

2019

**Travis County Auditor's Office Review of the
Travis County Tax Assessor-Collector's Special
Inventory Tax Function**

**Travis County Auditor's Office
Risk Evaluation & Consulting Division**

6/24/2019

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Travis County Auditor

Date: June 24, 2019

Subject: Travis County Special Inventory Tax Review

The Risk Evaluation & Consulting Division of the Travis County Auditor's Office has completed a review of the Travis County Tax Office's Special Inventory Tax (SIT) function. This function was previously known as Vehicle Inventory Tax (VIT). During our review, we verified that dealer inventory tax forms were complete and submitted timely, unit property taxes were properly calculated, penalties were assessed in a manner compliant with statute, and escrow accounts were appropriately accounted for. We conducted our examination in accordance with the applicable statutes governing the County Auditor's Office and those relating to SIT.

BACKGROUND

In Travis County, the SIT function is administered by the Travis County Tax Office's Property Tax Division. Annually, the Property Tax Division receives a list of active dealerships from the Travis Central Appraisal District (TCAD). TCAD provides this dealer listing, along with the applicable dealers' declaration statements, to the Tax Office. Tax Office personnel enter the dealers' information into the eTax system and attach electronic versions of the declaration statements to the dealers' records.

On a monthly basis, dealers are required by statute to complete a Dealer's Motor Vehicle Inventory Tax Statement. On this statement, dealers list all motor vehicles sold in the period. The dealers then compute and prepay estimated SIT for each vehicle sold. Both the payment and the statement are to be remitted to the Tax Office by the 10th day of the following month, and penalties are to be assessed for late remittance. These estimated tax payments are held by the Tax Office in an escrow account for each dealer.

No later than February 1st, dealers are required to remit their annual tax declarations to TCAD detailing all applicable vehicle sales from the previous calendar year. This report is utilized to determine the total taxes payable for each dealer for that year. Total taxes due are then reconciled to the estimated SIT payments received from each dealer during the year. If a shortfall exists, the Tax Office collects the balance due from the dealer. The Tax Office is then to remit the taxes collected to the applicable taxing jurisdictions no later than February 15th.

SCOPE OF EXAMINATION

This review included an assessment of the SIT function, particularly its compliance with the statutes and regulations governing this function, as well as an assessment of the applicable accounting protocols and the internal controls environment for the period January 1, 2017 through December 31, 2017.

REVIEW METHODOLOGY

Our review methodology was comprised of testing datasets containing SIT payments, SIT due, title transfer transactions, and other motor vehicle data. In addition, we applied sampling procedures to SIT statements and obtained verbal and written representations from Tax Office personnel regarding this functional area.

The use of sampling techniques would not necessarily disclose all material weaknesses and misstatements related to the SIT function. In regard to the written and verbal representations made by office personnel, unless otherwise noted in this report, office management maintains that the assertions we relied upon during this review were correct to the best of their knowledge.

ATTACHMENTS

Attachment A: Contains a finding identifying dealerships that have been assigned a General Distinguishing Number (GDN) by the Texas Department of Motor Vehicles (TXDMV) that have not also registered with the Travis Central Appraisal District (TCAD) in accordance with the Tax Code. This item is not the responsibility of the Tax Office, and we conveyed this finding to TCAD for review.

SIGNIFICANT FINDINGS

Our detailed findings and recommendations are detailed in the Areas of Concern section of this report. The following is a summary of the most significant issues noted:

- Of the 452 dealers that submitted at least one SIT payment/statement in the period, 146 (32%) dealers did not remit SIT payments/statements for one or more months of the review period. A total of 651 SIT statements were not submitted, for which penalties totaling \$325,500 were not assessed by the Tax Office (See Comment #2.).

- Eighty percent of monthly SIT payments received were not submitted by the dealers in a timely manner (by the 10th day of the following month.). Of these, 49% were not remitted by the 20th day of the following month. An estimated \$293,552 of penalties were not assessed by the Tax Office for these late items (See Comment #2.).
- Across all of our reviews and for all dealers combined, we noted over \$295,000 in SIT that was not remitted to or collected by the Tax Office (See Comments #3, 4, and 5.).

