probationary period with documented check-ins at 30, 60, and 90 days. Implement a formal offboarding checklist, including an exit interview, badge/key/equipment recovery, and immediate removal of access to systems.

6. Institutionalize training, professional development, and certification compliance

Create an annual training calendar covering technical appraisal development, customer service and de-escalation skills, ARB-facing professionalism, cybersecurity awareness, policy and governance basics, and role-specific systems training. Prioritize small-group offsite training (for example, 101–102 foundational courses) to build depth without disrupting operations. Partner with nearby CADs for cross-training exchanges and shadowing opportunities. Immediately audit CE

compliance for all appraisal staff and implement a tracking system with alerts well before deadlines.

7. Reset performance management around clarity, coaching, and advancement

Implement department and individual annual goals aligned to statutory responsibilities, operational KPIs, and improved operational goals. Require monthly or quarterly coaching check-ins documented in a simple format. Redesign the annual review as a developmental tool focused on goals, skills, and career progression. Separate performance feedback from compensation decisions by implementing a structured talent review process, such as a 9-box framework, where pay-for-performance decisions are anchored to documented outcomes and role market positioning.

8. Strengthen leadership capability and accountability mechanisms

Provide structured coaching and leadership development for directors and managers, with clear expectations for communication, equitable treatment, documentation, and professional conduct. Establish standards for manager behavior and require corrective action plans when patterns of conflict, inconsistency, or policy noncompliance are identified. Leadership stabilization is a prerequisite for cultural repair; policies alone will not reverse turnover without consistent modeling and accountability.

9. Implement engagement and feedback systems tied to action planning

Launch an organization-wide engagement program that includes quarterly pulse surveys and an annual complete survey, with action planning and transparent communication of results. Add external feedback loops through periodic surveys of taxing entities and a customer survey program to track service quality (including net promoter-style indicators). Use the results to prioritize training, staffing, and process improvements rather than treating surveys as standalone artifacts.

10. Align operational practices with productivity and workforce sustainability

Reassess paired appraisal fieldwork and transition toward independent inspections supported by targeted safety protocols. This improves productivity, strengthens accountability, and ensures auto allowances are aligned to actual vehicle usage. Provide regular public relations and de-escalation training for all public-facing roles and incorporate team-building initiatives to rebuild trust across departments.

F. Summary

JCAD's HR and talent environment is underdeveloped relative to the complexity and visibility of its mission. Turnover exceeding 100 percent over three years, inconsistent

certification documentation, and the absence of structured HR infrastructure have materially weakened continuity, morale, and the district's ability to recruit and retain skilled appraisal talent. While staffing ratios may appear defensible when normalized for mineral accounts, workforce instability and skill gaps create operational fragility and increase compliance exposure.

Stabilization requires centralizing HR ownership, professionalizing recruitment and onboarding, modernizing compensation and career progression, enforcing certification compliance, and investing in leadership capability. With these steps, JCAD can reduce turnover, rebuild institutional knowledge, improve defensibility and service quality, and position the organization to sustain performance through reappraisal cycles, protest seasons, and ongoing modernization.

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Section 4.4 – Policies, Procedures, and Internal Controls

A. Overview and Purpose

Policies, procedures, and internal controls form the structural foundation through which a Central Appraisal District executes its statutory responsibilities, ensures operational consistency, and manages risk. In an organization with significant public accountability, quasi-judicial functions, and financial impact, the presence of clearly documented Standard Operating Procedures (SOPs), formal policies, and internal control mechanisms is essential to ensure transparency, equity, and defensibility.

At the outset of the organizational review and audit conducted by Mackenzie Eason, Johnson County Appraisal District (JCAD) operated with virtually no formalized SOPs across most functional areas. With limited exceptions, operational knowledge resided primarily in institutional memory and informal practice rather than documented guidance. The only function with established written procedures at the start of the engagement was the finance and accounting operation. In other areas, particularly within Support Services, staff described relying on incomplete handwritten instructions and informal guidance passed down from former employees who were no longer with the organization. These informal artifacts were not standardized, validated, or centrally maintained, and in many cases reflected outdated practices.

The absence of documented procedures meant that core workflows in appraisal, exemptions, customer service, ARB coordination, human resources, and IT were executed inconsistently, depending on individual experience and interpretation. This lack of documentation created variability in outcomes, limited cross-training capability, and increased organizational vulnerability during periods of turnover or leadership change. It also constrained management's ability to enforce uniform practices or hold staff accountable to consistent standards.

As the organizational review progressed, departments began the process of developing written SOPs for their respective functions. While this represents a positive and necessary step toward operational maturity, the effort remains incomplete and uneven across divisions. Many procedures are still in draft form, lack formal approval, or do not yet reflect integrated cross-department workflows. Without a structured governance framework, these emerging SOPs risk becoming static documents rather than living tools that guide daily operations.

In addition to procedural gaps, the district was found to have very few formal policies beyond those explicitly required by state law. Policies addressing internal governance, approval authority, operational consistency, financial controls, technology lifecycle

management, workplace safety, and internal accountability were largely absent. The lack of internal policy infrastructure has contributed to inconsistent application of practices across departments and limited the district's ability to enforce uniform standards.

This section evaluates the current state of JCAD's policies, procedures, and internal controls, including the existence, adequacy, and application of SOPs; the governance and version control of policy documents; internal approval and authorization mechanisms; ARB procedural compliance; safety and emergency preparedness; and quality assurance practices. It also assesses whether the district has established a sustainable framework for maintaining, reviewing, and enforcing procedures and policies over time.

A complete review of all SOPs and policies should occur at least annually, with updates made to reflect changes in law, technology, organizational structure, and operational risk. Formalizing this review cycle is critical to ensuring that documentation remains current, effective, and aligned with statutory requirements and professional standards. Strengthening the district's policy and procedural infrastructure is a foundational step toward improving consistency, accountability, and long-term organizational resilience.

B. Findings

1. JCAD does not maintain a comprehensive, current Standard Operating Procedure manual. Core workflows in appraisal, exemptions, support services, HR, and IT are undocumented or only partially documented, resulting in reliance on learned behavior rather than standardized processes.
2. Where procedural documents exist, they are outdated and inconsistently applied. Written procedures have not been systematically updated to reflect changes in systems, user roles, leadership transitions, or offboarding requirements.
3. The district lacks a centralized policy governance framework. Policies are not maintained in a single repository, do not consistently include approval dates or version histories, and are not subject to routine review or formal board adoption. This makes it difficult to verify which policies are current and enforceable.
4. Appraisal Review Board (ARB) procedures are not consistently aligned with Texas Comptroller Model Hearing Procedures. ARB operations reflect inconsistent application of hearing protocols, uneven adherence to ethical standards, and insufficient procedural oversight. ARB should approve their own policies and procedures annually, which does not appear to have been done in the past.
5. The statutory role of the Taxpayer Liaison Officer has not been clearly communicated in written policy.

6. Approval and control workflows are insufficiently formalized. Key actions, including valuation changes, payroll adjustments, and vendor payments, often lack documented multi-level authorization and rely on verbal approvals rather than written signoffs.
7. Offboarding controls are weak. System access, permissions, and credentials are not consistently removed upon employee separation, increasing security and internal control risk.
8. The district does not maintain an internal audit or quality assurance function. Supervisory review is informal and varies by department, and there is no structured program for random file review, independent data verification, or process auditing.
9. The district does not conduct routine internal compliance reviews against Comptroller MAP standards, Property Value Study criteria, or internal control benchmarks outside of required external submissions.
10. Operational practices reflect several internal control weaknesses with financial and liability implications, including mileage reimbursement for training travel despite existing vehicle allowances, and budget structures that obscure true staffing cost exposure by listing pay by individual rather than by position.
11. The adopted budget does not include a formal technology replacement reserve for critical assets such as computers, servers, firewalls, network equipment, and mobile appraisal devices, despite the rapid obsolescence cycle of such infrastructure.
12. Property inspection controls are insufficient. There is no validation mechanism to confirm that all properties scheduled for inspection were actually visited, as inspection lists are automatically coded as completed without independent verification.
13. Workplace safety and emergency preparedness controls are absent. The district operates in an older, multi-level building with a complex layout, yet staff have not participated in fire drills, tornado drills, or active threat training. No designated evacuation plans, assembly points, or headcount responsibilities are documented or practiced.
14. Employees reported confusion regarding approval authority, escalation paths, and accountability boundaries, reinforcing a perception that decisions are personality-driven rather than process-driven.

C. Analysis

The absence of comprehensive policies and internal controls at JCAD materially undermines operational consistency, transparency, and accountability. Without documented SOPs, employees are forced to rely on institutional memory and informal norms, which increases variability in outcomes and weakens defensibility during audits, protests, and litigation. This environment also enables selective enforcement of practices, whether intentional or not, which erodes trust internally and externally.

Internal control deficiencies are especially pronounced in TLO operations, financial approvals and budget increases, and appraisal validation. The TLO's inconsistent adherence to handling complaints and suggestions represents not only a procedural weakness but a governance failure that compromises the integrity of the ARB process. Similarly, the lack of documented authorization trails for valuation changes and financial transactions increases the risk of error, misuse, or unintentional noncompliance.

The absence of an internal audit or quality assurance function prevents proactive detection of errors and systemic weaknesses. In the current environment, issues are more likely to surface through external review, taxpayer challenge, or crisis rather than through routine internal monitoring. This reactive posture places unnecessary strain on staff and increases reputational and compliance risk.

Safety and emergency preparedness gaps introduce additional liability exposure. Operating in an older, complex facility without drills or clear evacuation procedures places employees at risk and exposes the district to potential legal and insurance consequences in the event of an emergency.

Finally, weaknesses in budgeting and asset planning reflect a lack of long-term control discipline. Budgeting by individual rather than by position obscures staffing cost structure and succession assumptions, while the absence of a technology replacement reserve increases the likelihood of unplanned expenditures or deferred maintenance that can impair operations.

D. Compliance Check

JCAD demonstrates significant potential compliance gaps in its policies, procedures, and internal controls.

Texas Property Tax Code §6.052 requires the TLO to report all comments, complaints, and suggestions to the Board of Directors and forward them to the Texas Comptroller's office annually. In our investigation, it does not appear that the former TLO was complying with

this statute. ARB operations may not have been consistently compliant with Texas Comptroller Model Hearing Procedures.

Records management practices are partially compliant with state requirements. The absence of policy version control, retention schedules, and centralized repositories creates risk under Texas Local Government Code and state records retention standards.

The district does not meet IAAO standards related to written procedures and quality assurance for assessment practices, given the absence of comprehensive SOPs and internal review mechanisms.

Internal control practices partially align with COSO principles but lack sufficient segregation of duties, audit trails, and independent oversight to be considered robust.

Collectively, these conditions represent a material internal control weakness that should be addressed as a priority.

E. Recommendations

To strengthen procedural integrity, reduce risk, and improve accountability, JCAD should implement the following reforms:

- 1. Develop and adopt a comprehensive policy and procedure manual**

Document all core workflows across appraisal, exemptions, ARB coordination, HR, Customer Service, finance, and IT. Each policy and SOP should include scope, responsibilities, step-by-step procedures, approval authority, and recordkeeping requirements, with formal board adoption where appropriate.

- 2. Establish a centralized policy governance framework**

Designate a compliance owner responsible for maintaining a master policy index, enforcing version control, tracking revisions, and coordinating annual policy reviews. Substantive changes should require documented approval and board acknowledgment.

- 3. Reconstitute ARB procedural oversight**

Require written adherence to Comptroller Model Hearing Procedures, implement mandatory ethics and conflict-of-interest disclosures, and ensure annual training that goes beyond the state mandated training for all ARB members. Clearly define and limit the Taxpayer Liaison Officer's role in writing.

- 4. Implement multi-level approval and authorization controls**

Introduce documented approval requirements for valuation adjustments, payroll

changes, reimbursements, and vendor payments. Enforce immediate removal of system access and credentials upon employee separation.

5. Create an internal audit and quality assurance program

Establish a periodic internal review function to conduct file audits, data verification, and compliance testing. Perform semiannual operational audits and an annual compliance review against MAP, PVS, and internal control standards, with results reported to the Chief Appraiser and Board.

6. Strengthen property inspection validation controls

Implement verification mechanisms for field inspections, including date-stamped property photos and supervisory review of inspection completion, to ensure scheduled inspections are actually performed.

7. Standardize financial and asset planning practices

Budget staffing positions at fully qualified levels with defined pay ranges rather than by individual incumbents. Establish a dedicated technology replacement reserve funded annually at a proportional level to support lifecycle replacement of critical IT assets. Track all assets with the original date of entry into service, the expected replacement date, and the date of disposal.

8. Eliminate duplicative or inconsistent reimbursement practices

Align mileage reimbursement and vehicle allowance policies to avoid double compensation and ensure consistency with IRS and public-sector best practices.

9. Implement workplace safety and emergency preparedness protocols

Develop and document emergency response plans, designate evacuation routes and assembly points, assign headcount responsibilities, and conduct annual fire, severe-weather, and active-threat drills.

10. Clarify authority and accountability structures

Document approval chains, escalation paths, and decision-making authority across departments to reduce ambiguity and prevent personality-driven practices.

F. Summary

JCAD currently lacks the policy infrastructure and internal control framework necessary to ensure consistent, compliant, and transparent operations. The absence of comprehensive SOPs, structured approval workflows, internal audit capacity, and emergency preparedness exposes the district to operational, legal, and reputational risk.

Restoring procedural integrity will require disciplined documentation, centralized governance of policies, strengthened internal controls, and the establishment of routine

quality assurance and audit functions. These reforms are foundational and will support improvements in appraisal accuracy, customer service, workforce stability, and long-term compliance readiness.

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Section 4.5 – Data Collection, Technology, and Data Management

A. Overview and Purpose

Data collection, technology infrastructure, and data management systems are the operational backbone of modern mass appraisal and are inseparable from appraisal accuracy, internal controls, customer service, and value defensibility. In a contemporary Central Appraisal District, nearly every statutory function, field inspections, valuation modeling, exemption processing, protest preparation, certification, tax roll production, and public transparency, depends on reliable information systems and disciplined data governance.

