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Appraisal Subcommittee

Federal Financial Institutions Examination Council

TO: Appraisal Subcommittee

FROM: Jim Park, Executive Director

DATE: July 27, 2022

RE: August 3, 2022 ASC Briefing Package

The August 3rd ASC Briefing Agenda includes the following items:

- Staff prioritization of NFHA Recommendations (included in briefing package)

As discussed at the July 22nd ASC Briefing, staff has prioritized the NFHA recommendations. The purpose of this agenda item is to continue the discussion on how to move forward addressing the recommendations. If possible, staff would like for the Board to reach a consensus on moving forward with the recommendations.

- Governance and ASC Delegations of Authority (included in briefing package)

It was requested at the July 22nd ASC Briefing to include this item on the August 3rd Briefing agenda. A copy of the current Delegations of Authority are attached. The purpose of this agenda item is discuss the existing Delegations of Authority and share views on any changes that should be considered. Amendments would be need to approved in an open session of the Board.

- Other business is a place holder for Board members and staff staff to provide updates or discuss issues not included on the agenda.



Appraisal Subcommittee
Federal Financial Institutions Examination Council

August 3, 2022

ASC Briefing Agenda

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Appraisal Subcommittee

*Federal Financial Institutions Examination
Council*

Briefing Agenda

Date: August 3, 2022

Time: 10:00 a.m. ET

Location: Go to the Link below to register for the Briefing

<https://www.zoomgov.com/meeting/register/vJItcemtrzMuHpvn2NI6vCU6hwfJDSdPBA>

Briefing Topic(s)

Opening Remarks

Chair Martinez

**NFHA Report/Staff Prioritization of
Recommendations**

J. Park

**Governance and ASC Delegations of
Authority**

J. Park

Other Business

**Chair Martinez/
J. Park**



Appraisal Subcommittee
Federal Financial Institutions Examination Council

**ASC Staff
Prioritization of
NFHA
Recommendations**

NFHA Recommendations Prioritization

July 27, 2022

Priority 1			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
Appraisal Foundation's (TAF) legal authority should be considered for further review, including any potential issues under the Constitution's nondelegation doctrine.	Refer to U.S. Department of Justice (DOJ) for an analysis/opinion on the legal issues raised in the NFHA Report.		
Repeal the requirement of financial donations to appoint board members.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Form an advisory council consisting only of nonprofit civil rights and consumer advocates.	Send a letter indicating support and request more detail on implementation (e.g., timing and selection process).		
Require the ASB and AQB to state the legal authority under which it is promulgating standards or criteria.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Require the ASB to make the complete text of USPAP Standards, including Advisory Opinions (AO), available to both appraisers and the public for no charge.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Require the ASB and AQB to consider the impact of proposed standards and criteria on consumers and neighborhoods, including consumers and neighborhoods of color. As a best practice, many agencies that regulate the housing finance market set up specific and regular meetings to hear feedback from civil rights and consumer advocates.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Make it easier for appraisers and the public to understand an appraiser's fair housing obligations, the USPAP Standards and Advisory Opinion 16 should be revised to clearly state that discrimination in appraisals is prohibited.	ASC staff should respond in writing to the exposure draft of these and other proposed changes to USPAP.		

NFHA Recommendations Prioritization

July 27, 2022

Priority 1 (Cont'd)			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
The Criteria should be revised to clearly require comprehensive fair housing training on federal, state, and local fair housing laws at every stage of the credentialing process and at renewal.	Send a letter to TAF indicating support and ask what progress has been made on implementing this recommendation.	Action Plan Item 3.3 - The Task Force recommends that TAF update AQB criteria to include appraisal bias and fair housing training in the Real Property Appraiser Qualification Criteria as a requirement for all aspiring and licensed/certified appraisers, as well as during the recertification process.	
There should be comprehensive fair housing training included in the initial 15-hour USPAP course (not just in the 7-hour USPAP continuing education course).	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.	Related to Action Plan Item 3.3 above.	
The fair housing training module in the current 2022-2023 7-hour USPAP continuing education course for credentialed appraisers should be revised immediately and developed with the participation of fair housing experts to ensure the training is comprehensive and contains important elements needed to educate professionals about how to comply with the letter and spirit of applicable federal, state, and local fair housing laws.	Continue to monitor and review the progress and comment as appropriate. ASC should consider a recommendation to TAF that all Fair Housing training for aspiring and renewing appraisers be written and taught by experts in the fair housing field.		<ul style="list-style-type: none"> • On March 9, 2022, the ASC sent a letter to the Foundation asking how it intended "to address the recommendations in the NFHA Report regarding the 7-hour National USPAP Course both for those who have taken the course and for those who are still required to take the course." • On March 17, 2022, the Foundation responded that it had retained the nationally recognized fair housing and civil rights law firm Relman Colfax to assist us in our comprehensive review of the course. • On May 4, 2022, the ASC sent a letter requesting that the Foundation "please provide an action plan, including a timeline, on how these issues will be corrected and remediated by the Foundation going forward, as well as for those who have given and taken the course." • On May 23, 2022, the Foundation responded that the "timeline for Relman Colfax to provide us with modifications is July 30th. Upon receipt, the Foundation is prepared to include this in the course materials and distribute this to students who have already taken the course. We anticipate having this completed by September 30th."

