

FYI Cover Page

August 28, 2019

Appraisal Subcommittee Members
(Revised as of August 1, 2019)

Agency	Member	Alternate Member
CFPB	<p>John Schroeder Regional Director – Midwest Region Supervision, Enforcement and Fair Lending Consumer Financial Protection Bureau 230 S. Dearborn Street, Suite 1590 Chicago, IL 60604 P: 312-610-8948 C: 202-591-5938 Email: John.Schroeder@cfpb.gov</p>	<p>Orlando Orellano Assistant Regional Director – Midwest Region Consumer Financial Protection Bureau 230 S. Dearborn Street, Suite 1590 Chicago, IL 60604 P: 312-610-8953 C: 202-573-1010 Email: Orlando.Orellano@cfpb.gov</p>
FDIC	<p>Marianne Hatheway Deputy Regional Director Division of Risk Management Supervision FDIC Boston Area Office Federal Deposit Insurance Corporation 15 Braintree Hill Office Park, Suite 200 Braintree, MA 02184-8701 P: 781-794-5501 Email: MHatheway@fdic.gov</p>	<p>Rae-Ann Miller Associate Director Risk Management Policy Branch Division of Risk Management Supervision Federal Deposit Insurance Corporation 550 17th Street NW Washington, DC 20429 P: 202-898-3898 Email: RMiller@fdic.gov</p>
FHFA	<p>Maria Fernandez Senior Associate Director Office of Housing and Regulatory Policy Division of Housing Mission & Goals Federal Housing Finance Agency 400 7th Street SW Washington, DC 20219 P: 202-649-3102 Email: Maria.Fernandez@fhfa.gov</p>	<p>Robert Witt Senior Policy Analyst Office of Housing & Regulatory Policy Division of Housing Mission & Goals Federal Housing Finance Agency 400 7th Street SW Washington, DC 20219 P: 202-649-3128 Email: Robert.Witt@fhfa.gov</p>
FRB	<p>Arthur Lindo (Chair) Senior Associate Director Division of Banking Supervision and Regulation Board of Governors of the Federal Reserve System 1850 K Street NW Washington, DC 20006 P: 202-452-2695 C: 202-492-3528 Email: Arthur.Lindo@frb.gov</p>	

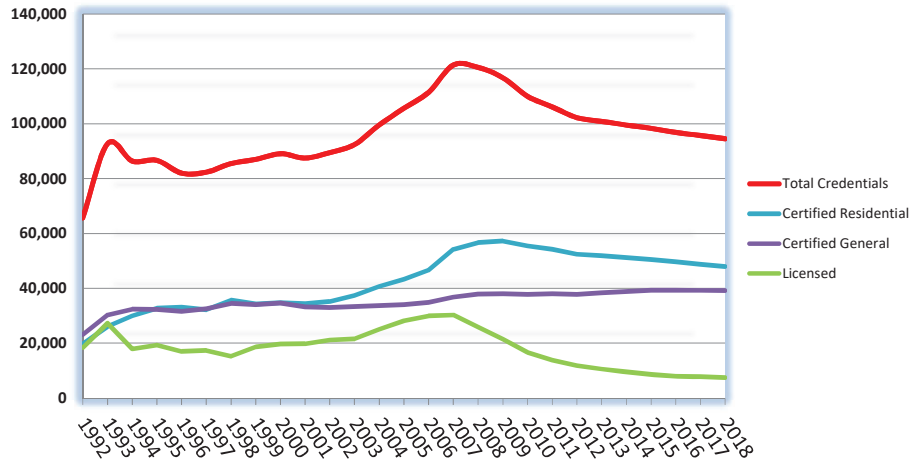
Appraisal Subcommittee Members
(Revised as of August 1, 2019)

Agency	Member	Alternate Member
HUD		Bobbi Borland Acting Director Home Valuation Policy Division Office of Program Development U.S. Department of Housing & Urban Development 451 7 th Street SW, Room 9274 Washington, DC 20410-8000 P: 202-402-5244 Email: Bobbi.L.Borland@hud.gov
NCUA	Tim Segerson Deputy Director for the 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	Richard Taft (Vice-Chair) Deputy Comptroller of Credit Risk Office of the Comptroller of the Currency 400 7 th Street SW Washington, DC 20219 P: 202-649-6767 Email: Richard.Taft@occ.treas.gov	

Year-End Appraiser Credentials					
Year-End	Certified General	Certified 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