For Johnson County Appraisal District (JCAD), technology plays an especially critical role due to the district's scale, complexity, and growth trajectory. JCAD manages more than 400,000 total parcels across diverse property classes, including a large volume of mineral, residential, commercial, and utility properties. These account types require different valuation methodologies, data inputs, and review cycles, all of which must be supported by integrated systems capable of handling large datasets, performing analytical validation, and producing defensible outputs. When technology systems are unstable, incomplete, or poorly integrated, appraisal staff are forced to rely on manual processes, spreadsheets, and judgment-based workarounds that increase variability, reduce efficiency, and elevate risk.

This section evaluates JCAD's technology and data environment at a moment of unusually high transition risk. The district is attempting to migrate from a long-standing legacy CAMA system (Beyond Appraisal / MARS) to the GSA CAMA platform while simultaneously modernizing its GIS environment and addressing hardware and operating system obsolescence. These initiatives are occurring against a backdrop of organizational turnover, limited internal IT capacity, and incomplete procedural controls, all of which amplify implementation risk.

Historically, JCAD's legacy CAMA system has supported appraisal operations through extensive customization and staff familiarity and individual staff opinion rather than through modern modeling and automation. While the system has allowed the district to function, it is increasingly constrained by aging architecture, limited analytical capability, and diminishing vendor support. The decision to migrate to GSA reflects a recognition that continued reliance on the legacy platform is not sustainable, particularly as operating system support and security updates for older environments have ended or are ending. At the same time, the district's legacy system remains deeply embedded in daily operations, requiring careful coordination and risk management during any transition.

Peer experience underscores both the feasibility and the demands of such a conversion. Other Texas appraisal districts that have successfully transitioned from highly customized MARS environments to GSA have done so by committing substantial internal technical resources, including dedicated IT staff with SQL expertise, disciplined project governance, and close coordination with tax collection vendors. These districts treated the conversion not as a software purchase, but as a multi-year data governance and organizational change effort. Their experience demonstrates that technology success in appraisal districts is driven not just by vendor selection but also by internal capacity, planning, and accountability.

JCAD's current technology posture differs materially from those peer models. The district does not maintain a dedicated IT department due to the recent retirement of a manager and relies heavily on external contractors and part-time internal support to manage complex systems. No internal staff member possesses the technical skills necessary to query databases, validate large-scale data conversions, or independently diagnose system defects. As a result, the district is dependent on vendors not only for implementation but also for interpretation of issues, which limits internal oversight and increases the risk of prolonged delays or incomplete solutions. This also creates a future information deficit once outside vendors have implemented systems and installed preferences.

The technology environment is further complicated by operational timing pressures. The district faced an imminent requirement to replace or upgrade a significant portion of its workstation inventory due to operating system end-of-support timelines. Concurrently, the district is upgrading to an enterprise GIS environment intended to support field-based appraisal and improved spatial analysis, introducing new integration dependencies and cybersecurity considerations.

Beyond systems and infrastructure, this section also addresses how data is collected, validated, and used within JCAD's appraisal process. Effective mass appraisal depends not only on software but on disciplined data practices, including verified inspections, consistent photo documentation, validated sales analysis, and reliable commercial market intelligence. Where data collection practices are inconsistent or incomplete, even the most advanced systems cannot produce equitable or defensible results. Conversely, strong data governance can mitigate some system limitations, while weak data discipline magnifies technology shortcomings.

Taken together, these factors place JCAD at a pivotal inflection point. Decisions made in the next 12 to 18 months regarding technology governance, internal IT capacity, and data management practices will materially influence the district's ability to conduct the 2026 reappraisal, defend values during protest and litigation, and maintain public confidence.

This section assesses whether current technology strategies and data practices are sufficient to meet those demands and identifies the structural investments necessary to stabilize and modernize the district's information environment.

B. Findings

1. Absence of Dedicated Internal IT Capacity

JCAD does not maintain a dedicated, full-time IT department or staff with formal IT training. There is limited internal SQL capability to extract, validate, and reconcile data from the legacy CAMA system. This stands in contrast to peer CADs that successfully operate and convert complex systems using in-house technical teams.

2. Extended and Costly GSA CAMA Conversion

The district has invested approximately \$712,528, according to Addendum 2 from GSA dated August 5, 2025, in the GSA CAMA conversion since 2018, yet the system is not operational as the primary appraisal platform. Multiple conversion timelines have slipped, and meaningful progress stalled for extended periods prior to renewed efforts in 2025.

3. Diffuse Project Governance

Responsibility for the GSA conversion is shared among multiple administrators without a single accountable project owner. Technical leadership has effectively defaulted to Directors rather than trained IT professionals, weakening coordination, accountability, and execution.

4. Interface Challenges with Tax Collection Systems

A key impediment to go-live remained incompatibility between GSA and the tax collection system operated by SpindleMedia, including field formatting issues that prevent reliable data exchange. Until this interface is fully resolved and verified with JCAD data, GSA cannot be relied upon for certification or levy calculation.

5. Imminent Infrastructure Risk from Operating System Obsolescence

The district operated a mix of Windows 10 and Windows 11 workstations. Microsoft support for Windows 10 ended in October 2025, forcing rapid upgrades. Per staff reports, Beyond Appraisal exhibited instability when installed on upgraded devices, functioning reliably only on newly deployed Windows 11 machines. The absence of proactive planning resulted in reactive upgrades under compressed timelines.

6. Dual-System Dependency Likely Through 2026

Given the stalled GSA conversion and infrastructure constraints, the district will likely need to operate MARS and GSA concurrently through at least the 2026 cycle. Peer experience demonstrates that such dual operations require strong internal IT

support to manage parallel databases and reconciliations, a capacity JCAD currently lacks.

7. According to the GSA document Addendum 2, there is an additional invoice due for milestone K. This includes costs for training and Full production (\$49,991) and the holdback (\$61,750) for a total of \$111,701 due immediately following go-live. Additional fees include those incurred by the District to hire Jeremy Wilhite as an hourly consultant to conduct data analysis on the District's behalf. According to Addendum 2, it was requested at the time that GSA bill your office (and then pay Mr. Wilhite as a pass-through) for these services for ease of invoicing. I believe those consulting fees totaled \$9,898.40.

8. **GIS Modernization Without Clear Integration Governance**

JCAD is upgrading from a legacy desktop ArcGIS environment to an enterprise configuration intended to support field-based appraisal. The project experienced schedule slippage and initially lacked a formal project plan, defined milestones, or clear integration pathways with the CAMA system. The new enterprise GIS environment also introduces increased cybersecurity exposure without corresponding internal capacity to test or monitor vulnerabilities.

9. **Underutilization of CAMA Capabilities**

The current CAMA environment is not being used to its full potential. Appraisal workflows rely heavily on manual processes, and system-driven quality tracking, productivity measurement, and modeling functions are limited.

10. **Weak Inspection and Sales Validation Controls**

Properties with recorded sales are not consistently subjected to on-site inspection prior to use of sale prices in market adjustments. Field inspections do not consistently include updated, date-stamped photos, reducing validation of inspection activity and weakening public confidence.

11. **Field Technology Limitations**

iPads used by appraisal staff in the field lack wireless internet connectivity, limiting real-time access to systems, mapping tools, pictometry, and potential appraiser tracking or validation tools.

12. **Limited Commercial Market Data Integration**

The district currently relies on a TREPP subscription, which provides limited structured finance data and minimal local market coverage. This constrains development of income-based valuation models and reinforces reliance on cost-based methods.

13. Heavy Reliance on External IT Contractors

JCAD spends approximately \$100,000 annually on external IT support. This model provides episodic assistance but does not replace the institutional knowledge, continuity, or proactive planning capacity of dedicated internal staff.

C. Analysis

JCAD's technology and data environment is characterized by high dependency on aging systems, incomplete modernization, and insufficient internal technical capacity. While peer CADs have demonstrated that migration from highly customized MARS environments to GSA is achievable, their success has hinged on robust in-house IT teams with SQL expertise, strong project governance, and disciplined vendor coordination. JCAD currently lacks all of these prerequisites.

The absence of dedicated IT staff has cascading effects. Data conversion efforts are slower and less reliable, system defects take longer to resolve, and the district is dependent on vendors to identify and explain issues that internal staff are not equipped to diagnose independently. This imbalance weakens negotiating leverage with vendors and increases the risk of incomplete or flawed implementations.

The convergence of unresolved GSA conversion issues, GIS modernization, and operating system obsolescence creates an operational cliff. Without clear contingency planning and strengthened internal capacity, the district risks system instability during critical periods of appraisal, certification, and tax roll production.

Data collection practices further compound these risks. Inconsistent inspection validation, limited use of updated property imagery, and incomplete sales verification reduce confidence in appraisal inputs and undermine defensibility. Similarly, limited commercial data sources restrict the district's ability to move toward income-based valuation methodologies, perpetuating inequities identified in the mass appraisal review.

Industry best practice indicates that IT staffing typically represents approximately 3–10 percent of total CAD staff, scaled to system complexity and workload. These staff are not merely technical operators but institutional stewards of appraisal data integrity. JCAD's current staffing model falls materially short of this benchmark.

D. Compliance Check

While no single statute mandates a specific IT staffing level or technology configuration, several compliance and risk considerations are implicated:

- **Texas Property Tax Code §25.18 and USPAP Standards 5 & 6:** Weak data validation, inconsistent inspection documentation, and limited analytical capability elevate risk to compliance with systematic mass appraisal requirements.
- **Cybersecurity and Records Management Standards:** Operating enterprise GIS and appraisal systems without internal security expertise increases exposure to data breaches and records integrity failures. Neighboring CADs have experienced cybersecurity incidents that have taken down their operations for up to a year and cost hundreds of thousands of taxpayer dollars in recovery efforts.
- **IAAO Standards on Assessment Practice:** Best practices emphasize reliable systems, documented processes, validated data inputs, and sufficient technical capacity, all of which are only partially met.

E. Recommendations

To stabilize technology operations and support future appraisal integrity, JCAD should implement the following actions:

1. **Establish Dedicated Internal IT Capacity**
Create at least one full-time IT position with SQL proficiency and CAMA database expertise, reporting to senior management. Over time, expand IT staffing to align with peer CAD benchmarks as system complexity increases.
2. **Appoint a Single Technology Project Owner**
Designate a single accountable project manager for the GSA conversion and GIS modernization to coordinate vendors, manage timelines, and report progress to leadership and the Board.
3. **Stabilize the GSA Conversion Before Full Cutover**
Secure extended on-site vendor training (minimum two weeks) and formally plan for concurrent operation of MARS and GSA through 2026 with documented reconciliation procedures and backup procedures.
4. **Resolve Tax System Interface Issues**
Prioritize resolution of GSA–tax system data exchange issues and require documented acceptance testing before reliance on GSA for certification or levy calculation.
5. **Formalize Technology Lifecycle and Replacement Planning**
Establish a technology replacement reserve funded annually to support systematic refresh of servers, workstations, network equipment, and mobile devices.

6. Enhance Inspection and Data Validation Practices

Require on-site inspection and updated, date-stamped photos for all valid sales and all scheduled property inspections to validate field activity and support transparency.

7. Upgrade Field Technology

Equip field iPads with wireless connectivity to support real-time data access, mobile applications, mapping tools, and inspection tracking with date and time stamping.

8. Expand Commercial Market Data Sources

Evaluate transitioning from TREPP to CoStar or a comparable platform to support the development of income-based valuation models and improve commercial appraisal equity.

9. Strengthen Cybersecurity Oversight

Conduct vulnerability assessments following the enterprise ArcGIS deployment and implement ongoing monitoring protocols, either through internal capacity or managed security services.

10. Integrate Technology Planning with Appraisal and Internal Control Reforms

Align technology initiatives with the SOP, internal control, and mass appraisal reforms outlined in Sections 4.1–4.4 to ensure systems support, rather than undermine, standardized practices.

F. Summary

Johnson County Appraisal District’s technology environment is at a critical juncture. The combination of an unfinished GSA conversion, legacy system limitations, infrastructure obsolescence, and insufficient internal IT capacity places the district at elevated operational risk heading into the 2026 cycle.

While peer CADs demonstrate that successful modernization is achievable, JCAD must invest in internal technical leadership, disciplined project governance, and validated data practices to reach that outcome. Strengthening data collection, technology management, and internal IT capacity is essential not only for system stability, but for appraisal accuracy, public confidence, and long-term organizational resilience.

Section 4.6 – Data Security & Privacy- CONFIDENTIAL

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Section 4.7 – Value Defense & Litigation Support

A. Overview and Purpose

Value defense and litigation support are critical downstream functions of an appraisal district's mass appraisal system, data integrity, customer service practices, and governance structure. While appraisal accuracy establishes the foundation of equitable taxation, the district's ability to clearly explain, defend, and substantiate those values during protests and litigation is what ultimately determines public confidence, legal defensibility, and operational efficiency.

At Johnson County Appraisal District (JCAD), value defense occurs primarily through the Appraisal Review Board (ARB) protest process, with additional exposure through formal litigation and correction actions. These functions rely heavily on the quality of appraisal models, consistency of data application, clarity of documentation, and effectiveness of communication with taxpayers and ARB panel members. Evidence packages must be understandable to taxpayers, technically sound for professional tax agents, and sufficiently clear and complete to support impartial decision-making by ARB members.

This section evaluates JCAD's current value defense practices, with a focus on how appraisal evidence is prepared, presented, and utilized during the protest process. The review assesses whether evidence materials are logically structured, internally consistent, and capable of standing on their own without requiring verbal explanation from appraisal staff. It also considers how differences in audience, individual property owners versus professional protest agents, affect evidence presentation and whether those differences are appropriately addressed.

Context from earlier sections is directly relevant. As discussed in Sections 4.1 and 4.5, appraisal modeling inconsistencies, limited use of standardized sales ratio analysis, and incomplete CAMA functionality influence the quality and defensibility of evidence. Section 4.2 identified procedural and ethical concerns within the ARB that further elevate the importance of clear, unbiased, and well-documented appraisal support. Additionally, deficiencies in SOPs, internal controls, and training described in Sections 4.4 and 4.3 constrain the district's ability to produce consistent evidence across appraisers and property classes.

The purpose of this section is to identify strengths and weaknesses in JCAD's value defense approach, evaluate compliance with applicable standards and best practices, and recommend improvements that enhance clarity, transparency, and defensibility while reducing protest friction and litigation risk.

B. Findings

1. Evidence Clarity for Individual Taxpayers

Evidence packages prepared for individual property owner protests often lack clarity and intuitive organization. Comparable sales grids and maps are difficult to interpret without supplemental explanation, reducing their effectiveness as standalone documents.

