

October 5, 2023

Via Email

Richard Monteaux, Board Chair
Chad Koch, Administrator
Appraiser Certification and Licensure Board
200 Hawthorne Ave SE, Ste C-302
Salem, OR 97301
rmonteaux@earthlink.net
Chad.Koch@alcb.oregon.gov

RE: ASC Compliance Review of Oregon's Appraiser Regulatory Program

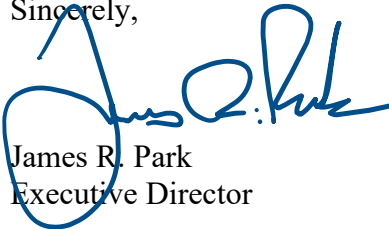
Dear Richard Monteaux and Chad Koch:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Oregon appraiser regulatory program (Appraiser Program) on June 13-15, 2023, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Good." Areas of concern that were identified are being addressed by the Appraiser Program. Oregon will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Oregon Appraiser 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: Paul Lindsay, Budget Manager, Paul.lindsay@aclb.oregon.gov

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 Appraiser Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: October 5, 2023

Oregon Appraiser Regulatory Program (State)		
Appraiser Certification and Licensure Board (Board)	PM: N. Fenochietti	ASC Compliance Review Date: June 13-15, 2023
Umbrella Agency: Independent	Number of State Credentialed Appraisers on Appraiser Registry: 1,468	Review Period: July 2021 - June 2023
		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
Temporary Practice:	X			No compliance issues noted.	N/A	None	None
National Registry:			X	The State did not report 2 disciplinary actions to the Appraiser Registry.	On September 7, 2023, the State reported that this occurred due to the vacation of one of the staff. The State has since assigned an additional staff member as back-up to ensure this does not re-occur.	None	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 3.
Application Process:	X			No compliance issues noted.	N/A	None	None
Reciprocity:	X			No compliance issues noted.	N/A	None	None
Education:	X			No compliance issues noted.	N/A	None	None
Enforcement:			X				



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	YES	NO	AC				
States must resolve all complaints filed against appraisers within one year (12 months) of the complaint filing date in the absence of special documented circumstances. (12 U.S.C. § 3347; Policy Statement 7 B.)				The State had 15 aged complaints that were unresolved for more than 1 year without the exemption for special documented circumstances.	On September 7, 2023, the State reported that in 2019, a second compliance officer position was filled and that improved the Board's complaint processing time and closure rate. However, in March of 2020, the Governor's Executive Order 20-12 (Stay Home, Save Lives Order) interfered with the improved processing time. To further assist in resolving complaints timely, the investigative staff implemented a Compliance Audit Program that provides additional paths to complaint settlement.	The State should monitor its revised processes to ensure complaints are resolved timely and the backlog of aged complaints is eliminated.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 7.