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Appraisal Subcommittee
Federal Financial Institutions Examination Council

February 28, 2020

Ms. Sarah Norberg, Attorney
Real Estate Appraisers Board
Division of Legal Services and Compliance
Department of Safety and Professional Services
P O Box 7190
Madison, WI 53707-7190

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

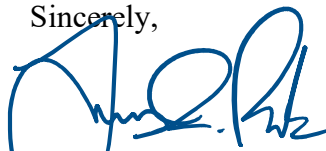
Dear Ms. Norberg:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Wisconsin AMC regulatory program (AMC Program) on November 18-20, 2019, to determine the AMC Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

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." Areas of concern that were identified are being addressed by the AMC Program. Wisconsin will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Wisconsin AMC Program is attached.

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,



James R. Park
Executive Director

Attachment
cc: Mr. Tom Ryan, Division Administrator

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.

ASC State AMC Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: February 28, 2020

Wisconsin AMC Regulatory Program (State)			
Wisconsin Real Estate Appraisers Board (Board)	PM: K. Klamet	ASC Compliance Review Date: November 18-20, 2019	Review Period: June 2017 to November 2019
Umbrella Agency: Department of Safety & Professional Services		Number of AMCs on AMC Registry: 0	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				
Participating States must impose requirements on AMCs consistent with the AMC Rule. (12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; Policy Statement 8.)				An AMC must notify appraisers on its appraiser panel before their removal from the panel. The State allows an AMC to remove an appraiser from its panel, without notice, within the first 60 days after the appraiser is first added to the appraiser panel.	On February 11, 2020, the State reported legislation amending the statute to bring it into compliance with Title XI was submitted to the Legislature and could be signed into law as early as the end of February 2020.	The State should continue the process to amend its statutes to bring them into compliance with Title XI, and provide the ASC staff with a copy once finalized.	None
National Registry:	X						
				No compliance issues noted.	N/A	None	None
Enforcement:	X						
				No compliance issues noted.	N/A	None	None