

March 19, 2025

Via Email

Diana Piechocki, Director
State Board of Appraisers, Abstracters, and Home Inspectors
Department of Labor and Licensing
900 West Capitol Avenue, Suite 400
Little Rock, AR 72201
Diana.Piechocki@arkansas.gov

RE: ASC Compliance Review of Arkansas' Appraisal Management Company (AMC)
Regulatory Program

Dear Diana Piechocki:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Arkansas AMC regulatory program (AMC Program) on October 22-24, 2024, to determine the AMC Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.¹

The ASC considered the preliminary results of the Review and the State's response to those results. The AMC Program has been awarded an ASC Finding of "Good." The final ASC Compliance Review Report (Report) is attached.

The ASC identified the following area of non-compliance:

- States must ensure the accuracy of all data submitted to the AMC Registry.²

ASC staff will confirm that appropriate corrective actions have been taken during the next Review. Arkansas will remain on a two-year Review Cycle.

¹ 12 U.S.C. §§ 3331-3356

² 12 U.S.C. § 3347; Policy Statement 9.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,

A handwritten signature in black ink, appearing to read "M Ponzar", written in a cursive style.

Matt Ponzar
Acting Executive Director

Attachment

cc: Suzie Puckett, Executive Assistant to the Director, Jimmie.Sue.Puckett@arkansas.gov

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor**	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

**An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, Reciprocity; see also Policy Statement 12, Interim Sanctions.



ASC State AMC Program Compliance Review Report

ASC Finding: Good

Final Report Issue Date: March 19, 2025

Arkansas AMC Regulatory Program (State)			
State Board of Appraisers, Abstracters, and Home Inspectors (Board)	PM: K. Klamet	ASC Compliance Review Date: October 22-24, 2024	Review Period: March 2022 to October 2024
Umbrella Agency: Arkansas Department of Labor and Licensing		Number of AMCs on AMC Registry: 99	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
National Registry:		X					
States must ensure the accuracy of all data submitted to the AMC Registry. (12 U.S.C. § 3347; Policy Statement 9.)				The State failed to report 7 AMCs to the AMC Registry.	On March 5, 2025, the State reported that its oversight pertained to AMCs that had zero AMC Registry fees and has been corrected. At the same time, the State reported that 3 of the AMCs were initially registered after the State's annual AMC report was due, and that it had not required 4 of the AMCs to submit an annual AMC report because none had an Arkansas appraiser perform a covered transaction in the previous year.	The State must ensure the accuracy of all data submitted to the AMC Registry.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
Enforcement:	X			No compliance issues noted.	N/A	None	None