NFHA Recommendations Prioritization

July 27, 2022

Priority 1 (Cont'd)			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
It is recommended that each of the barriers to entry to the appraisal profession be reviewed for disparate impact by analyzing the burden on potential appraisers of color, the business justification for the requirement, and whether there is a less discriminatory alternative that can achieve the business interest.	Work with the PAVE Task Force to expedite the letter to TAF included in the PAVE Task Force Action Plan. The ASC should also send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation. The ASC could consider holding a round table or public hearing on this topic.	Action Plan Item 3.1 - Update appraiser qualification criteria related to appraiser education, experience, and examination requirements to lower barriers to entry in the appraiser profession.	
The criteria should be reviewed to consider whether the college degree is necessary for the profession, including whether this requirement has appreciably improved the quality of appraisals.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation. The ASC could also consider holding a round table or public hearing on this topic.	Related to Action Plan Item 3.1 above. Provide additional justification for the college degree requirement for the Certified Residential Appraiser and Certified General Appraiser classifications or eliminate it entirely.	
Appraiser education hours criteria should be reviewed to consider whether the extensive hours are necessary and whether the content of the courses should be revised to better prepare the student to conduct the work of an appraiser.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation. The ASC could also consider holding a round table or public hearing on this topic.		
Replacing the current experience requirement with an exam that, once passed, makes the individual a certified appraiser.	Send a letter to TAF indicating qualified support and ask what TAF's intentions are to address this recommendation.	Action Plan Item 3.1 - Reduce or eliminate AQB experience requirements. Lowering the minimum requirements set by the AQB could remove unnecessary barriers to entry that add considerable time and expense to the process of becoming an appraiser, particularly for women and people of color.	
TAF should collect data on race, ethnicity, and gender to measure the impact of the examinations. Also, the examinations should be reviewed for validity and consistency with federal anti-discrimination laws.	The ASC could consider asking TAF to have an independent review of the exam questions and answers for discriminatory content and disparate impact by analyzing the burden on potential appraisers of color, the business justification for the requirement, and whether there is a less discriminatory alternative that can achieve the business interest. The demographics and skills of the committee that determines the exam content could also be reviewed.		

NFHA Recommendations Prioritization

July 27, 2022

Priority 1: (Cont'd)			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
Government, Government Sponsored Enterprises (GSEs, that is, Fannie Mae and Freddie Mac), lenders, appraisers, researchers, and civil rights/consumer advocates should strategize and work together for the release of appropriate elements of the appraisal data sets to reduce bias and develop more robust compliance and monitoring systems. In addition, after public input and collaboration, a public repository and accessible database of complaints involving appraisals for mortgage lending should be developed to identify trends in the filing of complaints, including instances of alleged discrimination, and to identify appraisers and appraisal management companies that may be engaging in repeatedly deficient or discriminatory appraisal activity.	ASC staff has obtained data from FHFA which will be used to determine the number of active appraisers in the U.S. The next phase will be to survey those active appraisers to obtain demographic and appraisal practice information.	Action Plan Item 3.1 - Develop data-sharing arrangements among all relevant government agencies and pursue joint strategies to make appraisal-related data more widely available, foster federal research, and better enable enforcement related to appraisal bias.	
Priority 2			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
Repeal the requirement that a majority of the Board of Trustees must be appraisers.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Provide a mechanism allowing industry groups and civil rights/consumer advocates to appoint an equal number of trustees. (For purposes of this report, the term "civil rights/consumer advocates" means organizations that have as their primary purpose the promotion of civil rights and/or consumer protection.)	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Provide a mechanism allowing industry groups and civil rights/consumer advocates to nominate an equal number of trustees to at-large elections.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		

