Department of Legislative Services
Maryland General Assembly
2009 Session

FISCAL AND POLICY NOTE
Revised

House Bill 309 (The Speaker, *et al.*) (By Request - Administration)
Ways and Means Budget and Taxation

Maryland Heritage Structure Rehabilitation Tax Credit Program

This Administration bill extends the Maryland Heritage Structure Rehabilitation Tax Credit Program, eliminates the geographic restriction on the awarding of commercial credits, and makes several other changes to the program.

The bill takes effect June 1, 2009.

Fiscal Summary

State Effect: General fund revenues decrease by $3.0 million in FY 2011 and by $4.8 million in FY 2014. General fund expenditures increase by $20.0 million annually in FY 2011 through 2014. Special fund revenues and expenditures increase by $0.2 million annually in FY 2011 through 2014.

($ in millions)	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014
GF Revenue	$0	($3.0)	($4.2)	($4.5)	($4.8)
SF Revenue	$0	$.2	$.2	$.2	$.2
GF Expenditure	$0	$20.0	$20.0	$20.0	$20.0
SF Expenditure	$0	$.2	$.2	$.2	$.2
Net Effect	$.0	($23.0)	($24.2)	($24.5)	($24.8)

Note:() = decrease; GF = general funds; FF = federal funds; SF = special funds; - = indeterminate effect

Local Effect: Local revenues decrease as a result of any tax credits claimed against the corporate income tax. The majority of tax credits in the last four tax years have been claimed against the personal income tax. No effect on expenditures.

Small Business Effect: A small business impact statement was not provided by the Administration in time for inclusion in this fiscal note. A revised fiscal note will be issued when the Administration's assessment becomes available.

Analysis

Bill Summary: The bill makes several significant changes to the tax credit program as outlined below. These changes are effective for residential and commercial applications received after June 30, 2009.

- ***Extend Program Termination Date and Funding:*** The bill extends the program's termination date through fiscal 2014 for commercial and owner-occupied residential property rehabilitations. The bill requires the Governor to appropriate funds for commercial projects in fiscal 2011, 2012, 2013, and 2014. The Maryland Historic Trust (MHT) can award an unlimited amount of residential credits through June 30, 2014.

- ***Alters Commercial Credit Eligibility****:* In order to be eligible to claim the heritage structure rehabilitation tax credit, any proposed rehabilitation that includes at least 30 residential rental units must set aside at least 10% of the total residential rental units for a period of 15 years for individuals whose median income does not exceed 60% of the area median income. MHT is required to adopt regulations to (1) monitor compliance with this provision; and (2) charge a reasonable fee necessary to cover MHT's cost of monitoring compliance.

- ***Alters Geographic Restrictions:*** The bill repeals the restriction that prohibits more than 75% of the total initial credit certificates issued in a fiscal year from being allocated for commercial projects located in one county or Baltimore City. Accordingly, there is no geographic limitation on the amount of initial credit certificates awarded after June 30, 2009.

- ***Enhanced Credits for "High-performance Buildings":*** The value of the credit increases to 25% for the commercial rehabilitation of a building that (1) meets or exceeds current LEED green building ratings; or (2) achieves a comparable numeric rating according to a nationally recognized standard approved by the Department of Budget and Management and the Department of General Services. MHT is required to adopt regulations that specify whether a rehabilitation is a high-performance building. Under current law, MHT is required to adopt regulations that competitively award commercial credits in a manner that favors the award of tax credits based on several factors. The bill adds an additional factor – favoring the award of credits for projects that exceed the requirements of Standard 90.1 of the American Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc.

- ***Qualifying Residential Properties***: The bill defines a single-family owner-occupied residence to include: (1) a structure occupied by the owner and the owner's immediate family as their primary or secondary residence; and (2) a residential unit in a cooperative project owned or leased to a cooperative housing corporation, and leased for the exclusive occupancy to, and occupied by, a member of the corporation and the member's family under a proprietary lease.