2. Disconnect Between Comparable Grids and Mapping

When maps of comparable sales are provided, parcels are not labeled with reference numbers that correspond to the comparable sales listed in the grid. This makes it difficult for taxpayers and ARB panel members to visually connect sales data to geographic context.

3. Absence of Subject Property Context in Comparable Grids

Comparable sales grids frequently omit a row or column for the subject property. As a result, taxpayers must independently understand and recall their own property's defining characteristics, and ARB members must mentally infer comparisons rather than review them directly.

4. Potential Impact on ARB Understanding and Decision-Making

The lack of clear, self-contained evidence materials increases the likelihood of confusion during hearings, particularly for ARB members who are not appraisal professionals. This may inadvertently disadvantage either the district or the taxpayer and undermines procedural fairness.

5. Effective Evidence Practices for Professional Tax Agents

Evidence provided to large appraisal protest firms and professional tax agents is generally concise, data-driven, and appropriately formatted for an expert audience. These submissions are efficient and effective for that audience and reflect an understanding of agent expectations.

6. Inconsistent Evidence Standards Across Audiences

While tailoring evidence to different audiences is appropriate, the district does not appear to operate under a formally defined evidence standard or template, resulting in variability in quality and presentation across cases.

C. Analysis

JCAD's value defense challenges are not rooted in a lack of effort, but in the absence of standardized, audience-aware evidence design and supporting procedures. Evidence prepared for ARB hearings should be capable of standing alone as a clear narrative that

explains the district's valuation logic without reliance on verbal explanation or insider knowledge.

The current approach places undue cognitive burden on taxpayers and ARB members by requiring them to reconcile multiple documents, infer relationships between data points, and supply missing context. This is particularly problematic in light of concerns identified in earlier sections regarding ARB training, consistency, and impartiality. When evidence is unclear, the risk of arbitrary outcomes, perceived bias, or diminished trust increases.

At the same time, the district's success in responding to professional tax agents demonstrates that staff are capable of producing effective value defense materials when expectations are well-defined. The gap, therefore, lies in the lack of standardized templates and guidance for non-professional audiences.

These issues are compounded by broader organizational constraints. Inconsistent appraisal methodologies, limited SOPs, and underutilized CAMA tools restrict the district's ability to automate or standardize evidence generation. Without clear internal standards, evidence quality depends heavily on individual appraiser judgment, which reduces uniformity and increases protest risk.

D. Compliance Check

While no specific statutory provision prescribes the exact format of ARB evidence, best practices under the Texas Property Tax Code and Comptroller guidance emphasize fairness, clarity, and transparency in the protest process. The current evidence approach does not violate statutory requirements; however, it falls short of professional best practices for effective and impartial value defense.

Inconsistent clarity of evidence may also indirectly undermine compliance with due process expectations under Texas Property Tax Code Chapter 41, particularly where taxpayers are unable to reasonably understand the basis of the district's value position.

E. Recommendations

1. Standardize Evidence Templates for ARB Hearings

Develop standardized evidence templates for residential and commercial protests that clearly present valuation logic, comparable sales, and conclusions in a consistent format.

2. Integrate Subject Property into Comparable Grids

Require that all comparable sales grids include the subject property as a reference point, allowing direct side-by-side comparison.

3. Improve Map-to-Grid Alignment

Ensure that all comparable sales maps include reference numbers or identifiers that correspond directly to entries in the sales grid.

4. Differentiate Evidence by Audience While Maintaining Core Standards

Maintain efficient, data-forward evidence for professional tax agents while enhancing clarity and explanatory content for individual taxpayers and ARB panels.

5. Leverage CAMA Capabilities for Evidence Generation

Work with the CAMA vendor to automate generation of standardized grids and maps, reducing reliance on manual assembly and improving consistency.

6. Train Appraisers on Evidence Presentation and Hearing Support

Provide targeted training on effective evidence design, visual communication, and ARB hearing preparation to improve defensibility and reduce protest friction.

7. Align Evidence Standards with ARB Training

Coordinate evidence format improvements with ARB training reforms to ensure that panel members are familiar with and able to interpret standardized materials consistently.

F. Summary

Johnson County Appraisal District demonstrates the capacity to defend values effectively, particularly when working with professional protest agents. However, evidence presented to individual taxpayers and ARB panels lacks the clarity and structure necessary to stand on its own, increasing confusion and undermining confidence in the protest process.

Improving value defense does not require more data, but better presentation, standardization, and alignment with appraisal best practices. By adopting clearer evidence templates, integrating subject property context, and leveraging CAMA tools, JCAD can strengthen defensibility, enhance fairness, and reduce both protest inefficiency and litigation risk.

Section 4.8 – Governance, Ethics & Regulatory Compliance

A. Overview and Purpose

Effective governance is the cornerstone of a Central Appraisal District's legitimacy, accountability, and public trust. Under the Texas Property Tax Code, the Board of Directors is charged with providing policy direction, ensuring statutory compliance, appointing and supervising the Chief Appraiser, and safeguarding the integrity of the district's operations. Ethical leadership and regulatory compliance are not ancillary functions; they are fundamental obligations that shape organizational culture, operational discipline, and public confidence in the fairness of the appraisal system.

This section evaluates Johnson County Appraisal District's (JCAD) governance framework, ethical standards, and compliance with applicable statutory and professional requirements. The review focuses on the relationship between the Board and district leadership, the conduct and accountability of senior management, the independence and integrity of the Appraisal Review Board (ARB), and the district's adherence to transparency, ethics, and appraisal standards.

Context from earlier sections is critical. As documented throughout this report, JCAD has experienced significant leadership instability, high staff turnover, limited internal controls, and inconsistent documentation practices. These operational challenges cannot be separated from governance. Weak oversight, informal decision-making, and insufficient accountability mechanisms have allowed inappropriate leadership behaviors to persist and have impaired the Board's ability to exercise its fiduciary and statutory responsibilities effectively.

While the district generally adheres to the technical requirements of appraisal practice under USPAP Standards 5 and 6, compliance with professional valuation standards alone does not equate to sound governance. Ethical administration requires that policies be followed consistently, authority exercised appropriately, and oversight functions performed without interference or retaliation. The absence of formal ethics reporting channels, whistleblower protections, and governance discipline has contributed to a culture in which employees expressed fear of retaliation and reluctance to raise concerns.

This section therefore examines not only whether JCAD meets minimum regulatory thresholds, but whether its governance structure and ethical environment support sustainable compliance, transparency, and public accountability. The findings and recommendations are intended to assist the Board and incoming leadership in restoring governance integrity, reinforcing ethical standards, and reestablishing clear lines of authority and responsibility.

B. Findings

1. Deficiencies in Board Oversight and Leadership Accountability

The review identified significant weaknesses in the Board's oversight of district leadership. Directors operated with limited supervision, and documented misconduct was not addressed through formal disciplinary or corrective processes.

2. Obstruction of a Board-Authorized Organizational Review

Documentation confirms that the former Administrative Director and Support Services Director actively obstructed a Board-authorized organizational audit by discouraging staff participation, delaying information requests, and misrepresenting directives. These actions compromised the integrity of the review process and interfered with the Board's statutory oversight authority.

3. Inconsistent Governance Documentation and Recordkeeping

The Administrative Director failed to consistently maintain governance records, including signed meeting minutes and documentation related to Public Funds Investment Act (PFIA) compliance. These lapses undermine transparency and expose the district to compliance risk under open government statutes.

4. Leadership Conduct Undermining Ethical Culture

Staff and former employees described a culture of favoritism, inconsistent policy enforcement, and retaliation. These conditions directly contradict the district's stated values and anti-retaliation provisions in the Employee Handbook.

5. ARB Governance and Procedural Integrity Issues

Multiple ARB members independently raised concerns regarding inconsistent hearing procedures, potential conflicts of interest, and improper influence by fellow members. These issues raise questions about ARB independence and adherence to statutory and Comptroller guidance.

6. Absence of Formal Ethics and Whistleblower Frameworks

JCAD lacks a district-wide Code of Ethics and a formal whistleblower policy providing protected reporting channels. As a result, employees have limited recourse to report misconduct without fear of retaliation.

C. Analysis

Governance at JCAD has weakened over time due to fragmented authority, insufficient accountability mechanisms, and a previous lack of consistent Board engagement. While the Board holds statutory responsibility for appointing and supervising the Chief Appraiser, effective governance requires more than episodic intervention. It requires ongoing,

informed oversight and the willingness to enforce ethical standards when leadership conduct deviates from policy or law.

The documented obstruction of a Board-authorized audit represents a serious governance failure. Such conduct undermines not only the review process but the Board's ability to fulfill its fiduciary duties under Texas Property Tax Code §6.05(c). Failure to address this behavior in a timely and transparent manner contributed to employee mistrust and organizational instability.

The absence of whistleblower protections and formal ethics reporting mechanisms has further enabled retaliatory behavior and discouraged transparency. Employees repeatedly described an environment in which raising concerns was perceived as risky, reinforcing a culture of silence that allowed governance deficiencies to persist.

While the district generally complies with USPAP Standards 5 and 6 from a technical appraisal perspective, governance compliance extends beyond valuation methodology. Incomplete records, inconsistent ARB procedures, and informal leadership practices reflect a reactive governance model rather than a disciplined, policy-driven framework.

The arrival of a new Chief Appraiser provides an opportunity to reset governance norms and restore proper hierarchy. However, meaningful improvement will require active Board engagement, clear ethical expectations, and enforceable accountability structures.

D. Compliance Check

- **Ethical Conduct and Retaliation-Free Workplace (JCAD Employee Handbook, 2025):** Partially compliant. Policies exist but are not consistently enforced.
- **ARB Independence and Procedural Integrity (Texas Property Tax Code §41.66):** Partially compliant. Procedural inconsistencies and potential conflicts of interest were identified.
- **Open Meetings and Transparency (Texas Government Code Chapter 551):** Partially compliant due to incomplete or unsigned meeting documentation.
- **Appraisal Standards (USPAP Standards 5 & 6):** Substantially compliant, though governance and documentation deficiencies affect consistent application.
- **Professional Licensing and Ethics (TDLR and TALCB):** Compliant at the individual certification level.

While outright statutory violations are limited, the cumulative deficiencies represent elevated governance and compliance risk.

E. Recommendations

- 1. Establish a Board-Level Governance and Ethics Committee**
Create a standing committee responsible for oversight of leadership conduct, ethics compliance, and policy review.
- 2. Adopt a District-Wide Code of Ethics and Whistleblower Policy**
Implement formal reporting protections and anti-retaliation provisions aligned with best practices for public entities.
- 3. Mandate Annual Ethics and Governance Training**
Require annual training for Board members and Directors covering ethics, open meetings, PFI, and governance roles, with signed certifications.
- 4. Implement a Governance Accountability Matrix**
Link Director responsibilities to measurable outcomes reviewed quarterly or semi-annually by the Board.
- 5. Require Written Documentation of Administrative Directives**
Formalize policy directives and administrative changes through written memoranda subject to Board review and retention.
- 6. Conduct Annual Independent Compliance Audits**
Perform annual audits assessing compliance with state statutes, USPAP, and professional licensing requirements.
- 7. Review and Reform ARB Governance Practices**
Evaluate ARB procedures, conflict-of-interest disclosures, and training to ensure independence, consistency, and transparency.

F. Summary

Governance and ethical oversight at Johnson County Appraisal District have been compromised by leadership interference, insufficient accountability, and limited Board engagement. While technical appraisal practices generally meet USPAP requirements, governance failures have eroded organizational integrity and public trust.

Restoring effective governance will require decisive Board action, clear ethical standards, and enforceable accountability mechanisms. By strengthening oversight structures, protecting whistleblowers, and reasserting proper roles and responsibilities, the Board and new Chief Appraiser can reestablish integrity, transparency, and compliance as foundational principles of the district's operations.

Section 4.9 – Property Discovery & Data Acquisition

A. Overview and Purpose

Property discovery and data acquisition are foundational to the accuracy, equity, and defensibility of mass appraisal. The quality of appraisal outcomes is directly dependent on the accuracy, completeness, and validation of underlying property characteristics, including land attributes, structural dimensions, use, condition, improvements, and ownership information. Inconsistent or unverified data collection undermines valuation models, reduces uniformity, and weakens the district’s ability to defend values during protests and litigation.

For Johnson County Appraisal District (JCAD), property discovery occurs through a combination of field inspections, exemption processing, data exchanges with external vendors, and reliance on third-party data sources. These processes support valuation across diverse property classes, including residential, commercial, agricultural, mineral, and industrial accounts. As documented in earlier sections, JCAD is undergoing organizational and technology transitions that place additional importance on disciplined, well-documented discovery practices to ensure data integrity and continuity.

This section evaluates JCAD’s property discovery and data acquisition practices, with a focus on field inspection protocols, verification of property characteristics, exemption auditing, mineral data coordination, and quality assurance mechanisms. It assesses whether inspection activities are standardized, whether management has visibility into fieldwork completion and quality, and whether external data sources are integrated through controlled and auditable processes.

Industry best practices emphasize that discovery is not merely a task to be completed, but a control function. Effective appraisal districts implement standardized inspection checklists, periodic validation of measurements and classifications, photographic or geolocation verification of inspections, and supervisory review of completed work. These practices ensure that valuation models are built on reliable inputs and that errors are detected early rather than propagated across appraisal cycles.

At JCAD, discovery practices must also be evaluated in light of staffing models, safety considerations, and the increasing reliance on technology. As discussed in Section 4.5, the district’s mobile technology and CAMA capabilities are underutilized, limiting opportunities to automate validation and improve transparency. Additionally, coordination with third-party vendors, particularly for mineral appraisal, requires structured communication and data reconciliation processes to prevent downstream issues such as returned mail, incorrect ownership records, and taxpayer confusion.

The purpose of this section is to determine whether JCAD's current discovery and data acquisition practices provide a sufficient foundation for accurate mass appraisal and to identify improvements necessary to strengthen data reliability, managerial oversight, and public trust.

B. Findings

1. Lack of Standardized Field Inspection Protocols

JCAD does not maintain a standardized checklist or punch list of attributes to be verified during property inspections. Appraisers are not required to confirm structural dimensions, review aerial imagery in the field, or document condition consistently.

2. Absence of Inspection Validation Mechanisms

There is no formal process to validate that assigned properties were actually inspected. Appraisers are issued weekly inspection lists and are trusted to return property record cards with handwritten notes, but management lacks tools to independently verify completion or quality of inspections.