EXAMINATION TEAM

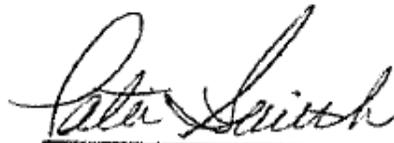
Angel Candelario, Lead Auditor
Dr. John Gomez, Staff Auditor
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CLOSING

This report is intended solely for the information and use of the Tax Office and the Commissioners Court. We appreciate the cooperation and assistance received from the management and staff of the Tax Office during this examination. Please contact our office if you have any questions or concerns regarding this report.



David Jungerman, CIA
Chief Assistant County Auditor II – Risk
Evaluation & Consulting



Patti Smith, CPA
Travis County Auditor

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Areas of Concern

1. Overdue Annual Billings and Payments from Escrow

Dealerships are required to submit monthly estimated SIT payments to the Tax Office based on their monthly SIT statements. These payments are tracked by the Tax Office and held in escrow accounts under the dealers' names. By February 1st of the following year, the dealerships are required to submit to the appraisal district an annual report detailing all applicable vehicles sold during the previous year. The appraisal district uses this report to determine each dealer's taxable value and tax factor for that year.

Based on this information, taxes due are computed by the Tax Office, which is responsible for submitting a tax bill to the dealerships in the fall of that year. These statements net the estimated SIT payments received against the final taxes due. If the dealer has overpaid, a refund is payable to the dealer. If a balance is due, the dealer has until January 31st of the following year to remit the applicable funds, after which the balance becomes delinquent, and penalty and interest (P&I) are to be assessed. The Tax Office is required to disburse all SIT collections applied to assessed taxes to the applicable taxing jurisdictions no later than February 15th.

For the Tax Office, the final SIT bills for 2016 vehicle sales were not remitted in the fall of 2017; instead, they were remitted in April 2018. Also in April of 2018, SIT collections on hand were disbursed to the jurisdictions, two months after the date denoted in the Tax Code. As of January 16, 2019, \$28,777.90 of SIT was still due from dealerships for bills remitted in April of 2018. At that time, P&I totaling \$5,834.43 had been assessed on these balances due. An additional \$32,111.25 of SIT and P&I were due for the previous 3 years' billings.

Significance

Title 1 § 23.122 of the Tax Code states the following:

“(j) If the amount in the escrow account is not sufficient to pay the taxes in full, the collector shall apply the money to the taxes and deliver to the owner a tax receipt for the partial payment and a tax bill for the amount of the deficiency together with a statement that the owner must remit to the collector the balance of the total tax due.

“(k) The collector shall remit to each relevant taxing unit the total amount collected by the collector in deficiency payments. The assessor of each relevant taxing unit shall apply those funds to the taxes owed by the owner. Taxes that are due but not received by the collector on or before January 31 are delinquent. Not later than February 15, the collector shall distribute to relevant taxing units in the manner set forth in this section all funds collected pursuant to the authority of this section and held in escrow by the collector as provided by this section. This section does not impose a duty on a collector to collect delinquent taxes that the collector is not otherwise obligated by law or contract to collect.”

Recommendation:

We recommend that the Tax Office distribute tax bills to the dealerships with sufficient time to meet the January 31 deadline provided in Tax Code Title 1 § 23.122. In addition, we recommend

that the Tax Assessor distribute the prior year's SIT collections to the taxing jurisdictions no later than the February 15, in order to be in compliance with Tax Code Title 1 § 23.122.

The Tax Office should implement processes to ensure collection of past due SIT balances. We recommend the Tax Office take the additional step of initiating the tax lien process where appropriate, as an additional tool for collecting delinquent balances.

Management Response:

The Tax Office understands the need to collect and remit SIT funds in a timely manner. It is not practical for the Tax Office to bill by January 31st because we are still collecting and reconciling the dealers December sales which are due by January 10th or January 20th if the entity is a heavy equipment dealer. By law, if bills are not sent by January 10th we have to delay the due date because the dealers have 21 days to pay timely before penalty and interest become due. We send the bills after the disbursement is done when we know who still owes taxes. Our current practice is to complete the reconciliation process and disburse the funds by the February 15th deadline. However, due to computer programming issues, we disbursed the 2018 SIT collections to the various jurisdictions on February 17th. Although the disbursement was still not in compliance with statute, the Tax Office believes our current processes will allow us to timely disburse the funds going forward.

As to implementing a process to ensure collection of past due SIT, our current delinquent property tax team targets these past due accounts for collection based on dollar amount due, number of years delinquent, and the jurisdictions involved. The dealers receive collection letters and collection calls prior to being turned over to the County Attorney's Office to initiate the tax lien process.