- ***Alters Criteria for Denying a Commercial Application:*** Under current law, MHT may not accept an application for a commercial rehabilitation if: (1) the applicant has previously submitted three or more applications for rehabilitations with proposed rehabilitations exceeding $500,000 in that year; and (2) any substantial part of the proposed rehabilitation work has begun. The bill alters the second criteria by stating MHT may not accept an application if actual substantive construction has started. MHT may accept an application if actual substantive construction has started if the rehabilitation expenditures were necessary to make the structure habitable immediately after an emergency.

- ***Allows for Credit Recapture:*** Commercial credits will be recaptured if within the close of four years after the rehabilitation is complete the rehabilitation is disposed of. The amount of credit recaptured in each year is equal to the amount specified in current law for disqualifying work performed to a commercial rehabilitation. The entire amount of the credit may also be recaptured if a commercial rehabilitation with 30 or more residential rental units no longer sets aside 10% of the units for low- and moderate-income households.

- ***Alters Administrative Aspects:*** Commercial rehabilitation credit certificates issued by MHT will expire if (1) the fee for a commercial rehabilitation is not received within 120 days after notification; or (2) within 18 months after credit certificate issuance the applicant has not notified MHT the commercial rehabilitation project has commenced.

Current Law: The following is a summary of the evolution of the Heritage Tax Credit.

Chapter 601 of 1996 established the Heritage Structure Rehabilitation Tax Credit. The credit replaced an existing subtraction modification for rehabilitating historic structures. The credit has been altered several times since it was established.

Chapter 160 of 2001 expanded the program by providing that any excess amounts of the existing credit in a taxable year that exceed an individual's or a business entity's tax liability may be claimed in refund. Chapter 160 added nonprofit entities to the definition of business entity for the purposes of the credit and also allowed the credit to be taken by partners and shareholders of a business entity in any manner that is agreed.

Chapter 541 of 2002 limited the program by reducing the credit percentage from 25% to 20% of qualified expenditures and providing that a State tax credit under the program may not exceed $3 million for any single commercial project.

Chapter 541 also stated that it was the intent of the General Assembly that heritage tax credits for commercial rehabilitations not exceed $50 million annually and required the Department of Legislative Services (DLS) to monitor approval of commercial rehabilitations eligible for the credit. If the approval of commercial rehabilitations under the credit in a calendar year would have resulted in more than $50 million in tax credits, DLS was required to notify the General Assembly and prepare legislation to implement a $50 million overall cap. Lastly, Chapter 541 provided that the program would terminate effective June 1, 2004.

Chapter 203 of 2003 limited the amount of proposed credits that could be approved from February 1, 2003 until the end of that calendar year by commercial properties to $23 million and $15 million in calendar 2004.

Chapter 76 of 2004 substantially altered the credit program by shifting the commercial credit part of the program from a traditional tax credit program to a tax credit program that is subject to an annual appropriation with an aggregate limit. Chapter 567 of 2008 altered the several aspects of the program and extended the termination date of the program to July 1, 2010.

Chapter 76 established the value of the credit equal to 20% of the qualified rehabilitation expenditures expended in the rehabilitation of a certified historic structure. The maximum amount of credits earned for an individual rehabilitation project cannot exceed (1) $50,000 for noncommercial projects; and (2) the lesser of $3 million or the maximum amount stated on an initial credit certificate for commercial projects. MHT awards an initial credit certificate to each approved commercial rehabilitation plan based on the amount of estimated rehabilitation expenditures.

Chapter 76 created a reserve fund that is designed to offset credits claimed in the future for the rehabilitation of commercial properties. The total amount of initial credit certificates issued by MHT in each fiscal year cannot exceed the amount appropriated to the reserve fund in the State budget. There is no aggregate cap or reserve fund for residential tax credits. Chapter 76 required the Governor to appropriate to the reserve fund at least $20 million in fiscal 2006 and $30 million annually in fiscal 2007 and 2008. The Governor may not reduce an appropriation to the reserve fund that is approved by the General Assembly. For each fiscal year, if funds are transferred from the reserve fund as a result of any law, the amount of total credits that can be approved by MHT is reduced by the amount of money transferred.