3. No Photographic or Geolocation Verification

Field inspections do not require the capture of dated photographs or geolocation data. As a result, neither supervisors nor taxpayers can easily confirm that an inspection occurred or assess the basis for valuation decisions.

4. Limited Management Oversight and Quality Control

There are no routine spot checks, secondary reviews, or supervisory audits of inspection work. Management does not systematically validate measurements, classifications, or coding accuracy.

5. Paired Appraiser Field Model

Appraisers conduct field inspections in pairs, citing safety concerns. This model significantly reduces inspection productivity and is inconsistent with industry norms for routine residential inspections, which are typically conducted by individual appraisers from public rights-of-way.

6. New and Developing Exemption Audit Function

The exemption department employees are relatively new and are processing exemptions appropriately; however, it has limited experience with homestead exemption auditing tools and methodologies, reducing the effectiveness of exemption compliance efforts.

7. Mineral Vendor Data Coordination Gaps

Mineral appraisal is outsourced to a third-party vendor that aggregates ownership and valuation data. While this approach aligns with industry practice, JCAD lacks a structured process to manage returned mail. A significant volume of mineral-related mail is returned annually due to incorrect addresses. There is no documented procedure to resolve these issues or flag accounts where all reasonable efforts to identify a valid address have been exhausted.

C. Analysis

JCAD's property discovery practices rely heavily on trust and individual professionalism rather than standardized controls and verification mechanisms. While appraisers and staff demonstrate commitment to their roles, the absence of documented procedures, validation tools, and supervisory review creates material risk to data accuracy and appraisal uniformity.

From a mass appraisal perspective, unverified property characteristics, such as square footage, condition, and improvements, undermine the reliability of valuation models. As noted in Section 4.1, appraisal models depend on accurate input data; deficiencies in discovery propagate directly into valuation inequities and weaken defensibility during protests.

Industry standards, including guidance from the International Association of Assessing Officers (IAAO), emphasize the importance of periodic measurement validation, photographic documentation, and audit trails to confirm inspections. JCAD's current practices fall short of these standards and limit transparency for both management and the public.

The paired inspection model, while well-intentioned, is not supported by risk-based analysis and reduces efficiency without materially improving safety in routine inspections. This approach also intersects with staffing and compensation concerns discussed in Section 4.3, as it increases workload pressure without corresponding gains in quality.

The absence of structured coordination with the mineral appraisal vendor further illustrates gaps in data governance. Outsourcing appraisal functions does not eliminate the district's responsibility to manage data quality, communication, and taxpayer impact. Without clear processes, errors persist across appraisal cycles and contribute to public dissatisfaction.

D. Compliance Check

JCAD's property discovery practices do not violate explicit statutory requirements; however, they do not align with recognized professional standards for mass appraisal and data validation.

- **IAAO Standard on Mass Appraisal and Discovery:** Partially compliant. Discovery activities occur, but lack validation, documentation, and supervisory review.
- **USPAP Standards 5 & 6:** Substantially compliant in principle, but weakened by unverified data inputs and inconsistent inspection documentation.
- **Texas Property Tax Code §25.18:** Partially supported. Reappraisal activities are conducted, but discovery controls are insufficient to ensure consistent data quality.

The deficiencies represent elevated operational and defensibility risk rather than immediate statutory noncompliance.

E. Recommendations

1. **Standardize Field Inspection Procedures**
Develop a formal inspection checklist identifying required attributes to be verified for each property class, including structural dimensions, condition, and observable improvements.
2. **Implement Inspection Validation Tools**
Require the capture of dated photographs for all inspected properties and utilize mobile applications that record geolocation data when an inspection is completed.
3. **Enhance Management Oversight and Quality Assurance**
Introduce random spot checks, supervisory reviews, and periodic measurement validation to confirm inspection accuracy and consistency.
4. **Transition to Single-Appraiser Routine Inspections**
Conduct routine residential inspections with individual appraisers, reserving paired inspections for higher-risk or special-circumstance properties.
5. **Expand Training for Exemption and Audit Functions**
Provide targeted training on homestead exemption auditing tools and methodologies to strengthen compliance and detection capabilities.
6. **Formalize Mineral Vendor Communication Protocols**
Establish an SOP governing data exchange with the mineral appraisal vendor,

including procedures for returned mail, address corrections, and ownership reconciliation.

7. Improve Mobile Technology Support

Equip field devices with cellular connectivity to support real-time access to aerial imagery, data entry, photography, and inspection tracking.

F. Summary

Property discovery and data acquisition at Johnson County Appraisal District lack the standardization, validation, and oversight necessary to fully support accurate and defensible mass appraisal. While inspections and exemption processing occur, the absence of documented procedures, verification mechanisms, and quality controls exposes the district to data integrity risks and public skepticism.

By formalizing inspection protocols, leveraging mobile technology, strengthening management oversight, and improving coordination with third-party vendors, JCAD can significantly enhance the reliability of its appraisal data. These improvements will directly support valuation equity, protest defensibility, and public confidence in the district's appraisal process.

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Section 4.10 – Intergovernmental Relations & Stakeholder Feedback

A. Overview and Purpose

Intergovernmental relationships are central to the effective operation of a Central Appraisal District. Johnson County Appraisal District (JCAD) serves as a critical data and valuation provider to numerous taxing entities, including cities, school districts, and special districts, whose budgets, tax rates, and public services depend directly on the accuracy, consistency, and timeliness of appraisal outcomes. In addition, JCAD operates within a broader regulatory environment that includes oversight and performance review by the Texas Comptroller's Property Tax Assistance Division (PTAD) and the Property Value Study (PVS) process, which directly affects school district funding and state certification.

Effective intergovernmental engagement requires more than technical compliance. It depends on proactive communication, predictable processes, and collaborative problem-solving. Taxing entities must understand valuation trends, anticipated impacts of market changes, exemption activity, and reappraisal schedules in advance of certification. Likewise, state oversight bodies expect appraisal districts to demonstrate not only compliance with statutory requirements, but also a capacity for self-assessment, early identification of risk, and responsiveness to study findings.

This section evaluates JCAD's relationships with its external stakeholders, including taxing entities, PTAD, and local governmental partners. The review assesses whether communication practices are structured and consistent, whether interlocal agreements are current and effectively managed, and whether stakeholder feedback mechanisms exist to measure confidence and satisfaction. It also considers how governance instability, leadership turnover, and internal communication gaps identified in earlier sections have affected external trust and collaboration.

As discussed throughout this report, JCAD has experienced operational disruption, leadership conflict, and inconsistent internal processes. These internal challenges have had outward-facing consequences. When appraisal methodologies, ARB outcomes, or budget information are not communicated clearly or consistently, taxing entities and the public experience uncertainty and frustration. Over time, this erodes confidence in the district's ability to function as a reliable and transparent partner.

The purpose of this section is to determine whether JCAD's current intergovernmental practices support transparency, consistency, and public trust, and to identify reforms necessary to restore credibility and strengthen collaborative relationships with its partners.

B. Findings

1. Stakeholder Engagement and Confidence Levels

JCAD serves 38 taxing entities across Johnson County. Feedback from representatives of these entities indicates declining confidence in the district's responsiveness, the clarity of appraisal data, and the timeliness of communication. Entities expressed frustration with inconsistent explanations of market conditions, difficulty understanding valuation changes that affect statewide studies and funding, and limited opportunities for dialogue prior to roll certification.

2. Reactive Relationship with State Oversight Bodies

Interactions with PTAD and the PVS process have been professional but largely reactive. Communication typically occurs in response to study findings or variance questions rather than through proactive coordination or early issue identification. There is limited evidence of structured engagement aimed at preventing repeat variances or addressing systemic risks before they impact certification.

3. Public Trust and Perception Challenges

Public comments during Board meetings and broader community feedback reflect diminished trust in JCAD. Concerns cited include leadership instability, perceived favoritism, inconsistent ARB outcomes, and unclear communication from management and Directors. These perceptions are reinforced by media coverage and public discourse questioning accountability and governance.

4. Outdated and Poorly Tracked Interlocal Agreements

JCAD maintains interlocal agreements for shared GIS and IT services with local governments; however, many agreements are outdated and lack current cost-sharing formulas, service expectations, or performance benchmarks. There is no centralized inventory of active agreements, and some partner entities expressed uncertainty regarding agreement status or renewal timelines.

5. Informal Collaboration Practices

Coordination with school districts and municipalities for property verification and exemption validation occurs on an informal basis, often relying on personal relationships rather than documented protocols. While these informal arrangements can be effective short-term, they are vulnerable to disruption due to staff turnover or leadership changes.

6. Inconsistent Documentation and Communication Tracking

Communication between JCAD and county departments or taxing entities is primarily conducted through email without systematic tracking, logging, or follow-

up. This results in incomplete documentation and inconsistent institutional memory of commitments or decisions.

7. Reporting and Data Transparency Gaps

Stakeholders have requested enhanced reporting, standardized data-sharing formats, and earlier coordination on budget and tax-rate implications. JCAD does not currently conduct formal stakeholder satisfaction surveys or publish an annual engagement or performance report addressing external feedback.

C. Analysis

JCAD's intergovernmental relationships are characterized by fragmentation and inconsistency rather than by a coordinated engagement strategy. While individual staff members often maintain professional and constructive relationships with specific entities, these efforts are not supported by institutional processes that ensure continuity, transparency, and accountability.

The district's largely reactive posture toward PTAD and PVS matters suggests an underdeveloped compliance and communication framework. Rather than using study outcomes as part of a continuous improvement cycle shared with stakeholders, responses tend to occur after variances or concerns are identified, limiting opportunities for collaborative resolution.

Public trust and stakeholder satisfaction have been further eroded by governance controversies, leadership turnover, and inconsistent messaging from management and Directors. Taxing entities reported learning about appraisal or budget-related issues indirectly, including through media coverage or third-party communication, rather than through direct briefings from the district. In at least one instance, inaccurate ballot information provided to entities during a Director election raised broader concerns about the reliability and transparency of district communications.

Outdated interlocal agreements represent a missed opportunity for structured collaboration and efficiency. Without current agreements that define roles, costs, and performance expectations, JCAD cannot fully leverage shared services or ensure consistency in data and service delivery across jurisdictions.

Overall, the absence of formal stakeholder engagement policies, tracking mechanisms, and reporting frameworks reflects a governance culture that has prioritized internal control over external collaboration. Without deliberate reform, these conditions risk further erosion of trust and reduced cooperation during audits, legislative review, or periods of market volatility.

D. Compliance Check

JCAD generally meets statutory requirements related to appraisal administration and reporting; however, the following compliance-related risks were identified:

- **Transparency and Accountability Expectations:** Partially met. While information is provided as required, the lack of proactive communication and incomplete documentation undermine transparency goals.
- **Interlocal Agreement Management (Texas Government Code Chapter 791):** Partially compliant. Agreements exist but are outdated and insufficiently tracked.
- **PTAD and PVS Engagement Best Practices:** Partially met. Technical compliance is maintained, but strategic and proactive engagement is limited.

These issues represent governance and trust risks rather than immediate statutory violations.

E. Recommendations

1. **Develop a Formal Stakeholder Engagement Plan**
Establish a written engagement strategy defining communication protocols, engagement frequency, and designated points of contact for all taxing entities.
2. **Implement Regular Coordination with Taxing Entities**
Conduct quarterly meetings with taxing entities to discuss appraisal schedules, exemption trends, anticipated market impacts, and budget implications prior to certification.
3. **Modernize and Centralize Interlocal Agreement Management**
Create a centralized inventory of all interlocal agreements, including service scope, cost allocation, performance expectations, and renewal timelines. Update agreements to reflect current operations and costs.
4. **Strengthen PTAD and PVS Coordination**
Designate a compliance liaison responsible for monitoring PVS outcomes, coordinating variance communications, and documenting corrective actions for Board review.
5. **Introduce Stakeholder and Public Feedback Mechanisms**
Conduct annual stakeholder and taxpayer satisfaction surveys and summarize findings, trends, and response actions in the district's annual report.

6. Enhance Transparency and Reporting

Publish quarterly performance dashboards highlighting certification timelines, protest statistics, PVS outcomes, and intergovernmental activities. Provide standardized engagement reports to the Board.

7. Standardize External Communications

Adopt uniform data-sharing formats and written communication protocols to ensure consistency, accuracy, and traceability of information provided to partners.

F. Summary

Johnson County Appraisal District’s relationships with taxing entities, state oversight bodies, and the public have weakened due to inconsistent communication, outdated collaboration mechanisms, and internal governance instability. While statutory functions continue to be performed, the lack of proactive engagement and transparent reporting has eroded stakeholder confidence.

Restoring credibility will require a deliberate shift toward structured intergovernmental coordination, timely and accurate communication, and measurable responsiveness to stakeholder concerns. By formalizing engagement practices and improving transparency, JCAD can rebuild trust, strengthen partnerships, and better support the taxing entities and communities it serves.

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Section 4.11 – Strategic Planning, Risk & Performance Metrics

A. Overview and Purpose

Strategic planning, enterprise risk management, and performance measurement are the connective tissue that translate an appraisal district's statutory responsibilities into consistent operational outcomes. In a high-volume, deadline-driven environment such as a Central Appraisal District, daily work can easily become reactive, focused on immediate certification tasks, protest cycles, and system issues, unless the organization intentionally establishes a long-range plan, quantifiable targets, and a formal approach to monitoring risk and performance.

For Johnson County Appraisal District (JCAD), the need for this discipline is heightened by several interrelated conditions identified throughout this report: elevated staff turnover, inconsistent internal controls and SOPs, incomplete technology modernization, significant governance strain, and declining stakeholder confidence. In this context, a strategic planning and performance framework is not an administrative "extra"; it is a stabilization mechanism that enables leadership to set priorities, allocate resources, track progress, and reduce operational volatility.

Strategic planning provides the Board and Chief Appraiser with a shared roadmap that defines the mission, vision, service expectations, and measurable outcomes over a 3–5-year horizon. Risk management provides a structured method for identifying and mitigating threats to appraisal integrity, compliance readiness, fiscal stability, data security, and public trust. Performance metrics provide the feedback loop required to ensure staff have clear expectations, managers can coach and correct performance objectively, and the Board can evaluate whether the district is improving over time.

In peer Texas CADs, this function is typically operationalized through: (1) a board-adopted strategic plan, (2) a KPI dashboard reviewed quarterly, (3) a risk register updated and reviewed on a defined cadence, and (4) basic quality assurance practices such as random file audits and documented supervisory review. These mechanisms reduce reliance on institutional memory and individual discretion, two risk areas that have been acute at JCAD, by embedding consistency and accountability into routine operations.