2. Filing Penalties

Automotive dealerships are required to file monthly SIT statements no later than the 10th day after the end of a month, regardless of the number of vehicles sold in that month. When these statements are not remitted timely, the dealer commits a misdemeanor offense punishable by a fine up to \$100 per day until the statement is filed. In addition to any other penalty provided by law, a dealer incurs a penalty of \$500 for each month or portion of a month for which a statement is not filed. A tax lien may be attached to a dealer's business personal property to secure payment of these penalties. Specifically, Title 1 § 23.122 of the Tax Code states the following:

“(m) A dealer who fails to file a statement as required by this section commits an offense. An offense under this subsection is a misdemeanor punishable by a fine not to exceed \$100. Each day during which a dealer fails to comply with the terms of this subsection is a separate violation.

“(n) In addition to other penalties provided by law, a dealer who fails to file or fails to timely file a statement as required by this section shall forfeit a penalty. A tax lien attaches to the dealer's business personal property to secure payment of the penalty. The appropriate district attorney, criminal district attorney, county attorney, collector, or person designated by the collector shall collect the penalty established by this section in the name

of the collector. Venue of an action brought under this subsection is in the county in which the violation occurred or in the county in which the owner maintains the owner's principal place of business or residence. A penalty forfeited under this subsection is \$500 for each month or part of a month in which a statement is not filed or timely filed after it is due."

We obtained a report from the Tax Office's eTax system detailing SIT payments for the period January 1, 2017 through December 31, 2017, which included transactions for 452 dealers. A total of 4,914 SIT transactions totaling \$7,150,245.43 were processed in this period. During our review of these items, we noted that 146 (32%) of these 452 dealers did not submit the required SIT statements for one or more months of the review period. A total of 651 SIT statements were not submitted, for which penalties totaling \$325,500 were not assessed and collected by the Tax Office.

In addition, Tax Code Title 1 § 23.122 states that when a dealer fails to remit taxes due by the 10th day of the following month they "... shall pay a penalty of five percent of the amount due." We noted that 3,910 (80%) of the 4,914 SIT payments from the period were not submitted by the 10th day of the following month. Penalties that were not assessed and collected by the Tax Office for these late payments totaled \$234,629.

Furthermore, according to Tax Code Title 1 § 23.122 "...If the amount is not paid within 10 days after the due date, the owner shall pay an additional penalty of five percent of the amount due." We noted that 1,909 (49%) of the 3,910 already delinquent SIT payment transactions were not submitted by the 20th of that month. For this additional penalty, approximately \$58,923 was not assessed and collected by the Tax Office.

Across all penalty types, approximately \$619,000 in penalties was not assessed and collected from noncompliant dealerships for 2017.

Recommendation:

Going forward, we recommend that the Tax Office assess and collect dealer penalties in accordance with Tax Code Title 1 § 23.122. In addition, we recommend that the Tax Office collect the \$500 per month penalty on all dealer's that were required to submit Vehicle Inventory Tax Statements but failed to do so. We also recommend that the Tax Office consult with the County Attorney's Office regarding attaching tax liens to applicable dealership property when a dealer fails to pay these penalties in a timely manner.

Management Response:

The Tax Office would like to note that we were not funded to administer these responsibilities until April of 2018. The Tax Office agrees with this comment and has been assessing and collecting dealer penalties as well as the \$500 per month penalty for dealer's that failed to timely submit a Special Inventory Tax Statement since March 1, 2019. On March 8, 2019, we billed for all January 2019 sales statements remitted late or not remitted at all by the end of February. In addition, the Tax Office is working with the Travis County Central Appraisal District to assess the \$1,000 per month penalty for not filing the annual declaration.

3. Dealers Registered with TCAD that Did Not Remit Payments

When auto dealers register with TCAD, they are annually required to file a declaration statement, along with submitting monthly SIT payments/statements to the Tax Office. During the months in which dealers have no sales, they are still required to submit a SIT statement indicating that no sales of motor vehicles occurred during that month. In addition, all dealers are required to annually submit a declaration statement indicating total sales for the year.

TCAD maintains a listing of dealers registered in Travis County. We obtained this TCAD dealer listing from the Tax Office. For 2017, it contained 629 registered automotive, manufactured home, heavy equipment and boat dealers. In addition, we generated a SIT payment dataset from eTax that included 452 dealers that paid SIT during the period.