Within 15 days of each calendar quarter, MHT is required to notify the Comptroller of the total number of commercial rehabilitations that were certified as being completed during the quarter and the total amounts of the maximum credit amount stated in the initial credit certificates and the total amounts of the final certified credit amount for these completed projects. Upon this notification from MHT, the Comptroller is required to transfer from the reserve fund to the general fund the total amounts stated in initial credit certificates for each rehabilitation project completed during that quarter.

Initial credit certificates expire and the credit may not be claimed if a commercial rehabilitation is not completed within 30 months after the certificate was issued. MHT may postpone the expiration date of a certificate indefinitely for "reasonable cause." By October 1 of each year, MHT must notify the Comptroller the maximum amounts stated on the initial credit certificate for each commercial rehabilitation project for which the certificate has expired as of the prior fiscal year. Upon this notification, the Comptroller is required to transfer from the reserve fund to the general fund the amount of expired initial certificate credit amounts.

Chapter 76 and Chapter 567 required MHT to adopt regulations to establish (1) the procedures and standards for certifying heritage structures and rehabilitations; (2) establishing a criteria for all rehabilitations for evaluating plans that conform with rehabilitations standards of the U.S. Secretary of the Interior; and (3) a competitive award process for the award of initial credit certificates for heritage structure rehabilitation tax credits. The competitive process must ensure that credits are awarded in a manner favors the award of tax credits: (1) for projects located in jurisdictions that have been historically underrepresented in the award of commercial credits; (2) that are consistent with current State development and growth programs; and (3) for the rehabilitation of structures that meet one of the following requirements: (1) are either listed on the national register of historic places or designated as historic property under local law and determined by MHT to be eligible for listing in the national register of historic places; or (2) is a building with historic significance that is located in a historic district listed in the national registry of historic places.

Chapter 76 of 2004 limited, to 50%, the amount of commercial credits MHT could award to any one jurisdiction. Chapter 567 raised the limit to 75% and provided that credits that were not awarded in a fiscal year could be awarded in the next year without regard to the 75% limitation.

Rehabilitation expenditures may not be certified unless the entity seeking the tax credit states under oath the amount of qualified rehabilitation expenditures. By December 15 of each fiscal year, MHT is required to report to the Governor and the General Assembly information about the credit including: (1) the amount of initial credit certificates awarded in the fiscal year; (2) the tax credits awarded for rehabilitations completed in the prior fiscal year; and (3) certain information about the rehabilitations for which credits were claimed.

A qualified expenditure is an amount that is expended by the end of the calendar year in which the rehabilitation is certified as being completed and in compliance with a plan of proposed expenditures that has been approved by the director of MHT and is not funded, financed, or otherwise reimbursed by any:

- State or local grant;
- grant made from proceeds of tax-exempt bonds issued by the State, a political subdivision of the State, or an instrumentality of the State or of a political subdivision of the State;
- State or local tax credit other than the Heritage Rehabilitation Tax Credit;
- other financial assistance from the State or a political subdivision except for a loan that must be repaid at an interest rate that is greater than the interest rate on general obligation bonds issued by the State at the most recent bond sale prior to the time the loan is made; or
- any other State tax credit.

A commercial rehabilitation is the rehabilitation of a structure other than a single-family, owner-occupied residence. Business entities, individuals, and nonprofit organizations are eligible to claim the credit. Commercial applications cannot be accepted if: (1) any part of the proposed rehabilitation work has begun; or (2) the applicant has previously submitted three or more applications in that year and the proposed commercial rehabilitations exceed $500,000. In order to qualify, within a two-year period the rehabilitation expenditures must exceed: (1) $5,000 for owner-occupied residential property; or (2) the greater of $5,000 or the adjusted basis of the structure for commercial property. The following rehabilitations qualify as a single commercial rehabilitation: (1) the phased rehabilitation of the same structure; (2) the separate rehabilitation of different components of the same structure; or (3) the rehabilitation of multiple structures that are functionally related.

The tax credit can be recaptured by the State if the rehabilitator performs disqualifying work within four years of the close of the tax year when the grant was approved. The State can recapture: (1) 100% in the same year; (2) 80% one year after; (3) 60% two years after; (4) 40% three years after; and (5) 20% four years after.

