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**Appraisal Subcommittee**  
*Federal Financial Institutions Examination Council*

January 12, 2011

Ms. Jill Whitlock, Chair  
Oregon Appraiser Certification and  
Licensure Board  
3000 Market Street, NE Suite 541  
Salem, OR 97301

RE: ASC Compliance Review of Oregon's appraiser regulatory program

Dear Ms. Whitlock:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of Oregon's appraiser regulatory program (Program) on July 13-15, 2010. This is the final ASC Compliance Review Report (Report) on that Review.

The ASC has considered the preliminary findings regarding the Review and the State's response. The ASC has determined the Program is in substantial compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended. Please also be advised this letter and the attached Report are public record and available on the ASC website in accordance with the Freedom of Information Act.

Please contact us if you have any questions.

Sincerely,



Deborah S. Merkle  
Chairman

Attachment

cc: Mr. Bob Keith, Administrator

## ASC Compliance Review Report

Finding: In Substantial Compliance

Report Issue Date: January 11, 2011

**Oregon Appraiser Regulatory Program (Program)**

<b>Oregon Appraiser Certification and Licensure Board (Board)</b>	PM: V. Ledbetter	ASC Compliance Review (Review) Date: July 13-15, 2010	Review Period: July 2008 to July 2010
Umbrella Agency: Independent		Number of State credentialed appraisers on National Registry: 1742	Issue: FINAL

Requirement/Guidance	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required State Actions	Recommended State Actions	General Comments
	YES	NO	AC					
<b>Oregon Statutes, Regulations, Policies and Procedures:</b>	X			No compliance issues noted.	N/A	None	None	None
<b>Temporary Practice:</b>	X							
States must recognize on a temporary basis appraiser credentials issued by another State if the property to be appraised is part of a federally related transaction. (Title XI § 1118 (a), 12 U.S.C. 3347; Title XI § 1122 (a), 12 U.S.C. 3351; AQB Real Property Appraiser Qualification Criteria; ASC Policy Statement 5.)				Effective January 1, 2010, the Board ceased issuing State licensed level credentials to new applicants. Board staff was not aware of the need to continue issuing temporary practice permits to those who hold a valid State appraiser license from another jurisdiction.	On September 22, 2010, the Board reported to ASC staff that although the Board no longer issues licensed residential credentials, the members understand their obligation to recognize out-of-state temporary practice applicants. Though the Board has not, to date, received a request, licensed level individuals will not be denied.	None	None	During the next Review, ASC staff will pay particular attention to this area for compliance with AQB Criteria.
<b>National Registry:</b>	X			No compliance issues noted.	N/A	None	None	None
<b>Application Process:</b>	X			No compliance issues noted.	N/A	None	None	None
<b>Reciprocity:</b>	X			No compliance issues noted.	N/A	None	None	None

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	YES	NO	AC					
<b>Education:</b>	X							
States should ensure that course approval expiration dates assigned by the State coincide with course approval expiration dates assigned by AQB's CAP and/or IDECC. (Title XI § 1118 (a), 12 U.S.C. 3347; AQB Real Property Appraiser Qualification Criteria.)				The list of Board approved qualifying and continuing education courses did not contain expiration dates for the course approvals. The Board does require approval of distance education courses by the Appraiser Qualifications Board Course Approval Program (CAP) and/or the International Distance Education Certification Center (IDECC). Though some distance education courses on the State's approved list had expired CAP and/or IDECC approval, ASC staff did not find these courses being relied upon for appraiser credentialing or renewal.	During the on-site Review, the Board took immediate action to review all approved distance education courses, and eliminated those for which IDECC and/or CAP approval had expired.  On September 22, 2010, the Board reported that in the future, they will ensure all distance education course approvals by the Board coincide with CAP/IDECC expirations. The Board also reconfirmed that no credentials were issued or renewed based on non-compliant distance education courses.	None	None	The Board's resolution addressed the concern. During the next Review, ASC staff will pay particular attention to this area for compliance with AQB Criteria.
<b>Enforcement:</b>	X							
				No compliance issues noted.	N/A	None	None	None