

CUSTER COUNTY PROPERTY ASSESSMENT STUDY







September 15, 2018

Mr. Mike Mauer Director of Research Colorado Legislative Council Room 029, State Capitol Building Denver, Colorado 80203

RE: Final Report for the 2018 Colorado Property Assessment Study

Dear Mr. Mauer:

Wildrose Appraisal Inc.-Audit Division is pleased to submit the Final Reports for the 2018 Colorado Property Assessment Study.

These reports are the result of two analyses: A procedural audit and a statistical audit.

The procedural audit examines all classes of property. It specifically looks at how the assessor develops economic areas, confirms and qualifies sales, develops time adjustments and performs periodic physical property inspections. The audit reviews the procedures for determining subdivision absorption and subdivision discounting. Valuation methodology is examined for residential properties and commercial properties. Procedures are reviewed for producing mines, oil and gas leaseholds and lands producing, producing coal mines, producing earth and stone products, severed mineral interests, and non-producing patented mining claims.

Statistical audits are performed on vacant land, residential properties, commercial/industrial properties and agricultural land. A statistical analysis is performed for personal property compliance on the eleven largest counties: Adams, Arapahoe, Boulder, Denver, Douglas, El Paso, Jefferson, Larimer, Mesa, Pueblo and Weld. The remaining counties receive a personal property procedural study.

Wildrose Appraisal Inc. – Audit Division appreciates the opportunity to be of service to the State of Colorado. Please contact us with any questions or concerns.

Harry J. Fuller Project Manager

Harry J. Zulln

Wildrose Appraisal Inc. - Audit Division



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INTRODUCTION



The State Board of Equalization (SBOE) reviews assessments for conformance to the Constitution. The SBOE will order revaluations for counties whose valuations do not reflect the proper valuation period level of value.

The statutory basis for the audit is found in C.R.S. 39-1-104 (16)(a)(b) and (c).

The legislative council sets forth two criteria that are the focus of the audit group:

To determine whether each county assessor is applying correctly the constitutional and statutory provisions, compliance requirements of the State Board of Equalization, and the manuals published by the State Property Tax Administrator to arrive at the actual value of each class of property.

To determine if each assessor is applying correctly the provisions of law to the actual values when arriving at valuations for assessment of all locally valued properties subject to the property tax.

The property assessment audit conducts a twopart analysis: A procedural analysis and a statistical analysis. The procedural analysis includes all classes of property and specifically looks at how the assessor develops economic areas, confirms and qualifies sales, and develops time adjustments. The audit also examines the procedures for adequately discovering, classifying and valuing agricultural outbuildings, discovering subdivision build-out subdivision and discounting procedures. Valuation methodology for vacant land, improved properties commercial residential and properties is examined. Procedures for producing mines, oil and gas leaseholds and lands producing, producing coal mines, producing earth and stone products, severed mineral interests and non-producing patented mining claims are also reviewed.

Statistical analysis is performed on vacant land, residential properties, commercial/industrial properties, agricultural land, and personal property. The statistical study results are compared with State Board of Equalization compliance requirements and the manuals published by the State Property Tax Administrator.

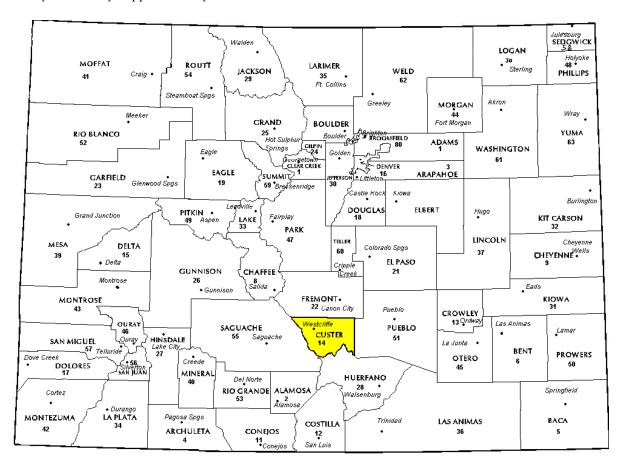
Wildrose Audit has completed the Property Assessment Study for 2018 and is pleased to report its findings for Custer County in the following report.



REGIONAL/HISTORICAL SKETCH OF CUSTER COUNTY

Regional Information

Custer County is located in the Central Mountains region of Colorado. The Central Mountains Region is in the central portion of Colorado. It extends from the northern Gilpin county boundary approximately 210 miles southeasterly to the southern boundary of Colorado, including Chaffee, Clear Creek, Custer, Fremont, Gilpin, Huerfano, Lake, Las Animas, Park, and Teller counties.





Historical Information

Custer County had an estimated population of approximately 4,602 people with 6.23 people per square mile, according to the U.S. Census Bureau's 2016 estimated census data. This represents a 8.2 percent change from April 1, 2010 to July 1, 2016.

Custer County was created by the Colorado legislature on March 9, 1877 out of the southern half of Fremont County. Originally set in Ula, the county seat moved to Rosita in 1878, and to Silver Cliff in 1886 before settling in Westcliffe in 1928. It was named in honor of Lt. Colonel George Armstrong Custer, who had died the previous year.

The county was the site of a silver rush during the 1870s. Thousands of men poured into the county during this time in the hunt for silver. Some of the notable mines include the Geyser Mine (on the north edge of the town of Silver Cliff), the Bassick Mine (near the ghost town of Querida) and the Bull Domingo (north of Silver Cliff).

During the late 1800s a railroad line was connected through the Grape Creek Canyon but was permanently closed after a few disastrous floods. The old railhouse has been

turned into a historical landmark in the town of Westcliffe.

After the mines dried up, the population dropped considerably and was replaced by cattle ranchers. An extensive system of irrigation ditches were built throughout the valley. The tradition of ranching in the Wet Mountain Valley continues to this day.

The county is very rugged and would be virtually inaccessible without roads. The lowest point of the county is around 6,000 feet in elevation, but most of the county is rugged and mountainous. The county seat of Westcliffe is about 7,800 feet and along with nearby town Silver Cliff lies in the Wet Mountain Valley which sits at the base of the Sangre de Cristo Mountains. The peaks of the Sangre de Cristo Mountains to the west reach heights in excess of 14,000 feet with Crestone Peak being the highest at 14,294 feet.