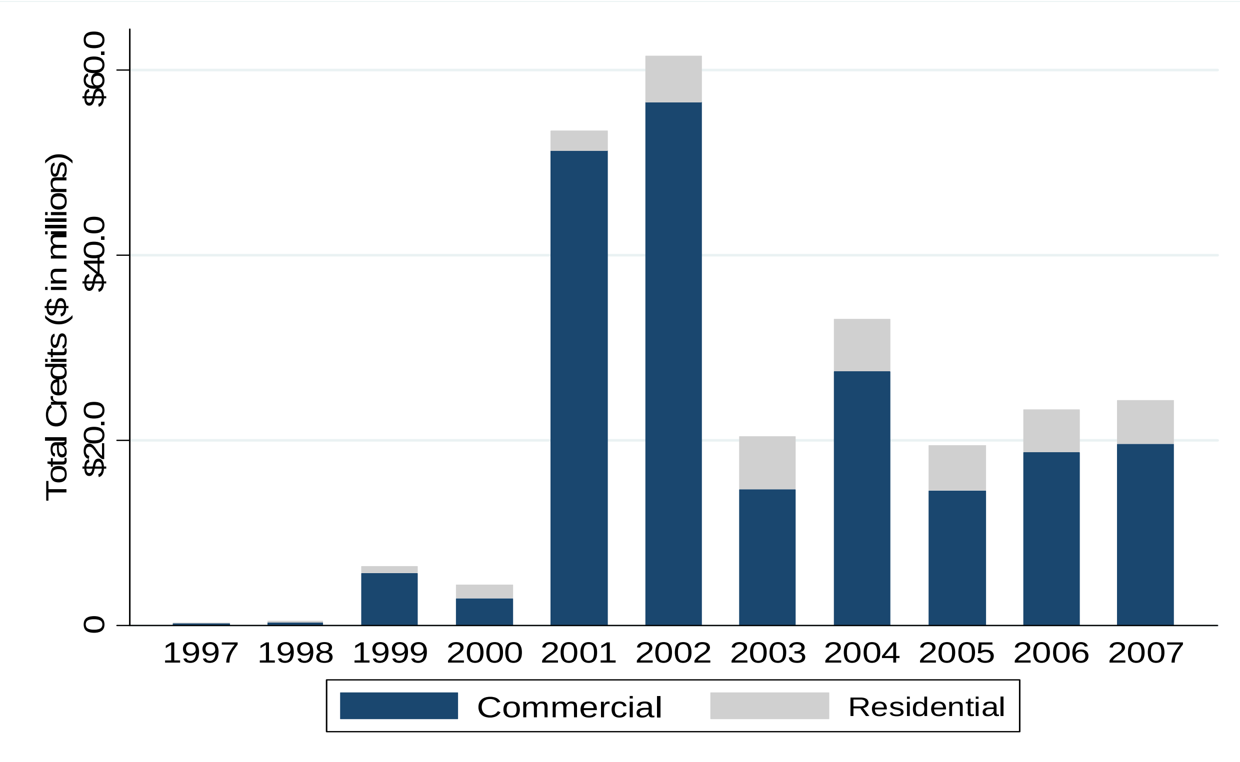
The Comptroller's Office can examine and audit returns claiming the tax credit to verify: (1) the amount of rehabilitation expenditures; (2) whether the rehabilitations qualify; and (3) whether the credit is allowable as claimed. The Comptroller may adopt regulations to require that taxpayers other than corporations claim the credit on the tax return filed by the entity or individual.

Background:

Fiscal Impact of Program

The impact of the tax credit program has changed over time as interest in the program increased and legislation altered the program. Initially, there were no limits on the maximum value of the credit or total amount of credits that could be awarded in the fiscal year. Prior to Chapter 76, revenue losses were not offset by money appropriated to the reserve fund, leading to significant revenue losses that were not offset by any revenue or appropriation. **Exhibit 1** illustrates the revenue losses resulting from residential and commercial projects through tax year 2007.

Exhibit 1
Commercial and Residential Credits
Tax Year 1997-2007



Beginning with fiscal 2006, any credits claimed under the commercial program are to be offset by appropriations to the reserve fund. A portion of the revenue losses in later tax years illustrated above have been offset by money transferred to the reserve fund.