This section evaluates whether JCAD has established the strategic, risk, and performance architecture necessary to support sustained improvement and compliance. It also assesses whether the organization is positioned to proactively manage emerging risks, including facility capacity constraints, staffing scalability, technology conversion exposure, and downstream impacts on customer experience and value defensibility.

B. Findings

1. Strategic Planning and Organizational Alignment

- JCAD does not maintain a formal, board-adopted strategic plan with defined objectives, timelines, and measurable outcomes.
- Planning activities are primarily short-term and operational, focused on cyclical deadlines rather than longer-range priorities.
- Department-level priorities have been set independently rather than through an integrated organizational framework.
- Staff awareness of organizational goals beyond appraisal compliance is limited, contributing to inconsistent priorities and reduced accountability.

2. Performance Measurement and KPI Deficiency

- The district does not track or report a consistent set of organization-wide operational KPIs (e.g., exemption turnaround time, customer satisfaction, protest resolution timing, productivity measures).
- The Board and Chief Appraiser do not receive standardized dashboards to monitor operational health.
- Employee evaluations do not consistently rely on objective performance targets; they are largely subjective and unevenly applied.
- All the Staff lacked familiarity with what KPIs are or how they would apply to their roles, indicating an underdeveloped performance culture.

3. Risk Assessment Framework and Enterprise Controls

- JCAD does not maintain a formal risk register or documented risk assessment process across operational, financial, IT, compliance, and reputational risk categories.
- Reserve adequacy is not defined through a formal policy, and acceptable fund balance targets are not established.
- Several known risks remain unmanaged through formal mitigation plans, including system access risks, training and CE compliance gaps, and technology conversion exposure.
- Fragmented systems and inconsistent documentation across HR, IT, and finance functions limit risk visibility.

4. Comparative Position vs. Peer CADs

- Peer CADs of comparable size typically maintain a 3–5-year planning horizon, publish performance measures, and conduct annual reporting aligned to IAAO expectations.
- JCAD’s lack of performance reporting and risk governance limits its ability to benchmark and communicate improvements credibly to taxing entities and the public.

5. Facility and Capacity Constraints

- The district’s physical facility appears inadequate for current and projected operational needs. Workspace configuration, public flow, and ARB hearing room accessibility limit the quality of customer service and contribute to operational inefficiency.
- The building constraints are likely to worsen as county growth drives additional staffing, taxpayer interactions, and protest volume.

6. Schedule Development and Cost Data Risks

- Appraisal schedules were derived from legacy sources, and they remain materially out of date. This increases the importance of formal schedule governance, quality controls, and transparent update cycles.

C. Analysis

JCAD’s absence of a strategic plan, KPI framework, and risk register leaves the organization structurally reactive. In practice, this means priorities are set by immediate pressure rather than by coordinated goals, and performance is assessed informally rather than through reliable indicators. These conditions magnify volatility during leadership transitions, undermine morale, and limit the Board’s ability to exercise effective oversight.

Without objective performance standards and routine quality assurance, JCAD has limited capacity to identify underperformance, correct inconsistent practices, or demonstrate improvement to stakeholders. This is particularly consequential given the operational and reputational challenges described in prior sections, especially around customer service and appraisal consistency, ARB integrity, data governance, and appraisal defensibility.

Risk management is similarly informal. Known risks, technology conversion exposure, cybersecurity gaps, staffing instability, incomplete SOPs, and public trust erosion, have been described and experienced, but not institutionalized into a formal mitigation structure with accountability and timelines. The absence of a defined reserve policy further

increases vulnerability, as the district lacks an established approach to funding operational continuity, capital replacement, or emergency response.

Peer districts have demonstrated that a disciplined performance and risk framework strengthens credibility, supports board governance, and improves operational consistency. JCAD's gap is not primarily technical; it is managerial and structural. Implementing the recommended framework will enable leadership to move from episodic problem-solving to sustained performance management.

D. Compliance Check

- **Texas Property Tax Code §6.05 (Administration and operational responsibility):** Partially compliant due to limited formal reporting and performance governance.
- **IAAO Standard on Assessment Administration (Strategic planning and performance):** Non-compliant; no adopted plan or KPI system.
- **Texas Local Government Code fiscal oversight norms (reserve governance):** Partially compliant; very basic budgeting occurs but reserve targets are undefined.
- **COSO Enterprise Risk Framework:** Non-compliant; no formal risk identification and mitigation program.
- **Comptroller MAP Standards (management and documentation discipline):** Partially compliant; planning, monitoring, and reporting functions are insufficiently established.

E. Recommendations

1. Develop and Adopt a 3–5 Year Strategic Plan

- Establish mission, vision, strategic goals, and measurable objectives aligned to appraisal accuracy, service quality, operational resilience, and transparency.
- Include implementation sequencing and annual milestones.
- Publish an annual progress report to the Board and taxing entities.

2. Implement a Districtwide KPI and Quality Assurance Program (Include Random Spot Checks)

- Establish KPIs for each function and a quarterly board dashboard.
- Require manager-level random quality reviews across departments and track the percentage of sampled work requiring correction.

- Use results for coaching, training, and corrective action, and to identify systemic issues requiring process redesign.

Illustrative KPI Menu (to be refined and adopted by leadership):

Appraisers – Production & Quality

- Parcels inspected per week; annual workload target range by property mix (rule of thumb: 9,000–12,000 parcels/appraiser/year).
- New photos attached per appraiser (as a proxy for verified inspection completion).
- Gain/loss reports by appraiser; track number of accounts with value changes after inspection (not just dollar impact).
- Inspection rate targets for stable neighborhoods (e.g., average daily inspection volume where most accounts require limited updates).
- New construction production rates (residential and commercial, adjusted for complexity).
- Random spot check outcomes: number/percent requiring reinspection or correction.

Appraisers – Protests & Informal Resolution

- Evidence packet production volume; cycle time per account (targeting efficiency where appropriate).
- Number of active protests assigned; number contacted and reviewed before hearing date.
- Gain/loss on settled protests to validate reasonableness and consistency.
- Walk-in/informal meeting volume and average handling time (e.g., residential vs. commercial benchmarks).
- ARB hearings handled; time per property benchmark (e.g., standard cadence targets).

ARB Coordinator / Clerk

- Protests received and entered by channel (mail/email/over-the-counter).
- Backlog aging: days from postmark/receipt to entry in CAMA.
- Scheduling cycle time: hearings scheduled and notices generated per day.

- Post-hearing cycle time: days from quorum approval to final order letters produced/mailed.

Customer Service

- Customer satisfaction metric (e.g., NPS or simplified satisfaction score).
- Taxpayers served per day/hour.
- Calls handled; resolution rate.
- Average call duration and abandon rate (if tracked).

Deeds

- Deeds processed per day (experienced benchmarks can be used).
- Backlog aging: days between filing date and processing.
- Random spot check accuracy rate on processed deeds/plats.

Exemptions

- Days from application receipt to approval/denial (including statutory response timelines).
- Applications processed per period; approval/denial volumes.
- Homestead audit workflow: cases reviewed; letters issued; outcomes tracked for compliance effectiveness.

3. Implement an Enterprise Risk Management Framework

- Create a risk register across financial, operational, IT/cyber, compliance, reputational, and safety risk categories.
- Assign owners and mitigation actions; review quarterly with the Board.
- Incorporate technology and cybersecurity risks identified in Sections 4.5 and 4.6 as priority risk domains.

4. Define and Monitor Reserve Adequacy and Capital Planning

- Adopt a fund balance policy defining minimum reserves (commonly benchmarked as a percentage of annual operating expenses).
- Establish a capital replacement plan for IT and facility needs, linked to the risk register and strategic plan.

5. Facility and Public-Facing Capacity Plan

- Conduct a facilities assessment and develop a plan for building reconfiguration or relocation.
- Prioritize ARB hearing accessibility, taxpayer seating and flow, and staff workspace needs aligned to projected growth.

6. Formalize Schedule Governance and Data Source Strategy

- Establish a controlled annual process for reviewing and updating cost schedules, land schedules, and key valuation inputs.
- Ensure schedule development methods are compliant with contractual and professional limitations and supported by defensible benchmarking.

F. Summary

JCAD currently operates without the strategic planning, KPI monitoring, and risk management framework required for a modern appraisal district facing growth, technology transition, and heightened public scrutiny. The absence of these systems has contributed to reactive decision-making, inconsistent priorities, limited accountability, and reduced stakeholder confidence.

Implementing a 3–5 year strategic plan, a districtwide KPI dashboard supported by routine quality assurance spot checks, and an enterprise risk register will provide the structure necessary to stabilize operations and measure sustained improvement. These tools will also improve Board oversight, strengthen compliance readiness, and support the operational discipline required to rebuild public trust.

Section 4.12 – Facilities, Equipment, and Physical Security

A. Overview and Purpose

Facilities and physical security controls are essential operational enablers for an appraisal district. The physical environment affects employee safety, public interaction, data confidentiality, and the district's ability to sustain continuity during peak operational periods (e.g., notice mailings, protest season, and certification). In appraisal operations, physical controls also function as an extension of information security: sensitive taxpayer information, appraisal work files, exemption documentation, and ARB records are frequently accessed in public-facing settings, making the segregation of public and staff areas, controlled access, and secure storage fundamental risk controls.

This section evaluates the Johnson County Appraisal District's (JCAD) facilities conditions, equipment safeguarding practices, and physical security framework. The assessment covers building suitability for current operations, physical access controls, visitor management, emergency preparedness, records storage conditions, and equipment inventory and disposition controls. It also considers how facilities and physical security align with broader internal control and data protection frameworks, including HR offboarding procedures and access termination practices addressed elsewhere in the report.

JCAD's current building presents significant operational and risk implications. The facility is an older structure with known mechanical and electrical limitations, suspected hazardous environmental conditions, and functional constraints that do not support modern customer service and ARB operations. The building is not legally compliant for ADA accessibility, and internal layout issues and constrained spaces hinder taxpayer flow, staff productivity, and the effective separation of public and confidential work areas. These issues are particularly consequential given county growth trends and the district's increasing workload demands.

The Board is aware of the facility limitations and is currently exploring alternative options. Nevertheless, the facility-related risks are material and should be documented in the report because they affect operational resilience, employee health and safety, public experience, and reputational credibility. The objective of this section is to identify gaps in facilities governance and physical security controls and to provide actionable recommendations that reduce risk, improve safety and compliance, and better support the district's long-term operational needs.

B. Findings

1. Facility Access and Security Controls

- JCAD lacks a formal physical security policy defining access levels, after-hours restrictions, contractor protocols, and accountability for key control.
- Access is controlled primarily through exterior doors; internal department doors remain unlocked during operating hours.
- There is no documented procedure to re-key exterior locks or reissue physical access controls upon employee separation, consistent with broader offboarding deficiencies.
- Staff reported instances of vendor or contract personnel entering restricted areas without supervision or escort controls.

2. Safety and Emergency Preparedness

- The Employee Handbook references workplace safety generally but does not include facility-specific emergency procedures, evacuation maps, or assigned emergency roles.
- Fire drill records, severe-weather drill documentation, and first-aid training records were not available, and staff indicated drills have not been conducted in recent years.
- Physical hazards were observed in support areas (e.g., overcrowded storage, unmanaged cables), increasing trip and injury risk.
- Staff expressed concern about parking lot security and reported feeling unsafe when entering or leaving the building, particularly during periods of public tension.

3. Equipment and Asset Management

- JCAD does not maintain a centralized, districtwide equipment inventory covering computers, printers, scanners, mobile devices, and peripheral equipment.
- Equipment assignment records are kept inconsistently by departments using spreadsheets without standard fields, serial numbers, or lifecycle tracking.
- Decommissioned devices are stored onsite without a documented data sanitization process, disposal certificates, or verification of secure wiping.

- Staff reported occasional shortages and uneven distribution of operational equipment and field supplies.

4. Building Maintenance and Environmental Controls

- JCAD lacks a preventive maintenance schedule for HVAC, plumbing, or electrical systems, and maintenance requests are submitted informally rather than through a tracked system.
- The electrical system is antiquated and has reportedly caused recurring service interruptions, presenting a continuous operational risk. Staff indicated replacement parts are difficult or impossible to obtain for certain components.
- Records storage areas lack temperature and humidity monitoring, elevating risk of deterioration for documents requiring long-term retention.
- Staff reported suspected asbestos exposure and mold-related illness. Leadership awareness of these issues was acknowledged, but corrective actions, such as relocation of affected staff, were not implemented.

5. Visitor and Public Access Management

- Visitors sign in at reception; however, identification is not verified, and visitor badges are not issued.

C. Analysis

JCAD's physical security controls are fragmented and reactive, reflecting the broader control and policy gaps identified elsewhere in the report. Inadequate access controls, inconsistent key management, and weak inventory tracking increase the risk of theft, loss, and unauthorized exposure of confidential information. The lack of formal emergency preparedness introduces safety liability and threatens operational continuity in the event of fire, severe weather, or other disruptions.

Facility conditions represent both near-term and structural risk. Recurring electrical instability creates a practical threat to ongoing operations, particularly in a technology-dependent environment where appraisal, exemption processing, and public service functions rely on system availability. Additionally, suspected environmental hazards, particularly asbestos and mold, create elevated employee health risk and potential litigation exposure.

Because JCAD handles sensitive data and conducts public-facing operations daily, physical controls must be integrated with information security and HR processes. Building

access termination, equipment recovery, and device sanitization should be coordinated with employee offboarding and system access controls to ensure a uniform approach to risk mitigation. Absent a unified framework, physical vulnerabilities can undermine progress made in IT security and governance reforms.

D. Compliance Check

- **Texas Occupational Safety Code §411.103 (Workplace Safety Programs):** Partially compliant due to lack of documented emergency plans, drill records, and training logs.
- **Occupational Safety standards related to asbestos and mold exposure:** Non-compliant based on reported conditions and absence of documented mitigation actions.
- **IAAO facility norms for assessment offices (secure records and segregated public access):** Partially compliant due to inadequate separation of public and staff areas and exposure risks.
- **Texas Local Government Code §201.003 (records retention environment):** Partially compliant; record rooms lack environmental controls and monitoring.
- **COSO physical safeguarding principles (asset protection):** Non-compliant; no centralized inventory, assignment controls, or documented disposition processes.
- **NFPA 101 Life Safety Code (egress and emergency readiness):** Partially compliant due to lack of posted evacuation plans and drill documentation.

