Appraisal Subcommittee
Federal Financial Institutions Examination Council

FYI Cover Page

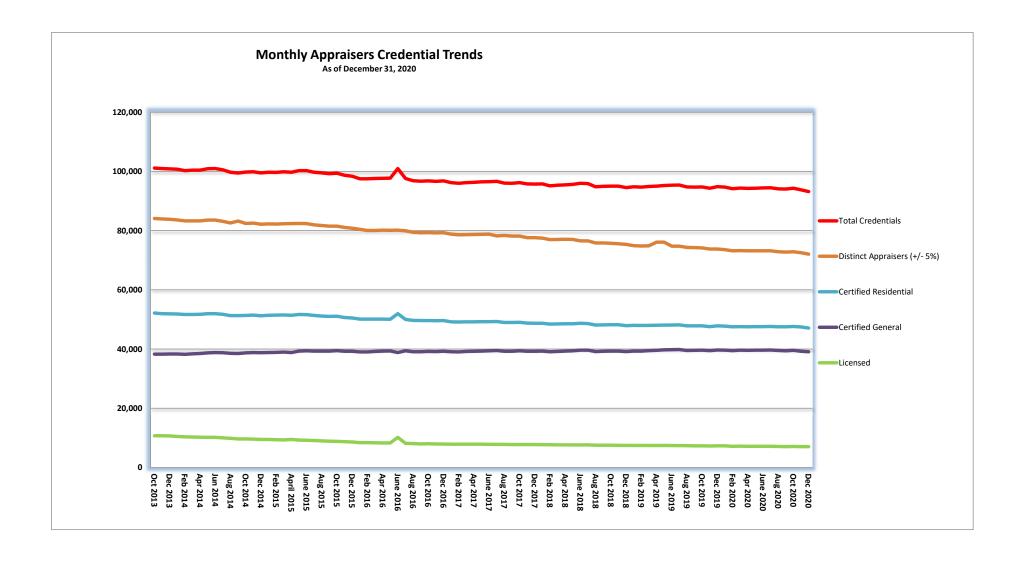
March 10, 2021

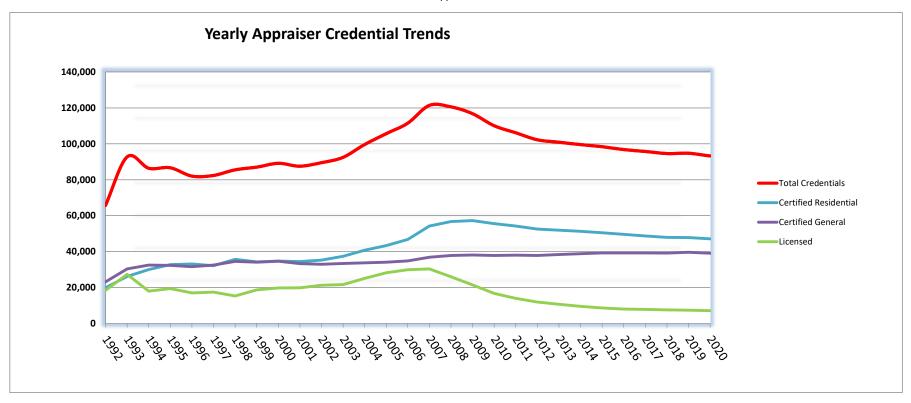
Appraisal Subcommittee Members (Revised as of January 19, 2021)

Agency	Member	Alternate Member
CFPB	John Schroeder (Vice-Chair)	Orlando Orellano
	Regional Director – Midwest Region	Assistant Regional Director – Midwest
	Supervision, Enforcement and Fair Lending	Region
	Consumer Financial Protection Bureau	Consumer Financial Protection Bureau
	230 S. Dearborn Street, Suite 1590	230 S. Dearborn Street, Suite 1590
	Chicago, IL 60604	Chicago, IL 60604
	P: 312-610-8948	P: 312-610-8953
	C: 202-591-5938	C: 202-573-1010
	Email: John.Schroeder@cfpb.gov	Email: Orlando.Orellano@cfpb.gov
FDIC	John Jilovec	Rae-Ann Miller
	Deputy Regional Director	Associate Director
	Division of Risk Management Supervision	Risk Management Policy Branch
	Federal Deposit Insurance Corporation	Division of Risk Management Supervision
	Kansas City Regional Office	Federal Deposit Insurance Corporation
	1100 Walnut Street, Suite 2100	550 17 th Street NW
	Kansas City, MO 64106	Washington, DC 20429
	P: 816-234-8141	P: 202-898-3898
	C: 816-309-1779	Email: RMiller@fdic.gov
	Email: <u>JJilovec@fdic.gov</u>	
FHFA	Maria Fernandez	Robert Witt
	Senior Associate Director	Senior Policy Analyst
	Office of Housing and Regulatory Policy	Office of Housing & Regulatory Policy
	Division of Housing Mission & Goals	Division of Housing Mission & Goals
	Federal Housing Finance Agency	Federal Housing Finance Agency
	400 7 th Street SW	400 7 th Street SW
	Washington, DC 20219	Washington, DC 20219
	P: 202-649-3102	P: 202-649-3128
	Email: Maria.Fernandez@fhfa.gov	Email: Robert.Witt@fhfa.gov
FRB	Keith Coughlin	
	Assistant Director	
	Community & Regional Bank Supervision	
	Division of Supervision and Regulation	
	Board of Governors of the Federal Reserve System	
	20 th & C Streets NW	
	Washington, DC 20551	
	P: 202-452-2056	
	C: 202-294-9232	
	Email: Keith.J.Coughlin@frb.gov	

Appraisal Subcommittee Members (Revised as of January 19, 2021)

Agency	Member	Alternate Member
HUD	Bobbi Borland Director Home Valuation Policy Division Office of Single Family Program Development U.S. Department of Housing & Urban Development 451 7 th Street SW, Room 9272 Washington, DC 20410-8000 P: 202-402-5244 Email: Bobbi.L.Borland@hud.gov	Brian Barnes Acting Deputy Director Home Valuation Policy Division Office of Single Family Program Devel. U.S. Department of Housing & Urban Development 451 7 th Street SW, Room 9270 Washington, DC 20410-8000 P: 202-402-6467 Email: Brian.S.Barnes@hud.gov
NCUA	Tim Segerson (Chair) Deputy Director Office of Examination & Insurance National Credit Union Administration 1775 Duke Street Alexandria, VA 22314-3428 P: 703-518-6397 C: 716-228-4993 Email: Segerson@ncua.gov	
OCC	Enice Thomas, CFE Deputy Comptroller for Credit Risk Office of the Comptroller of the Currency 400 7th Street SW Washington, DC 20219 P: 202-649-8281 C: 202-286-2954 Email: Enice.Thomas@occ.treas.gov	James Rives National Bank Examiner Bank Supervision Policy – Credit Risk Office of the Comptroller of the Currency 400 7 th Street SW, 7W-114 Washington, DC 20219 P: 202-649-6594 C: 202-294-1823 Email: James.Rives@occ.treas.gov





Year-End Appraiser Credentials						
Certified Certified						
Year-End	General	Residential	Licensed	Transitional	Total Credentials	
1992	23,133	19,772	18,406	4,405	65,716	
1993	30,348	26,163	27,316	8,882	92,709	
1994	32,450	29,949	17,960	6,043	86,402	
1995	32,305	32,733	19,375	2,244	86,657	
1996	31,628	33,141	16,984	226	81,979	
1997	32,519	32,161	17,371	318	82,369	
1998	34,485	35,697	15,287	23	85,492	
1999	34,082	34,237	18,676	24	87,019	
2000	34,609	34,702	19,755	28	89,094	
2001	33,246	34,401	19,837	23	87,507	
2002	32,959	35,233	21,261	37	89,490	
2003	33,394	37,418	21,575	47	92,434	
2004	33,725	40,726	25,095	46	99,592	
2005	34,074	43,327	28,185	52	105,638	
2006	34,812	46,701	29,921	51	111,485	
2007	36,881	54,177	30,286	63	121,407	
2008	37,851	56,704	25,931	65	120,551	
2009	38,061	57,253	21,434	43	116,791	
2010	37,807	55,522	16,674	23	110,026	
2011	38,016	54,201	13,900	13	106,130	
2012	37,834	52,504	11,875	12	102,225	
2013	38,332	51,893	10,648	1	100,874	
2014	38,777	51,240	9,507	0	99,524	
2015	39,257	50,472	8,622	0	98,351	
2016	39,246	49,631	7,926	0	96,803	
2017	39,262	48,720	7,749	0	95,731	
2018	39,135	47,908	7,481	0	94,524	
2019	39,606	47,776	7,321	0	94,703	
2020	39,070	47,073	7,061	0	93,204	