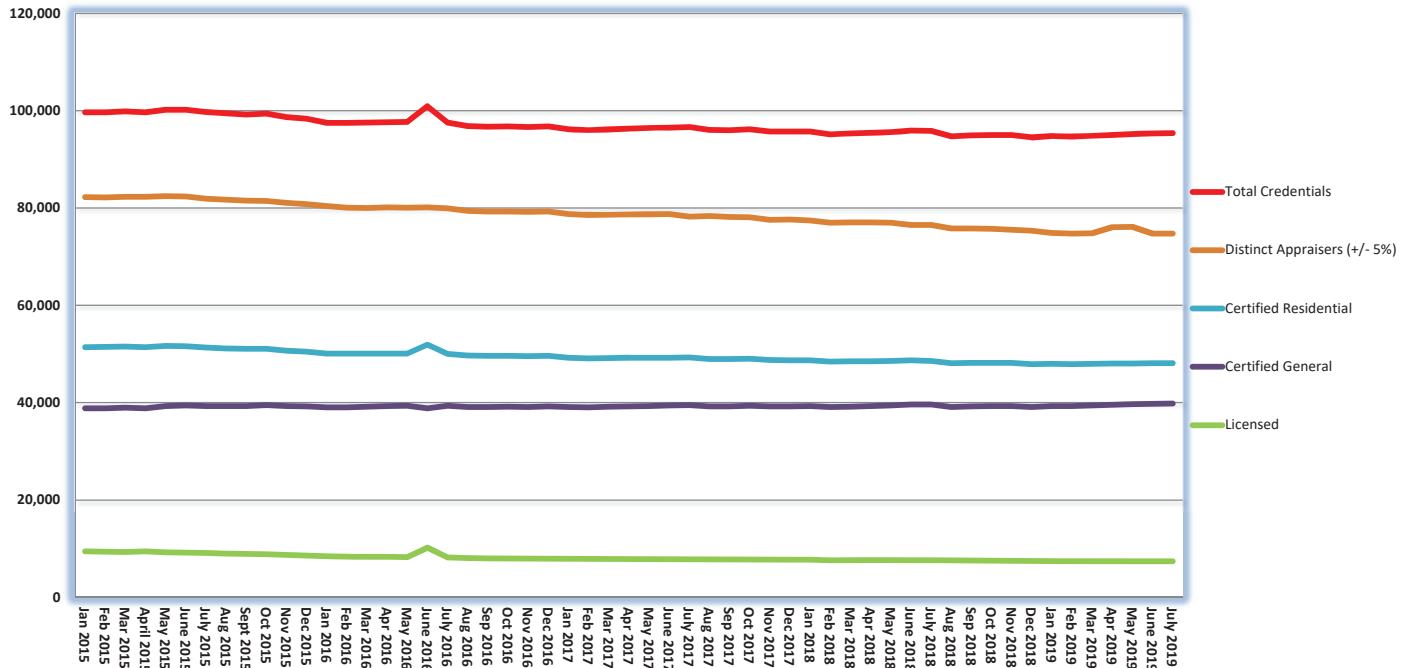
Monthly Appraiser Credential Trends						
Date	Certified General	Certified Residential	Licensed	Transitional	Total Credentials	Appraisers (+/- 5%)
Jan 2015	38,828	51,419	9,460	0	99,707	82,249
Feb 2015	38,865	51,448	9,358	0	99,671	82,187
Mar 2015	39,012	51,538	9,342	0	99,892	82,299
April 2015	38,828	51,419	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	0	99,726	81,950
Aug 2015	39,309	51,164	9,009	0	99,482	81,740
Sept 2015	39,284	51,056	8,889	0	99,229	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	39,099	49,672	8,078	0	96,849	79,441
Sep 2016	39,092	49,622	7,995	0	96,709	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	39,241	49,005	7,759	0	96,005	78,174
Oct 2017	39,404	49,022	7,778	0	96,204	78,142
Nov 2017	39,229	48,763	7,757	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
Sep 2018	39,246	48,195	7,518	0	94,959	75,822
Oct 2018	39,300	48,219	7,514	0	95,033	75,751
Nov 2018	39,302	48,217	7,503	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

Yearly Appraiser Credential Trends



Monthly Appraisers Credential Trends

As of July 26, 2019



State Program Summary Report

State or Territory	AL		AK		AZ		AR		CA		CO		CT		DE		DC		FL		GA		GU		HI			
Review Year	2018		2017		2018		2018		2018		2018		2018		2019		2019		2019		2018		2015		2017			
Review Month	Jan		Jul		Jun		Mar		Oct		Aug		Jun		Mar		Apr		Feb		Mar		Nov		Dec			
ASC Finding	Good		Good		Excel		Good		Excel		Good		Excel		Good		Good		Good		Good		Good		Excel			
Review Cycle Assigned (in years)	2		2		2		2		2		2		2		2		2		2		2		2		2			
Required State Actions or Off Site Monitoring																												
Follow-Up (in months)																												
Out of Compliance (OC) Area of Concern (AC)	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC		
Statutes, Regulations, Policies and Procedures:		1		1			1																2	1				
Temporary Practice:	1														3													
National Registry:		1		1				1										1		1								
Application Process:														1											1			
Reciprocity:																									1			
Education:							1																					
Enforcement:											1														1			
TOTAL OUT OF COMPLIANCE	1		-		-		1		-		-		-		-		3		-		-		2		-			
TOTAL AREA OF CONCERN	2		2		-		2		-		1		-		1		1		1		1		4		-			
Last Review Finding	Good (2016)		Good (2015)		Excel (2016)		Good (2016)		Excel (2016)		Excel (2016)		Good (2016)		Good (2017)		Good (2017)		Excel (2017)		Excel (2016)		Needs Imp (2013)		Good (2015)			
Previous Review Finding	Good (2014)		Not Sat (2014)		Excel (2014)		Good (2014)		Good (2014)		Excel (2014)		Good (2014)		Good (2015)		Good (2015)		Good (2015)		Needs Imp (2014)		ISC (2007)		Good (2013)			
FTE	5.6		0.57		4.28		3		23		9.6		1.75		0.85		1.2		15.5		5.8		0.14		0.75			
Independent or Under Umbrella (I/UU)	I		UU		UU		I		UU		UU		UU		UU		UU		UU		UU		1		UU		UU	
Board	Yes		Yes		No		Yes		No		Yes		Yes		Yes		Yes		Yes		Yes		Yes		No		Yes	
# Credentials on National Registry	1,369		239		1,349		1,369		10,340		2,553		1,314		548		764		5,921		3,354		21		572			
# Trainees	86		10		173		86		738		n/a		58		34		19		543		103		3		23			
Complaints Received in Review Cycle	107		15		225		107		583		274		60		19		10		258		247		0		14			
Complaints Outstanding	28		2		45		28		134		95		8		6		3		55		50		0		5			
Complaints Outstanding Over 1 Year (No SDC)	0		0		0		0		0		11		0		0		0		0		0		0		0			
Special Documented Circumstances (SDC)	6		0		0		6		11		0		0		1		0		0		2		0		0			
AMC Laws and Regulations	Yes		No		Yes		Yes		Yes		Yes		Yes		Yes		No		Yes		Yes		No		Pending			