NFHA Recommendations Prioritization

July 27, 2022

Priority 2 (Cont'd)			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
Require that at least four of the at-large trustees must be civil rights/consumer advocates.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Require that at least a third of the members of the ASB and AQB be civil rights/consumer advocates.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Require the AQB to provide notice to the public, exposure of drafts, and an opportunity for public participation. (The AQB currently engages in this practice but would benefit from having the practice codified in its bylaws.)	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.	Action Plan Item 1.6 - TAF establishes standards/ criteria through a limited-exposure draft process. As compared to Federal Register notice and comment process, this minimizes broader participation from stakeholders, including residential and commercial lending regulators, and in particular, those overseeing fair housing and fair lending, during the development of industry-wide appraisal standards and appraiser qualification criteria.	
Require the ASB and AQB to publish the final standards and criteria at least 30 days before the effective date.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Require the ASB and AQB to provide to the public an easily accessible system to request the issuance, amendment, or repeal of any standard or criteria.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Consistent with other aspects of the housing finance market, the appraisal process should be thoroughly reviewed for fair housing risk, particularly in the exercise of discretion, and the USPAP Standards should be amended accordingly in order to provide a baseline standard for fair and equitable outcomes.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation. If TAF does not follow through on this recommendation, the ASC could consider establishing an advisory committee or hold hearings on this topic.		

NFHA Recommendations Prioritization

July 27, 2022

Priority 2 (Cont'd)			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
TAF should collaborate with HUD, the DOJ, the Federal Housing Finance Agency (FHFA), and other regulators and enforcement agencies to develop, improve, and implement fair housing training.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
TAF should consider inviting civil rights experts to provide the fair housing training for appraisers.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
TAF and other appraiser organizations should continue and expand their outreach to women and people of color. In addition, TAF and other appraisal organizations should monitor the demographics of individuals entering the profession or renewing their credentials and share this information publicly to ensure that the demographics of the profession are more transparent. Finally, appraiser organizations should ensure that new professionals are prepared for the future with respect to the use of technology, automation, and artificial intelligence.	Send a letter to TAF and the States indicating support for this recommendation. The ASC could consider providing grant funds to TAF and States to assist in this effort. The ASC could also consider hosting a round table or public hearing on this topic.		
The ASB should consider amending the USPAP Standards to require appraisers to identify mortgage borrowers as "intended users" of appraisals prepared in relation to residential mortgage transactions.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation.		
Priority 3			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
The credentialing criteria should be reviewed to consider streamlining the credentials to just two certifications: 1) certified residential appraiser; and 2) certified general appraiser.	Consider further study on this recommendation.		

NFHA Recommendations Prioritization

July 27, 2022

Priority 3 (Cont'd)			
NFHA Recommendation	ASC Staff Recommendation	PAVE Action Plan Considerations	Actions/Current Status
Improving the content of the education courses so that the student is better prepared to conduct appraisals after passing the exam.	Send a letter to TAF indicating support and ask what TAF's intentions are to address this recommendation. The ASC could consider holding a round table or public hearing on this topic.		
Improving the content of the exam by including a practice-based component that ensures a prospective appraiser has a clear understanding of industry practices.	Work with TAF to better understand the content of the exam and whether or not the recommended changes are needed.		
Government, the GSEs, lenders, appraisers, researchers, and civil rights/consumer advocates should use knowledge of data science and appropriate examples from the mortgage and homeowners' insurance industries to develop more robust compliance management systems to monitor, remedy, and prevent fair housing risk and/or violations in appraisals.	The ASC could support such initiatives by working with government and industry to promote enhanced compliance management systems for appraisers.		
Government, the GSEs, lenders, and TAF should develop standards and guidance for appraisers regarding the fair handling of and increasing the transparency and accountability in the Reconsideration of Value process.	ASC staff could work with State appraiser regulatory agencies to address the risk of appraisers receiving disciplinary actions if they reconsider their appraisal conclusions. Appraiser independence concerns should be taken into consideration. ASC could consider having a round table or having a public hearing on this topic.		