	Monthl		iser Cr	edentiai	Trenas	
Date	Certified General	Certified Residential	Licensed	Transitional	Total Credentials	Appraise (+/- 5%)
Oct 2013	38,273	52,170	10,711	1	101,155	84,122
Nov 2013	38,298	51,971	10,703	1	100,973	83,921
Dec 2013	38,332	51,893	10,648	1	100,874	83,809
Jan 2014	38,359	51,835	10,524	1	100,719	83,611
Feb 2014	38,239	51,669	10,349	0	100,257	83,276
Mar 2014	38,407	51,701	10,301	0	100,409	83,274
Apr 2014	38,473	51,751	10,190	0	100,414	83,277
May 2014	38,721	51,940	10,231	0	100,892	83,554
Jun 2014 Jul 2014	38,818 38,757	51,936 51,734	10,202	0	100,956 100,521	83,542 83,125
Aug 2014	38,570	51,734	9,842	0	99,741	82,562
Sep 2014	38,526	51,278	9,650	0	99,454	83,236
Oct 2014	38,735	51,384	9,635	0	99,754	82,449
Nov 2014	38,835	51,441	9,596	0	99,872	82,521
Dec 2014	38,777	51,240	9,507	0	99,524	82,164
Jan 2015	38,828	51,419	9,460	0	99,707	82,249
Feb 2015	38,865	51,448	9,358	0	99,671	82,187
Mar 2015	39,012	51,538	9,342	0	99,892	82,299
April 2015	38,828	51,419	9,460	0	99,707	82,354
May 2015	39,315	51,680	9,249	0	100,242	82,428
June 2015	39,435	51,617	9,195	0	100,247	82,366
July 2015	39,290	51,335	9,101 9,009	0	99,726 99.482	81,950
Aug 2015 Sept 2015	39,309 39,284	51,164 51,056	8,889	0	99,482	81,740 81,527
Oct 2015	39,480	51,085	8,833	0	99,398	81,502
Nov 2015	39,282	50,672	8,751	0	98,705	81,069
Dec 2015	39,257	50,472	8,622	0	98,351	80,806
Jan 2016	39,032	50,105	8,378	0	97,515	80,407
Feb 2016	39,027	50,104	8,379	0	97,510	80,062
Mar 2016	39,187	50,107	8,325	0	97,619	80,055
Apr 2016	39,288	50,097	8,294	0	97,679	80,170
May 2016	39,352	50,072	8,277	0	97,701	80,114
June 2016	38,818	51,936	10,202	0	100,956	80,160
July 2016	39,394	50,010	8,196	0	97,600	79,935
Aug 2016 Sep 2016	39,099 39,092	49,672 49,622	8,078 7,995	0	96,849 96,709	79,441 79,297
Oct 2016	39,201	49,622	8,001	0	96,824	79,334
Nov 2016	39,128	49,591	7,934	0	96,653	79,219
Dec 2016	39,246	49,631	7,926	0	96,803	79,302
Jan 2017	39,119	49,210	7,899	0	96,228	78,794
Feb 2017	39,029	49,131	7,842	0	96,002	78,577
Mar 2017	39,196	49,173	7,851	0	96,220	78,663
Apr 2017	39,256	49,214	7,854	0	96,324	78,683
May 2017	39,333	49,265	7,852	0	96,450	78,732
June 2017	39,429	49,259	7,855	0	96,543	78,789
July 2017	39,513	49,309	7,833	0	96,655	78,235
Aug 2017	39,265	48,994	7,793	0	96,052	78,386
Sep 2017 Oct 2017	39,241 39,404	49,005 49,022	7,759 7,778	0	96,005 96,204	78,174 78,142
Nov 2017	39,229	48,763	7,778	0	95,749	77,596
Dec 2017	39,262	48,720	7,749	0	95,731	77,629
Jan 2018	39,316	48,689	7,744	0	95,749	77,478
Feb 2018	39,087	48,420	7,635	0	95,142	76,968
Mar 2018	39,190	48,492	7,644	0	95,326	77,034
Apr 2018	39,310	48,530	7,628	0	95,468	77,066
May 2018	39,418	48,556	7,637	0	95,611	77,002
June 2018	39,627	48,700	7,638	0	95,965	76,551
July 2018	39,623	48,603	7,643	0	95,869	76,519
Aug 2018	39,126	48,126	7,529	0	94,781	75,825 75,822
Sep 2018 Oct 2018	39,246 39,300	48,195 48,219	7,518 7,514	0	94,959 95,033	75,822
Nov 2018	39,300	48,217	7,514	0	95,022	75,548
Dec 2018	39,135	47,908	7,481	0	94,524	75,339
Jan 2019	39,320	47,990	7,483	0	94,793	74,894
Feb 2019	39,305	47,953	7,449	0	94,707	74,793
Mar 2019	39,468	48,007	7,426	0	94,901	74,839
Apr 2019	39,589	48,039	7,413	0	95,041	76,110
May 2019	39,728	48,085	7,424	0	95,237	76,129
June 2019	39,778	48,130	7,424	0	95,332	74,763
July 2019	39,846	48,146	7,411	0	95,403	74,760
Aug 2019	39,551	47,824	7,377	0	94,752	74,332
Sep 2019 Oct 2019	39,573 39,630	47,836 47,822	7,308 7,299	0	94,717 94,751	74,262 74,142
Nov 2019	39,630	47,822	7,299	0	94,751	74,142
Dec 2019	39,679	47,828	7,262	0	94,848	73,774
Jan 2020	39,639	47,732	7,307	0	94,678	73,565
Feb 2020	39,448	47,501	7,185	0	94,134	73,170
Mar 2020	39,613	47,555	7,192	0	94,360	73,235
Apr 2020	39,563	47,508	7,161	0	94,232	73,213
May 2020	39,607	47,553	7,158	0	94,318	73,187
June 2020	39,642	47,594	7,167	0	94,403	73,177
July 2020	39,686	47,626	7,160	0	94,472	73,177
Aug 2020	39,502	47,512	7,105	0	94,119	72,886
Sep 2020	39,418	47,542	7,061	0	94,021	72,756
Oct 2020	39,569	47,623	7,104	0	94,296	72,852
Nov 2020	39,260	47,446	7,071	0	93,777	72,559

APPRAISAL SUBCOMMITTEE OPEN SESSION MEETING MINUTES MAY 13, 2020

LOCATION: Zoom Conference

ATTENDEES

ASC MEMBERS: CFPB – John Schroeder

FDIC – John Jilovec FHFA – Robert Witt FRB – Art Lindo HUD – Bobbi Borland NCUA – Tim Segerson OCC – James Rives

ASC STAFF: Executive Director – Jim Park

Deputy Executive Director – Denise Graves

General Counsel – Alice Ritter Grants Director – Mark Abbott Financial Manager – Girard Hull Attorney-Advisor – Ada Bohorfoush

Management and Program Analyst – Lori Schuster

Administrative Officer – Brian Kelly

Regulatory Affairs Specialist – Maria Brown

Policy Manager – Claire Brooks Policy Manager – Kristi Klamet Policy Manager – Jenny Tidwell

OBSERVERS: Please see attached list

The Meeting was called to order at 10:00 a.m. by Chair T. Segerson.

REPORTS

• Chair

T. Segerson welcomed the observers. He reported that OCC's primary member and ASC Vice Chair, R. Taft, has accepted another position. J. Rives, currently the OCC's alternate member, will be the acting OCC representative. T. Segerson thanked R. Taft for his service to the ASC and wished him well.

• Executive Director

- J. Park updated the ASC on recent staff activity.
- This is the first virtual ASC Meeting and thanked attendees for their interest.

- He reported on steps taken by the ASC, the Appraiser Qualifications Board and States to identify areas where relief and assistance is most needed during the COVID-19 pandemic.
- The Association of Appraiser Regulatory Officials (AARO) was helpful with the virtual presentation of the ASC Grants Program to States. This presentation had been scheduled for AARO's Spring Conference which was cancelled.
- J. Schroeder asked if the Government Accountability Office (GAO) has contacted the ASC regarding the request from the House Financial Services Committee to GAO to study the federal agencies' implementation of Title XI. J. Park responded "no." J. Schroeder also asked if North Dakota will be requesting an extension of the temporary waiver. J. Park responded that North Dakota has not submitted an extension request and has not heard anything from them regarding their intentions.

• Delegated State Compliance Reviews

A. Bohorfoush reported on State Program Compliance Reviews completed pursuant to delegated authority since the ASC's February 12th Meeting. Three State Appraiser Program Compliance Reviews were finalized and approved by the Executive Director under delegated authority. Kansas, Rhode Island and Wisconsin were awarded a Finding of "Good" and all will remain on a two-year Review Cycle. One State Appraiser Program Compliance Review was finalized and approved by the Chair under delegated authority. Puerto Rico earned a finding of "Needs Improvement" and will remain on a two-year Review Cycle.

There were three State AMC Program Compliance Reviews finalized and approved by the Executive Director under delegated authority. Kansas was awarded a Finding of "Excellent" and will remain on a two-year Review Cycle. Illinois and Wisconsin were awarded a Finding of "Good" and both will remain on a two-year Review Cycle. One State AMC Program Compliance Review was finalized and approved by the Chair under delegated authority. Rhode Island earned a rating of "Needs Improvement" and will remain on a two-year Review Cycle.

The Illinois Appraiser Program requested and was granted an extension to the deadlines contained in the final Appraiser Program Compliance Review Report. The deadline has been extended from April 24 to October 31, 2020 as the Division of Real Estate is largely conducting its operations with a remote work force. The Illinois Governor issued an Executive Order directing State agencies to temporarily reduce activities due to the COVID-19 pandemic. Illinois did submit a quarterly complaint log on May 1st and of the 148 open complaints, 15 of those have been open for more than one year. ASC staff expects that many of those would be removed for special documented circumstances.

• Grants Report

M. Abbott updated the ASC on the Grants Program. Currently two grants have been awarded: one for the Investigator Training Program (ITP) administered by the Appraisal Foundation (TAF) and one for the grant-eligible activities of the Appraiser Qualifications and Appraisal Standards Boards. The ITP grant has been executed but has not had much activity due to the COVID-19 pandemic. The second grant for Board support remains approved by the ASC but not executed by TAF.