E. Recommendations

1. Address Unsafe Environmental Workspace Conditions Immediately

- Initiate formal assessment and remediation planning for potential asbestos and mold risks.
- Relocate affected staff to alternate work areas until environmental hazards are resolved to reduce health exposure and mitigate liability.

2. Adopt a Formal Facilities and Physical Security Policy

- Define access levels, key issuance, after-hours procedures, and contractor/visitor controls.
- Require written authorization protocols for facility modifications, equipment relocations, and restricted-area access.

3. Implement a Centralized Asset and Inventory Management System

- Establish a standardized inventory tool tracking serial numbers, assignments, lifecycle status, and custody acknowledgments.
- Conduct annual physical inventory reconciliation and report results to the Board.

4. Enhance Safety and Emergency Preparedness

- Develop and publish a facility-specific Emergency Action Plan (EAP), including evacuation routes, severe weather procedures, and workplace violence response guidance.
- Assign a Safety Officer responsible for training, documentation, and drill execution.
- Conduct at least semiannual fire and severe-weather drills and annual workplace violence/active threat training.

5. Secure Visitor and Public Access Areas

- Install physical separation measures (barriers, privacy screens, controlled pathways) between public and staff zones.
- Implement visitor badge protocols, ID verification for non-routine visitors, and escort requirements for contractors.

6. Integrate Physical Security with Data Security and HR Offboarding Controls

- Align building access controls with HR status changes so physical access is terminated concurrently with system access.
- Implement standardized device return and secure data-wiping procedures as required steps in employee separation.

7. Establish Preventive Maintenance and Facility Inspection Protocols

- Create a tracked maintenance system for HVAC, electrical, safety equipment, and building inspections.
- Conduct quarterly checks of storage conditions and safety hazards; document findings and remediation actions.

F. Summary

JCAD's facility conditions and physical security controls are insufficient to protect employees, safeguard sensitive information, and support reliable operations. Weaknesses in access control, inventory management, emergency preparedness, and environmental safety mirror broader internal control gaps and create elevated operational and liability risk. The building's age, layout, and reported environmental hazards further reinforce the need for corrective action and longer-term facilities planning.

Strengthening facilities governance requires both immediate risk mitigation, particularly regarding environmental hazards and emergency preparedness, and the establishment of standardized policies that link physical security to HR offboarding and data protection. Implementing preventive maintenance, centralized asset tracking, and structured visitor management will reduce risk exposure and improve operational continuity while supporting a safer and more professional public-facing environment.

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Section 5 – Summary of Compliance

A. Overview and Purpose

This section summarizes the Johnson County Appraisal District's (JCAD) compliance with applicable professional standards and statutory requirements, with particular emphasis on the Uniform Standards of Professional Appraisal Practice (USPAP) Standards 5 and 6, which govern mass appraisal development and reporting. Because mass appraisal is the core statutory function of an appraisal district, compliance with these standards is central to appraisal credibility, equity, and the preservation of public trust.

USPAP explicitly states that the preservation and promotion of public trust is an integral part of appraisal practice. Interviews and observations indicate that JCAD staff broadly embrace this principle and demonstrate a genuine commitment to ethical conduct and fairness. The purpose of this compliance summary is not to identify isolated technical deficiencies, but rather to assess whether systemic practices materially align with USPAP requirements and whether observed weaknesses rise to a level that threatens appraisal credibility, statutory compliance, or public confidence.

The compliance assessment was informed by a comprehensive review of requested data and documentation, including historical appraisal values, prior-year protest records, ARB documentation, cost and land schedules, depreciation methodologies, property record cards, and reference materials, combined with interviews and operational observation. The summary below focuses on those areas where there is the greatest potential for material compliance risk based on the originating concerns of this operational review.

B. Overall Compliance Assessment

Based on the work performed, JCAD is generally compliant with USPAP Standards 5 and 6. The district's appraisal outcomes, as measured by state studies and certification results, do not indicate systemic valuation failure or intentional misconduct. However, several areas of weakness exist where compliance is achieved in form but not consistently in practice, or where reliance on legacy methods increases risk of future noncompliance if not addressed.

The most significant compliance vulnerabilities relate to documentation, standardization, and methodology rather than intent or ethics. These vulnerabilities align closely with operational issues identified elsewhere in this report, including limited use of appraisal models, inconsistent data validation practices, lack of standardized procedures, and insufficient application of the income approach for applicable properties.

C. Key Compliance Observations by USPAP Standard

Standard Rule 5-1 – Credible Appraisal Development

JCAD generally employs recognized appraisal methods and techniques and does not exhibit evidence of careless or negligent mass appraisal practices. There was no indication of substantial errors of omission or commission that would materially misstate overall values at the districtwide level. However, inefficiencies in model development and reliance on manual adjustments increase the risk of inconsistency and make validation more difficult than necessary.

Standard Rule 5-2 – Identification and Analysis

The district identifies properties, property characteristics, and market areas in a manner that broadly satisfies USPAP requirements. Physical characteristics, land use, and neighborhood delineations are generally captured. That said, the use of very small market areas and inconsistent neighborhood definitions limits the robustness of market analysis and undermines some of the benefits of mass appraisal methodology. These practices do not constitute noncompliance but reduce analytical strength.

Standard Rule 5-3 – Highest and Best Use Analysis

Highest and best use is implicitly addressed through zoning, land use, and classification practices. However, documentation of this analysis is limited, and the lack of standardized appraisal manuals or written methodologies makes it difficult to demonstrate consistency across appraisers. While this does not rise to a clear violation, it represents a compliance documentation gap.

Standard Rule 5-4 – Procedures, Standardization, and Model Calibration

This is one of the most significant areas of weakness. At the outset of the review, JCAD had minimal standardized collection forms, procedures, training materials, or written appraisal manuals. USPAP explicitly requires the development of standardized procedures and training materials to support mass appraisal. While management recognized this deficiency during the review and initiated efforts to develop such documentation, the absence of these materials historically represents a gap in compliance execution.

Similarly, while recognized techniques for value modeling and calibration are referenced, the district's limited use of formalized models and heavy reliance on manual adjustments reduce transparency and reproducibility.

Standard Rules 5-5 and 5-6 – Data Collection and Application of Approaches to Value

JCAD collects and analyzes data related to cost and sales comparison approaches; however, the income approach is not applied to noticed values, even for income-producing properties where it would ordinarily be expected. The district cites data availability limitations and subscription constraints, and the review confirmed that JCAD lacks seasoned commercial appraisers with income-approach expertise.

This represents a methodological weakness rather than outright noncompliance, as USPAP allows flexibility based on data availability. However, it is a material risk area. Continued exclusion of the income approach for applicable properties increases exposure to equity challenges, ARB disputes, and litigation, particularly as the county continues to develop commercially.

Standard Rule 5-7 – Testing and Reconciliation

JCAD performs reconciliation and testing sufficient to meet minimum standards, including reliance on state studies and internal review. However, the lack of routine ratio studies at the appraiser level and limited automated testing reduces the district's ability to proactively identify uniformity issues. This is an area where compliance exists, but best practices are not fully implemented.

Standard Rule 6-1 – Reporting and Disclosure

The district's mass appraisal reporting meets baseline requirements by clearly setting forth appraisal results and assumptions at a high level. However, the absence of comprehensive internal appraisal manuals and inconsistent documentation of assumptions, extraordinary assumptions, and limiting conditions within operational records creates unnecessary risk. Improving documentation would strengthen compliance defensibility and transparency.

D. Compliance Conclusion

In summary, JCAD is largely compliant with USPAP Standards 5 and 6 and applicable statutory requirements. The district's appraisal outcomes do not indicate systemic failure, intentional bias, or ethical violations. The most significant compliance issues are structural and procedural in nature rather than substantive or intentional.

Key areas of compliance vulnerability include:

- Lack of historically standardized procedures and training materials
- Limited application of income-based valuation methods
- Insufficient documentation of appraisal methodologies and assumptions

- Overreliance on manual adjustments instead of calibrated models

Encouragingly, management demonstrated responsiveness once these issues were identified, and early steps have been taken to improve documentation and procedural consistency. Addressing the remaining gaps through formal policy adoption, enhanced training, and expanded valuation methodologies will materially strengthen compliance posture and reduce future risk.

E. Summary

JCAD's compliance posture reflects an organization that has operated in good faith and generally within professional standards, but one that has not fully modernized its mass appraisal infrastructure or documentation practices. The district's commitment to public trust is evident among staff; however, sustaining that trust requires institutionalizing best practices rather than relying on individual judgment and experience.

By strengthening standardized procedures, expanding valuation methodologies where appropriate, and improving documentation and testing practices, JCAD can move from baseline compliance toward a defensible, best-practice model that supports equity, transparency, and long-term public confidence.

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Section 6- CAD Comparison

Section 6.1 CAD Comparison: Budget Structure and Fiscal Transparency

A. Overview and Purpose

This section compares the Johnson County Appraisal District's (JCAD) adopted budgets with those of similarly sized peer appraisal districts, including Ellis, Grayson, Guadalupe, and Jefferson CADs. The purpose of this comparison is not to assess absolute spending levels alone, but to evaluate budget structure, transparency, governance maturity, and alignment with operational needs.

Budgets serve as both financial plans and governance tools. Well-structured budgets communicate staffing intent, operational priorities, risk tolerance, and long-term sustainability. This comparison evaluates whether JCAD's budget format and content provide the Board of Directors, taxing entities, and the public with sufficient information to support informed oversight and strategic decision-making.

B. Findings

1. Position-Based Budgeting Is Absent at JCAD

Peer CADs consistently budget by authorized position, showing the number of full-time equivalents by department, salary ranges, and vacancy assumptions. JCAD budgets salaries by individual incumbent, rather than by position, obscuring true staffing capacity and long-term workforce intent.

2. Limited Salary Structure Disclosure

Peer CAD budgets often reference pay grades, steps, or salary contingencies that signal career progression and retention strategy. JCAD's budget provides no explanation of compensation philosophy, progression assumptions, or market-alignment strategy.

3. No Capital Replacement or Technology Reserve Planning

Ellis, Grayson, Guadalupe, and Jefferson CADs include explicit budget allocations or reserves for technology refresh cycles, equipment replacement, and infrastructure maintenance. JCAD's budget does not include capital replacement reserves for computers, servers, network equipment, or appraisal technology.

4. Absence of Formal Contingency and Risk Reserves

Peer CADs budget for contingencies related to litigation, protest volume, operational disruptions, or unplanned expenditures. JCAD lacks a defined

contingency or reserve policy, limiting its ability to absorb volatility without reactive budget amendments.

5. Minimal Narrative Context

Peer budgets include narrative explanations describing departmental responsibilities, year-over-year changes, and strategic initiatives. JCAD's budget is largely numeric, with little explanatory context connecting expenditures to operational objectives or known risks.

6. Performance and Workload Metrics Not Embedded

Several peer CAD budgets include parcel counts, protest volumes, staffing ratios, or workload indicators. JCAD's budget does not reference performance metrics or expected outputs tied to funding levels.

7. IT Governance and Security Costs Not Clearly Defined

Peer CADs identify internal IT staffing, software ownership, and security-related expenditures. JCAD relies heavily on external IT vendors without clearly defining oversight responsibilities or aligning budget structure to cybersecurity and data governance risks.

C. Analysis

The differences observed between JCAD's budget and those of its peers reflect more than stylistic variation; they indicate differences in governance maturity and strategic planning capacity. Peer CAD budgets function as management tools that support workforce planning, risk mitigation, and long-term investment. JCAD's budget, by contrast, functions primarily as a compliance document that meets statutory adoption requirements but offers limited strategic insight.

Budgeting by individual rather than by position reduces transparency and complicates recruitment, succession planning, and performance management. The absence of capital reserves and contingency planning exposes the district to heightened operational and financial risk, particularly given known challenges related to facilities, technology modernization, and litigation exposure.

The lack of narrative explanation and performance linkage further limits the Board's ability to assess whether resources are aligned with statutory responsibilities, operational priorities, or reform initiatives outlined elsewhere in this report. Collectively, these structural weaknesses reinforce earlier findings regarding reactive decision-making and limited long-term planning at JCAD.

D. Recommendations

1. Adopt Position-Based Budgeting

Budget all authorized positions at full market value by classification and grade, or a percentage of full market value driven by a compensation strategy, regardless of current incumbency, to improve transparency, recruitment readiness, and workforce planning.

2. Include Salary Structure and Progression Context

Incorporate pay-grade summaries, step assumptions, and salary contingency lines into the budget to align fiscal planning with HR and retention strategies and an annual workforce plan.

3. Establish Capital Replacement Reserves

Create dedicated annual reserves for technology, appraisal equipment, and infrastructure replacement based on defined lifecycle assumptions.

4. Implement Contingency and Risk Reserve Policies

Adopt a formal reserve policy defining minimum fund balance targets and contingency uses to address litigation, protest volume fluctuations, and operational disruptions.

5. Expand Budget Narrative and Departmental Explanations

Add narrative sections explaining major cost drivers, year-over-year changes, and how expenditures support statutory duties and strategic priorities.

6. Integrate Performance and Workload Metrics

Embed key operational metrics, such as parcels per appraiser, protest volumes, and service turnaround times, to link funding decisions to expected outcomes.

7. Clarify IT and Security Governance in the Budget

Clearly identify internal IT responsibilities, vendor reliance, cybersecurity investments, and system-maintenance costs to align financial planning with risk management obligations.

E. Summary

Compared to peer appraisal districts, Johnson CAD's budget lacks several structural and informational elements that support transparency, governance oversight, and long-term sustainability. While the budget satisfies statutory adoption requirements, it does not function as an effective management or strategic planning tool.

Peer CADs demonstrate that incorporating position-based budgeting, reserve planning, narrative context, and performance metrics strengthens accountability and public trust. Aligning JCAD's budget structure with these practices will enhance Board oversight, reduce operational risk, and better support the organizational reforms recommended throughout this report.

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Section 6.2- CAD Comparison: Pay Grades, Classifications, and Salaries

A. Overview and Purpose

This section compares the pay grades, job classifications, and salary structures of the Johnson County Appraisal District (JCAD) with those of similarly sized peer appraisal districts, including Ellis, Grayson, Guadalupe, and Jefferson CADs. The purpose of this comparison is to evaluate market competitiveness, internal equity, career progression, and structural maturity of JCAD's compensation framework.