When we compared the two lists, we noted that of the 629 registered dealers, 438 made SIT payments and 191 (30%) did not. Of the 191 dealers that did not pay SIT, 144 (75%) made 5 or fewer sales during the period, and thus did not owe SIT for 2017 (See table below.). Sales for the remaining 47 (25%) dealers with over 5 sales transactions totaled \$19,854,067. Using an average tax rate of .001871 per dollar of sales, we estimate that \$37,147 in SIT was not collected for these 47 dealers.

Dealers making no payments in the period		
	Number of Dealers	Percentages
Dealers with fewer than 5 sales	144 ¹	75%
Dealers with 5 or more sales that did not make SIT payments	47	25%
Total	191	100%

We also noted that of the 452 dealers remitting SIT payments in 2017, 14 (3%) dealers were not included on TCAD's dealer listing.

Significance:

Section 23.121, Title 1, § 23 of the Tax Code states the following:

“If a dealer fails to file a declaration, or if, on the declaration, a dealer reports the sale of fewer than five motor vehicles in the prior year, the chief appraiser shall report that fact to the Texas Department of Motor Vehicles and the department shall initiate termination proceedings. The chief appraiser shall include with the report a copy of a declaration, if any, indicating the sale by a dealer of fewer than five motor vehicles in the prior year. A report by a chief appraiser to the Texas Department of Motor Vehicles is prima facie grounds for the cancellation of the dealer’s GDN or for refusal by the Texas Department of Motor Vehicles to renew the dealer’s GDN.”

¹ This was determined by reconciling records for the 191 dealers to the applicable RTS motor vehicle sales data.

Recommendation:

We recommend the Tax Office continue collection efforts on the delinquent SIT due from the 47 dealers noted. We also recommend the Tax Office work with TCAD to report the 14 non-registered dealerships to the TXDMV for further penalties.

Management Response:

Although the Tax Code does not specifically spell out a procedure for collecting delinquent SIT, the Tax Office believes that we may be able to send out bills in an attempt to collect the delinquent SIT. The Tax Office can send out a notice advising the 47 Dealers of the penalties under 23.121(k) and the Offense, a misdemeanor, for not filing the required declaration under 23.121(i). This would, presumably get the dealers to file their Monthly Inventory Statements and fall into compliance. The Tax Office could then prepare and send out bills for the taxes and penalties due. However, assessing thousands of dollars in penalties that will ultimately be uncollectable may only serve to put a dealership out of business as opposed to encourage compliance.

Under the Tax Code, the Chief Appraiser is required to report the dealers that fail to file their Declarations to TXDMV. The Tax Office is not under a duty to report to the TXDMV and we have been advised by our attorneys' that we should not take over the duties of the Chief Appraiser. However, the Tax Office will work with the Travis County Appraisal District to help identify non-registered dealerships so that they can be reported to the TXDMV by TCAD.

4. Understated SIT Payments

When a dealer sells a vehicle, they are required to process a title transfer transaction. Travis County Tax Office processes dealer title transfers and the transaction are captured in the TXDMV's Registration and Title System (RTS). Dealers are required to pay SIT on the sales of vehicles that are not considered fleet or dealer sales. Dealers submit SIT statements to the Tax Office indicating the number of sales and the total dollar amount of sales for each month.

We obtained an RTS dataset of title transfers for the review period, and we compared the dealer title transfers in RTS with the SIT payment transactions on the eTax payment reports for CY2017. This review revealed that 79 dealers issued 7,809 applications for title transfers for which SIT was not paid. Specifically, we determined that \$111,148 in SIT should have been remitted by these 79 dealers, but only \$73,726 was actually paid, resulting in a \$37,422 shortfall.

Significance:

Some dealers are paying the incorrect amount of SIT causing a loss funds to the County and the other applicable taxing jurisdictions.

Recommendations:

We recommend the Tax Office reconcile monthly SIT statements received to the title transfer data collected in RTS, working with the dealerships to resolve any differences.

Management Response

The Tax Code does not directly impose a duty on the Tax Office to reconcile the monthly SIT statements with the RTS data. However, the Tax Office believes that a policy of reconciling these

amounts and sending notices to the dealers of the shortfall in SIT payments is a best practice that should be followed as reasonably possible. This can only be accomplished if the Tax Office can actually use a system and make appropriate calculations that will yield a precise SIT due that can be compared to what each dealer actually paid and will be dependent on clean, accurate data as well as adequate personnel.