Through fiscal 2008 about $17.0 million of the amount appropriated to the reserve fund has been transferred back to the general fund to offset commercial credit revenue losses.

Exhibit 2 lists the amount appropriated to the reserve fund in fiscal 2006 through 2009 and the actual amount allocated to MHT in each year. In fiscal 2008 and 2009 the amount appropriated to the reserve fund was reduced by the Board of Public Works. The Governor's fiscal 2009 budget plan includes a $4.7 million reversion from the fiscal 2009 appropriation that lowers the appropriation to $10.0 million. This reduction was intended to be part of the Governor's cost containment actions brought to the Board of Public Works in October 2008; however, it was later determined that the board lacked authority to reduce this appropriation. The program approved 15 commercial tax credit programs through January 2009. The Maryland Department of Planning indicates that it is unlikely to approve any fiscal 2010 applications until after the status of the program is resolved.

Exhibit 2
Reserve Fund Appropriations and Commercial Credits Allocated
Fiscal 2006-2009

	FY 2006	FY 2007	FY 2008	FY 2009
Appropriation	$20,000,000	$30,000,000	$15,000,000	$14,700,000
BPW			(300,000)	(4,700,000)
Net Appropriation	20,000,000	30,000,000	14,700,000	10,000,000
Net Allocated	18,707,256	20,101,059	24,068,195	10,000,000

Exhibit 3 lists the estimated amount of commercial credits earned prior to the restriction on the percentage of commercial credits that can be awarded to one county as enacted by Chapter 76 of 2004. Baltimore City has the highest estimated amount of commercial rehabilitation tax credits earned or yet to be earned, approximately $194.9 million or 90% of the total amount.

Exhibit 4 lists, by county, the estimated amount of commercial and residential credits awarded in fiscal 2006 through 2009.

Additional Federal and Local Tax Incentives

Federal law allows a taxpayer to claim a credit for the rehabilitation of qualified historic buildings. For certified historic structures, the credit is equal to 20% of qualified rehabilitation expenditures. Nonresidential buildings that are not certified historic structures but were placed in service before 1936 qualify for a 10% credit. For both credits, the rehabilitation must be substantial (exceed the greater of $5,000 or the adjusted basis of the building) and the building must be depreciable. A depreciable building is one that is used in a trade or business or held for the production of income. Buildings that serve exclusively as the owner's primary residence do not qualify. The Joint Committee on Taxation estimates that the historic tax credit will reduce federal government revenues by approximately $400 million in federal fiscal 2010.

In addition to federal and State tax credits, rehabilitated properties often qualify for local property tax incentives. These credits include a freeze on the increased property tax assessment due to a rehabilitation project, a property tax credit, or combination of both. **Exhibit 5** lists the local historic rehabilitation property tax credits available by jurisdiction.

Exhibit 3
Estimated Commercial Credits
Prior to Chapter 76 of 2004

County	Projects	Credits	Percent of Total
Allegany	14	$2,249,642	1.0%
Anne Arundel	16	4,765,292	2.2%
Baltimore City	284	194,882,359	89.7%
Baltimore	12	3,639,098	1.7%
Calvert	1	63,852	0.0%
Caroline	0	0	0.0%
Carroll	9	1,893,804	0.9%
Cecil	2	90,135	0.0%
Charles	0	0	0
Dorchester	3	387,637	0.2%
Frederick	16	4,719,466	2.2%
Garrett	0	0	0
Harford	1	100,000	0.0%
Howard	6	374,841	0.2%
Kent	3	189,814	0.1%
Montgomery	7	1,022,645	0.5%
Prince George's	3	576,224	0.3%
Queen Anne's	3	148,032	0.1%
St. Mary's	2	172,613	0.1%
Somerset	0	0	0.0%
Talbot	9	1,405,505	0.6%
Washington	4	206,078	0.1%
Wicomico	3	184,498	0.1%
Worcester	3	141,605	0.1%
Total	**401**	**$217,213,137**	**100%**

Source: Department of Legislative Services, Department of Housing and Community Development (Maryland Historical Trust)