Legend: NISC = Not in Substantial Compliance; ISC = In Substantial Compliance; NIC = Not in Compliance; Excel = Excellent; Needs Imp = Needs Improvement; Not Sat = Not Satisfactory

State Program Summary Report

State or Territory	ID	IL	IN	IA	KS	KY	LA	ME	CNMI	MD	MA	MI	MN
Review Year	2017	2017	2017	2017	2017	2019	2018	2017	2015	2018	2018	2018	2018
Review Month	Apr	Nov	Jan	Jul	Oct	May	Apr	May	Nov	Apr	May	Sep	Sep
ASC Finding	Excel	Needs Imp	Good	Excel	Excel	Excel	Excel	Good	Needs Imp	Excel	Needs Imp	Needs Imp	Good
Review Cycle Assigned (in years)	2	2	2	2	2	2	2	2	2	2	2	2	2
Required State Actions or Off Site Monitoring		Yes							Yes		Yes		
Follow-Up (in months)											6		
Out of Compliance (OC) Area of Concern (AC)	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC	OC AC
Statutes, Regulations, Policies and Procedures:			2	1				1	2				1
Temporary Practice:											1		1
National Registry:		3										3	1
Application Process:		1	1						1		2	1	2
Reciprocity:													1
Education:			1										1
Enforcement		1							1		2		1
TOTAL OUT OF COMPLIANCE	-	-	5	-	-	-	-	-	1	2	-	5	3
TOTAL AREA OF CONCERN	-	-	4	1	-	-	-	-	-	2	-	4	3
Last Review Finding	Good (2015)	Needs Imp (2013)	Needs Imp (2015)	Excel (2015)	Excel (2015)	Excel (2017)	Good (2016)	Good (2015)	Needs Imp (2013)	Good (2016)	Needs Imp (2016)	Good (2016)	Good (2016)
Previous Review Finding	NISC (2013)	Needs Imp (2013)	ISC (2013)	Excel (2013)	Excel (2013)	Excel (2015)	Good (2014)	Excel (2013)	ISC (2007)	Good (2014)	Needs Imp (2014)	Good (2014)	Good (2014)
FTE	0.1	3.6	3.1	0.95	2	3	3	0.57	0.3	3.5	2.75	1.56	2.18
Independent or Under Umbrella (I/UU)	UU	UU	UU	UU	UU	UU	UU	UU	UU	UU	UU	UU	UU
Board	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
# Credentials on National Registry	699	3,871	2,094	1,111	981	1,412	1,313	557	9	2,200	2,045	2,526	1,946
# Trainees	35	442	113	95	13	214	216	27	0	195	74	439	542
Complaints Received in Review Cycle	46	416	106	92	28	57	49	67	0	100	74	130	170
Complaints Outstanding	13	71	37	12	4	17	9	13	0	12	29	51	25
Complaints Outstanding Over 1 Year (No SDC)	2	8	0	0	0	0	0	0	0	0	4	10	0
Special Documented Circumstances (SDC)	0	17	3	0	0	0	0	1	0	1	6	7	4
AMC Laws and Regulations	No	Yes	Yes	Pending	Yes	Yes	Yes	No	No	Yes	Pending	Yes	Yes

Legend: NISC = Not in Substantial Compliance; ISC = In Substantial Compliance; NIC = Not in Compliance; Excel = Excellent; Needs Imp = Needs Improvement; Not Sat = Not Satisfactory

State Program Summary Report

State or Territory	MS		MO		MT		NE		NV		NH		NJ		NM		NY		NC		ND		OH	
Review Year	2019		2018		2017		2019		2018		2017		2018		2017		2017		2018		2018		2017	
Review Month	May		Jun		Sep		Mar		June		May		Nov		Apr		Sep		Nov		Jun		Aug	
ASC Finding	Excel		Good		Good		Excel		Good		Excel		Good		Needs Imp		Good		Excel		Excel		Excel	
Review Cycle Assigned (in years)	2		2		2		2		2		2		2		2		2		2		2		2	
Required State Actions or Off Site Monitoring															Yes									
Follow-Up (in months)															10									
Out of Compliance (OC)																								
Area of Concern (AC)	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC
Statutes, Regulations, Policies and Procedures:				1										1		2								
Temporary Practice:						1				2								2						
National Registry:																								
Application Process:																1								
Reciprocity:																								
Education:																								
Enforcement										1						4								
TOTAL OUT OF COMPLIANCE	-		-		-		-		-		-		-		5		-		-		-		-	
TOTAL AREA OF CONCERN	-		1		1		-		3		-		1		2		-		-		-		-	
Last Review Finding	Excel (2017)	Excel (2016)	Good (2015)	Good (2017)	Excel (2016)	Excel (2015)	Needs Imp (2016)	Good (2015)	Needs Imp (2015)	Excel (2016)	Excel (2016)	Excel (2015)												
Previous Review Finding	Needs Imp (2015)	Good (2014)	Needs Imp (2013)	Good (2015)	Good (2014)	Good (2013)	Needs Imp (2014)	Good (2013)	Needs Imp (2013)	Excel (2014)	Good (2014)	Good (2013)												
FTE	1.7	2	3.8	1.45	2.4	1.8	2.5	3.95	3.8	5.5	1.4	5.5												
Independent or Under Umbrella (I/UU)	I	UU	UU	I	UU	UU	UU	UU	UU	I	I	UU												
Board	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes												
# Credentials on National Registry	978	2,045	382	641	967	733	2,611	641	3,804	2,976	297	2,944												
# Trainees	45	74	27	73	87	13	48	71	446	429	34	296												
Complaints Received in Review Cycle	60	77	36	19	61	34	88	46	153	151	23	145												
Complaints Outstanding	3	15	6	4	37	4	17	31	31	33	11	42												
Complaints Outstanding Over 1 Year (No SDC)	0	0	0	0	5	0	0	8	0	0	0	0												
Special Documented Circumstances (SDC)	0	0	0	1	1	0	4	3	5	1	6	0												
AMC Laws and Regulations	Yes	Yes	Yes	Yes	Yes	Yes	Pending	Yes	No	Yes	Yes	No												