A large percentage of the county is National Forest land in the Sangre de Cristo Mountains on the west side and in the Wet Mountains on the east. The only lake of size is the Deweese Reservoir in the north end of the Wet Mountain Valley. (Wikipedia.org)



RATIO ANALYSIS

Methodology

All significant classes of properties were analyzed. Sales were collected for each property class over the appropriate sale period, which was typically defined as the 18-month period between January 1, 2015 and June 30, 2016. Counties with less than 30 sales typically extended the sale period back up to 5 years prior to June 30, 2016 in 6-month increments. If there were still fewer than 30 sales, supplemental appraisals were performed and treated as proxy sales. Residential sales for all counties using this method totaled at least 30 per county. For commercial sales, the total number analyzed was allowed, in some cases, to fall below 30. There were no sale quantity issues for counties requiring vacant land analysis or condominium analysis. Although it was required that we examine the median and coefficient of dispersion for all counties, we also calculated the weighted mean and pricerelated differential for each class of property. Counties were not passed or failed by these

latter measures, but were counseled if there were anomalies noted during our analysis. Qualified sales were based on the qualification code used by each county, which were typically coded as either "Q" or "C." The ratio analysis included all sales. The data was trimmed for counties with obvious outliers using IAAO standards for data analysis. In every case, we examined the loss in data from trimming to ensure that only true outliers were excluded. Any county with a significant portion of sales excluded by this trimming method was examined further. No county was allowed to pass the audit if more than 5% of the sales were "lost" because of trimming. For the largest 11 counties, the residential ratio statistics were broken down by economic area as well.

Conclusions

For this final analysis report, the minimum acceptable statistical standards allowed by the State Board of Equalization are:

ALLOWABLE STANDARDS RATIO GRID					
Property Class Unweighted Coeffi Median Ratio Dis					
Commercial/Industrial	Between .95-1.05	Less than 20.99			
Condominium	Between .95-1.05	Less than 15.99			
Single Family	Between .95-1.05	Less than 15.99			
Vacant Land	Between .95-1.05	Less than 20.99			



The results for Custer County are:

Custer County Ratio Grid							
Number of Unweighted Price Coefficient Qualified Median Related of Time Tren Property Class Sales Ratio Differential Dispersion Analys							
*Commercial/Industrial	19	1.016	1.099	17.4	Compliant		
Condominium	N/A	N/A	N/A	N/A	N/A		
Single Family	253	1.003	1.023	14.6	Compliant		
Vacant Land	145	1.005	1.066	17.3	Compliant		

^{*}County Sales File augmented by one supplemental appraisal

After applying the above described methodologies, it is concluded from the sales ratios that Custer County is in compliance with

SBOE, DPT, and Colorado State Statute valuation guidelines.

Recommendations



TIME TRENDING VERIFICATION

Methodology

While we recommend that counties use the inverted ratio regression analysis method to account for market (time) trending, some counties have used other IAAO-approved methods, such as the weighted monthly median approach. We are not auditing the methods used, but rather the results of the methods used. Given this range of methodologies used to account for market trending, we concluded that the best validation method was to examine the sale ratios for each class across the appropriate sale period. To be specific, if a county has considered and adjusted correctly for market trending, then the sale ratios should remain stable (i.e. flat) across the sale period. If a residual market trend is detected, then the county may or may not have addressed market

trending adequately, and a further examination is warranted. This validation method also considers the number of sales and the length of the sale period. Counties with few sales across the sale period were carefully examined to determine if the statistical results were valid.

Conclusions

After verification and analysis, it has been determined that Custer County has complied with the statutory requirements to analyze the effects of time on value in their county. Custer County has also satisfactorily applied the results of their time trending analysis to arrive at the time adjusted sales price (TASP).

Recommendations



SOLD/UNSOLD ANALYSIS

Methodology

Custer County was tested for the equal treatment of sold and unsold properties to ensure that "sales chasing" has not occurred. The auditors employed a multi-step process to determine if sold and unsold properties were valued in a consistent manner.

We test the hypothesis that the assessor has valued unsold properties consistent with what is observed with the sold properties based on several units of comparison and tests. units of comparison include the actual value per square foot and the change in value from the previous base year period to the current base year. The first test compares the actual value per square foot between sold and unsold properties by class. The median and mean value per square foot is compared and tested for any significant difference. This is tested using non-parametric methods, such as the Mann-Whitney test for differences in the distributions or medians between sold and unsold groups. It is also examined graphically and from an appraisal perspective. Data can be stratified based on location and subclass. The second test compares the difference in the median change in value from the previous base year to the current base year between sold and unsold properties by class. The same combination of non-parametric and appraisal testing is used as with the first test. A third test employing a valuation model testing a sold/unsold binary variable while controlling for property attributes such as location, size, age and other attributes. determines if the sold/unsold variable is statistically and empirically significant. three tests indicate a significant difference between sold and unsold properties for a given class, the Auditor may meet with the county to determine if sale chasing is actually occurring,

or if there are other explanations for the observed difference.

If the unsold properties have a higher median value per square foot than the sold properties, or if the median change in value is greater for the unsold properties than the sold properties, the analysis is stopped and the county is concluded to be in compliance with sold and unsold guidelines. All sold and unsold properties in a given class are first tested, although properties with extreme unit values or percent changes can be trimmed to stabilize the analysis. The median is the primary comparison metric, although the mean can also be used as a comparison metric if the distribution supports that type of measure of central tendency.

The first test (unit value method) is applied to both residential and commercial/industrial sold and unsold properties. The second test is applied to sold and unsold vacant land properties. The second test (change in value method) is also applied to residential or commercial sold and unsold properties if the first test results in a significant difference observed and/or tested between sold and unsold properties. The third test (valuation modeling) is used in instances where the results from the first two tests indicate a significant difference between sold and unsold properties. It can also be used when the number of sold and unsold properties is so large that the nonparametric testing is indicating a false rejection of the hypothesis that there is no difference between the sold and unsold property values.

These tests were supported by both tabular and graphics presentations, along with written documentation explaining the methodology used.



Sold/Unsold Re	sults
Property Class	Results
Commercial/Industrial	Compliant
Condominium	N/A
Single Family	Compliant
Vacant Land	Compliant

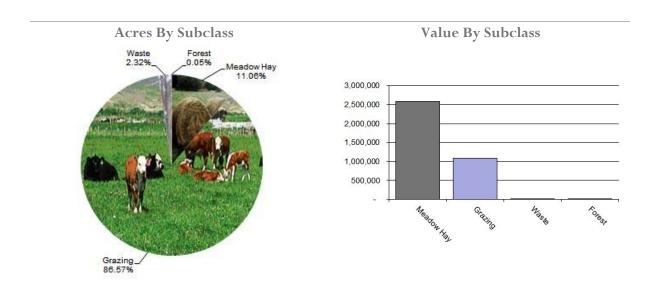
Conclusions

After applying the above described methodologies, it is concluded that Custer County is reasonably treating its sold and unsold properties in the same manner.