M. Abbott shared a brief summary of the presentation that was given to States describing the ASC State Grant Program. The presentation is available on the ASC and AARO websites. ASC staff is also considering in-person training for FY21.

• Financial Manager

G. Hull provided the mid-year financial status for FY20. The ASC has recognized revenue of \$3.2M, or 51% of the annual budgeted revenue of \$6.4M. Appraiser registry fees account for \$1.8M, or 54% of mid-year revenue, and AMC registry fees account for \$1.M, or 46% of mid-year revenue. ASC expenditures totaled \$2.1M, or 42% of the annual budget of roughly \$4.9M, and \$391K less than budgeted mid-year expenditures. ASC travel costs have decreased significantly due to the COVID-19 pandemic. IT Project Services are expected to increase for the remainder of FY20. J. Schroeder asked if there is an appropriate level for the reserve fund, and if so, how to maintain that level. G. Hull responded that the reserve balance is equal to one year of operating costs, or approximately \$4.2M, not including grants. M. Abbott added that some of the reserve will be transferred to a new account for grants. J. Schroeder asked why Personnel Benefits are lower than the budgeted amount. G. Hull responded that the General Services Administration provides a monthly cash report to him. Due to COVID-19 related work delays, the March cash report did not include complete payroll data for March. This information was included in the April cash report received on May 8th and has been recorded in the April financial statements.

• Notation Vote

L. Schuster reported that approval to distribute and post the February 10, 2020 ASC Roundtable Summary passed by a 7-0 vote on April 21, 2020.

ACTION ITEMS

• February 12, 2020 Open Session Minutes

J. Schroeder made a motion to approve the February 12th open session meeting minutes as presented. J. Rives seconded and all members present voted to approve.

• February 12, 2020 Closed Session Minutes

J. Schroeder made a motion to approve the February 12th closed session meeting minutes as edited by FDIC. J. Rives seconded and all members present voted to approve.

• April 9, 2020 Special Meeting Minutes

J. Schroeder made a motion to approve the April 9th special session meeting minutes as presented. J. Rives seconded and all members present voted to approve.

• Selection of ASC Vice Chair

T. Segerson stated that with the departure of R. Taft, the Vice-Chair position is vacant. J. Schroeder notified T. Segerson that he would be interested in the position. No other ASC member expressed interest. A voice vote was taken, and all members voted to approve the selection of J. Schroeder as Vice-Chair for a two-year period. J. Schroeder abstained. T. Segerson asked J. Park if FFIEC approval is needed and J. Park responded "no."

Policy on Monitoring and Reviewing the Appraisal Foundation

J. Park summarized the current monitoring process and the proposed policy which would formalize the process. A. Lindo suggested the section regarding Round Tables and Hearings be removed since the ASC has statutory authority to convene roundtables or public hearings on appraisal-related issues. All ASC members agreed that this section should be removed. T. Segerson asked for a motion to approve the Policy with edits as discussed above. A voice vote was taken, and all members present voted to approve.

• Review and Approval of 2020 State Grant Notice of Funding Availability (NOFA) Summary

M. Abbott summarized the NOFA for the ASC. There will be quarterly deadlines of August 17 and October 1, 2020, as well as 2021 deadlines of March 1st and June 1st. The award period will be for three years (October 1, 2020 – September 30, 2023). The grant funds will support ongoing (e.g., annual participation in conferences or software subscriptions) and onetime (e.g., computer upgrades or IT development projects) expenditures in categories that include: (1) Technology; (2) Travel; (3) Communications; (4) Training; (5) Supplies; and (6) Other. He plans to schedule technical assistance calls with States in the future. J. Jilovec asked if the recommendations from the Appraisal Subcommittee Advisory Committee for Development of Regulations (ASCAC) were considered in the preparation of the NOFA. J. Park responded that ASC staff took the recommendations from ASCAC into consideration. J. Rives asked if the quarterly deadlines would change to an annual deadline in the future. He also wanted to know if the quarterly deadlines would create additional work for ASC staff. M. Abbott responded that flexibility was allowed for this year due to the COVID-19 pandemic. If a grant is awarded six months into the fiscal year, the funds will cover the remaining six months of the fiscal year. Afterwards, the grant funds will cover one year. As some States will have challenges submitting a grant request due to the COVID-19 pandemic, grants awarded in FY21 would cover two years. He would prefer the grant awards be spread out rather than awarded at one time. This will allow ASC staff to work with the States. ASC staff will request that awardees submit a narrative of how grant funds were spent to ensure that funds were spent correctly. J. Rives asked if there is an algorithm to determine how much funding would be obligated for grants. M. Abbott responded that ASC staff does not

know what types of grant proposals will be submitted but felt that \$10M over three years was a reasonable amount. The ASC would need to approve an increase in funds. T. Segerson asked if the ASC should have controls in place regarding State supplantation of funds if a grant is awarded. M. Abbott responded that State staff are also concerned about supplantation of funds. This will be mitigated by insisting that proposed grant activities are new activities or an expansion of existing activities. There is no Federal statute regarding supplantation of funds. Due to the COVID-19 pandemic, State budgets may be severely cut. During his grant presentation to States last week, M. Abbott asked States to let ASC staff know what types of funding would be helpful. T. Segerson asked how the funds would be transferred to a State once a grant is awarded. M. Abbott responded that funds would be committed but not obligated. The Financial Manager will prepare a new report showing the reserve balance, obligated grant funds and committed grant funds. Only first year grant awards will be obligated. T. Segerson asked if the ASC will have adequate funding for its operations and grants. M. Abbott responded that one-year of operating funds will be in the reserve and will be separate from grant funds. Grant commitments will be subject to future revenue. J. Jilovec made a motion to approve the 2020 NOFA as presented. J. Schroeder seconded and all members present voted to approve.

• 2019 ASC Annual Report

A. Bohorfoush presented the 2019 ASC Annual Report for approval. She said the FFIEC logo on the back cover will be removed. J. Schroeder made a motion to approve the 2019 ASC Annual Report as presented. J. Rives seconded and all members present voted to approve.

The Open Session adjourned at 11:30 a.m. The next regularly scheduled ASC Meeting will be held on September 9, 2020.

Attachment: Observer list

Meeting:	Appraisal Subcommittee Meeting	Meeting Date:	May 13, 2020
Time:	10:00 a.m. ET	Location:	Zoom

Name	Affiliation			
David Bunton	Appraisal Foundation			
Kelly Davids	Appraisal Foundation			
Lisa Desmarais	Appraisal Foundation			
Edna Nkemngu	Appraisal Foundation			
Amy Timmerman	Appraisal Foundation			
Jeremy Gray	Appraisal Foundation Board of Trustees			
Lisa Hobart	Appraisal Foundation Board of Trustees			
Ronny Johnson	Appraisal Foundation Board of Trustees			
Wayne Miller	Appraisal Standards Board			
Mark Lewis	Appraiser Qualifications Board			
Bill Garber	Appraisal Institute			
Brian Rodgers	Appraisal Institute			
Steven Feyerick	American Society of Farm Managers & Rural Appraisers			
Deanna Ilk	American Society of Farm Managers & Rural Appraisers			
Brian Stockman	American Society of Farm Managers & Rural Appraisers			
Julie Friess	Arizona real estate appraiser			
Leah Callahan	Columbia Bank			
Deana Krumhansl	Consumer Financial Protection Bureau			
Orlando Orellano	Consumer Financial Protection Bureau			

Name	Affiliation
Michael Briggs	Federal Deposit Insurance Corporation
Suzy Gardner	Federal Deposit Insurance Corporation
Ben Gibbs	Federal Deposit Insurance Corporation
Ming-Yuen Meyer Fong	Federal Housing Finance Agency
Marie DeGregorio	Federal Reserve Board
Trevor Feigleson	Federal Reserve Board
David Imhoff	Federal Reserve Board
Joe Maldonado	Federal Reserve Board
Matthew McQueeney	Federal Reserve Board
Derald Seid	Federal Reserve Board
John Lynch	JPMorgan Chase
Steve Sousa	Massachusetts Board of Real Estate Appraisers
Rachel Ackmann	National Credit Union Administration
Will Binkley	Office of the Comptroller of the Currency
Stacey Fluellen	Office of the Comptroller of the Currency
Joanne Phillips	Office of the Comptroller of the Currency

APPRAISAL SUBCOMMITTEE SPECIAL MEETING MINUTES JULY 29, 2020

LOCATION: Zoom

ATTENDEES

ASC MEMBERS: CFPB – John Schroeder

FDIC – John Jilovec FHFA – Robert Witt FRB – Art Lindo HUD – Bobbi Borland NCUA – Tim Segerson OCC – James Rives

ASC STAFF: Executive Director – Jim Park

Deputy Executive Director – Denise Graves

General Counsel – Alice Ritter Grants Director – Mark Abbott Financial Manager – Girard Hull Attorney-Advisor – Ada Bohorfoush

Management and Program Analyst – Lori Schuster

Administrative Officer – Brian Kelly

Regulatory Affairs Specialist – Maria Brown

Policy Manager – Claire Brooks Policy Manager – Kristi Klamet Policy Manager – Vicki Metcalf Policy Manager – Jenny Tidwell

OBSERVERS: (See attached list)

The Meeting was called to order at 4:00 p.m. by Chair T. Segerson.