Legend: NISC = Not in Substantial Compliance; ISC = In Substantial Compliance; NIC = Not in Compliance; Excel = Excellent; Needs Imp = Needs Improvement; Not Sat = Not Satisfactory

State Program Summary Report

State or Territory	OK		OR		PA		PR		RI		SC		SD		TN		TX		UT		VT		VI	
Review Year	2017		2018		2018		2015		2017		2017		2018		2019		2018		2019		2018		2016	
Review Month	Sep		Jul		May		Dec		Oct		Feb		Aug		Jan		Feb		Feb		Aug		Nov	
ASC Finding	Excel		Needs Imp		Needs Imp		Good		Excel		Good		Good		Good		Good		Good		Needs Imp		Needs Imp	
Review Cycle Assigned (in years)	2		2		2		2		2		2		2		2		2		2		2		2	
Required State Actions or Off Site Monitoring			Yes		Yes																Yes		Yes	
Follow-Up (in months)																					12		6 to 9	
Out of Compliance (OC) Area of Concern (AC)	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC
Statutes, Regulations, Policies and Procedures:			1	2		1		1							1								1	1
Temporary Practice:																								
National Registry:						1						1		1				2		1				1
Application Process:								1																
Reciprocity:																								1
Education:																	1							
Enforcement			1			1																2		
TOTAL OUT OF COMPLIANCE		-		2		1		-		-		-		-		1		-		-		3		3
TOTAL AREA OF CONCERN		-		2		2		2		-		1		1		2		2		1		-		2
Last Review Finding	Good (2015)		Excel (2016)		Needs Imp (2016)		Good (2013)		Needs Imp (2015)		Excel (2017)		Excel (2016)		Good (2017)		Excel (2016)		Good (2017)		Needs Imp (2016)		Needs Imp (2014)	
Previous Review Finding	Excel (2013)		Good (2014)		Needs Imp (2014)		ISC (2012)		Good (2013)		Needs Imp (2015)		Good (2014)		Excel (2015)		Good (2014)		Good (2015)		Good (2014)		NISC (2012)	
FTE	3.75		5.2		2.85		1		1.7		1.97		2		3		13.5		3.6		0.71		1	
Independent or Under Umbrella (I/UU)	UU		1		UU		UU		UU		UU		UU		UU		1		UU		UU		UU	
Board	Yes		Yes		Yes		Yes		Yes		Yes		Yes		Yes		Yes		Yes		Yes		Yes	
# Credentials on National Registry	997		1,487		3,158		27		439		2,039		377		1,936		5,256		1,242		264		27	
# Trainees	77		126		359		n/a		145		205		61		215		999		135		16		n/a	
Complaints Received in Review Cycle	87		76		208		1		4		132		16		119		330		63		10		1	
Complaints Outstanding	43		66		70		1		0		33		4		15		65		15		13		0	
Complaints Outstanding Over 1 Year (No SDC)	0		31		16		0		0		0		0		0		0		0		0		0	
Special Documented Circumstances (SDC)	2		5		11		0		0		0		0		1		6		1		0		0	
AMC Laws and Regulations	Yes		Yes		Yes		No		Pending		Yes		Yes		Yes		Yes		Yes		Yes		No	

Legend: NISC = Not in Substantial Compliance; ISC = In Substantial Compliance; NIC = Not in Compliance; Excel = Excellent; Needs Imp = Needs Improvement; Not Sat = Not Satisfactory

State Program Summary Report

State or Territory	VA		WA		WV		WI		WY			
Review Year	2017		2018		2018		2017		2017		# Excel	19
Review Month	Aug		Aug		Dec		Jun		Aug		# Good	26
ASC Finding	Good		Excel		Good		Needs Imp		Good		# Needs Imp	10
Review Cycle Assigned (in years)	2		2		2		2		2		# Not Sat	0
Required State Actions or Off Site Monitoring							Yes				# Poor	0
Follow-Up (in months)							12					
Out of Compliance (OC) Area of Concern (AC)	OC	AC	OC	AC	OC	AC	OC	AC	OC	AC	OC TOTAL	AC TOTAL
Statutes, Regulations, Policies and Procedures:								2		2	11	19
Temporary Practice:											6	1
National Registry:					1			1			4	24
Application Process:							2				8	7
Reciprocity:											0	2
Education:					1						1	4
Enforcement	1							1			11	7
TOTAL OUT OF COMPLIANCE	-	-	-	-	-	-	-	2	-	-	41	
TOTAL AREA OF CONCERN	1	-	-	-	2	-	4	-	2	-		64
Last Review Finding	Needs Imp (2015)		Excel (2016)		Good (2016)		Good (2015)		Good (2015)			
Previous Review Finding	ISC (2013)		Excel (2014)		Needs Imp (2015)		Needs Imp (2015)		Good (2013)			
FTE	1.8		4.5		2		3.8		1.5			
Independent or Under Umbrella (I/UU)	UU		UU		1		UU		UU			
Board	Yes		Yes		Yes		Yes		Yes			
# Credentials on National Registry	3,363		2,616		559		1,897		316			
# Trainees	107		363		35		n/a		81			
Complaints Received in Review Cycle	182		204		35		114		19			
Complaints Outstanding	34		25		2		24		3			
Complaints Outstanding Over 1 Year (No SDC)	0		0		0		2		0			
Special Documented Circumstances (SDC)	0		4		1		2		0			
AMC Laws and Regulations	Yes		Yes		Yes		No		Yes			