ASC Delegations of Authority

(Revised December 12, 2019)

ASC Delegations of Authority

Preamble

Pursuant to the Appraisal Subcommittee's (ASC) authority under Title XI¹ of the Federal Financial Institutions Reform, Recovery and Enforcement Act, the ASC has delegated specific functions and duties to its Chairperson and staff. In addition to the delegations listed in this document, general areas of responsibility and authority, as well as other specific delegations of authority, have been and will be made in other documents, including, but not limited to, ASC regulations, Policy Statements, manuals, position descriptions, orders and certain instructions. All authority not expressly delegated is reserved by the ASC. All delegations must agree with applicable laws and regulations. Unless specifically provided for in the delegations below, there is no authority to redelegate. An authority to make a redelegation is specifically set forth in these delegations. All authorized redelegations of authority shall be made in writing. An individual who acts in the capacity of another is vested with all of the delegated authority of the position. No redelegation is needed if one has been authorized in writing to act in the capacity of another.

The following compilation of delegations of authority reflects those authorities delegated or whose delegation was reaffirmed at the ASC's May 10, 1995 meeting, and as subsequently amended.

1. Title XI § 1105, 12 U.S.C. § 3334.

Table of Contents

ASC Delegations of Authority.....	1
Preamble	1
General.....	3
Procurement and Property Management.....	4
ASC Grants Program	6
Personnel.....	10
Personnel Management.....	10
Training and Training Expenses	12
Incentive Awards	13
Travel	14
Compliance Review Reports.....	15
Special Activities	16

General

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
GEN 1	Authority to bar any exercise of a delegated authority by revoking the delegation with respect to the specific matter in question.	Chairperson
GEN 2	Authority to sign all documents adopted and issued by and on behalf of the ASC (with authority to redelegate to the Executive Director).	Chairperson
GEN 3	Authority to record, signify and certify the official vote of individual ASC members when such vote is obtained through the use of telephonic or similar medium (with the authority to redelegate to the General Counsel).	Executive Director

Procurement and Property Management

Any actions under these procurement delegations that would cause the ASC to exceed its budget as a whole or by line item are subject to approval by the ASC.

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
PRO 1	Authority to approve, sign, issue and make payment on orders and contracts for goods or services required in the operations of the ASC (with authority to redelegate to the Executive Director).	Chairperson
PRO 2	Within approved budget limits, authority to serve as ASC Contracting Officer and, subject to a review by the General Counsel of single contracts and purchase orders for goods and/or services up to \$100,000; authority to approve, sign and issue procurement documents for all goods or services up to \$100,000 required for normal operations of ASC, and which are included in the current budget or to authorize modifications to such contracts and orders; approve, sign and issue Purchase Orders, Requests for Proposals, Invitations for Bids, Requests for Quotations, Certificates of Contract Awards, and Contract Addenda. Under this delegation are included: printing, leases, purchases of furniture and furnishings, purchases of supplies or services, and other items or services operationally required. [Amended 10/8/95, 12/11/13]	Executive Director
PRO 3	Authority to authorize payment for approved purchases of and contracts for property or services.	Executive Director
PRO 4	Authority to make payment of all expenses, expense allowances and payment for goods or services included in the current ASC budget or which are approved for payment by the ASC or other authorized persons (with authority to redelegate to one or more senior staff members).[Amended 10/8/95]	Executive Director

PRO 5	Authority to approve claims up to \$2,500 to reimburse ASC employees for damage or loss of personally owned equipment being used on ASC business.	Executive Director, with the concurrence of the Chairperson
PRO 6	Within approved budget limits, authority to purchase supplies and equipment not in excess of \$500 per item (with the authority to redelegate to the Administrative Assistant). [Amended 10/8/95, 2/14/96,. 12/11/13]	Executive Director
PRO 7	Within approved budget limits, authority to approve, sign and issue purchase orders and blanket purchase agreement (BPA) up to \$150,000 per purchase order and BPA for goods or services required for the ASC's normal operation.[Amended 12/11/13]	Executive Director

ASC Grants Program

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
GP 1	Determine amount of funding available for grants annually. [Amended 12/12/19]	ASC
GP 2	Approve funding opportunities overview prior to issuance of any notice of funding availability (NOFA). [Amended 12/12/19]	ASC
GP 3	Approve any award of grant funding prior to issuance of a Notice of Grant Award, including TAF grant and any competitive grants. [Amended 12/12/19]	ASC
GP 4	In the case of multi-year grant, approve annual budgets and performance plans. [Amended 12/12/19]	ASC
GP 5	Audits or financial reviews of grants awarded: <ul style="list-style-type: none"> • make final determination on recipient appeals of Management Decisions to resolve the audit findings. [Amended 12/12/19] 	ASC
GP 6	Single Audit program: <ul style="list-style-type: none"> • make final determination on recipient appeals of Management Decision. [Amended 12/12/19] 	ASC
GP 7	Indirect cost proposals: <ul style="list-style-type: none"> • make final decision on any disagreement on an ASC ICP adjustment. [Amended 12/12/19] 	ASC