Recommendations



AGRICULTURAL LAND STUDY



Agricultural Land

County records were reviewed to determine major land categories such as irrigated farm, dry farm, meadow hay, grazing and other In addition, county records were lands. reviewed in order to determine if: Aerial photographs are available and are being used; soil conservation guidelines have been used to classify lands based on productivity; crop rotations have been documented; typical commodities and yields have been determined; orchard lands have been properly classified and valued; expenses reflect a ten year average and are typical landlord expenses; grazing lands have been properly classified and valued; the number of acres in each class and subclass have been determined; the capitalization rate was properly applied. Also, documentation was required for the valuation methods used and locally developed yields, carrying capacities, and expenses. Records were also checked to ensure that the commodity prices and expenses, furnished by the Property Tax Administrator (PTA), were applied properly.

(See Assessor Reference Library Volume 3 Chapter 5.)

Conclusions

An analysis of the agricultural land data indicates an acceptable appraisal of this property type. Directives, commodity prices and expenses provided by the PTA were properly applied. County yields compared favorably to those published by Colorado Agricultural Statistics. Expenses used by the county were allowable expenses and were in an acceptable range. Grazing lands carrying capacities were in an acceptable range. The data analyzed resulted in the following ratios:



	Custer County Agricultural Land Ratio Grid							
Number County County WRA Abstract Of Value Assessed Total Code Land Class Acres Per Acre Total Value Value Ratio								
4137	Meadow Hay	23,750	109.00	2,588,667	2,588,667	1.00		
4147	Grazing	185,858	5.82	1,081,459	1,081,459	1.00		
4177	Forest	106	11.77	1,247	1,247	1.00		
4167	Waste	4,983	2.22	11,071	11,071	1.00		
Total/Avg		214,697	17.15	3,682,444	3,682,444	1.00		

Recommendations

None

Agricultural Outbuildings

Methodology

Data was collected and reviewed to determine if the guidelines found in the Assessor's Reference Library (ARL) Volume 3, pages 5.74 through 5.77 were being followed.

Conclusions

Custer County has substantially complied with the procedures provided by the Division of Property Taxation for the valuation of agricultural outbuildings.

Recommendations



Agricultural Land Under Improvements

Methodology

Data was collected and reviewed to determine if the guidelines found in the Assessor's Reference Library (ARL) Volume 3, pages 5.19 and 5.20 were being followed.

Conclusions

Custer County has used the following methods to discover land under a residential improvement on a farm or ranch that is determined to be not integral under 39-1-102, C.R.S.:

- Questionnaires
- Field Inspections
- Phone Interviews
- In-Person Interviews with Owners/Tenants
- Personal Knowledge of Occupants at Assessment Date
- Aerial Photography/Pictometry

Custer County has used the following methods to discover the land area under a residential improvement that is determined to be not integral under 39-1-102, C.R.S.:

- Property Record Card Analysis
- Questionnaires
- Field Inspections
- Phone Interviews
- In-Person Interviews with Owners/Tenants
- Personal Knowledge of Occupants at Assessment Date
- Aerial Photography/Pictometry

Custer County has substantially complied with the procedures provided by the Division of Property Taxation for the valuation of land under residential improvements that may or may not be integral to an agricultural operation.

Recommendations



SALES VERIFICATION

According to Colorado Revised Statutes:

A representative body of sales is required when considering the market approach to appraisal.

(8) In any case in which sales prices of comparable properties within any class or subclass are utilized when considering the market approach to appraisal in the determination of actual value of any taxable property, the following limitations and conditions shall apply:

(a)(I) Use of the market approach shall require a representative body of sales, including sales by a lender or government, sufficient to set a pattern, and appraisals shall reflect due consideration of the degree of comparability of sales, including the extent of similarities and dissimilarities among properties that are compared for assessment purposes. In order to obtain a reasonable sample and to reduce sudden price changes or fluctuations, all sales shall be included in the sample that reasonably reflect a true or typical sales price during the period specified in section 39-1-104 (10.2). Sales of personal property exempt pursuant to the provisions of sections 39-3-102, 39-3-103, and 39-3-119 to 39-3-122 shall not be included in any such sample.

(b) Each such sale included in the sample shall be coded to indicate a typical, negotiated sale, as screened and verified by the assessor. (39-1-103, C.R.S.)

The assessor is required to use sales of real property only in the valuation process.

(8)(f) Such true and typical sales shall include only those sales which have been determined on an individual basis to reflect the selling price of the real property only or which have been adjusted on an individual basis to reflect the selling price of the real property only. (39-1-103, C.R.S.)

Part of the Property Assessment Study is the sales verification analysis. WRA has used the above-cited statutes as a guide in our study of the county's procedures and practices for verifying sales.

WRA reviewed the sales verification procedures in 2018 for Custer County. This study was conducted by checking selected sales from the master sales list for the current valuation period. Specifically WRA selected 31 sales listed as unqualified.

All of the sales in the unqualified sales sample had reasons that were clear and supportable.

For residential, commercial, and vacant land sales with considerations over \$500, the contractor has examined and reported the ratio of qualified sales to total sales by class and performed the following analyses of unqualified sales:

The contractor has examined the manner in which sales have been classified as qualified or unqualified, including a listing of each step in the sales verification process, any adjustment procedures, and the county official responsible for making the final decision on qualification.

The contractor has reviewed with the assessor any analysis indicating that sales data are inadequate, fail to reflect typical properties, or have been disqualified for insufficient cause. In addition, the contractor has reviewed the disqualified sales by assigned code. If there appears to be any inconsistency in the coding, the contractor has



conducted further analysis to determine if the sales included in that code have been assigned appropriately.

Conclusions

Custer County appears to be doing a good job of verifying their sales. WRA agreed with the

county's reason for disqualifying each of the sales selected in the sample. There are no recommendations or suggestions.

Recommendations



ECONOMIC AREA REVIEW AND EVALUATION

Methodology

Custer County has submitted a written narrative describing the economic areas that make up the county's market areas. Custer County has also submitted a map illustrating these areas. Each of these narratives have been read and analyzed for logic and appraisal sensibility. The maps were also compared to the narrative for consistency between the written description and the map.

Conclusions

After review and analysis, it has been determined that Custer County has adequately

identified homogeneous economic areas comprised of smaller neighborhoods. Each economic area defined is equally subject to a set of economic forces that impact the value of the properties within that geographic area and this has been adequately addressed. Each economic area defined adequately delineates an area that will give "similar values for similar properties in similar areas."