Exhibit 4
Residential and Commercial Credits by County
Fiscal 2006-2009

	Commercial			Residential		
County	**Projects**	**Total Credits**	**Percent of Total**	**Projects**	**Total Credits**	**Percent of Total**
Allegany	8	$2,758,199	3.7%	1	$26,547	0.2%
Anne Arundel	6	683,557	0.9%	29	303,922	2.5%
Baltimore City	86	49,207,272	66.5%	446	9,200,591	76.8%
Baltimore	6	1,557,600	2.1%	83	672,098	5.6%
Calvert	0	0	0.0%	5	39,526	0.3%
Caroline	3	247,600	0.3%	0	0	0.0%
Carroll	7	2,447,085	3.3%	3	27,366	0.2%
Cecil	0	0	0.0%	4	51,297	0.4%
Charles	0	0	0.0%	0	0	0.0%
Dorchester	6	1,280,000	1.7%	5	46,716	0.4%
Frederick	8	1,170,000	1.6%	15	153,187	1.3%
Garrett	0	0	0.0%	2	100,000	0.8%
Harford	1	80,000	0.1%	1	3,033	0.0%
Howard	1	70,000	0.1%	8	151,015	1.3%
Kent	5	1,416,967	1.9%	2	7,090	0.1%
Montgomery	4	4,053,056	5.5%	46	556,158	4.6%
Prince George’s	4	1,875,836	2.5%	23	212,404	1.8%
Queen Anne’s	1	44,888	0.1%	1	3,591	0.0%
St. Mary's	0	0	0.0%	0	0	0.0%
Somerset	3	599,000	0.8%	1	50,000	0.4%
Talbot	9	3,026,400	4.1%	12	312,145	2.6%
Washington	8	3,520,396	4.8%	8	45,712	0.4%
Wicomico	0	0	0.0%	5	12,900	0.1%
Worcester	0	0	0.0%	0	0	0.0%
Total	**166**	**$74,037,856**	**100.0%**	**700**	**$11,975,298**	**100.0%**

Exhibit 5
Local Property Tax Credits

Tax Assessment Freeze	Property Tax Credit	Both
City of Frederick	Baltimore City	Baltimore County
	Calvert County	Howard County
	Cecil County	
	Frederick County	City of Rainier
	Harford County	City of Cumberland
	Montgomery County	
	Prince George's County	
	St. Mary's County	
	Washington County	
	City of Laurel	
	Town of North Beach	
	Town of Bel Air	

Source: Maryland Historic Trust

State Fiscal Effect: The bill extends the tax credit program through fiscal 2014 and makes several changes to the program. **Exhibit 6** details the fiscal impact of the bill in fiscal 2011 through 2014.

Credit Reserve Fund

The bill does not require or suggest an amount that will be appropriated to the reserve fund in fiscal 2011 through 2014. Based on the amount appropriated to the reserve fund in the last four fiscal years, it is estimated that $20 million annually will be appropriated for the commercial program in fiscal 2011 through 2014. The money transferred to the reserve fund is to be transferred back to the general fund on a quarterly basis based on the projects that are certified as being completed in that calendar quarter and would act to offset general fund revenue losses resulting from credit being claimed for these completed projects.

Exhibit 6
Impact on State Finances
($ in Millions)

	FY 2011	FY 2012	FY 2013	FY 2014
General Fund Expenditures				
Reserve Fund Appropriations	$20.0	$20.0	$20.0	$20.0
Special Fund Expenditures				
MHT Administrative Expenses	0.2	0.2	0.2	0.3
Total Expenditures	**$20.2**	**$20.2**	**$20.2**	**$20.3**
General Fund Revenues				
Residential Credits Claimed	(2.9)	(4.2)	(4.5)	(4.8)
Special Fund Revenues				
MHT Certification and Monitoring Fees	0.2	0.2	0.2	0.3
Total Revenues	**($2.8)**	**($4.0)**	**($4.3)**	**($4.5)**
Net Effect	**($23.0)**	**($24.2)**	**($24.5)**	**($24.8)**

Revenue Effects from Reserve Fund Transfers

It is assumed that the amount of credits claimed in each tax year will be equal to the amount stated in the initial credit certificate so that credits claimed in each tax year will be offset by a transfer from the reserve fund. The final amount of the credit, however, may be less than the amount stated on the initial credit certificate if actual rehabilitation expenses are less than the estimated expenditures stated on the approved application. To the extent final credit amounts for commercial projects are less than the amount stated on the initial credit certificate, revenues may increase in these fiscal years.