ACTION ITEMS

North Dakota Request to Extend Commercial Temporary Waiver Relief

T. Segerson opened the Special Meeting and welcomed observers. He noted that ASC staff will provide a summary and staff recommendation regarding the Request from North Dakota. He added that there would be no public comments taken at this Special Meeting.

J. Park provided the summary and staff recommendation:

Title XI authorizes the ASC to waive, on a temporary basis and subject to approval of the FFIEC, "any requirement relating to certification or licensing of a person to perform appraisals under [Title XI]" upon "a written determination that

there is a scarcity of certified or licensed appraisers to perform appraisals in connection with federally-related transactions (FRT) in a State, or in any geographical political subdivision of a State, leading to significant delays in the performance of such appraisals." The ASC has promulgated regulations that set forth procedures that govern the processing of temporary waiver requests. On August 1, 2018, the Governor of North Dakota, the North Dakota Department of Financial Institutions, and the North Dakota Bankers Association (Requesters) submitted a temporary waiver request to the ASC. The Requesters sought a temporary waiver of not less than five years of appraiser credentialing requirements for appraisals of FRTs under \$500,000 for 1-to-4 family residential real estate transactions and under \$1,000,000 for agricultural and commercial real estate transactions throughout the State of North Dakota. On July 9, 2019, the ASC convened a Special Meeting to consider the request. Based on the information provided by the Requester, the North Dakota Real Estate Appraiser Qualifications and Ethics Board (Appraiser Board) and by the public through comment letter submissions, the ASC issued an Order approving a limited version of the waiver request. The Order was published in the Federal Register, and in pertinent part included a temporary waiver of appraiser credentialing requirements for appraisals of FRTs under \$1,000,000 for commercial real estate transactions throughout the State of North Dakota for a period of one year and residential FRTs below \$500,000. (The temporary waiver for residential real estate transactions terminated on December 8, 2019 due to the federal banking agencies final rule that increased the appraisal exemption threshold for residential real estate transactions that became effective on October 9, 2019.) The Order included an option for the Requester to submit certain information to the ASC at least 30 days prior to the expiration of the one-year period and the ASC would consider the information submitted and by vote, in open session, may extend the temporary waiver for an additional one-year period. On July 6, 2020, the Requesters submitted an extension request and as amended on July 8, 2020, sought extension of the commercial real estate transaction temporary waiver relief for an additional one-year period. In their July 6th submission, the Requesters reported that a November 6, 2019 meeting had been held with North Dakota stakeholders, including appraisers. Requesters provided a list of 25 "ideas and potential solutions" identified by the meeting's 58 attendees as potential steps to address appraiser scarcity or appraisal delays. The Requesters stated that a follow-up meeting was planned for the spring of 2020, but that "due to the challenges presented by the COVID-19 pandemic, all in-person meetings and conventions were canceled when travel became restricted and everyone responded to the crisis." The Requesters further stated that "although our collaboration efforts have been disrupted for the time being, we are anticipating future collaboration to do as much as we can locally." In support of their assertion that a scarcity of appraisers persists in North Dakota, the Requesters cited data from the Appraiser Board indicating that the number of certified general appraisers has fallen from 67 as of September 17, 2018, to 65 as of April 30, 2020. The Requesters reported that a May 2020 survey by the North Dakota Department of

Financial Institutions found that turnaround times for commercial appraisals have improved over the past year (which Requesters attributed to the current waiver and the increased appraisal threshold for credit unions for commercial real estate transactions) but 23 percent of respondents still reported delays more than 50 percent of the time and 23 percent of respondents reported 5 or more delays in the past 12 months. The ASC also received information from the Appraiser Board. The Appraiser Board stated that a July 2020 survey found that at least 80 percent of commercial appraisers responding reported appraisal turn times of five weeks or less in each of North Dakota's six regions. According to the same survey, 90 percent of agricultural appraisers responding, reported appraisal turn times of six weeks or less in five of North Dakota's six regions. To summarize ASC staff's recommendations to the Board, staff found that while the information submitted by the Requesters is less than robust than expected to support a one-year extension under the terms of the original Order, we acknowledge extenuating and unprecedented circumstances due to the national emergency declared on March 13, 2020. ASC staff recognizes the significant impact to all parties due to the pandemic. It is reasonable to conclude that the Requesters' intentions to further collaborate with financial institutions as well as other North Dakota stakeholders were negatively impacted by the disruption resulting from COVID-19. If the ASC votes to extend the commercial transaction temporary waiver for an additional one-year term, staff recommends that it be subject to specified terms and conditions as follows:

- 1. During the additional one-year period, Requesters are expected to continue efforts to develop, through continued dialogue with the Appraiser Board and other North Dakota stakeholders, a plan to identify potential solutions to address appraiser scarcity and appraisal delays; and
- 2. The ASC may terminate the waiver on a finding that significant delays in the receipt of appraisals for FRTs no longer exists, or that the terms and conditions of the Order ore not being satisfied.

T. Segerson thanked J. Park and requested comments from ASC members. J. Schroeder recognized that the Requesters did make efforts in 2019 to meet with stakeholders consistent with the 2019 Order. He also noted that COVID-19 has provided challenges to financial institutions to serve their customers and described recent regulatory flexibilities provided by bank regulatory agencies. He supported granting a one-year waiver with the conditions noted above. A. Lindo agreed with J. Schroeder's comments adding that the ASC wants to maintain its focus on resolving the scarcity and delay issues, but the current circumstances require flexibility. B. Borland disagreed stating that all lenders are dealing with the pandemic. She added the Requesters had seven months to make progress before a national pandemic was declared in March 2020. She stated that she voted against the temporary waiver in 2019 and would not support an additional one-year waiver. She did not feel that the Requesters provided the specific information requested by the Order in their July 6th extension request and that the Appraiser Board provided information to refute information submitted by the Requesters. J. Jilovec agreed with comments provided by J. Schroeder and

A. Lindo and was inclined to support the one-year temporary waiver extension. B. Witt said he voted against the temporary waiver in 2019 and would have considered voting no on this request if not for the pandemic. Due to the pandemic, he supports extending the temporary waiver for one year. While he felt that documentation provided by the Requesters was weak, the pandemic allows for some latitude. J. Rives agreed with others in support of approving the temporary waiver for an additional year. He also agreed with B. Witt that while the documentation provided by the Requesters was insufficient, the pandemic should be considered an extenuating circumstance. T. Segerson said he voted in support of the waiver request in 2019 with reservations. He would have liked to have seen more progress along with more detailed information provided in the extension request; however, this temporary waiver was requested by State authorities, and due to the pandemic, he stated it was worthwhile to provide the one-year extension. He then asked for a motion to be put forward.

R. Witt moved to approve the temporary waiver for an additional one-year period through August 7, 2021. J. Schroeder requested an amendment to the motion, which was adopted, as follows:

Commercial temporary waiver relief should be extended for an additional one-year period, subject to specified terms and conditions, and subject to FFIEC approval, as follows:

- 1. A temporary waiver of appraiser credentialing requirements for appraisals of FRTs under \$1,000,000 for commercial real estate transactions throughout the State of North Dakota is extended for an additional one-year period, expiring August 7, 2021.
- 2. During the additional one-year period, Requesters are expected to continue efforts to develop, through continued dialogue with the Appraiser Board and other North Dakota stakeholders, a plan to identify potential solutions to address appraiser scarcity and appraisal delays.
- 3. The ASC pursuant to 12 CFR 1102.7 may terminate this waiver order on a finding that significant delays in the receipt of appraisals for FRTs no longer exists, or that the terms and conditions of the order are not being satisfied.

Art Lindo seconded the motion, and the vote passed 6-1 with HUD voting no. T. Segerson requested a roll call vote for the record:

J. Schroeder – yes; J. Jilovec – yes; R. Witt – yes; J. Rives – yes; B. Borland – no; A. Lindo – yes; T. Segerson – yes.

The Open Session adjourned at 4:25 p.m. The next regularly scheduled ASC Meeting will be held on September 9, 2020.

Attachment: Observer List

Meeting:	Appraisal Subcommittee Meeting	Meeting Date:	July 29, 2020
Time:	4:00 PM ET	Location:	Zoom Meeting

Name	Affiliation			
Justin Kane	American Society of Appraisers			
David Bunton	Appraisal Foundation			
Kelly Davids	Appraisal Foundation			
Jim Amorin	Appraisal Institute			
Scott DiBiasio	Appraisal Institute			
Bill Garber	Appraisal Institute			
Brian Rodgers	Appraisal Institute			
Wade Becker	Boulder Appraisal, LLC			
Dan Berkland	Conference of State Bank Supervisors			
Mary Beth Quist	Conference of State Bank Supervisors			
Deana Krumhansl	Consumer Financial Protection Bureau			
Orlando Orellano	Consumer Financial Protection Bureau			
Brian Field	Crown Appraisals, Inc.			
Megan Sheeley	Crown Appraisals, Inc.			
Tyler Walsh	Crown Appraisals, Inc.			
Joe Ibach	Dakota Appraisal & Consulting			
Richard Foley	Federal Deposit Insurance Corporation			
Suzy Gardner	Federal Deposit Insurance Corporation			
Ben Gibbs	Federal Deposit Insurance Corporation			