Recommendations



NATURAL RESOURCES

Earth and Stone Products

Methodology

Under the guidelines of the Assessor's Reference Library (ARL), Volume 3, Natural Resource Valuation Procedures, the income approach was applied to determine value for production of earth and stone products. The number of tons was multiplied by an economic royalty rate determined by the Division of Property Taxation to determine income. The income was multiplied by a recommended Hoskold factor to determine the actual value. The Hoskold factor is determined by the life of the reserves or the lease. Value is based on two

variables: life and tonnage. The operator determines these since there is no other means to obtain production data through any state or private agency.

Conclusions

The County has applied the correct formulas and state guidelines to earth and stone production.

Recommendations



VACANT LAND

Subdivision Discounting

Subdivisions were reviewed in 2018 in Custer County. The review showed that subdivisions were discounted pursuant to the Colorado Revised Statutes in Article 39-1-103 (14) and by applying the recommended methodology in ARL Vol 3, Chap 4. Subdivision Discounting in the intervening year can be accomplished by reducing the absorption period by one year. In instances where the number of sales within an approved plat was less than the absorption rate

per year calculated for the plat, the absorption period was left unchanged.

Conclusions

Custer County has implemented proper procedures to adequately estimate absorption periods, discount rates, and lot values for qualifying subdivisions.

Recommendations



POSSESSORY INTEREST PROPERTIES

Possessory Interest

Possessory interest property discovery and valuation is described in the Assessor's Reference Library (ARL) Volume 3 section 7 in accordance with the requirements of C.R.S. Chapter 39-1-103 (17)(a)(II)Possessory Interest is defined by the Property Tax Administrator's Publication ARL Volume 3, Chapter 7: A private property interest in government-owned property or the right to the occupancy and use of any benefit in government-owned property that has been under lease, permit, concession, contract, or other agreement.

Custer County has been reviewed for their procedures and adherence to guidelines when

assessing and valuing agricultural possessory interest properties. The county has also been queried as to their confidence that the possessory interest properties have been discovered and placed on the tax rolls.

Conclusions

Custer County has implemented a discovery process to place possessory interest properties on the roll. They have also correctly and consistently applied the correct procedures and valuation methods in the valuation of possessory interest properties.

Recommendations



PERSONAL PROPERTY AUDIT

Custer County was studied for its procedural compliance with the personal property assessment outlined in the Assessor's Reference Library (ARL) Volume 5, and in the State Board of Equalization (SBOE) requirements for the assessment of personal property. The SBOE requires that counties use ARL Volume 5, including current discovery, classification, documentation procedures, current economic lives table, cost factor tables, depreciation table, and level of value adjustment factor table.

The personal property audit standards narrative must be in place and current. A listing of businesses that have been audited by the assessor within the twelve-month period reflected in the plan is given to the auditor. The audited businesses must be in conformity with those described in the plan.

Aggregate ratio will be determined solely from the personal property accounts that have been physically inspected. The minimum assessment sample is one percent or ten schedules, whichever is greater, and the maximum assessment audit sample is 100 schedules.

For the counties having over 100,000 population, WRA selected a sample of all personal property schedules to determine whether the assessor is correctly applying the provisions of law and manuals of the Property Tax Administrator in arriving at the assessment This sample was levels of such property. selected from the personal property schedules audited by the assessor. In no event was the sample selected by the contractor less than 30 schedules. The counties to be included in this study are Adams, Arapahoe, Boulder, Denver, Douglas, El Paso, Jefferson, Larimer, Mesa, Pueblo, and Weld. All other counties received a procedural study.

Custer County is compliant with the guidelines set forth in ARL Volume 5 regarding discovery procedures, using the following methods to discover personal property accounts in the county:

- Public Record Documents
- MLS Listing and/or Sold Books
- Chamber of Commerce/Economic Development Contacts
- Local Telephone Directories, Newspapers or Other Local Publications
- Personal Observation, Physical Canvassing or Word of Mouth
- Questionnaires, Letters and/or Phone Calls to Buyer, Seller and/or Realtor

The county uses the Division of Property Taxation (DPT) recommended classification and documentation procedures. The DPT's recommended cost factor tables, depreciation tables and level of value adjustment factor tables are also used.

Custer County submitted their personal property written audit plan and was current for the 2018 valuation period. The number and listing of businesses audited was also submitted and was in conformance with the written audit plan. The following audit triggers were used by the county to select accounts to be audited:

- Accounts with obvious discrepancies
- New businesses filing for the first time
- Accounts with greater than 10% change
- Incomplete or inconsistent declarations
- Accounts with omitted property
- Same business type or use



- Businesses with no deletions or additions for 2 or more years
- Non-filing Accounts Best Information Available
- Accounts close to the \$7,400 actual value exemption status
- Accounts protested with substantial disagreement

Conclusions

Custer County has employed adequate discovery, classification, documentation, valuation, and auditing procedures for their personal property assessment and is in statistical compliance with SBOE requirements.

Recommendations



WILDROSE AUDITOR STAFF

Harry J. Fuller, Audit Project Manager

Suzanne Howard, Audit Administrative Manager

Steve Kane, Audit Statistician

Carl W. Ross, Agricultural/Natural Resource Analyst

J. Andrew Rodriguez, Field Analyst



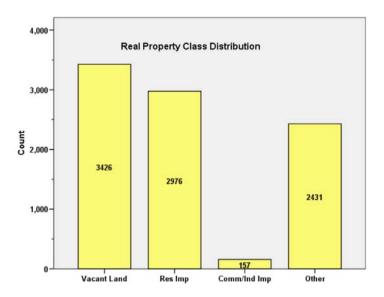
APPENDICES



STATISTICAL COMPLIANCE REPORT FOR CUSTER COUNTY 2018

I. OVERVIEW

Custer County is located in south central Colorado. The county has a total of 8,990 real property parcels, according to data submitted by the county assessor's office in 2018. The following provides a breakdown of property classes for this county:



The vacant land class of properties was dominated by residential land. Residential lots (coded 100) accounted for 85.8% of all vacant land parcels.

For residential improved properties, single family properties accounted for nearly 99.2% of all residential properties.

Commercial and industrial properties represented a much smaller proportion of property classes in comparison. Commercial/industrial properties accounted for 1.75% of all such properties in this county.

II. DATA FILES

The following sales analyses were based on the requirements of the 2018 Colorado Property Assessment Study. Information was provided by the Custer Assessor's Office in April 2018. The data included all 5 property record files as specified by the Auditor.

