

June 25, 2025

Via Email

E. C. Neelly, IV, Executive Director
Mississippi Real Estate Appraiser Licensing
and Certification Board
239 North Lamar Street, Suite 502
Jackson, MS 39201
ECN@mab.ms.gov

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

Dear E. C. Neelly:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Mississippi AMC regulatory program (AMC Program) on August 27-29, 2024, to determine the 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 is given an ASC Finding of "Needs Improvement." The final ASC Compliance Review Report (Report) of the Mississippi AMC Program is attached.

The ASC identified the following area(s) of non-compliance:

- States must have the authority to collect and transmit to the Appraisal Subcommittee annual registry fees from an appraisal management company that either has registered with a State appraiser certifying and licensing agency or operates as a subsidiary of a federally regulated financial institution;²
- States must ensure the accuracy of all data submitted to the AMC Registry;³
- States are required to ensure that staff authorization information provided to the ASC is updated and accurate;⁴ and

¹ 12 U.S.C. §§ 3331-3356

² 12 U.S.C. § 3338(a)(4); 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 9

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

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

- States must designate a senior official, such as an executive director, who will serve as the State's Authorized Registry Official, and provide to the ASC, in writing, information regarding the selected Authorized Registry Official, and any individual(s) authorized to act on their behalf.⁵

The ASC considers the State's proactive responses to the Preliminary Report to be indicative of an earnest effort to remedy non-compliance. ASC staff will confirm appropriate corrective actions have been taken during the next Review. Mississippi will remain on a two-year Review Cycle.

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,



Luke H. Brown
Vice Chair

Attachment

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

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: Needs Improvement

Final Report Issue Date: June 25, 2025

Mississippi AMC Regulatory Program (State)			
Mississippi Real Estate Appraisal Board (Board)	PM: K. Klamet	ASC Compliance Review Date: August 27-29, 2024	Review Period: June 2022 to August 2024
Umbrella Agency: Independent	Number of AMCs on AMC Registry: 92		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					
States must have the authority to collect and transmit to the Appraisal Subcommittee annual registry fees from an appraisal management company that either has registered with a State appraiser certifying and licensing agency or operates as a subsidiary of a federally regulated financial institution. (12 U.S.C. § 3338(a)(4); 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 9.)				A review of the State's statutes and regulations revealed the following inconsistencies with Title XI regarding: (1) the State's authority to collect and transmit annual registry fees from Federally Regulated AMCs for the AMC Registry; and (2) the State does not correctly calculate the annual fee according to the AMC Fee Rule.	On January 27, 2025, the State reported that a regulation was adopted that specifically provides the Board with the authority to collect and transmit the annual registry fees with the correct calculation. At the same time, the State reported that the application/renewal forms have been updated to ensure accurate reporting and transmission of fees.	The State must continue to ensure its authority to collect and transmit annual fees to the AMC Registry from federally regulated AMCs.	The State addressed the concern. During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
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 4 AMCs to the AMC Registry and failed to inactivate 1 AMC on the AMC Registry.	On January 27, 2025, the State reported that a Policy was adopted to ensure all data submitted from the State to the AMC Registry is timely and accurate.	The State must continue to ensure all data submitted to the AMC Registry is timely and accurate.	The State addressed the concern. During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.

<div></div> <div>ASC State AMC Program Compliance Review Report</div>						ASC Finding: Needs Improvement	
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Umbrella Agency: Independent				Number of AMCs on AMC Registry: 92		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				
National Registry continued:		X					
States are required to ensure that staff authorization information provided to the ASC is updated and accurate. (12 U.S.C. § 3347; Policy Statement 9.)				The State failed to ensure that the authorization information for access to the AMC Registry was updated and accurate.	On January 27, 2025, the State reported that a Policy was adopted and implemented to identify persons authorized to access the AMC Registry. At the same time, the State reported that the Policy will also ensure access authorization(s) are updated and accurate.	The State must continue to ensure that the authorization information for access to the AMC registry is updated and accurate.	The State addressed the concern. During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
National Registry continued:		X					
States must designate a senior official, such as an executive director, who will serve as the State’s Authorized Registry Official, and provide to the ASC, in writing, information regarding the selected Authorized Registry Official, and any individual(s) authorized to act on their behalf. (12 U.S.C. § 3347; Policy Statement 9.)				The State failed to designate a senior official, such as an executive director, to serve as the State’s Authorized Registry Official.	On January 27, 2025, the State reported that a rule was adopted that specifically designates the Executive Director of the Appraisal Board as the selected Authorized Registry Official.	The State must continue to ensure it has an official designated to serve as the State's Authorized Registry Official.	The State addressed the concern. 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