Name	Affiliation				
Lauren Whitaker	Federal Deposit Insurance Corporation				
Kaelin Browne	Federal Financial Institutions Examination Council				
Judith Dupre	Federal Financial Institutions Examination Council				
Ming-Yuen Meyer-Fong	Federal Housing Finance Agency				
Keith Coughlin	Federal Reserve Board				
Trevor Feigleson	Federal Reserve Board				
Carmen Holly	Federal Reserve Board				
David Imhoff	Federal Reserve Board				
Derald Seid	Federal Reserve Board				
Matt Schlenvogt	Gate City Bank				
Richard Tsuhara	General Accountability Office				
Steve Pleger	Georgia Department of Banking & Finance				
William Gion	Gion Appraisal, LLC				
Brandy March	Iowa Real Estate Appraiser Examining Board				
Stephen Sousa	Massachusetts Board of Real Estate Appraisers				
Jonathan Miller	Miller Samuel, Inc.				
James Rist	Minnesota Department of Commerce				
Rachel Ackmann	National Credit Union Administration				
Gira Bose	National Credit Union Administration				
Ian Marenna	National Credit Union Administration				
Cate Agnew	Natixis				
Lise Kruse	North Dakota Department of Financial Institutions				

Name	Affiliation			
Jodie Campbell	North Dakota Real Estate Appraisers Board			
Corey Kost	North Dakota Real Estate Appraisers Board			
Tim Timian	North Dakota Real Estate Appraisers Board			
Luke Schields	North Dakota Senator Hoeven's Office			
Eric Oberg	Oberg Appraisals, Inc.			
Will Binkley	Office of the Comptroller of the Currency			
Stacey Fluellen	Office of the Comptroller of the Currency			
Kevin Lawton	Office of the Comptroller of the Currency			
Joanne Phillips	Office of the Comptroller of the Currency			
Susan Broaddus	Regulatory Report			
Patrick Keefe	Regulatory Report			
Vance Patton	Tennessee Appraiser			
Greg Gonzales	Tennessee Department of Financial Institutions			

Appraiser News, Conference Coverage



ASC exec updates appraisers

Appraiser News, Conference Coverage

Monday, December 14, 2020



Appraisal Subcommittee (ASC) Executive Director Jim Park gave an industry update to conference attendees at this year's virtual Appraisal Summit. Park addressed confusion he believes the profession has when it comes to the workings of the appraisal regulatory system.

"The U.S. appraisal regulatory system is unique in the world of financial regulation. I am not aware of a comparable system domestically or abroad," Park told *Valuation Review* following the conference. "The unique and somewhat complicated aspects of the system lead to some misunderstandings. The appraisal regulatory system consists of three main partners in the states, the Appraisal Foundation (a non-profit organization) and the Appraisal Subcommittee (federal government agency).

"The ASC of the Federal Financial Institutions Examination Council (FFIEC) was created on Aug. 9, 1989, pursuant to Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (Title XI). Title XI's purpose is to 'provide that federal financial and public policy interests in real estate transactions will be protected by requiring that real estate appraisals utilized in connection with federally related transactions are performed in writing, in accordance with uniform standards, by individuals whose competency has been demonstrated and whose professional conduct will be subject to effective supervision'," Park added.

The executive said in order to carry out the purposes of Title XI, Congress empowered the ASC to:

- Monitor the requirements established by the states, territories, and the District of Columbia and their
 appraiser regulatory agencies for the certification and licensing of appraisers, and for the registration and
 supervision of the operations and activities of an appraisal management companies (AMCs). The ASC
 reviews each state's compliance with the requirements of Title XI and is authorized by Title XI to take action
 against noncomplying states. The ASC has rulemaking and enforcement authority.
- Monitor the requirements established by the Federal Financial Institutions Regulatory Agencies regarding
 appraisal standards for federally related transactions and determinations of which federally related
 transactions will require the services of state-licensed or state-certified appraisers.
- Maintain a national registry of state-licensed and certified appraisers who may perform appraisals in connection with federally related transactions.
- Maintain a national registry of AMCs that either are registered with and subject to supervision of a state agency or are operating subsidiaries of a federally regulated financial institution.
- Monitor and review the practices, procedures, activities, and organizational structure of the Appraisal Foundation. ASC staff actively monitors all activities of the foundation.

- Provide grant funds to the foundation to support Title XI-related activities of the foundation's Appraiser Qualifications Board and Appraisal Standards Board.
- Provide grant funds to state agencies to support their Title XI-related

activities.

There are some key steps regarding the ASC making sure the states know what is expected of them concerning meeting outlined appraisal requirements.

"The ASC provides policy statements to the state agencies that explain the ASC's expectations for Title XI compliance," Park said. "ASC policy managers conduct compliance reviews of state regulatory programs at least once every two years. At times states may be required to provide additional information, including routine reports when deficiencies in the state program are identified that require additional monitoring and oversight."

"Additionally, ASC policy managers work with the states' programs on an ongoing basis to ensure they have access to the information needed for them to comply with Title XI," he said.

And just like most businesses and organizations, the ASC had some noteworthy areas to point out as it relates to dealing with COVID-19 and its many impacts. What were some of the more noteworthy areas the ASC had to deal with as far as the impacts from COVID-19?

Specifically, he said state compliance reviews were canceled for 2020 and policy managers shifted their focus to technical assistance to the states rather than compliance.

Compliance reviews, Park went on to say, will likely be canceled for at least the first quarter of 2021 and ASC staff is currently developing an off-site assessment program that will allow it to monitor and review aspects of state programs that can be shared electronically.



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Fannie Mae exec discusses industry focus on diversity

Home prices continue upward momentum

Report: Safest cities in America released

SoCal VA homes say new loan limit falls short

Iron Solutions launches technology to assist in valuating equipment



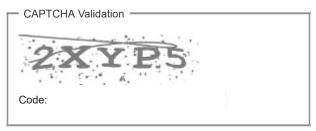
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- 1. Interpretation of Results: (to be written by agency)
- **2. How the survey was conducted:** The survey was conducted online from September 14, 2020, to October 2, 2020.
- **3. Description of sample:** All 14 full-time permanent employees of the agency were surveyed.
- **4. Survey items and response choices:** See the tables on the following pages.
- 5. Number of employees surveyed, number who responded, and representativeness of respondents: Of the 14 employees surveyed, 12 responded, for a 86% response rate. These respondents are representative of the population.

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	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	Total
Frequencies	10	2	0	0	0	12
Percentages	83.3%	16.7%	0.0%	0.0%	0.0%	100.0%
Frequencies	5	4	2	0	0	11
Percentages	45.5%	36.4%	18.2%	0.0%	0.0%	100.0%
Frequencies	6	3	3	0	0	12
Percentages	50.0%	25.0%	25.0%	0.0%	0.0%	100.0%
Frequencies	8	2	2	0	0	12
Percentages	66.7%	16.7%	16.7%	0.0%	0.0%	100.0%
Frequencies	8	2	1	1	0	12
Percentages	66.7%	16.7%	8.3%	8.3%	0.0%	100.0%
	Very Good	Good	Fair	Poor	Very Poor	Total
Frequencies	9	1	1	0	0	11
Percentages	81.8%	9.1%	9.1%	0.0%	0.0%	100.0%
	Frequencies Percentages Frequencies Percentages Frequencies Percentages Frequencies Percentages Frequencies Percentages Frequencies Frequencies Frequencies	Strongly Agree Frequencies 10 Percentages 83.3% Frequencies 5 Percentages 45.5% Frequencies 6 Percentages 50.0% Frequencies 8 Percentages 66.7% Frequencies 8 Percentages 9	Agree Agree Frequencies 10 2 Percentages 83.3% 16.7% Frequencies 5 4 Percentages 45.5% 36.4% Frequencies 6 3 Percentages 50.0% 25.0% Frequencies 8 2 Percentages 66.7% 16.7% Frequencies 8 2 Percentages 66.7% 16.7% Very Good Good Good Frequencies 9 1	Strongly Agree Agree Neither Frequencies 10 2 0 Percentages 83.3% 16.7% 0.0% Frequencies 5 4 2 Percentages 45.5% 36.4% 18.2% Frequencies 6 3 3 Percentages 50.0% 25.0% 25.0% Frequencies 8 2 2 Percentages 66.7% 16.7% 16.7% Frequencies 8 2 1 Percentages 66.7% 16.7% 8.3% Very Good Good Fair Frequencies 9 1 1	Strongly Agree Agree Neither Disagree Frequencies 10 2 0 0 Percentages 83.3% 16.7% 0.0% 0.0% Frequencies 5 4 2 0 Percentages 45.5% 36.4% 18.2% 0.0% Frequencies 6 3 3 0 Percentages 50.0% 25.0% 25.0% 0.0% Frequencies 8 2 2 0 Percentages 66.7% 16.7% 16.7% 0.0% Frequencies 8 2 1 1 Percentages 66.7% 16.7% 8.3% 8.3% Very Good Good Fair Poor Frequencies 9 1 1 0	Strongly Agree Agree Neither Disagree Strongly Disagree Frequencies 10 2 0 0 0 Percentages 83.3% 16.7% 0.0% 0.0% 0.0% Frequencies 5 4 2 0 0 Percentages 45.5% 36.4% 18.2% 0.0% 0.0% Frequencies 6 3 3 0 0 0 Percentages 50.0% 25.0% 25.0% 0.0% 0.0% 0.0% Frequencies 8 2 2 0