Legend: NISC = Not in Substantial Compliance; ISC = In Substantial Compliance; NIC = Not in Compliance; Excel = Excellent; Needs Imp = Needs Improvement; Not Sat = Not Satisfactory

**APPRAISAL SUBCOMMITTEE
OPEN SESSION MEETING MINUTES
FEBRUARY 13, 2019**

LOCATION: Federal Reserve Board – International Square location
1850 K Street NW, Washington, DC 20006

ATTENDEES

ASC MEMBERS: FRB – Art Lindo (Chair)
CFPB – Veronica Spicer
FDIC – Marianne Hatheway
FHFA – Robert Witt
HUD – Cheryl Walker
NCUA – Tim Segerson
OCC – Richard Taft

ASC STAFF: Executive Director – Jim Park
Deputy Executive Director – Denise Graves
General Counsel – Alice Ritter
Financial Manager – Girard Hull
Attorney-Advisor – Ada Bohorfoush
Management and Program Analyst – Lori Schuster
Administrative Officer – Brian Kelly
Policy Manager – Jenny Tidwell

OBSERVERS: Appraisal Institute – Bill Garber
CFPB – Philip Neary
FDIC – Michael Briggs
FDIC – Rich Foley
FDIC – Suzy Gardner
FDIC – Ben Gibbs
FHFA – Ming-Yuen Meyer-Fong
FRB – Carmen Holly
FRB – Matt Suntag
GAO – Sonya Phillips
OCC – Will Binkley
OCC – Kevin Lawton
OCC – Stacy Fluellen
REVAA – Tom Tilton

The Meeting was called to order at 10:00 a.m. by A. Lindo.

REPORTS

- **Chairman**

A. Lindo welcomed observers to the Meeting. He reported the following:

- In 2019, the ASC will begin the process of developing a more robust State grant program.
- The ASC may receive additional requests for temporary waivers in 2019. He spoke with Commissioner Kruse from the North Dakota Department of Financial Institutions (NDDFI) regarding their temporary waiver submission that was submitted by NDDFI, ND Bankers Association and the North Dakota Governor's Office. Commissioner Kruse relayed that NDDFI will submit information to support the submission. J. Park met on January 15th with the Tennessee (TN) Department of Financial Institutions, TN Bankers Association and the TN Real Estate Appraiser Commission to discuss improving appraisal services in the State. R. Taft asked if TriStar Bank has located appraisers to work for them. J. Park responded that Tristar Bank attended the meeting and he felt that it was helpful to all participants. The TN Bankers Association will compile a list of TN appraisers along with their specialties and list them on their website. R. Taft suggested that ASC staff write a White Paper listing the concerns discussed and how they were addressed. A. Lindo noted that assistance from TriStar Bank may be helpful. The White Paper could list the positive outcomes and the issues that still need resolution. M. Hatheway was in agreement with A. Lindo.
- The November 5th ASC Roundtable was successful, and the ASC will plan a third Roundtable this year.

- **Executive Director**

J. Park reported on 2018 highlights:

- The appraisal management company (AMC) Registry opened in July and, to date, five States are inputting data. 26 States received a one-year extension to August 10, 2019, to start an AMC Program. Lenders are voicing concerns that if a State's AMC Program is not operational by August 10, 2019, that it could affect lending in those States. J. Park asked lenders to send their concerns to the ASC and asked how the ASC should convey its message to the public. A. Ritter suggested concerns could be addressed in the Frequently Asked Questions (FAQs) on the ASC website. A. Lindo requested that staff draft FAQs for ASC review. R. Taft added that these concerns could be discussed at the Association of Appraiser Regulatory Officials (AARO) spring conference.
- ASC staff initiated the AMC Program Compliance Review process in August; thus far, three State AMC Programs have been reviewed.
- The ASC's lease for office space expired on October 1, 2018. All staff are now working remotely. He said that future ASC Meetings could be held at 1325 G Street NW as there is available meeting space at that location. Staff will look into the logistics and notify the ASC of their findings.

- 42 States are using the Unique Identifier Number, three are in process and the remaining States need more attention. The ASC may want to consider rulemaking. J. Park said that staff is researching whether the ASC Registries could be augmented to function more like the Nationwide Mortgage Licensing System and Registry.
 - Currently, 20 State Appraiser Programs have an Excellent rating, 24 are rated Good and 11 are rated as Needs Improvement.
 - The Appraisal Foundation (Foundation) is currently working on two major projects: the virtual training program known as *Practical Applications for Real Estate Appraisers* and changes to the 2020-21 USPAP. A fourth Exposure Draft will be released for comment for the 2020-21 USPAP.
 - A lawsuit has been filed in New Jersey regarding the constitutionality of USPAP. V. Spicer asked if this issue has come up previously. A. Ritter responded one State has raised similar questions, but the State did not file pleadings.
- **Delegated State Compliance Reviews**

A. Bohorfoush reported on State Compliance Reviews completed pursuant to delegated authority since the ASC's August 29th Meeting. Eight State Compliance Reviews were finalized and approved by the Executive Director under delegated authority. Arizona, California, North Carolina, North Dakota and Washington were awarded a Finding of "Excellent" and all will remain on a two-year Review Cycle. Colorado, Minnesota and South Dakota were awarded a Finding of "Good" and all will remain on a two-year Review Cycle.