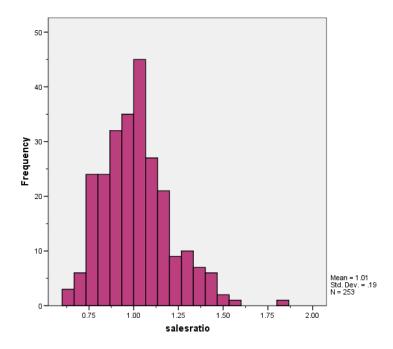


III. RESIDENTIAL SALES RESULTS

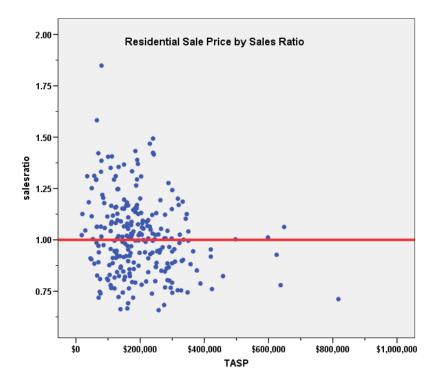
There were 256 qualified residential sales in the 24-month sale period ending June 30, 2016. Three sales with extreme outliers were trimmed. The sales ratio analysis was analyzed as follows:

Median	1.003
Price Related Differential	1.023
Coefficient of Dispersion	14.6

The above ratio statistics were in compliance with the standards set forth by the Colorado State Board of Equalization (SBOE) for the overall residential sales. The following graphs describe further the sales ratio distribution for these properties:







The above graphs indicate that the distribution of the sale ratios was within state mandated limits.

Residential Market Trend Analysis

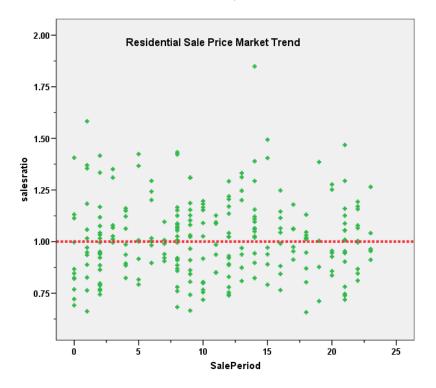
We next analyzed the residential dataset using the 24-month sale period for any residual market trending. The following indicates that there was no statistically significant residual trend based on the sale ratios:

Coefficients^a

		Unstandardized	Coefficients	Standardized Coefficients			
Model		В	Std. Error	Beta	t	Sig.	
1	(Constant)	1.004	.022		45.193	.000	
	SalePeriod	.001	.002	.030	.470	.639	

a. Dependent Variable: salesratio





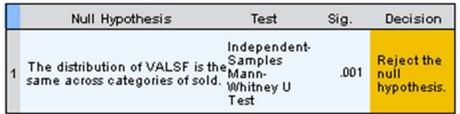
The above analysis indicated that the assessor has adequately addressed market trending in the valuation of residential properties.

Sold/Unsold Analysis

In terms of the valuation consistency between sold and unsold residential properties, we compared the median actual value per square foot for 2018 between each group, as follows:

Group	N	Median Val/SF	Mean Val/SF
Unsold	2,721	\$106	\$112
Sold	248	\$115	\$120

Hypothesis Test Summary



Asymptotic significances are displayed. The significance level is .01.



Given that there was a significant difference between sold and unsold residential properties based on the distribution of the actual value per square foot, we next compared the change in actual value per square foot between taxable years 2016 and 2018, as follows:

Group	N	Median Chg Val	Mean Chg Val
Unsold	2,649	1.02	1.24
Sold	252	1.02	1.09

We also compared the change in value between sold and unsold residential properties stratified by neighborhood, as follows:

Report				
DIFF				
NBHDDES	sold	N	Median	Mean
NBHD 1	UNSOLD	366	1.01	1.16
	SOLD	48	1.01	1.07
NBHD 2	UNSOLD	1291	1.02	1.38
	SOLD	96	1.02	1.09
NBHD 3	UNSOLD	616	1.02	1.10
	SOLD	80	1.02	1.06
NBHD 4	UNSOLD	376	1.02	1.10
	SOLD	28	1.12	1.16

The above results indicate that sold and unsold residential properties were valued in a consistent manner overall.

IV. COMMERCIAL/INDUSTRIAL SALE RESULTS

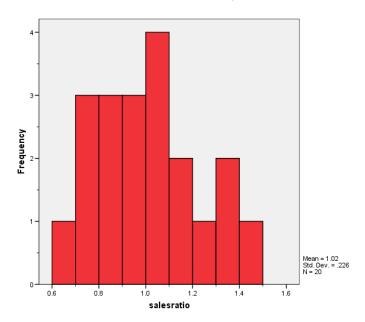
There were 19 qualified commercial and industrial sales in the 60-month sale period ending June 30, 2016. Because there were fewer than 20 sales, 1 supplemental appraisal of an unsold commercial property was completed to augment these sales, bringing the total number of commercial/industrial properties analyzed to 20. We used all 20 properties for the sales ratio analysis, while the 19 sales alone were used to analyze market trending and sold/unsold properties.

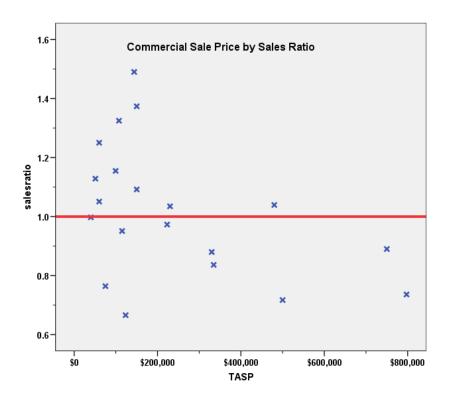
The sales ratio analysis was as follows:

Median	1.016
Price Related Differential	1.099
Coefficient of Dispersion	17.4

The above table indicates that the Custer County commercial/industrial sale ratios were in compliance with the SBOE standards. The following histogram and scatter plot describe the sales ratio distribution further:







Commercial Market Trend Analysis

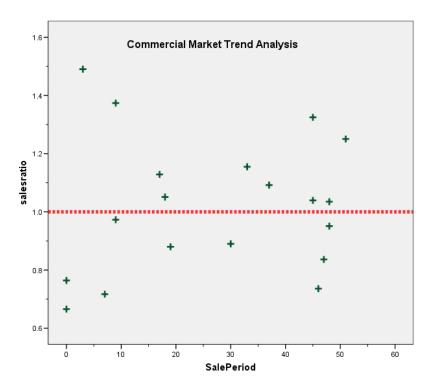
The assessor did not apply any market trend adjustment to the commercial dataset. The 19 commercial sales were analyzed, examining the sale ratios across the 60-month sale period with the following results and stratifying the results by commercial subclass:



Coefficients^a

		Unstandardized		Standardized Coefficients		
Model		В	Std. Error	Beta	t	Sig.
1	(Constant)	.985	.097		10.141	.000
	SalePeriod	.001	.003	.099	.411	.686

a. Dependent Variable: salesratio



The market trend results indicated no statistically significant trend. We concur that no market trend adjustments were warranted for properties in this class for Custer County.