It is also assumed that taxpayers claim the credit in the tax year that corresponds to the fiscal year in which the Comptroller transfers funds to the general fund on notification of a commercial project's completion. To the extent that taxpayers claim the credit in a tax year after the fiscal year in which the transfer is made, general fund revenues may increase in earlier fiscal years and potentially decrease by a corresponding amount in later fiscal years. The extent of this lag, if any, cannot be reliably estimated at this time. This timing issue, however, does not alter the total cost of the bill.

In addition, credits claimed against the corporate income tax will decrease general fund and Transportation Trust Fund (TTF) revenues. This would result in an increase in general funds in each year and decrease in TTF revenues as money is transferred back from the reserve fund to the general fund. Due to the limited amounts of credits claimed against the corporate income tax, this effect is expected to be limited.

Residential Rehabilitation Credits

There is no limitation on the amount of credits that can be earned in a year by residential projects. Based on the correlation of residential credits claimed, State home sales, total residential improvement expenditures, and the forecasts for these other variables; Legislative Services estimates that approximately $3.0 million in credits will be claimed in fiscal 2011 as shown in Exhibit 6.

MHT Administrative Fees

The bill extends MHT's authority to charge a fee, not to exceed 1% of the estimated value of credits issued, that is sufficient to pay the cost of administering the State and federal historic tax credit. The bill also authorizes MHT to charge a fee to monitor compliance with low-income rental set aside specified by the bill. Exhibit 6 lists the estimated amount of fee revenue deposited in the fund in each fiscal year based on the estimated amount of commercial and residential applications in each year.

Indirect Revenue Effects of the Program

Several individuals and groups have examined the tax credit program and have concluded that the program generates State and local revenues that partially or totally offset the cost of the program. These examinations suffer from a serious methodological flaw by assuming that none of the rehabilitations, and associated economic activity, would have occurred in the absence of the State income tax credit. For example, a common assumption is that all of the jobs that are located in a commercial property after a rehabilitation are new jobs to the State and are resultant from the commercial rehabilitation, even though most jobs are transferred from other parts of the State or would have been located in another office building had the commercial rehabilitation not occurred. In addition, studies do not take into account the value of the State income tax credit has varied over time and commercial rehabilitations also qualify for a federal historic tax credit.

In fiscal 2006, 43 projects were denied funding due to program restrictions. The median score of these projects was 71, compared with a median score of 75 for all projects that received funding. Twelve projects applied for funding again in fiscal 2007. Half of these projects received funding for a total of $7.3 million. Thirty-one projects that were denied funding in fiscal 2006 elected not to apply for funding in fiscal 2007. Legislative Services located rehabilitation permitting activity for three-quarters of these denied projects. This activity was after the time in which an applicant would have received a denial letter from MHT. While rehabilitation expenditures might have been less than what it would had the project been awarded the State tax credit, a majority of applicants elected to rehabilitate the property either because existing federal and local tax credits were a sufficient incentive or because the project's expected return on investment was sufficient enough for the project manager(s) to undertake the rehabilitation in the absence of the credit.

State Expenditures: Under current law, the tax credit program operates through fiscal 2010. Special fund expenditures will increase beginning in fiscal 2011 at MHT as a result of extending the tax credit program. In its fiscal response to the bill, MHT did not provide any information on the fiscal impact to the agency from the proposed extension of the tax credit program. Exhibit 6 lists the estimated cost of administering the program in fiscal 2011 through 2014.

Additional Information

Prior Introductions: None.

Cross File: SB 258 (The President)(By Request - Administration) - Budget and Taxation.

Information Source(s): Maryland Department of Planning, Comptroller's Office, Joint Committee on Taxation, Department of Legislative Services

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