5. Dealers Applying for Title Transfer that Did Not Pay SIT

When a dealer sells a motor vehicle, they are required to process a title transfer transaction. These title transfer transactions are completed by the Tax Office and recorded in RTS. For each applicable title transfer, the dealer is required to submit SIT to the Tax Office.

We generated an RTS dataset of dealer title transactions for 2017, which we compared to the SIT payment dataset to verify that each time a dealer applied for a title transfer, that dealer also paid SIT for that transaction. Exclusive to all findings previously noted in this report, we discovered 16,888 vehicle title transactions for which 310 dealers did not remit SIT to the Tax Office. Uncollected taxes due on these transactions total approximately \$220,754.

Significance:

A dealer holding a GDN issued by the TXDMV must submit a SIT declaration statement annually to TCAD indicating their sales totals, even if they had no qualifying sales in the period. In addition, all dealers are required to submit SIT statements to the Tax Office monthly. Without this information, the Tax Office is unable to properly assess, collect, and disburse SIT for each dealership in the County as required by statute. In addition, Section 23.121, Title 1, § 23 of the Tax Code states the following:

““Dealer” means a person who holds a dealer’s general distinguishing number issued by the Texas Department of Motor Vehicles under the authority of Chapter 503, Transportation Code. If a dealer fails to file a declaration, or if, on the declaration, a dealer reports the sale of fewer than five motor vehicles in the prior year, the chief appraiser shall report that fact to the Texas Department of Motor Vehicles and the department shall initiate termination proceedings. The chief appraiser shall include with the report a copy of a declaration, if any, indicating the sale by a dealer of fewer than five motor vehicles in the prior year. A report by a chief appraiser to the Texas Department of Motor Vehicles is prima facie grounds for the cancellation of the dealer’s GDN or for refusal by the Texas Department of Motor Vehicles to renew the dealer’s GDN.”

Recommendations:

We recommend that the Tax Office implement a process to verify that all dealers applying for title transfers are registered with TCAD and have an active GDN with the TXDMV. In addition, the Tax Office should reconcile the monthly SIT statements to the title transfer data collected in RTS to determine if the correct amount of SIT was submitted by each dealer. Furthermore, we recommend the Tax Office periodically provide TCAD with the list of the dealers who processed title transfers.

Management Response:

The Tax Code does not make verifying that dealers applying for transfers are registered with TCAD and have a GDN a responsibility of the Tax Office. However, the verification process is possible but would be very time consuming without an automated verification methodology. We will work to establish a process to at least spot verify active GDNs as part of our audit process. As noted above, the Tax Code does not specifically address reconciling SIT statements against RTS, but we believe that it is a best practice. We will work to implement that process as it is reasonable to do so. The Tax Code does not make the Tax Office responsible for providing TCAD with a list of dealers. TCAD has the responsibility of keeping track of dealers. However, if a list can be generated from the tax system, we believe it is a good practice to provide that list periodically to TCAD.

6. Tax Factors

For SIT, the unit property tax factor is calculated by dividing a dealership's aggregate tax rate by 12. Dealerships are required to use the appropriate tax factor when calculating the amount of SIT payable (sales in dollars x the tax factor) when submitting their monthly SIT statements. The unit property tax factor is provided to all dealers by the Travis Central Tax Appraisal District (TCAD), and this factor is also posted on their webpage.

During our review, we noted that several dealers were not utilizing the tax factor assigned by TCAD. It appeared that no reconciliation was conducted by the Tax Office to verify that the correct tax rate was being utilized and that the County was receiving the correct amount of SIT from the dealerships. These incorrect rates resulted in both overpayments and shortfalls across the sampled dealers.

Significance:

TCAD provides dealers the correct tax factor to help ensure the proper SIT due is paid by the dealers. Dealers using the wrong tax factor remit incorrect SIT amounts, resulting in tax shortfalls and/or overpayments.

Recommendation:

We recommend the Tax Office review each SIT statement to verify that the correct tax factor is utilized. Where appropriate, the Tax Office should collect shortfalls and reimburse overpayments resulting from dealers utilizing incorrect tax factors. In addition, the Tax Office should inform the dealers that they are using the wrong tax factor and provided them with the correct one.