Sold/Unsold Analysis

We compared the 2018 median and mean actual value per square feet between sold and unsold commercial/industrial properties in Custer County to determine if sold and unsold properties were treated consistently, as follows:

Report VALSF			
sold	N	Median	Mean
UNSOLD	138	\$59	\$68
SOLD	18	\$69	\$75



Hypothesis Test Summary

	Null Hypothesis	Test	Sig.	Decision
1	The distribution of VALSF is th same across categories of sold	Independent- Samples Mann- Whitney U Test	.434	Retain the null hypothesis.

Asymptotic significances are displayed. The significance level is .01.

We also compared commercial sold and unsold properties stratified by subclass, as follows:

Report VALSF				
ABSTRIMP	sold	N	Median	Mean
2212	UNSOLD	22	\$58	\$61
	SOLD	5	\$73	\$78
2220	UNSOLD	31	\$103	\$104
	SOLD	4	\$89	\$95
2230	UNSOLD	25	\$69	\$72
	SOLD	4	\$72	\$70
2235	UNSOLD	19	\$24	\$27
	SOLD	2	\$28	\$28

The above results indicate that sold and unsold commercial properties were valued in a consistent manner overall.

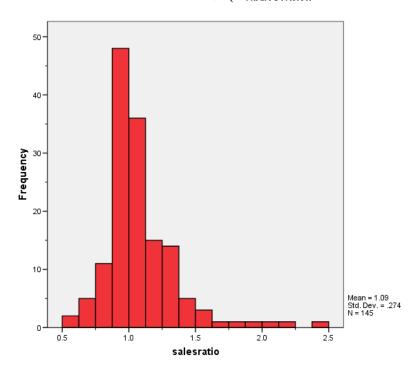
V. VACANT LAND SALE RESULTS

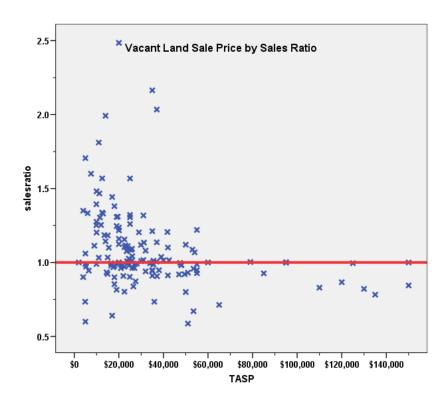
There were 151 qualified vacant land sales in the 24-month sale period ending June 30, 2016. Six sales were excluded due to their extreme ratios, resulting in a final total of 145 sales. The sales ratio analysis was analyzed as follows:

Median	1.005
Price Related Differential	1.066
Coefficient of Dispersion	17.3

The above table indicates that the Custer County vacant land sale ratios were in compliance with the SBOE standards. The following histogram and scatter plot describe the sales ratio distribution further:







Vacant Land Market Trend Analysis

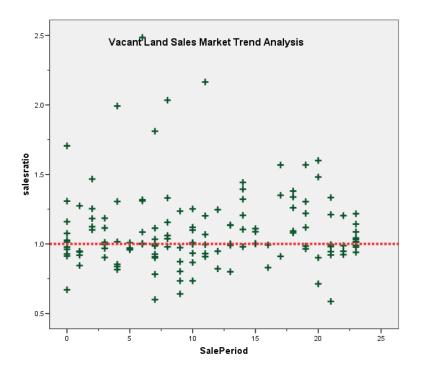
The 145 vacant land sales were next analyzed for residual market trending, examining the sale ratios across the 24-month sale period with the following results:



Coefficients^a

		Unstandard	ized Coefficients	Standardized Coefficients			
Mod	el	В	Std. Error	Beta	t	Sig.	
1	(Constant)	1.087	.041		26.226	.000	
	SalePeriod	.000	.003	.005	.057	.955	

a. Dependent Variable: salesratio



The above analysis indicated that no statistically significant market trend was present in the sales ratio for vacant land. We therefore concluded that the assessor considered market trending appropriately for this class of property.

Sold/Unsold Analysis

We compared the median change in actual value between taxable years 2016 and 2018 for vacant land properties to determine if sold and unsold properties were valued consistently. We performed the analysis stratifying the properties by subdivision, as follows:

Group	No. Props	Median	Mean
Unsold	3,253	1.000	1.18
Sold	130	1.000	1.19

The above results indicated that sold and unsold vacant land properties were valued consistently.



VI. AGRICULTURAL IMPROVEMENTS ANALYSIS

The final statistical verification concerned the assigned actual values for agricultural residential improvements. We compared the actual value per square foot rate for this group and compared it to rates assigned to residential single family improvements in Custer County.

The following indicates that agricultural residential improvements were valued in a manner similar to the single family residential improvements in this county:

Report			
IMPVALSF			
ABSTRIMP	N	Median	Mean
1212	2944	\$85.22	\$86.60
4277	393	\$80.53	\$85.28

Hypothesis Test Summary

	Null Hypothesis	Test	Sig.	Decision
1	The distribution of IMPVALSF same across categories of ABSTRIMP.	Independent- is th&les Mann- Whitney U Test	.159	Retain the null hypothesis.

Asymptotic significances are displayed. The significance level is .05.

VII. CONCLUSIONS

Based on this statistical analysis, there were no significant compliance issues concluded for Custer County as of the date of this report.



STATISTICAL ABSTRACT Residential

Ratio Statistics for CURRTOT / TASP

		95% Confidence Interval for Mean 95% Confidence Interval for Median 95% Confidence Interval for Median 95% Confidence Interval for Median				Coefficient of Variation						
Mean	Lower Bound	Upper Bound	Median	Lower Bound	Upper Bound	Actual Coverage	Weighted Mean	Lower Bound	Upper Bound	Price Related Differential	Coefficient of Dispersion	Mean Centered
1.013	.989	1.036	1.003	.971	1.023	95.6%	.990	.965	1.014	1.023	.146	18.7%

The confidence interval for the median is constructed without any distribution assumptions. The actual coverage level may be greater than the specified level. Other confidence intervals are constructed by assuming a Normal distribution for the ratios.