D. Graves reported that five State Compliance Reviews were finalized and approved by the Chairman under delegated authority. Massachusetts, Michigan, Oregon, Pennsylvania and Vermont all received a finding of Needs Improvement and are subject to specific requirements and monitoring to correct the concerns. V. Spicer asked what the next steps are for Vermont. D. Graves responded that ASC staff will schedule a meeting with the State. Either the Executive Director and/or Deputy Executive Director would meet with Vermont with or without the Policy Manager to find the best plan of action. R. Taft asked if ASC staff are comfortable with the steps these States (excluding Vermont) are taking to improve their Program. D. Graves responded that ASC staff are comfortable monitoring those States as the issues those States are having are not recurring or ongoing issues. M. Hatheway felt that States rated as Needs Improvement may need better training and said it seems enforcement is the biggest issue. D. Graves said that staff attorneys need better enforcement training. R. Taft asked if staff knows what kind of training State staff receive, and if ASC staff should review the materials. A. Lindo suggested staff provide best practices from other States to those that need better training. M. Hatheway said staff could provide a recap of common issues to States with solutions to those problems. A. Lindo asked if States in need of help attend AARO Conferences. J. Park responded that it varies; a State may attend some or they may send different staff each time.

D. Graves reported that three Follow-up Reviews were performed. Illinois has made progress and a Compliance Review will be conducted in September 2019. New Mexico has improved, and a Compliance Review will be conducted in June 2019. Wisconsin resolved all outstanding issues and is scheduled for a Review in November 2019.

A. Bohorfoush reported that three State AMC Programs were reviewed: Arizona, California and Minnesota. All were given a finding of “Good.” The Reports were signed by the Executive Director under delegated authority from the Chairman. D. Graves said that the AMC Compliance Review Reports mirror the Appraiser Program Reports. A. Lindo commended staff for the AMC Reviews.

- **Financial Manager**

G. Hull reported that the Foundation submitted grant reimbursement requests for May-September in the amounts of \$56,610, \$93,980, \$76,363, \$63,230 and \$29,709 respectively. These requests covered costs for Appraiser Qualifications Board (AQB) and Appraisal Standards Board (ASB) expenses for meetings, direct labor and overhead costs, as well as the Investigator Training Program. Of the \$660,000 total grant award, \$139,923 remains unexpended.

G. Hull updated the ASC on revenue and expenses for the first quarter of FY19. Expenses and revenue are in line with projections. Five States are submitting AMC Registry fees. The FY18 audit should be finalized within the next two weeks. R. Taft asked if an analysis could be prepared to project AMC Registry fees. G. Hull responded that staff is putting together trends of payment activity. J. Park added that staff is looking at the average number of AMCs in various States and how many appraisers on their panels are being utilized.

ACTION ITEMS

- **August 29, 2018 Open Session Minutes**

R. Taft made a motion to approve the August 29th open session meeting minutes incorporating edits received by the FDIC. V. Spicer seconded and all members present voted to approve.

- **Reprogramming Request for FY18 Appraisal Foundation Grant**

G. Hull reported that the Foundation submitted a Reprogramming Request for \$25,634. Currently \$43,000 of the Foundation grant remains. The Foundation would like to reprogram \$19,139 of ASB and AQB salaries and fringe benefits along with \$6,495 to be reprogrammed for AQB and ASB travel. This would leave an unspent balance of approximately \$17,000. ASC staff recommends approval of the request. R. Taft made a motion to approve the reprogramming request in the amount of \$25,634. T. Segerson seconded and all members present voted to approve.

- **ASC Roundtable Summary**

J. Park reported on the November 5th ASC Roundtable (Roundtable) held in Washington, DC. There were 66 participants representing 43 organizations, including Federal and State agencies as well as the private and non-profit sectors. V. Spicer suggested minor wording changes and said she would forward them to ASC staff. R. Taft felt that the bullet points could be clarified with more detail. A. Ritter said that she would send out an editable version of the Summary to the ASC to provide edits. After edits are incorporated, the Summary will be sent out for notation vote. A. Bohorfoush said that the Summary would also be in the 2018 ASC Annual Report.

A. Lindo asked if planning has started for the 2019 ASC Roundtable. J. Park responded that he would reach out to the OCC for conference room availability for the first week of November. He suggested contracting with CLI again to assist with logistics. R. Taft suggested picking one or two bullets from the Summary and focus on them for the next Roundtable. A. Lindo also suggested getting feedback from participants.

M. Hatheway asked when the ASC would be reviewing the recommendations provided by the Appraisal Subcommittee Advisory Committee for Development of Regulations (ASCAC) to determine which recommendations should be implemented. There should be a broader discussion on the ASCAC recommendations with staff to determine next steps for the recommendations. R. Taft requested staff send the ASCAC Recommendations to the ASC. A. Lindo requested that staff update the ASC on its next steps at the May 8th ASC Meeting.

The Open Session adjourned at 11:30 a.m. The next ASC Meeting is scheduled for May 8, 2019.

**APPRAISAL SUBCOMMITTEE
SPECIAL MEETING MINUTES
APRIL 15, 2019**

LOCATION: Conference Call

ATTENDEES

ASC MEMBERS: FRB – Art Lindo (Chair)
CFPB – Veronica Spicer
FDIC – Marianne Hatheway
FHFA – Robert Witt
HUD – Bobbi Borland
NCUA – Tim Segerson
OCC – Richard Taft

ASC STAFF: Executive Director – Jim Park
Deputy Executive Director – Denise Graves
General Counsel – Alice Ritter
Attorney-Advisor – Ada Bohorfoush
Management and Program Analyst – Lori Schuster

OBSERVERS: CFPB – Deana Krumhansl
CFPB – Philip Neary
CFPB – Paul Sanford
FDIC – Michael Briggs
FDIC – Suzy Gardner
FDIC – Ben Gibbs
FDIC – Mark Mellon
FHFA – Ming-Yuen Meyer-Fong
FRB – Carmen Holly
FRB – Derald Seid
FRB – Matt Suntag
NCUA – Rachel Ackmann
OCC – Kevin Lawton
OCC – Joanne Phillips
OCC – Mitchell Plave

The Meeting was called to order at 12:55 p.m. by A. Lindo.