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Prescribed Questions: Recruitment, Development, & Retention								
Item Text		Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	Do Not Know	Total
7. The workforce has the job-relevant knowledge and skills	Frequencies	9	3	0	0	0	0	12
necessary to accomplish organizational goals.	Percentages	75.0%	25.0%	0.0%	0.0%	0.0%		100.0%
O. Marriage contribute a halo to many it manufactorists the gight of the	Frequencies	4	7	1	0	0	0	12
8. My work unit is able to recruit people with the right skills.	Percentages	33.3%	58.3%	8.3%	Disagree 0 0.0%	0.0%		100.0%
9. I know how my work relates to the agency's goals and	Frequencies	7	3	1	0	0	0	11
priorities.	Percentages	63.6%	27.3%	9.1%	0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0%	0.0%		100.0%
	Frequencies	8	2	2	0	0	0	12
10. The work I do is important.	Percentages	66.7%	16.7%	16.7%	Disagree I 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0%	0.0%		100.0%
7. The work I do is important. Percenta	Frequencies	9	2	0	0	0	1	11
employees to perform their jobs well.	Percentages	81.8%	18.2%	0.0%	0.0%	0.0%		100.0%
12. Supervisors in my work unit support employee	Frequencies	7	3	2	0	0	0	12
development.	Percentages	58.3%	25.0%	16.7%	0.0%	0.0%		100.0%
40. Martin Landa and a constant and a constant and	Frequencies	7	3	2	0	0	0	12
13. My talents are used well in the workplace.	Percentages	58.3%	25.0%	16.7%	0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0	0.0%		100.0%
	Frequencies	4	4	4	0	0	0	12
14. My training needs are assessed.	Percentages	33.3%	33.3%	33.3%	0.0%	0.0%		100.0%

Surveys Sent. 14	Surveys INC	uilleu. 12	·		respons	e Nate. o	0 /0	
Prescribed Questions: Performance Culture								
Item Text		Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	Do Not Know	Total
45 December 10 mars in the second of the sec	Frequencies	4	3	5	0	0	0	12
15. Promotions in my work unit are based on merit.	Percentages	33.3%	25.0%	41.7%	0.0%	0.0%		100.0%
16. In my work unit, steps are taken to deal with a poor	Frequencies	3	3	4	0	0	2	10
performer who cannot or will not improve.	Percentages	30.0%	30.0%	40.0%	0.0% 0 0.0% 0 0.0% Disagree 0 0.0%	0.0%		100.0%
47. One shirity and improved an area managed	Frequencies	5	2	5	0	0	0	12
17. Creativity and innovation are rewarded.	Percentages	41.7%	16.7%	41.7%	0.0%	0.0%		100.0%
Item Text		Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	No Basis to Judge	Total
18. In my most recent performance appraisal, I understood what I had to do to be rated at different performance levels (e.g., Fully Successful, Outstanding).	Frequencies	6	6	0	0	0	0	12
	Percentages	50.0%	50.0%	0.0%	0.0%	0.0%		100.0%
Item Text		Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	Do Not Know	Total
19. In my work unit, differences in performance are	Frequencies	5	4	3	0	0	0	12
recognized in a meaningful way.	Percentages	41.7%	33.3%	25.0%	0 0.0% 0 0.0% 0 0.0% Disagree 0 0.0% Disagree 0 16.7% 0	0.0%		100.0%
20. Pay raises depend on how well employees perform	Frequencies	3	4	3	2	0	0	12
their jobs.	Percentages	25.0%	33.3%	25.0%	16.7%	0.0%		100.0%
21. My performance appraisal is a fair reflection of my	Frequencies	5	5	1	0	0	1	11
performance.	Percentages	45.5%	45.5%	9.1%	0.0%	0.0%		100.0%
22. Discussions with my supervisor about my performance	Frequencies	7	4	0	0	0	0	11
are worthwhile.	Percentages	63.6%	36.4%	0.0%	0.0%	0.0%		100.0%
23. Supervisors work well with employees of different	Frequencies	5	6	0	0	0	1	11
backgrounds.	Percentages	45.5%	54.5%	0.0%	0.0%	0.0%		100.0%
24. My supervisor supports my need to balance work and	Frequencies	9	3	0	0	0	0	12
family issues.	Percentages	75.0%	25.0%	0.0%	0.0%	0.0%		100.0%

Prescribed Questions: Leadership								
Item Text		Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	Do Not Know	Total
25. I have a high level of respect for my organization's	Frequencies	6	4	2	0	0	0	12
senior leaders.	Percentages	50.0%	33.3%	16.7%	0.0%	0.0%		100.0%
26. In my organization, leaders generate high levels of	Frequencies	4	6	2	0	0	0	12
motivation and commitment in the workforce.	Percentages	33.3%	50.0%	16.7%	0 0.0%	0.0%		100.0%
27. Managers review and evaluate the organization's	Frequencies	6	4	2	0	0	0	12
progress toward meeting its goals and objectives.	Percentages	50.0%	33.3%	16.7%	0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0%	0.0%		100.0%
28. Employees are protected from health and safety	Frequencies	6	3	0	0	0	2	9
hazards on the job.	Percentages	66.7%	33.3%	0.0%	0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0%	0.0%		100.0%
29. Employees have a feeling of personal empowerment	Frequencies	5	5	2	0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0%	0	0	12
with respect to work processes.	Percentages	41.7%	41.7%	16.7%	0.0%	0.0%		100.0%
	Frequencies	4	8	0	0	0	0	12
30. My workload is reasonable.	Percentages	33.3%	66.7%	0.0%	0.0%	0.0%		100.0%
31. Managers communicate the goals and priorities of the	Frequencies	6	6	0	0	0	0	12
organization.	Percentages	50.0%	50.0%	0.0%	0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0%	0.0%		100.0%
32. My organization has prepared employees for potential	Frequencies	5	4	2	0	0	1	11
security threats.	Percentages	45.5%	36.4%	18.2%	0.0%	0.0%		100.0%

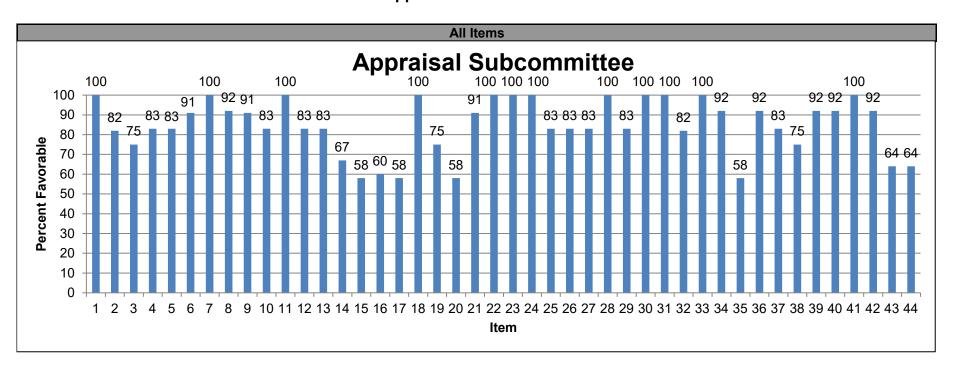
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Prescribed Questions: Job Satisfaction								
Item Text		Very Satisfied	Satisfied	Neither	Dis- satisfied	Very Dis- satisfied		Total
33. How satisfied are you with the information you receive	Frequencies	5	7	0	0	0		12
from management on what's going on in your organization?	Percentages	41.7%	58.3%	0.0%	0.0%	0.0%		100.0%
34. How satisfied are you with your involvement in	Frequencies	6	5	1	0	0		12
decisions that affect your work?	Percentages	50.0%	41.7%	8.3%	0 0.0%	0.0%		100.0%
35. How satisfied are you with your opportunity to get a	Frequencies	5	2	5	0	0		12
better job in your organization?	Percentages	41.7%	16.7%	41.7%	satisfied 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0	0.0%		100.0%
36. How satisfied are you with the recognition you receive	Frequencies	5	6	1	0	0		12
for doing a good job?	Percentages	41.7%	50.0%	8.3%	0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0 0.0% 0	0.0%		100.0%
37. How satisfied are you with the policies and practices of	Frequencies	5	5	2	0	0		12
your senior leaders?	Percentages	41.7%	41.7%	16.7%	0.0%	0.0%		100.0%
38. How satisfied are you with the training you receive for	Frequencies	4	5	3	0	0		12
your present job?	Percentages	33.3%	41.7%	25.0%	0.0%	0.0%		100.0%
39. Considering everything, how satisfied are you with your	Frequencies	9	2	1	0	0		12
job?	Percentages	75.0%	16.7%	8.3%	0.0%	0.0%		100.0%
40. Considering everything, how satisfied are you with your	Frequencies	5	6	1	0	0		12
pay?	Percentages	41.7%	50.0%	8.3%	0.0%	0.0%		100.0%

Surveys Sent: 14 Surveys Returned: 12 Response Rate: 86%

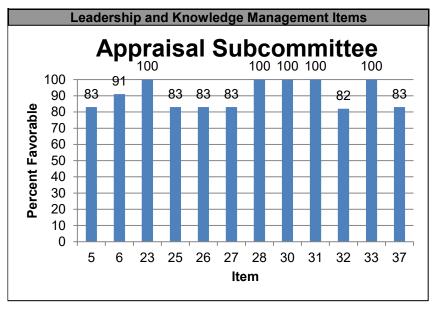
Additional Questions								
Item Text		Very Satisfied	Satisfied	Neither	Dis- satisfied	Very Dis- satisfied		Total
41. Considering everything, how satisfied are you with your	Frequencies	6	6	0	0	0		12
organization?	Percentages	50.0%	50.0%	0.0%	0.0%	0.0%		100.0%
Item Text		Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	Do Not Know	Total
42. I recommend my organization as a good place to work.	Frequencies 8 3 1	0	0	0	12			
42. Trecommend my organization as a good place to work.	Percentages	66.7%	25.0%	8.3%	0.0%	0.0%		100.0%
43. I believe the results of this survey will be used to make	Frequencies	4	3	2	2	0	1	11
my agency a better place to work.	Percentages	36.4%	27.3%	18.2%	18.2%	0.0%		100.0%
44. I can disclose a suspected violation of any law, rule or	Frequencies	5	2	4	0	0	1	11
regulation without fear or reprisal.	Percentages	45.5%	18.2%	36.4%	0.0%	0.0%		100.0%