Commercial/Industrial

Ratio Statistics for CURRTOT / TASP

	95% Confiden	nce Interval for ean		95% Cor	ifidence Interval fo	r Median		95% Confidence Interval for Weighted Mean				Coefficient of Variation
Mean	Lower Bound	Upper Bound	Median	Lower Bound	Upper Bound	Actual Coverage	Weighted Mean	Lower Bound	Upper Bound	Price Related Differential	Coefficient of Dispersion	Mean Centered
1.018	.912	1.123	1.016	.880	1.128	95.9%	.926	.821	1.031	1.099	.174	22.2%

The confidence interval for the median is constructed without any distribution assumptions. The actual coverage level may be greater than the specified level. Other confidence intervals are constructed by assuming a Normal distribution for the ratios.

Vacant Land

Ratio Statistics for CURRLND / TASP

95% Confidence Interval for Mean				95% Con	fidence Interval fo	or Median		95% Confiden Weighte				Coefficient of Variation
Mean	Lower Bound	Upper Bound	Median	Lower Bound	Upper Bound	Actual Coverage	Weighted Mean	Lower Bound	Upper Bound	Price Related Differential	Coefficient of Dispersion	Mean Centered
1.089	1.044	1.134	1.005	.995	1.042	95.4%	1.022	.979	1.064	1.066	.173	25.2%

The confidence interval for the median is constructed without any distribution assumptions. The actual coverage level may be greater than the specified level. Other confidence intervals are constructed by assuming a Normal distribution for the ratios.



Residential Median Ratio Stratification

Sale Price

Case Processing Summary

		Count	Percent
SPRec	LT \$25K	2	0.8%
	\$25K to \$50K	7	2.8%
	\$50K to \$100K	32	12.6%
	\$100K to \$150K	55	21.7%
	\$150K to \$200K	57	22.5%
	\$200K to \$300K	69	27.3%
	\$300K to \$500K	26	10.3%
	\$500K to \$750K	4	1.6%
	\$750K to \$1,000K	1	0.4%
Overall		253	100.0%
Excluded		0	
Total		253	

Ratio Statistics for CURRTOT / TASP

		Price Related	Coefficient of	Coefficient of Variation
Group	Median	Differential	Dispersion	Median Centered
LT \$25K	1.074	.997	.048	6.8%
\$25K to \$50K	1.115	1.005	.113	14.3%
\$50K to \$100K	1.060	1.000	.195	25.3%
\$100K to \$150K	.990	1.000	.155	18.8%
\$150K to \$200K	1.023	.995	.130	16.9%
\$200K to \$300K	.996	1.005	.134	17.9%
\$300K to \$500K	.949	1.005	.115	14.4%
\$500K to \$750K	.969	1.000	.095	13.1%
\$750K to \$1,000K	.711	1.000	.000	
Overall	1.003	1.023	.146	18.9%

Subclass

		Count	Percent
ABSTRIMP	0	5	2.0%
	1212	248	98.0%
Overall		253	100.0%
Excluded		0	
Total		253	



				Coefficient of
		Price Related	Coefficient of	Variation
Group	Median	Differential	Dispersion	Median Centered
0	.905	1.070	.144	18.9%
1212	1.003	1.024	.146	19.0%
Overall	1.003	1.023	.146	18.9%

Age

Case Processing Summary

		Count	Percent
AgeRec	Over 100	19	7.5%
	75 to 100	5	2.0%
	50 to 75	23	9.1%
	25 to 50	77	30.4%
	5 to 25	124	49.0%
	5 or Newer	5	2.0%
Overall		253	100.0%
Excluded		0	
Total		253	

Ratio Statistics for CURRTOT / TASP

				Coefficient of
		Price Related	Coefficient of	Variation
Group	Median	Differential	Dispersion	Median Centered
Over 100	.913	1.037	.134	17.0%
75 to 100	.918	1.031	.106	16.8%
50 to 75	.945	1.041	.155	19.4%
25 to 50	.974	1.033	.141	18.6%
5 to 25	1.025	1.029	.148	19.5%
5 or Newer	1.025	1.036	.135	18.8%
Overall	1.003	1.023	.146	18.9%

Improved Area

		Count	Percent
ImpSFRec	LE 500 sf	9	3.6%
	500 to 1,000 sf	51	20.2%
	1,000 to 1,500 sf	62	24.5%
	1,500 to 2,000 sf	57	22.5%
	2,000 to 3,000 sf	51	20.2%
	3,000 sf or Higher	23	9.1%
Overall		253	100.0%
Excluded		0	
Total		253	



Group	Median	Price Related Differential	Coefficient of Dispersion	Coefficient of Variation Median Centered
LE 500 sf	.905	1.036	.120	15.9%
LE 300 SI	.905	1.030	. 120	
500 to 1,000 sf	.974	1.045	.165	20.9%
1,000 to 1,500 sf	.929	1.039	.171	23.3%
1,500 to 2,000 sf	1.000	1.025	.119	15.8%
2,000 to 3,000 sf	1.053	1.028	.133	16.8%
3,000 sf or Higher	1.044	1.053	.123	17.7%
Overall	1.003	1.023	.146	18.9%

Improvement Quality

Case Processing Summary

	_	_	
		Count	Percent
QUALITY		5	2.0%
	ABOVE AV	19	7.5%
	AVERAGE	207	81.8%
	BELOW AVG	20	7.9%
	FAIR	2	0.8%
Overall		253	100.0%
Excluded		0	
Total		253	

Ratio Statistics for CURRTOT / TASP

			· -	
Group	Median	Price Related Differential	Coefficient of Dispersion	Coefficient of Variation Median Centered
	.905	1.070	.144	18.9%
ABOVE AV	.965	1.071	.168	23.4%
AVERAGE	1.000	1.011	.141	17.9%
BELOW AVG	1.119	1.048	.152	21.6%
FAIR	1.005	1.010	.018	2.6%
Overall	1.003	1.023	.146	18.9%

Improvement Condition

		Count	Percent
CONDITION		5	2.0%
	ABOVE AV	21	8.3%
	AVERAGE	200	79.1%
	BELOW AV	25	9.9%
	FAIR	1	0.4%
	POOR	1	0.4%
Overall		253	100.0%
Excluded		0	
Total		253	