While absolute salary levels are important, the structure of a compensation system is equally critical. Effective appraisal districts use compensation frameworks to support recruitment, retention, professional development, and accountability. This review assesses whether JCAD's current pay practices align with peer standards and whether they support the operational and workforce needs identified elsewhere in this report.

B. Findings

1. Peer CADs Use Structured Classification Systems

Ellis, Grayson, Guadalupe, and Jefferson CADs maintain clearly defined classification systems organized by work series (e.g., clerical, technical, appraisal, supervisory, management). These systems typically include:

- Standardized job titles
- Consistent minimum qualifications
- Defined scopes of responsibility
- Clear differentiation between entry-level, intermediate, senior, and lead roles

JCAD's classification is a simple Pay Grade structure, but it is inconsistently applied and lacks uniform differentiation among experience levels, certifications, and the complexity of work.

2. Multi-Step Pay Grades Are Standard Among Peer CADs

Peer CADs commonly use multi-step pay grades, often with eight to ten steps per grade. These steps provide predictable wage progression tied to tenure, certification, performance, or skill acquisition.

JCAD's pay grades are comparatively flat and do not consistently function as true progression systems. Employees performing similar work at the same classification level are paid significantly different base salaries without transparent criteria.

3. Salary Compression Is More Pronounced at JCAD

Peer CADs demonstrate greater separation between:

- Entry-level and fully certified appraisers
- Clerical staff and technical specialists
- Supervisory and non-supervisory roles

At JCAD, salary compression is evident across multiple functions, particularly within appraisal and support services. This compression reduces incentives for advancement and contributes to retention challenges.

4. Market Positioning Is Below Peer Medians for Key Roles

Across appraisal, clerical, technical, and administrative roles, JCAD salaries generally fall below peer median ranges, especially at the mid-career and senior levels. This gap is most pronounced in:

- Certified appraisers
- Commercial and complex appraisal roles
- Technical and IT-related functions
- ARB coordination and high-risk public-facing positions

5. Certification and Specialization Are Weakly Incentivized

Peer CADs more consistently link compensation progression to professional credentials, such as RPA certification, commercial appraisal expertise, or GIS and IT specialization. JCAD's compensation structure does not reliably reward these qualifications, limiting its ability to attract experienced external candidates.

C. Analysis

The compensation differences observed between JCAD and its peer districts reflect structural immaturity rather than isolated pay decisions. Peer CADs have intentionally designed classification and pay systems to reinforce professional development, internal equity, and workforce stability. JCAD's system, by contrast, has evolved reactively over time, resulting in inconsistent pay outcomes and unclear advancement pathways.

Salary compression and weak progression signals undermine morale and retention, particularly in a competitive labor market proximate to the Dallas–Fort Worth metroplex. The lack of clear differentiation between certification levels and job complexity also conflicts with the district's need to improve appraisal quality, technology capability, and leadership depth.

These compensation challenges are closely linked to other findings in this report, including high turnover, reliance on internal-only training, limited external recruitment, and difficulty staffing specialized functions. Without structural reform, incremental salary adjustments alone are unlikely to resolve these issues.

D. Recommendations

1. Adopt a Structured, Market-Based Classification System

Standardize job classifications across all functions with clear definitions, minimum qualifications, and scope distinctions aligned with peer CAD practices.

2. Implement Multi-Step Pay Grades

Introduce formal step progression within each pay grade to support predictable advancement, retention, and performance management.

3. Address Salary Compression Systematically

Conduct a phased compression analysis and adjust ranges to restore appropriate separation between entry, intermediate, senior, and supervisory roles.

4. Align Compensation With Certification and Expertise

Tie pay progression explicitly to professional credentials, appraisal specialization, and technical skill sets critical to district operations.

5. Reposition JCAD Toward Peer Market Medians

Establish compensation targets at or near peer medians for critical roles, with particular focus on certified appraisers, ARB coordination, IT, and technical staff.

6. Integrate Compensation Strategy With Budget Reform

Ensure that pay-grade restructuring is supported by position-based budgeting and long-term financial planning, as outlined in the CAD Budget Comparison section.

E. Summary

Compared to peer appraisal districts, Johnson CAD's pay grades, classifications, and salary structure lack the clarity, progression, and market alignment necessary to support a stable and professional workforce. Salary compression, inconsistent application of pay grades, and limited incentives for certification and specialization have contributed to turnover and constrained organizational capacity.

Peer CADs demonstrate that structured classification systems and transparent progression models strengthen recruitment, retention, and accountability. Aligning JCAD's compensation framework with these practices is essential to achieving the operational, governance, and appraisal reforms recommended throughout this report.

Section 6.3- CAD Comparison – Organizational Structure, Span of Control, and Functional Alignment

A. Overview and Purpose

This section compares the organizational structure of the Johnson County Appraisal District (JCAD) to similarly sized peer appraisal districts, including Ellis, Grayson, Guadalupe, and Jefferson CADs. The objective is to evaluate how organizational design, span of control, departmental alignment, and staffing distribution support operational effectiveness, accountability, and scalability.

Organizational structure is a critical enabler of appraisal quality, customer service consistency, technology stability, and compliance. Peer CADs of similar parcel counts and complexity increasingly rely on clearly defined departmental boundaries, dedicated technical and administrative leadership, and balanced spans of control to reduce operational risk and leadership bottlenecks.

This comparison focuses on:

- Functional separation and clarity of roles
- Placement of IT, GIS, exemptions, and customer service
- Leadership layering and span of control
- Alignment between structure and operational demands

B. Findings

1. Johnson CAD Operates with a Compressed and Overloaded Leadership Model

JCAD's structure reflects three primary directors (Appraisal, Support Services, Administration) reporting directly to the Chief Appraiser, with no dedicated IT, GIS, or compliance leadership functions. Several operationally distinct functions, HR, finance, exemptions, records, and customer service, are consolidated under a single administrative director role.

By contrast, peer CADs distribute these responsibilities across specialized leadership roles, reducing operational concentration and improving accountability.

2. Peer CADs Maintain Clear Functional Separation

Across Ellis, Grayson, Guadalupe, and Jefferson CADs, the following structural patterns are consistent:

- Dedicated IT or GIS leadership (often separate from appraisal)
- Distinct customer service / exemptions divisions, frequently paired together
- Clearly defined appraisal hierarchies, including senior or chief appraisers by discipline
- Formal ARB support roles with experienced clerks or managers

For example:

- Jefferson CAD maintains separate divisions for Appraisal, IT/GIS, Information & Exemptions, and Administration, with approximately 39 employees and an average turnover rate below 11 percent.
- Ellis CAD and Guadalupe CAD both utilize departmental managers with narrower spans of control and clearer functional specialization.

3. Span of Control at Johnson CAD Exceeds Peer Norms

JCAD directors oversee a wider range of unrelated functions than peers, particularly in Administration and Support Services. This structure contributes to:

- Delayed decision-making
- Inconsistent policy enforcement
- Role confusion among staff
- Increased dependency on informal knowledge

Peer CADs typically maintain spans of control that allow managers to focus on one functional domain, rather than acting as generalists across multiple disciplines.

4. IT and Technology Governance Is Structurally Underrepresented at JCAD

All peer CADs reviewed maintain either:

- A dedicated IT Director or Manager, or
- A defined IT/GIS division with multiple staff

JCAD has no internal IT function and relies on vendors and appraisal staff to perform technical oversight. Given the complexity of CAMA, GIS, cybersecurity, and data governance, this represents a significant structural gap when compared to peers.

C. Analysis

Organizational design at JCAD reflects a legacy structure that has not evolved alongside operational complexity, technology demands, or workforce scale. While the structure may have been sufficient in earlier periods, it no longer aligns with the district's parcel volume, regulatory environment, or system dependencies.

Peer CADs demonstrate that functional clarity, specialization, and layered leadership correlate strongly with:

- Lower turnover
- Higher training maturity
- Stronger compliance posture
- More stable technology environments

At JCAD, structural compression has magnified leadership weaknesses and cultural stressors identified in earlier sections. Directors are required to operate simultaneously as managers, subject-matter experts, HR decision-makers, and compliance gatekeepers, an unsustainable model that increases institutional risk.

Importantly, this comparison reinforces that many of JCAD's operational challenges are structural, not individual, and can be mitigated through realignment rather than relying solely on personnel turnover.

D. Recommendations

1. Realign Departmental Structure

- Merge Customer Service and Exemptions into a single division under one manager, consistent with peer CAD practice.
- Separate and centralize administrative functions (HR, finance, records) from operational support roles.

2. Establish Dedicated IT Leadership

- Create an IT Director or IT Manager role responsible for CAMA, GIS, cybersecurity, data governance, and vendor oversight.
- Align IT structurally with executive leadership rather than embedding it informally within appraisal operations.

3. Reduce Span of Control

- Limit directors to one primary functional domain.
- Introduce senior or lead roles and additional supervisor roles within appraisal, exemptions, and customer service to improve supervision and mentoring.

4. Formalize ARB Support Structure

- Elevate the ARB Clerk role to a senior-level position with defined authority, training, and continuity responsibility.

5. Align Organizational Structure with Strategic Growth

- Ensure future staffing and leadership additions align with a documented organizational design, not ad hoc needs.

E. Summary

Compared to peer appraisal districts, Johnson CAD operates with a compressed organizational structure that places excessive responsibility on a small number of directors and lacks dedicated leadership in critical areas such as IT, customer service integration, and compliance support. Peer CADs demonstrate that clearer functional separation, narrower spans of control, and specialized leadership roles materially improve operational stability and staff retention.

Realigning JCAD's organizational structure is foundational to the success of other recommended reforms, including mass appraisal modernization, HR stabilization, technology conversion, and governance improvement. Structural reform should be viewed not as an administrative exercise, but as a risk-reduction and performance-enabling strategy essential to the district's long-term effectiveness.

Section 7- Roadmap and Implementation Plan

A. Purpose and Implementation Philosophy

This roadmap establishes a phased approach to implementing the recommendations contained in this report. The sequencing is intentional: immediate actions focus on risk mitigation and operational stabilization; mid-term actions institutionalize modernization and workforce maturity; and long-term actions position the district for scalability, resilience, and continuous improvement in a growing county environment.

Each phase is designed to build upon the prior phase, avoiding disruption to statutory cycles while progressively strengthening governance, appraisal defensibility, technology utilization, and organizational culture.

Immediate Actions (0–12 Months): Risk Mitigation, Stabilization, and Foundational Reforms

These actions address the most significant operational, compliance, and credibility risks identified in the review. They are prioritized to stabilize appraisal outcomes, improve defensibility, reduce reliance on non-transparent practices, and establish the infrastructure necessary for successful modernization.

Appraisal Practices and Valuation Integrity

- Implement updated residential improvement cost schedules that reflect current construction costs.
 - **Prioritization rationale:** Existing schedules are materially outdated, requiring excessive manual adjustments that undermine uniformity and appraisal defensibility.
- Strip non-measurable “eco” and similar discretionary adjustments from residential accounts and transition properties into appropriate mass appraisal models.
 - **Prioritization rationale:** These adjustments obscure valuation logic, reduce transparency, and create inequity across neighborhoods.
- Obtain and implement standardized depreciation schedules within the CAMA system.
 - **Prioritization rationale:** Manual depreciation increases inconsistency and risk; automated schedules are foundational to uniform mass appraisal.
- Begin development of land schedules that recognize economy of scale, starting with rural land classes.

- **Prioritization rationale:** Rural land is most affected by flat-rate schedules, and correcting this early will yield immediate equity improvements.

Technology and Data Infrastructure

- Continue forward with the GSA CAMA conversion using a dual-system strategy (GSA and MARS running concurrently through the transition period).
 - **Prioritization rationale:** Abandoning the conversion is not viable given system obsolescence risks; stabilization is required before optimization.
- Schedule structured pre-go-live and post-go-live onsite training with the vendor using JCAD's actual data.
 - **Prioritization rationale:** Staff confidence and data accuracy are critical to preventing roll disruption during transition.
- Hire a full-time IT Director or senior IT professional with SQL and data governance expertise.
 - **Prioritization rationale:** Successful CAMA conversion, GIS integration, and cybersecurity controls cannot be sustained without internal technical leadership.

Organizational Structure and Customer Service

- Merge Exemptions and Customer Service into a single department under one manager.
 - **Prioritization rationale:** These functions are operationally intertwined, and consolidation will reduce processing delays, confusion, and taxpayer frustration.
- Hire a Deputy Chief Appraiser over Administration, which would include Human Resources, ARB, Information Technology, and Finance. Hire a Human Resources and Information Technology professional.
 - **Prioritization rationale:** Aligns with organizational needs that address immediate talent needs that are materially affecting operations and areas that leave the District open to legal and operational risks.
- Issue desk scanners and standardize intake workflows at the front counter for exemptions and documentation.

- **Prioritization rationale:** Immediate gains can be achieved in processing efficiency, record integrity, and public trust.
- Develop an initial 3 Year Strategic Plan
 - **Prioritization rationale:** A comprehensive plan that will guide the Board, Chief Appraiser, Departmental Goals, and subsequently individual goals going forward.

Mid-Term Actions (1–2 Years): System Modernization, Workforce Development, and Process Maturity

These actions focus on building institutional capability, reducing reliance on legacy practices, and embedding best practices into daily operations. They assume stabilization from the immediate phase has been achieved.

Appraisal Methodology Expansion

- Develop and implement income-based valuation models for applicable commercial property classes.
 - **Prioritization rationale:** Income-producing properties cannot be equitably appraised long-term without this methodology.
- Expand land schedule modeling to urban and suburban classes using market-calibrated ranges and interpolation.
 - **Prioritization rationale:** Once rural schedules are stabilized, broader application improves countywide uniformity.
- Hire senior-level appraisers with external experience in commercial, residential, and land appraisal.
 - **Prioritization rationale:** External expertise accelerates modernization and reduces institutional blind spots created by in-house-only training.

Workforce Development and Performance Management

- Implement department-specific performance metrics and quality-control spot checks across all functions.
 - **Prioritization rationale:** Performance accountability supports consistency, coaching, and defensible outcomes.
- Establish formal training curricula, including off-site appraisal education and rotational exposure with peer CADs.

- **Prioritization rationale:** Structured development is essential for retention and succession readiness.
- Implement an internal quality assurance and random review program for appraisal and exemption work.
 - **Prioritization rationale:** Early detection of errors prevents compounding issues and strengthens MAP readiness.