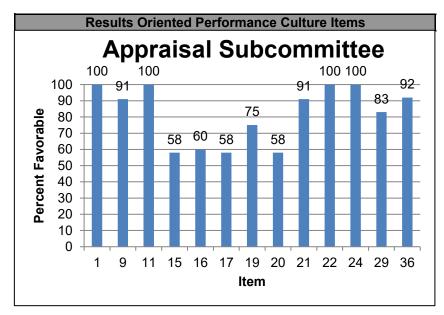
HCAAF Indices

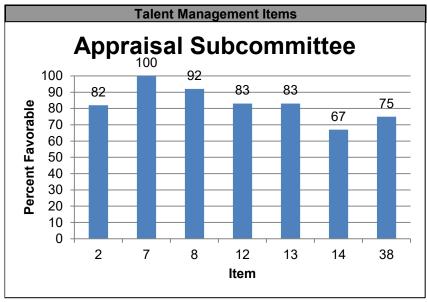
Index	% Favorable
Leadership and Knowledge Management	91%
Results Oriented Performance Culture	82%
Talent Management	83%
Job Satisfaction	82%



2020 Annual Employee Survey Results For Appraisal Subcommittee Results by HCAAF Index









Appraisal Subcommittee

Federal Financial Institutions Examination Council

October 13, 2020

Via Email: AQB@appraisalfoundation.org

Mr. Mark A. Lewis, Chairman Appraiser Qualifications Board 1155 15th St. NW #1111 Washington, DC 20005

Dear Chairman Lewis:

The Appraisal Subcommittee (ASC) staff appreciates the opportunity to comment on the Second Exposure Draft of *Practical Applications of Real Estate Appraisal* (PAREA). These comments reflect the opinions of ASC staff and are not necessarily those of the ASC or its member agencies.

We have supported the PAREA concept since the first Concept Paper was published over five years ago, as well as other paths to obtaining an appraiser credential. However, significant questions that could undermine its success remain unanswered, including:

- cost to potential users
- investment to develop the training
- approval by States

The AQB maintains that PAREA is intended to satisfy the experience requirement, not education. The experience component of the *Real Property Appraiser Qualification Criteria* (Criteria) has been a significant barrier to entry for decades. This has taken on even more relevance considering the lack of diversity among appraisers.

If the AQB were to consider an alternative path to credentialing that did not include an experience component, PAREA could offer a hybrid solution as simulated experience in an educational environment. Title XI does not require experience. Therefore, PAREA as an education component could compliment an entirely different approach, such as an examination, in lieu of experience, that demonstrates practical application of appraisal theory and practice, similar to the legal and accounting professions. Using a practice-based examination without the need for experience would follow the model Congress recommended in a report on the initial implementation of Title XI.

The PAREA outline indicates that any PAREA program must be approved by the AQB. The approval of PAREA programs could instead be modeled after the Course Approval Program (CAP) which would allow the AQB to approve voluntarily submitted PAREA programs, and at the same time, allow the States to do so as well. The proposed Guide Notes are well thought out, comprehensive and would provide States with the ability to approve PAREA. This approach could increase the speed with which this concept can be brought to the marketplace.

¹¹ H.R. REP. No. 101-981, at 10 (1990).

PAREA as proposed is eligible to satisfy 100% of the Criteria's experience requirement. States can be more restrictive and allow only a portion of the required experience to be completed via PAREA. If the programs were designed in distinct modules (*e.g.*, by topic area or type of property), PAREA could gain more acceptance. For example, an appraiser who has no experience with Small Residential Income Property appraisals and wants to gain such experience could train using a module specifically designed for that purpose. Modules could also make PAREA more affordable and accessible.

The Mentor qualification requirements as proposed appear to be less than the Criteria's existing Supervisory Appraiser requirements. For example, Mentors are not required to take the Supervisory Appraiser Course; given the lack of prerequisites proposed for Mentors, the same shortcomings that exist with Supervisory Appraisers could carry over to Mentors. They could even be amplified since there is no limitation on the number of Trainees under a Mentor. Moreover, the financial incentive for having numerous Trainees could be significant. Additionally, the qualification requirements as proposed prohibit individuals who could be qualified such as retired appraisers, formerly credentialed appraisers, professional educators and those simply not active on the Appraiser Registry from becoming Mentors.

Finally, as proposed, PAREA creates a linear path to licensing or residential certification by requiring completed education before PAREA can be started. This differs from the existing Criteria by increasing the time required to obtain a credential, and thereby could pose a barrier to entry for a more diverse set of candidates.

The general concept of PAREA is a good one and we appreciate the hard work the AQB has put into this concept. We are particularly appreciative for the opportunity to share our thoughts and concerns for the AQB's consideration before adoption.

Please contact us if you have any questions.

James R. Park

Executive Director

Appraisal Subcommittee

Federal Financial Institutions Examination Council

February 18, 2021

Via Email: www.surveymonkey.com/r/ASBComments

Appraisal Standards Board Wayne R. Miller, Chair The Appraisal Foundation 1155 15th Street, NW Suite 1111 Washington, DC 20005

RE: ASC Staff Comments on Fourth Exposure Draft of Proposed Changes for the 2022-2023 edition of the USPAP; Advisory Opinion 16

Dear Chair Miller.

The Appraisal Subcommittee (ASC) staff appreciates the opportunity to comment on the Appraisal Standards Board's (ASB) Fourth Exposure Draft of proposed changes for the 2022-2023 edition of the *Uniform Standards of Professional Appraisal Practice* (USPAP). The following comments reflect the opinions of the ASC staff, not necessarily the ASC or its member agencies.

We appreciate the work the ASB performs on behalf of appraisers, regulators, users of appraisal services and consumers. We remain concerned about the cadence of USPAP changes, the burden and cost these changes generate for appraisers and other stakeholders, and the nexus between USPAP changes and Foundation revenue. This is even more concerning when the same issues are revisited.

Industry opinion on the Fourth Exposure Draft appears to be mixed. We share similar concerns to those expressed by some stakeholders regarding the changes proposed in Section 1. Section 1 is largely in response to the increased use of hybrid or bifurcated appraisals where the inspection is provided by a third party. We appreciate the concerns some of these appraisal assignments may cause for appraisers. However, development of appraisal products to assist in this regard could be beneficial to the financial markets and appraisal profession in the future. Since USPAP does not require any inspection of the subject property, we ask that the ASB consider whether this is an area that needs increased regulation.

The proposed changes to DEFINITIONS, such as Significant Professional Assistance and Assignment Results, will likely pose potential downstream impacts on trainees and other areas of the profession. We encourage you to ensure that the proper research and analysis be completed.

We applaud TAF's and the ASB's commitment to diversity and inclusion. We ask that you consider lines 198-200 in the 2020-2021 USPAP. This language could be construed to allow the use of supported conclusions to justify discriminatory findings as an ethical act.

Please contact us if you have any questions.

Sincerely,

James R. Park

Executive Director

Lori L. Schuster

From: James R. Park

Sent: Tuesday, December 22, 2020 9:15 AM **To:** Alice M. Ritter; Denise Graves; Mark Abbott

Cc: Lori L. Schuster

Subject: FW: 4th Exposure Draft for 2022-23 USPAP

FYI

Lori – please include this in the next meeting package.

From: Dave Towne <dtowne@fidalgo.net>
Sent: Saturday, December 19, 2020 9:05 PM
To: Dave Towne <dtowne@fidalgo.net>

Subject: 4th Exposure Draft for 2022-23 USPAP

The Appraisal Foundation/Appraisal Standards Board have released the **4**th **Exposure Draft** to the FUTURE version (**2022-23**) of USPAP.

I, like so many other 'stakeholders' and appraisers, have grown weary of the incessant Exposure Drafts and updates to our mandated PROTOCOL MANUAL, which for many years has been massaged and modified in various ways every 2 years. Largely because new members cycle onto the ASB every year or two.

The constant updates has resulted into a continuing cash cow for the TAF/ASB. But in actual use, that should not happen because USPAP is codified as 'law' in virtually every state and territory of the US. Nobody has to buy a copy of whatever 'law' applies to their profession except appraisers.

It's time to quit the constant updating process (after this FUTURE edition), and only update IF REALLY necessary at a minimum of every 4-5 years. (Yes....license renewal CE hours will be affected, but is not difficult to remedy.)

But, in quickly reading the info about pending (FUTURE) changes, I agree with one:

The ASB is proposing adding the word "appraiser" to describe exactly who is providing Significant Appraisal Assistance:

SIGNIFICANT APPRAISAL (or APPRAISAL REVIEW) ASSISTANCE: <u>assistance</u> that affects the assignment results and is provided by another appraiser <u>explicitly in</u> support of a particular assignment.

Ever since the words "significant appraisal assistance" were added to USPAP a few issues ago, the intent was never defined well. It was addressed in a FAQ in a subsequent USPAP, but many appraisers don't read that far into the tome.

You can access the 2022-23 Exposure Draft at the link below. **Follow directions in it if you want to provide comments**, as there is a new process to do that.