ACTION ITEMS

- **North Dakota Temporary Waiver Request**

R. Taft made a motion to consider the Request from the North Dakota Governor's Office, the North Dakota Department of Financial Institutions and the North Dakota Bankers Association as a completed Request for purposes of publication in the *Federal Register* to receive public comment on the Request; M. Hatheway seconded. The vote passed 6-1 with B. Borland voting no. A. Lindo instructed ASC staff to prepare the 30-day Notice for Comment for publication in the *Federal Register*. Members should submit any specific questions to be asked in the Notice to A. Ritter. A. Ritter said a draft will be completed this afternoon and sent to ASC members for review and edit.

The Special Meeting adjourned at 1:00 p.m.

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee
Federal Financial Institutions Examination Council

July 10, 2019

Mr. David Mangler, Director
Division of Professional Regulation
Council on Real Estate Appraisers
861 Silver Lake Blvd, Suite 203
Dover, DE 19904

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

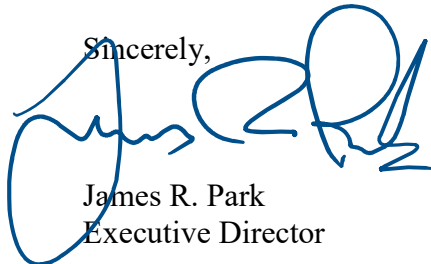
Dear Mr. Mangler:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Delaware appraiser regulatory program (Appraiser Program) on March 19 - 21, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Good." An area of concern that was identified is being addressed by the Appraiser Program. Delaware will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Delaware Appraiser Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Ms. Jennifer Witte, Administrative Specialist II
Dr. Pamela Zickafoose, Executive Director


Appraisal Subcommittee
Federal Financial Institutions Examination Council

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor ¹	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

¹ An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, *Reciprocity*; see also Policy Statement 8, *Interim Sanctions*.

ASC State Appraiser Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: July 10, 2019

Delaware Appraiser Regulatory Program (State)

Council on Real Estate Appraisers (Council)	PM: V. Metcalf	ASC Compliance Review Date: March 19-21, 2019	Review Period: January 2017 to March 2019
Umbrella Agency: Umbrella Agency: Division of Professional Regulation		Number of State Credentialed Appraisers on National Registry: 548	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
Temporary Practice:	X			No compliance issues noted.	N/A	None	None
National Registry:	X			No compliance issues noted.	N/A	None	None
Application Process:			X	The State failed to take appropriate action after the State determined an appraiser failed to complete all CE consistent with AQB Criteria for renewal.	On March 26, 2019, the State provided evidence of the appraiser's completion of additional CE to meet AQB Criteria. On June 5, 2019, the State reported that in the future, staff will place an alert in the licensure system to ensure CE deficiencies are not overlooked.	None	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 4.
Reciprocity:	X			No compliance issues noted.	N/A	None	None
Education:	X			No compliance issues noted.	N/A	None	None
Enforcement:	X			No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

August 6, 2019

Ms. Cynthia Briggs, Program Manager
Board of Real Estate Appraisers
Occupational and Professional Licensing Administration
Department of Consumer and Regulatory Affairs
1100 4th Street SW, Suite E500
Washington, DC 20024

RE: ASC Compliance Review of the District of Columbia's Appraiser Regulatory Program

Dear Ms. Briggs:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the District of Columbia appraiser regulatory program (Appraiser Program) on April 15-17, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Good." The final ASC Compliance Review Report (Report) of the District of Columbia Appraiser Program is attached.

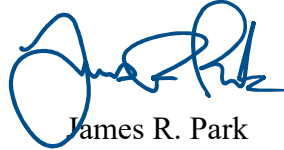
The ASC identified the following areas of non-compliance:

- States must issue temporary practice permits within five business days of receipt of a completed application, or notify the applicant and document the file as to the circumstances justifying delay or other action;¹
- States must track all temporary practice permits using a permit log which includes the name of the applicant, date application received, date completed application received, date of issuance, and date of expiration, if any;² and
- States may not limit an appraiser to one temporary practice permit per calendar year.³

ASC staff will confirm that appropriate corrective actions have been taken during the next Review. The District of Columbia will remain on a two-year Review Cycle.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Mr. Leon Lewis, Executive Director
Ms. Stacey Williams, Board Administrator
Ms. Tamora Papas, Board Chair

¹ 12 U.S.C. § 3351; Policy Statement 2.

² 12 U.S.C. § 3351; Policy Statement 2 B.

³ 12 U.S.C. § 3351; Policy Statement 2 B.

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor ¹	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

¹ An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, *Reciprocity*; see also Policy Statement 8, *Interim Sanctions*.

ASC State Appraiser Program Compliance Review Report

ASC Finding: **Good**
Final Report Issue Date: **August 6, 2019**

District of Columbia (DC) Appraiser Regulatory Program (State)

DC Board of Real Estate Appraisers (Board) / Decision Making	PM: J. Tidwell	ASC Compliance Review Date: April 15-17, 2019	Review Period: April 2017 to April 2019
Umbrella Agency: Department of Consumer and Regulatory Affairs		Number of State Credentialed Appraisers on National Registry: 764	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
Temporary Practice:		X		The State failed to process requests for temporary practice permits within 5 business days of receipt of a completed application.	On July 8, 2019, the State reported they directed their application processing vendor to approve and issue temporary permits that do not require Board review. This will allow the vendor to process applications within 5 business days of receipt of a completed application.	The State must monitor temporary practice permit processing to ensure compliance with Title XI and ASC Policy Statement 2.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 2.
Temporary Practice continued:		X		The State failed to accurately track all temporary practice permits using a permit log which includes the name of the applicant, date application received, date completed application received, date of issuance, and date of expiration, if any.	On July 8, 2019, the State reported they directed their application processing vendor to accurately track all temporary practice permits using a permit log which includes the name of the applicant, date application received, date completed application received, date of issuance, and date of expiration, if any.	The State must monitor temporary practice permit processing to ensure compliance with Title XI and ASC Policy Statement 2.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 2.