Governance and Policy Maturity

- Finalize and adopt comprehensive SOPs across all departments and establish an annual review cycle.
 - **Prioritization rationale:** SOPs move from stabilization artifacts to governance tools when institutionalized.
- Integrate KPI reporting into quarterly Board agendas.
 - **Prioritization rationale:** Sustained oversight requires consistent, comparable performance data.

Long-Term Actions (3+ Years): Strategic Optimization, Scalability, and Continuous Improvement

These initiatives support long-term resilience, efficiency, and alignment with county growth. They should be pursued once core systems, staffing, and processes are stable and functioning effectively.

Facilities and Capacity Planning

- Develop and execute a facility replacement or relocation plan aligned with ADA compliance, ARB needs, and public service capacity.
 - **Prioritization rationale:** The current facility constrains operations and poses long-term safety and reputational risks.
- Design public-facing spaces that improve taxpayer experience and ARB accessibility.
 - **Prioritization rationale:** Physical environment directly affects public trust and service efficiency.

Advanced Analytics and Optimization

- Implement advanced modeling, automated ratio studies, and predictive analytics within the CAMA environment.
 - **Prioritization rationale:** Mature districts use analytics to proactively manage equity and compliance.
- Reduce reliance on manual intervention through automation and data-driven workflows.
 - **Prioritization rationale:** Automation improves scalability as parcel counts increase.

Continuous Improvement and Benchmarking

- Conduct annual peer benchmarking against comparable CADs using IAAO standards.
 - **Prioritization rationale:** External comparison prevents stagnation and reinforces accountability.
- Perform periodic independent operational and compliance reviews.
 - **Prioritization rationale:** Sustained excellence requires objective external validation.

C. Summary

This phased roadmap provides JCAD with a realistic, disciplined path forward. Immediate actions stabilize appraisal practices and reduce risk; mid-term actions institutionalize modernization and workforce capability; and long-term actions position the district for scalable, best-practice operations.

Successful execution will depend on leadership consistency, internal technical capacity, and clear governance oversight. If implemented as outlined, this roadmap will materially improve appraisal defensibility, operational efficiency, employee engagement, and public trust while supporting Johnson County's continued growth.

Section 7.1 – Action Matrix

Initiative	Targeted Timeline	Performance Metric
Implement updated residential improvement cost schedules	0–6 months	New schedules adopted; reduction in discretionary adjustments; improved residential ratio study results
Remove non-measurable “eco” and discretionary adjustments from accounts	0–6 months	Percentage of accounts without discretionary adjustments; improved uniformity metrics (COD, PRD)
Implement automated depreciation schedules in CAMA	0–9 months	Depreciation schedules active; reduction in manual overrides; consistency across similar properties
Develop rural land schedules recognizing economy of scale	0–12 months	New rural land schedules adopted; reduction in valuation outliers for large tracts
Hire a full-time Deputy Chief Appraiser, Human Resources, and Senior IT professional or administrator	0–6 months	Position filled; internal SQL capability established; reduction in external IT spend
Continue GSA CAMA conversion with dual-system operation	0–12 months	Successful parallel operation; no certification delays; staff adoption benchmarks met
Conduct pre- and post-go-live onsite GSA training using JCAD data	0–12 months	Training completion rate; reduction in post-go-live defects; staff competency assessments
Merge Exemptions and Customer Service into a single department	0–9 months	Reduced processing time; improved customer satisfaction scores; fewer handoffs
Issue desk scanners and standardize intake workflows	0–6 months	Reduction in backlog; same-day document scanning rate; fewer lost applications
Develop a 3 Year Strategic Plan	9-12 months	Provide a roadmap and goals to direct Board, Chief Appraiser, Departments, and Individuals
Develop income-based valuation models for commercial properties	12–24 months	Income models implemented; commercial PRD improvement; reduced protest losses
Expand land schedules to suburban and urban classes	12–24 months	Countywide land model coverage; improved land value uniformity
Hire senior-level appraisers with external experience	12–24 months	Number of senior hires; reduced reliance on in-house-only training

Initiative	Targeted Timeline	Performance Metric
Implement formal performance metrics and QA spot checks	12–18 months	Documented QA reviews; reduction in error rates; performance coaching documentation
Establish structured training curriculum and off-site education	12–24 months	Training hours per employee; certification compliance; improved retention
Implement internal appraisal and exemption quality assurance program	12–24 months	Number of random audits completed; corrective action rates
Finalize and adopt SOPs across all departments	12–18 months	SOP adoption rate; annual review completion
Integrate KPI dashboards into quarterly Board reporting	12–18 months	Regular KPI reporting; Board review documentation
Develop and execute facility replacement or relocation plan	3–5 years	Board-approved facilities plan; ADA compliance achieved
Redesign public-facing and ARB hearing spaces	3–5 years	Improved accessibility; reduced ARB complaints
Implement advanced analytics and automated ratio modeling	3–5 years	Automated ratio studies; early detection of valuation drift
Reduce manual workflows through automation	3–5 years	Decrease in manual adjustments; cycle-time reductions
Conduct annual peer benchmarking using IAAO standards	Annual	Benchmark reports completed; performance trend improvements
Perform periodic independent operational and compliance reviews	Every 3–5 years	Independent review completion; corrective action tracking

Section 7.2 - Master List of Recommended Actions

(Consolidated Across All Report Sections)

A. Governance, Leadership, and Ethics

1. Establish a formal Board Governance and Ethics Committee to oversee leadership conduct, compliance, and accountability.
2. Adopt a district-wide Code of Ethics applicable to Board members, Directors, ARB members, and staff.
3. Adopt a formal Whistleblower and Anti-Retaliation Policy with protected reporting channels.
4. Require annual ethics, Open Meetings Act, and Public Information Act training for Board members and Directors, with signed certifications.
5. Require all Board directives and policy guidance to be issued in written form, approved by the Board, and archived.
6. Prohibit individual Board members from directing staff outside of formal Board action.
7. Implement a governance accountability matrix linking Director responsibilities to measurable outcomes.
8. Conduct an annual independent governance and compliance audit.
9. Strengthen ARB independence by enforcing statutory boundaries between the ARB, TLO, and district staff.
10. Require annual ARB conflict-of-interest disclosures and ethics certifications.
11. Require ARB members to complete standardized annual training on hearings, bias, and due process.
12. Establish a formal, documented ARB complaint intake and investigation process.
13. Clarify and limit the Taxpayer Liaison Officer (TLO) role to statutory duties only.

B. Organizational Structure and Staffing Alignment

14. Merge Customer Service and Exemptions into a single department under one manager.

15. Separate administrative functions (HR, finance, records) from operational support roles.
16. Reduce Director span of control so each Director oversees one primary functional domain.
17. Create senior or lead positions within appraisal, exemptions, and customer service to improve supervision.
18. Establish a Deputy Chief Appraiser or equivalent leadership depth for continuity and succession.
19. Elevate the ARB Clerk role to a senior, experienced position with appropriate compensation.
20. Hire three senior-level appraisers from outside the district with expertise in:
 - Mass land appraisal
 - Residential appraisal
 - Commercial income appraisal
21. Eliminate the routine two-appraiser “team driving” model and transition to single-appraiser field inspections.
22. Align organizational structure with a documented 3–5 year workforce plan.

C. Human Resources, Talent, and Culture

23. Establish a formal Human Resources Department led by a credentialed HR professional.
24. Centralize all job descriptions within HR and update them to reflect actual duties.
25. Normalize pay grades and create steps within grades to allow progression.
26. Develop clear, transparent career pathways for all job families.
27. Implement a 90-day probationary period for all new hires.
28. Develop a comprehensive 180-day onboarding program with checklists and training milestones.
29. Implement mandatory exit interviews for all separations with documented findings.
30. Conduct quarterly and annual employee engagement surveys.

31. Conduct annual taxing entity and taxpayer satisfaction surveys.
32. Develop and publish a district-wide training calendar.
33. Expand training to include in-person, off-site 101/102 coursework for staff.
34. Provide regular de-escalation and public-interaction training for customer-facing staff.
35. Implement annual team-building initiatives.
36. Revise annual performance evaluations to focus on goals, coaching, and development.
37. Decouple merit increases from annual reviews and adopt a 9-box pay-for-performance model.
38. Implement monthly coaching and check-ins for all employees.
39. Audit personnel files to verify TDLR/TALCB continuing education compliance.
40. Review benefits for ROI and consider reallocating excess benefit costs toward wages.
41. Develop standardized recruitment, interviewing, and offer-letter procedures.
42. Develop a rolling 3-year workforce and succession plan.
43. Ensure compliance with FMLA eligibility thresholds and document policies accordingly.

D. Mass Appraisal Accuracy and Uniformity

44. Implement updated residential improvement cost schedules aligned with current construction costs.
45. Eliminate duplicate residential classification systems and adopt a single standard.
46. Develop and implement depreciation schedules within the CAMA system.
47. Strip non-objective “Eco” and similar manual adjustments from residential accounts.
48. Develop and maintain land schedules that recognize economy of scale.
49. Begin economy-of-scale land modeling with rural land as a pilot.
50. Implement larger, competitive market area groupings.

51. Require standardized ratio studies and gain/loss analysis across all appraisal staff.
52. Standardize quality and condition coding across neighborhoods.
53. Require photos to be taken and updated at every inspection.
54. Develop and implement income models for commercial appraisal.
55. Transition from TREPP to CoStar or equivalent comprehensive commercial data source.
56. Establish a formal process to collect income and lease data from ARBs and brokers.
57. Require annual certification by the Chief Appraiser of compliance with the reappraisal plan.
58. Allow correction of appraisal errors regardless of reappraisal cycle zone.
59. Conduct regular appraisal calibration sessions.
60. Develop and publish a district appraisal manual used by all appraisers.

E. Customer Service and Public Transparency

61. Develop unified customer-service FAQs, scripts, and escalation matrices.
62. Require appraisers to be available to customer service staff during operating hours.
63. Install desk scanners for all exemption and front-counter workstations.
64. Scan and receipt-stamp exemption applications at intake.
65. Implement a formal process for handling returned mail, especially for mineral accounts.
66. Improve ARB hearing room accessibility, signage, and seating.
67. Ensure all ARB sessions are fully recorded and retained.
68. Publish signed board minutes and recordings within five business days.
69. Adopt a formal Public Engagement Plan, including quarterly community forums.
70. Track and publish customer service metrics, including wait times and resolution rates.

F. Policies, Procedures, and Internal Controls

71. Develop a comprehensive district-wide SOP manual covering all functions.

72. Conduct annual SOP reviews and updates.
73. Establish policy version control, numbering, and approval tracking.
74. Create policies beyond statutory minimums to ensure organizational uniformity.
75. Implement multi-level approval workflows for payroll, valuation changes, and vendor payments.
76. Establish formal offboarding protocols that remove system and building access immediately.
77. Create an internal audit and quality-assurance function.
78. Conduct semiannual appraisal and exemption file audits.
79. Implement a COSO-aligned internal control framework.
80. Eliminate mileage reimbursement for appraisers already receiving auto allowances.
81. Implement validation mechanisms for field inspections.

G. Data Collection, Technology, and Data Management

82. Hire a full-time IT Director or IT Manager.
83. Reduce reliance on external IT vendors by building internal capacity.
84. Stabilize the GSA CAMA system before expanding features.
85. Continue dual operation of MARS and GSA through 2026 if necessary.
86. Schedule pre- and post-go-live onsite training using JCAD data.
87. Ensure all field iPads have cellular connectivity.
88. Integrate mobile GIS, imagery, and inspection tracking.
89. Implement automated ratio studies within the CAMA system.
90. Establish SQL reporting capability internally.
91. Create a technology replacement reserve fund.
92. Implement a formal data-governance framework.
93. Require inspections prior to using sales data in modeling.

H. Data Security and Privacy

94. Adopt a formal cybersecurity and data-governance policy aligned with NIST/DIR.

95. Conduct annual third-party penetration testing and vulnerability scans.
96. Encrypt all PII and appraisal data at rest and in transit.
97. Implement secure email and encrypted file transfer protocols.
98. Enforce role-based access controls across all systems.
99. Conduct quarterly access reviews.
100. Implement multi-factor authentication.
101. Designate a Data Protection Officer (DPO).
102. Implement audit logging for all critical systems.

I. Property Discovery and Data Acquisition

103. Develop a standardized inspection checklist.
104. Require geotagged, date-stamped photos for all inspections.
105. Implement GPS or app-based validation of field inspections.
106. Conduct random spot checks of appraiser fieldwork.
107. Transition routine inspections to single-appraiser assignments.
108. Establish SOPs for mineral vendor coordination and returned mail tracking.
109. Validate sketch dimensions and aerial imagery during inspections.

J. Value Defense and Litigation Support

110. Redesign ARB evidence packets to be clear and self-explanatory.
111. Implement standardized comp grids and annotated maps.
112. Ensure subject properties are clearly identified in all evidence.
113. Maintain differentiated evidence formats for agents versus self-represented taxpayers.

K. Intergovernmental Relations and Stakeholder Engagement

114. Develop a formal Stakeholder Engagement Plan.
115. Hold quarterly coordination meetings with taxing entities.
116. Modernize and inventory all interlocal agreements.

117. Designate a PTAD/PVS compliance liaison.
118. Publish quarterly performance dashboards.
119. Provide early coordination on budget and certification impacts.
120. Correct and verify all ballot and entity communication calculations.

L. Strategic Planning, Risk, and Performance Metrics

121. Develop and adopt a 3–5 year strategic plan.
122. Establish district-wide KPIs for all functions.
123. Implement random quality-control sampling for all staff work.
124. Develop an enterprise risk register.
125. Assign risk owners and review quarterly.
126. Establish a formal fund balance and reserve policy.
127. Conduct annual peer benchmarking.
128. Link employee performance evaluations to KPIs.
129. Publish annual strategic progress reports.

M. Facilities, Equipment, and Physical Security

130. Address potential asbestos and mold hazards immediately.
131. Relocate affected staff to safe workspaces.
132. Develop a facilities and physical-security policy.
133. Implement visitor identification and escort protocols.
134. Install barriers between public and staff work areas.
135. Conduct annual fire, tornado, and active-shooter drills.
136. Designate a Safety Officer.
137. Implement centralized asset inventory tracking.
138. Establish data-wiping and disposal procedures.
139. Develop preventive maintenance schedules.
140. Plan for relocation to a larger, ADA-compliant facility.