Dave Towne, MNAA, AVAA, AGA

Certified Residential RE Appraiser

19+ yrs Experience

FHA Approved

Accredited Green Appraiser

Specialist – HUD Sec. 184 Lending Pgms.

Freelance Writer - Appraisal Topics

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Towne Appraisals

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[DISCUSSION DRAFT]

116TH CONGRESS	T
2D Session	ı

H.R.

To establish an interagency Task Force to analyze Federal collateral underwriting standards and guidance, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

v1		introduced	the follo	owing bill	; which	was re	eterred t	o th
	Commi	ttee on						

A BILL

To establish an interagency Task Force to analyze Federal collateral underwriting standards and guidance, and for other purposes.

- 1 Be it enacted by the Senate and House of Representa-
- 2 tives of the United States of America in Congress assembled,
- 3 SECTION 1. SHORT TITLE.
- 4 This Act may be cited as the "Appraisal Fairness and
- 5 Improvement Act of 2020".
- 6 SEC. 2. FINDINGS.
- 7 The Congress finds the following:

1	(1) Two Federal agencies, the Federal Home
2	Owners' Loan Corporation and the Federal Housing
3	Administration played a major role in the develop-
4	ment of the modern home mortgage origination in-
5	dustry.
6	(2) Both Federal agencies explicitly considered
7	the racial and ethnic make up of neighborhoods
8	when underwriting loans and valuing the real estate
9	to be used as home loan collateral.
10	(3) Both agencies devalued property or refused
11	to make loans secured by property in communities of
12	color.
13	(4) The harmful consequences of this discrimi-
14	nation remain unresolved.
15	SEC. 3. REAL ESTATE VALUATION TASK FORCE.
16	(a) Establishment.—The Appraisal Subcommittee
17	of the Financial Institutions Examination Council shall fa-
18	cilitate the establishment and convening of an Interagency
19	Task Force on Real Estate Valuation (in this section re-
20	ferred to as the "Task Force").
21	(b) Members.—The Task Force shall consist of the
22	following members or their designees:
23	(1) The Director of the Federal Housing Fi-
24	nance Agency.

1	(2) The chairman of the board of directors of
2	the Federal National Mortgage Association.
3	(3) The Chairman of the Board of Directors of
4	the Federal Home Loan Mortgage Corporation.
5	(4) The President of the Government National
6	Mortgage Association.
7	(5) The Chairperson of the board of directors
8	of one of the Federal home loan banks, selected by
9	[?] .
10	(6) The Assistant Secretary of the Department
11	of Housing and Urban Development who is the Fed-
12	eral Housing Commissioner.
13	(7) The Undersecretary for Rural Development
14	of the Department of Agriculture.
15	(8) The Secretary of Veterans Affairs.
16	(9) The Director of the Bureau of Consumer
17	Financial Protection, who shall serve as the Chair-
18	person of the Task Force.
19	(c) Duties.—The Task Force shall—
20	(1) harmonize to the greatest extent possible
21	the various collateral underwriting standards and
22	guidance of the agencies and entities represented on
23	the Task Force governing residential and commer-
24	cial real estate valuations, including standards and
25	guidance with respect to appraisals, non-traditional

1	and alternative methods of providing real estate
2	property evaluations such as automated valuation
3	models, and standards and guidance with respect to
4	the valuation of energy efficient housing;
5	(2) to the extent that standards or guidance de-
6	scribed under paragraph (1) are not harmonized
7	each member of the Task Force shall issue a report
8	to Congress explaining why harmonization cannot or
9	should not be implemented;
10	(3) establish specific definitions for limited or
11	inactive housing markets in which comparable sales
12	are limited or unavailable over a certain period of
13	time, and establish greater flexibilities and guidance
14	for appraisals and any underwriting processes asso-
15	ciated with appraisals conducted in such markets
16	such as the ability to consider market evidence for
17	similar properties in other geographic areas;
18	(4) aggregate data across Task Force members
19	and conduct a study to determine whether there are
20	racial disparities at both the borrower and commu-
21	nity level in the valuation and price of the residential
22	real estate to be used as collateral for mortgage ap-
23	plications processed by Task Force Members;
24	(5) identify specific causes of such racial dis-
25	parities and—

1	(A) adopt changes to address such causes;
2	or
3	(B) if the Task Force determines that ad-
4	ditional statutory authority is needed to adopt
5	such changes, issue a report to Congress de-
6	scribing the needed statutory authority; and
7	(6) evaluate whether current minimum experi-
8	ence requirements established by the Appraiser
9	Qualifications Board are disproportionately pre-
10	venting minorities from entering into the appraisal
11	profession.
12	(d) Meetings.—The Task Force shall convene regu-
13	larly, including with the advisory committee described
14	under subsection (g), to carry out the duties under sub-
15	section (c) and submit the reports required under sub-
16	section (f).
17	(e) Sharing of Information.—Each agency and
18	entity represented on the Task Force shall share with the
19	Task Force any data of the agency or entity necessary
20	for the Task Force to carry out the duties of the Task
21	Force under this Act.
22	(f) Reports.—
23	(1) Initial.—The Chairperson of the Task
24	Force shall submit a report to the Congress not
25	later than the expiration of the 24-month period be-

1	ginning on the date of the enactment of this Act de-
2	tailing the findings and any actions taken to further
3	the duties of the Task Force as of such time and de-
4	scribing any planned efforts and activities.
5	(2) Ongoing.—Periodically after the submis-
6	sion of the report pursuant to paragraph (1), the
7	Chairperson shall submit reports to the Congress
8	setting forth updates of the findings and actions
9	taken to further the duties of the Task Force.
10	(g) Advisory Committee.—The Task Force shall
11	establish an advisory committee to provide advice with re-
12	spect to the duties of the Task Force. The advisory com-
13	mittee shall consist of—
14	(1) at least 2 civil rights advocates;
15	(2) at least 2 consumer advocates;
16	(3) at least 2 real estate appraisers (or rep-
17	resentatives of real estate appraiser trade groups);
18	(4) at least 1 small lender (or representative of
19	a trade group for small lenders);
20	(5) at least 1 representative of a trade group
21	that represents private investors; and
22	(6) at least 1 individual expertise on alternative
23	valuation models.

1	(h) Sunset.—The Task Force shall terminate upon
2	the expiration of the 5-year period beginning on the date
3	of the enactment of this Act.
4	SEC. 4. PROMOTING DIVERSITY AND INCLUSION IN THE AP-
5	PRAISAL PROFESSION.
6	The Financial Institutions Reform, Recovery, and
7	Enforcement Act of 1989 is amended—
8	(1) in section 1103(a) (12 U.S.C. 3332(a))—
9	(A) in paragraph (3), by striking "and" at
10	the end;
11	(B) in paragraph (4), by striking the pe-
12	riod at the end and inserting a semicolon;
13	(C) in paragraph (5), by striking the pe-
14	riod at the end and inserting a semicolon;
15	(D) in paragraph (6), by striking the pe-
16	riod at the end and inserting "a semicolon;
17	and"; and
18	(E) by adding at the end the following new
19	paragraph:
20	"(7) administer the grant program under sec-
21	tion 1122(j)."; and
22	(2) in section 1122 (12 U.S.C. 3351), by add-
23	ing at the end the following new subsection:
24	"(j) Grant Program to Promote Diversity and
25	Inclusion in the Appraisal Profession —

1	"(1) In General.—The Appraisal Sub-
2	committee shall carry out a program under this sub-
3	section to makes grants to State agencies, nonprofit
4	organizations, and institutions of higher education to
5	promote diversity and inclusion in the appraisal pro-
6	fession.
7	"(2) Eligible activities.—Activities carried
8	out with amounts from a grant under this Act shall
9	be designed to promote diversity and inclusion in the
10	appraisal profession, and may include—
11	"(A) funding scholarships;
12	"(B) providing training and education;
13	"(C) providing implicit bias training for
14	appraisers; and
15	"(D) other activities as determined appro-
16	priate to further the purposes of this grant pro-
17	gram by the Appraisal Subcommittee.
18	"(3) Allocation of funds.—In making
19	grants under this subsection, the Appraisal Sub-
20	committee shall—
21	"(A) allocate 50 percent of the funds made
22	available to Historically Black Colleges and
23	Universities or universities with degree pro-
24	grams approved by the Appraiser Qualifications

1	Board or a relevant State regulatory agency
2	for—
3	"(i) scholarships for students of color
4	who want to pursue a career in real estate
5	appraisal; and
6	"(ii) subsidizing living expenses for
7	those students while in training; and
8	"(B) allocate 20 percent of the funds to
9	cover the cost of fulfilling the experience re-
10	quirements or other applicable requirements
11	that the students described under subparagraph
12	(A) will need to complete in order to become
13	appraisers.
14	"(4) Administrative costs.—The Appraisal
15	Subcommittee may use 1 percent of amounts appro-
16	priated pursuant to paragraph (6) to cover the ad-
17	ministrative costs of carrying out this subsection.
18	"(5) Reports.—For each fiscal year during
19	which grants are made under the program under
20	this subsection, the Appraisal Subcommittee shall
21	submit a report to the Congress regarding imple-
22	mentation of the program and describing the grants
23	made and activities conducted using grant amounts.
24	"(6) Authorization of appropriations.—
25	There is authorized to be appropriated to the Ap-

- 1 praisal Subcommittee for grants under this sub-
- 2 section \$50,000,000 for each of fiscal years 2021
- 3 through 2025.".