GP 8	Fraud, waste or abuse: <ul style="list-style-type: none"> • make the final decision on termination. [Amended 12/12/19] 	ASC
GP 9	Prepare notice of notice of funding availability (NOFA) based on Board approval of the funding opportunities overview document. [Amended 12/12/19]	Grants Director
GP 10	Review applications, budgets and proposals prior to submission to the ASC Board. [Amended 12/12/19]	Grants Director
GP 11	Approve formula applications to the State Agencies. [Amended 12/12/19]	Grants Director
GP 12	After approval from ASC Board, to execute final award contingent upon applicants meeting all budget and programmatic changes required by the Grants Office. [Amended 12/12/19]	Grants Director
GP 13	Audits or financial reviews of grants awarded: <ul style="list-style-type: none"> • arrange audits or reviews; • identify system, fiscal and/or performance issues and define scope for any grant review; • review audits and approve audits, and prepare ASC’s decisions for resolving audit findings and recommendations; and • track status of audits and implementation of audit. [Amended 12/12/19]	Grants Director
GP 14	Single Audit program: <ul style="list-style-type: none"> • administer and track Single Audits; • inform Executive Director of any recipient appeals of Management Decisions related to Single Audit 	Grants Director

findings; and

- track status of implementation of the actions necessary to resolve the recommendations. [Amended 12/12/19]

GP 15	Oversee close out of grants, and if the grantee reports any equipment purchased with ASC funds, determine whether the equipment will be used in subsequent grants from the ASC or transferred for use by the grantee on another federal program. [Amended 12/12/19]	Grants Director
GP 16	Sign award agreements. [Amended 12/12/19]	Executive Director
GP 17	Audits or financial reviews of grants awarded: <ul style="list-style-type: none"> • sign and issue Management Decision. [Amended 12/12/19] 	Executive Director
GP 18	Single Audit program: <ul style="list-style-type: none"> • sign and issue Management Decision. [Amended 12/12/19] 	Executive Director
GP 19	Indirect cost proposals: <ul style="list-style-type: none"> • process, negotiate, enter into agreements on indirect cost proposals (ICPs). [Amended 12/12/19] 	Executive Director
GP 20	Close out of grants: <ul style="list-style-type: none"> • issue final closeout letter. [Amended 12/12/19] 	Executive Director
GP 21	Fraud, waste or abuse: <ul style="list-style-type: none"> • sign letter of suspension. [Amended 12/12/19] 	Executive Director

GP 22	Indirect cost proposals: <ul style="list-style-type: none">• sign indirect cost rate agreement on behalf of the ASC. [Amended 12/12/19]	Financial Manager
GP 23	Close out of grants: <ul style="list-style-type: none">• issue invoice for any amount to be reimbursed;• if the grantee has unspent cash on hand, establish an accounts receivable for the balance and begin collection action; and• de-obligate the funds from the grantee's account if there is an unspent balance remaining in the grantee's account that has not been drawn down. [Amended 12/12/19]	Financial Manager

Personnel

Personnel Management

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
PERS 1	Authority to exercise all authorities related to personnel management, including appointment, removal, reassignment and direction of personnel and improvement of staff support (with the authority to redelegate to the Executive Director). The ASC, however, reserves the authority to approve the appointment, reassignment, removal and compensation of all staff at GS-15 or above (senior staff). The ASC also reserves the authority to approve the promotion of all individuals to, and in, these positions.	Chairperson
PERS 2	Authority to evaluate Executive Director's performance, and to review, evaluate and approve the Executive Director's appraisal of a senior staff member's performance.	Chairperson (Vice-Chairperson in the event Chairperson is unavailable for 15 days or more) [Amended 5/9/18]
PERS 3	Authority to evaluate and rate each staff employee's job performance, through the use of performance elements and standards. [Amended 10/8/95]	Executive Director
PERS 4	Authority to establish organizational structure and to hire persons to fill staff positions (with the authority to redelegate to the Executive Director).	Chairperson
PERS 5	Authority to allocate personnel within established staffing patterns, including authority to appoint Acting Executive Director and to delegate authority to that Acting Director.	Executive Director
PERS 6	Approval of Leave: a. Annual and sick leave up to the maximum earned yearly.	All Supervisors