Management Response:

Beginning with the filing of the January 2019 monthly statements, the Tax Office began reviewing each SIT statement and notifying the dealers that were using an incorrect tax factor in February 2019. As our attorneys' have advised, we cannot reimburse overpayments, as the dealers receive this money from the customer at the time of purchase and there is no way for us to know that they will in turn, refund the customer. However, if the dealer resubmits an amendment to their monthly filings with a statement that their customers will be reimbursed, we will refund the money back to the dealer. We are currently applying any overpayments resulting from a dealer using an incorrect

tax factor as a credit against any penalties they may owe us while also being notified of incorrect property tax factors.

7. Data Quality:

The TXDMV provides RTS to tax offices across the state for the purposes of consistently calculating, tracking, and accounting for vehicle title and registration transactions. The TXDMV also collects and maintains the data accumulated by RTS. The local entities using this system have little input on its design, functionality, and controls. However, a limited number of system settings can be locally administered, some of which can be utilized for internal control purposes. In addition, the TXDMV provides the Tax Office with the raw RTS transactional data on a periodic basis. The Tax Office has created a data-lake to store this data, using it to monitor daily transactions.

We performed our various analyses using data obtained from multiple data sources: TXDMV, RTS, TCAD, and the Tax Office. We completed data preparation steps to verify the validity and reliability of the data before the data was utilized in our analysis. In our data analytics methodology, these preparation steps are vital to the consistency and reliability of our analysis. These tedious tasks can be time-consuming, depending on the quality of the raw data that is recorded in each system.

We generated a dataset that included all transactions from dealers who submitted title transactions during the audit period from the RTS data. During our data preparation steps, we noted grammatical errors/spelling differences when tax specialists entered dealer names into RTS. Also, in some instances, the dealer's GDN was not recorded correctly. To illustrate, transactions for the dealer CarMax were recorded under 245 different name variations, including misspellings, extra spaces, or added symbols.

Recommendations:

We recommend the Tax Office implement a data quality program to monitor data entered into RTS. If a higher level of data quality is maintained, the Tax Office can better leverage data analytics to improve the efficiency and effectiveness of its day-to-day operations, including the proper collection SIT from county dealerships.

Management Response:

The Tax Office agrees that a data quality program that monitors data entered into RTS as well as all other Tax Office data is critical to our operations. We believe that the Tax Office as well as other county offices will be able to better leverage data analytics to improve efficiency and effectiveness. We have requested an additional FTE to acquire, cleanse, validate and maintain not only the DMV data, but all data the Tax Office is responsible for as part of our FY2020 Budget Submission.

Attachment A

Motor Vehicle Dealers not Registered with TCAD

All dealers that are registered with the Texas Department of Motor Vehicles and have been assigned a General Distinguishing Number (GDN) are required to submit Declaration Statements to TCAD. During our review, we obtained a motor vehicle dealer list from the Texas Department of Motor Vehicles (TXDMV) website², which contained GDNs for each dealer in Texas. The parameters of the list consisted of motor vehicle dealers with active GDNs through 2017. The data contained 580 motor vehicle dealers with active GDNs. In addition, we obtained a listing from the Tax Office composed of motor vehicle, manufactured home, heavy equipment and boat dealers registered with TCAD.

Of the 580 active motor vehicle dealers from the TXDMV list, only 467 (81%) dealers were registered with TCAD. It appears the remaining 113 (19%) dealers were registered with the TXDMV, but not with TCAD, as detailed in the table below:

Motor Vehicle Dealers registered with TXDMV but not with TCAD		
	Number of Dealers	Percentages
Motor Vehicle Dealers Registered with TCAD	467	81%
Motor Vehicle Dealers not Registered with TCAD	113	19%
Total	580	100%

Significance

Section 23.121, Title 1, § 23 of the Tax Code states that: *"Dealer" means a person who holds a dealer's general distinguishing number issued by the Texas Department of Motor Vehicles under the authority of Chapter 503, Transportation Code.*"

Recommendations:

We recommend that the Tax Office provide the list of dealers registered with DMV to TCAD for follow up. Note that Comment #5 above includes any SIT payable for these 113 entities.

Management Response

Although the Tax Code does not impose a duty on the Tax Office to provide a list of dealers registered with the TXDMV to TCAD, the Tax Office will provide a list of dealers registered with TXDMV to TCAD.

² <http://txdmv.force.com/dealers/motorvehicledealerliststaging>