		Price Related	Coefficient of	Coefficient of Variation
Group	Median	Differential	Dispersion	Median Centered
	.905	1.070	.144	18.9%
ABOVE AV	.953	1.048	.157	21.4%
AVERAGE	1.000	1.012	.142	18.0%
BELOW AV	1.063	1.039	.163	23.2%
FAIR	1.023	1.000	.000	
POOR	.986	1.000	.000	
Overall	1.003	1.023	.146	18.9%

Commercial Median Ratio Stratification

Sale Price

Case Processing Summary

		Count	Percent
SPRec	\$25K to \$50K	1	5.0%
	\$50K to \$100K	5	25.0%
	\$100K to \$150K	6	30.0%
	\$200K to \$300K	2	10.0%
	\$300K to \$500K	4	20.0%
	\$500K to \$750K	1	5.0%
	\$750K to \$1,000K	1	5.0%
Overall		20	100.0%
Excluded		0	
Total		20	

Ratio Statistics for CURRTOT / TASP

Group	Median	Price Related Differential	Coefficient of Dispersion	Coefficient of Variation Median Centered
\$25K to \$50K	.998	1.000	.000	
\$50K to \$100K	1.128	1.005	.105	17.4%
\$100K to \$150K	1.208	.989	.204	26.0%
\$200K to \$300K	1.004	1.000	.031	4.4%
\$300K to \$500K	.858	1.000	.107	15.6%
\$500K to \$750K	.890	1.000	.000	
\$750K to \$1,000K	.736	1.000	.000	
Overall	1.016	1.099	.174	22.2%



Subclass

Case Processing Summary

		Count	Percent
ABSTRIMP	0	1	5.0%
	1212	2	10.0%
	2212	5	25.0%
	2220	5	25.0%
	2223	1	5.0%
	2230	4	20.0%
	2235	2	10.0%
Overall		20	100.0%
Excluded		0	
Total		20	

Ratio Statistics for CURRTOT / TASP

Group	Median	Price Related Differential	Coefficient of Dispersion	Coefficient of Variation Median Centered
0	.666	1.000	.000	
1212	1.265	1.106	.178	25.2%
2212	.836	1.090	.180	33.1%
2220	1.051	.997	.041	5.9%
2223	1.325	1.000	.000	
2230	.931	1.086	.133	18.4%
2235	1.101	1.045	.136	19.2%
Overall	1.016	1.099	.174	22.2%

Age

		Count	Percent
AgeRec	Over 100	3	15.0%
	75 to 100	1	5.0%
	50 to 75	4	20.0%
	25 to 50	5	25.0%
	5 to 25	6	30.0%
	5 or Newer	1	5.0%
Overall		20	100.0%
Excluded		0	
Total		20	



				Coefficient of
		Price Related	Coefficient of	Variation
Group	Median	Differential	Dispersion	Median Centered
Over 100	.717	1.099	.329	65.0%
75 to 100	1.092	1.000	.000	
50 to 75	1.103	.986	.081	10.2%
25 to 50	1.035	1.058	.190	27.4%
5 to 25	.931	1.067	.121	15.3%
5 or Newer	.764	1.000	.000	
Overall	1.016	1.099	.174	22.2%

Improved Area

Case Processing Summary

		Count	Percent
ImpSFRec	LE 500 sf	3	15.0%
	1,000 to 1,500 sf	2	10.0%
	1,500 to 2,000 sf	1	5.0%
	2,000 to 3,000 sf	4	20.0%
	3,000 sf or Higher	10	50.0%
Overall		20	100.0%
Excluded		0	
Total		20	

Ratio Statistics for CURRTOT / TASP

		Price Related	Coefficient of	Coefficient of Variation
Group	Median	Differential	Dispersion	Median Centered
LE 500 sf	.998	1.092	.129	23.8%
1,000 to 1,500 sf	1.110	1.008	.016	2.3%
1,500 to 2,000 sf	1.490	1.000	.000	
2,000 to 3,000 sf	.905	1.020	.146	19.3%
3,000 sf or Higher	.993	1.131	.186	23.6%
Overall	1.016	1.099	.174	22.2%

Improvement Quality

		Count	Percent
QUALITY	·	1	5.0%
	AVERAGE	16	80.0%
	GOOD	2	10.0%
	LOW COST	1	5.0%
Overall		20	100.0%
Excluded		0	
Total		20	



Group	Median	Price Related Differential	Coefficient of Dispersion	Coefficient of Variation Median Centered
	.666	1.000	.000	
AVERAGE	1.016	1.118	.178	23.0%
GOOD	1.021	.991	.069	9.8%
LOW COST	1.155	1.000	.000	
Overall	1.016	1.099	.174	22.2%

Vacant Land Median Ratio Stratification

Sale Price

Case Processing Summary

		Count	Percent
SPRec	LT \$25K	76	52.4%
	\$25K to \$50K	46	31.7%
	\$50K to \$100K	16	11.0%
	\$100K to \$150K	7	4.8%
Overall		145	100.0%
Excluded	I	0	
Total		145	

Ratio Statistics for CURRTOT / TASP

Group	Median	Price Related Differential	Coefficient of Dispersion	Coefficient of Variation Median Centered
LT \$25K	1.177	1.010	1.057	326.1%
\$25K to \$50K	1.040	1.002	1.011	223.1%
\$50K to \$100K	.993	1.054	1.341	241.5%
\$100K to \$150K	.867	.977	.249	52.1%
Overall	1.088	1.108	1.060	290.9%



Subclass

Case Processing Summary

		Count	Percent
ABSTRLND	100	106	73.1%
	200	1	0.7%
	510	1	0.7%
	520	1	0.7%
	530	1	0.7%
	540	1	0.7%
	550	1	0.7%
	1112	27	18.6%
	1135	2	1.4%
	2112	1	0.7%
	5140	3	2.1%
Overall		145	100.0%
Excluded		0	
Total		145	

Ratio Statistics for CURRLND / TASP

Group	Median	Price Related Differential	Coefficient of Dispersion	Coefficient of Variation Median Centered
100	1.010	1.073	.148	22.6%
200	.800	1.000	.000	
510	.984	1.000	.000	
520	1.060	1.000	.000	
530	.963	1.000	.000	
540	1.002	1.000	.000	
550	.995	1.000	.000	
1112	1.068	1.077	.290	43.7%
1135	.979	.986	.128	18.1%
2112	1.000	1.000	.000	
5140	.945	.951	.124	23.2%
Overall	1.005	1.066	.173	28.6%