- b. Leave without pay, administrative leave, and advanced annual and sick leave. Executive Director

- c. Within the basic eight-hour day and 40-hour week, authority to approve temporary flexible working hours. Executive Director

- d. Authority to approve flexible working hours. ASC

- e. Authority to approve retention of annual leave that exceeds 240 hours. Executive Director

Training and Training Expenses

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
TRN 1	Within approved budget limits, authority to budget for, approve, conduct, schedule, coordinate, monitor and evaluate all ASC training and career development activities.	Executive Director
TRN 2	Within approved budget limits, authority to plan, schedule and conduct data processing training for ASC staff.	Executive Director
TRN 3	Within approved budget limits, authority to approve SF-182's, Request, Authorization, Agreement, and Certification of Training up to \$10,000 per form (with authority to redelegate to Executive Director).	Chairperson

Incentive Awards

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
AWD 1	Authority to grant the following awards:	
	a. Superior Accomplishment Awards greater than \$5,000, but not more than \$10,000. (Awards over \$10,000 require OPM approval.)	ASC
	b. Special Act or Service Awards or Superior Accomplishment Awards up to \$2,500	Chairperson (Vice-Chairperson in the event Chairperson is unavailable for 15 days or more) [Amended 5/9/18]
	c. Quality Step Increase	Chairperson (authority to re-delegate to Executive Director)
	d. Letters of Commendation	Executive Director
	e. Length of Service Awards	Executive Director
	g. Time Off From Duty Award	Executive Director

Travel

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
TRV 1	Within approved budget limits, authority to approve travel orders and disbursements thereof.	Executive Director
TRV 2	Within approved budget limits, authority to approve advance of funds for travel.	Executive Director

Compliance Review Reports

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
CRR 1	Approve, sign and release Compliance Review Reports with recommended Finding of “POOR.” ² [Amended 12/11/13]	ASC
CRR 2	Approve, sign and release Compliance Review Reports with recommended Finding of “NOT SATISFACTORY.” ³ [Amended 12/11/13]	ASC
CRR 3	Approve, sign and release Compliance Review Reports with recommended Finding of “NEEDS IMPROVEMENT.” ⁴ [Amended 12/11/13]	Chairperson or Vice-Chairperson [Amended 5/9/18]
CRR 4	Approve, sign and release Compliance Review Reports with recommended Finding of “GOOD.” ⁵ [Amended 12/11/13]	Chairperson (authority to re-delegate to Executive Director)*
CRR 5	Approve, sign and release Compliance Review Reports with recommended Finding of “EXCELLENT.” ⁶ [Amended 12/11/13]	Chairperson (authority to re-delegate to Executive Director)*

*Executive Director to provide quarterly reports to ASC on Compliance Review Reports (may delegate to Deputy Executive Director).

2. Applies when deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program and high risk of Program failure.

3. Applies when deficiencies present a significant risk and if not corrected in a timely manner, pose a well-defined risk to the Program and substantial risk of Program failure.

4. Applies when deficiencies are material but manageable and if not corrected in a timely manner, pose a potential risk to the Program and moderate risk of Program failure.

5. Applies when deficiencies are minor in nature, State is adequately addressing deficiencies identified and correcting them in the normal course of business, and low risk of Program failure.

6. Applies when State maintains a strong regulatory Program and very low risk of Program failure.

Special Activities

<u>Reference</u>	<u>Authority</u>	<u>Delegation</u>
SPE 1	Authority to grant or deny any request made for information pursuant to the Freedom of Information Act and Subpart D of the ASC's Regulations, including the authority to release exempt information (with authority to redelegate approvals only to the General Counsel).	Executive Director
SPE 2	Authority to submit for publication in the <i>Federal Register</i> any ASC-approved Agency document and to take appropriate action to correct any obvious error of form, typographical error or similar error contained in such documents (with authority to redelegate to the General Counsel).	Executive Director
SPE 3	Authority to sign and release non-routine, significant correspondence (with the authority to redelegate to the Executive Director).	Chairperson or Vice-Chairperson [Amended 5/9/18]
SPE 4	Authority to sign and release routine correspondence.	Executive Director
SPE 5	Authority to coordinate and manage the ASC's ethics program as the ASC Designated Agency Ethics Officer (DAEO) with the ASC's Management and Program Analyst who serves as the alternate DAEO. [Amended 12/11/13]	General Counsel
SPE 6	Authority to sign and release documents or other communications relating to established ASC policies and procedures.	Executive Director