ASC State Appraiser Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: August 6, 2019

District of Columbia (DC) Appraiser Regulatory Program (State)

DC Board of Real Estate Appraisers (Board) / Decision Making	PM: J. Tidwell	ASC Compliance Review Date: April 15-17, 2019	Review Period: April 2017 to April 2019
Umbrella Agency: Department of Consumer and Regulatory Affairs		Number of State Credentialed Appraisers on National Registry: 764	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Temporary Practice continued:		X					
States may not limit an appraiser to one temporary practice permit per calendar year. (12 U.S.C. § 3351; Policy Statement 2 B.)				The State limits an appraiser to one temporary practice permit at a time; consequently limiting temporary practice permits to one permit per calendar year.	On July 8, 2019, the State reported a new on-line system did not allow for more than one temporary practice permit at a time consequently limiting permits to 1 every 12 months. The application processing vendor is manually processing temporary practice permits until the system is corrected to allow an appraiser two temporary practice permits at a time.	The State must monitor temporary practice permit processing to ensure compliance with Title XI and ASC Policy Statement 2.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 2.
National Registry:			X				
States must ensure that the authorization information provided to the ASC is updated and accurate. (12 U.S.C. § 3347; Policy Statement 3 C.)				The State failed to notify the ASC to remove National Registry authorization of two individuals when they were no longer eligible.	On July 8, 2019, the State reported the authorization information was updated. In addition, a backup person was added to ensure the information will be kept updated and accurate in the future.	None	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 3.
Application Process:	X						
				No compliance issues noted.	N/A	None	None
Reciprocity:	X						
				No compliance issues noted.	N/A	None	None
Education:	X						
				No compliance issues noted.	N/A	None	None
Enforcement:	X						
				No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee
Federal Financial Institutions Examination Council

June 10, 2019

Mr. Halsey Beshears, Secretary
Department of Business and Professional Regulation
2601 Blair Stone Road
Tallahassee, FL 32399-1010

RE: ASC Preliminary Compliance Review of Florida's Appraiser Regulatory Program

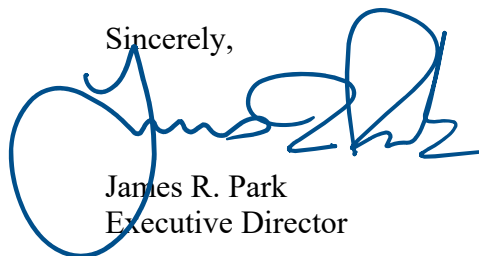
Dear Mr. Beshears:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Florida appraiser regulatory program (Appraiser Program) on February 4 -7, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Good." An area of concern that was identified is being addressed by the Appraiser Program. Florida will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Florida Appraiser Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Ms. Katy McGinnis, Director
Ms. Allison McDonald, Executive Director
Ms. Beverly Ridenauer, Government Analyst II

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor ¹	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

¹ An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, *Reciprocity*; see also Policy Statement 8, *Interim Sanctions*.

ASC State Appraiser Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: June 10, 2019

Florida Appraiser Regulatory Program (State)		
State Board Title (Board): Florida Real Estate Appraisal Board	PM: V. Metcalf	ASC Compliance Review Date: February 4-7, 2019
Umbrella Agency: Department of Business and Professional Regulation, Division of Real Estate		Review Period: February 2017 to February 2019
		Number of State Credentialed Appraisers on National Registry: 5,912
		Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
Temporary Practice:	X			No compliance issues noted.	N/A	None	None
National Registry:			X	The State did not report all disciplinary actions to the ASC National Registry.	On January 28, 2019, the State reported all missing disciplinary actions were provided to the National Registry. In addition, the State reported that a new procedure was implemented to ensure all actions are reported to the National Registry timely.	None	ASC staff will pay particular attention to this area for compliance with ASC Policy Statement 3, during the next Review.
Application Process:	X			No compliance issues noted.	N/A	None	None
Reciprocity:	X			No compliance issues noted.	N/A	None	None
Education:	X			No compliance issues noted.	N/A	None	None
Enforcement:	X			No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

August 9, 2019

Mr. John Kenkel, Jr., Chair
Real Estate Appraisers Board
321 N. Madison Avenue
Richmond, KY 40475

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

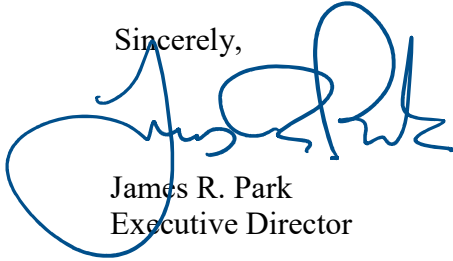
Dear Mr. Kenkel:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Kentucky appraiser regulatory program (Appraiser Program) on May 21-24, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Excellent." Kentucky will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Kentucky Appraiser Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Mr. Harold Corder, Executive Director, Kentucky Real Estate Authority

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor ¹	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

¹ An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, *Reciprocity*; see also Policy Statement 8, *Interim Sanctions*.

ASC State Appraiser Program Compliance Review Report

ASC Finding: Excellent
 Final Report Issue Date: August 9, 2019

Kentucky Appraiser Regulatory Program (State)			
Kentucky Real Estate Appraisers Board (Board)	PM: N. Fenochietti	ASC Compliance Review Date: May 21-24, 2019	Review Period: March 2017 to May 2019
Umbrella Agency: Public Protection Cabinet/ Kentucky Real Estate Authority		Number of State Credentialed Appraisers on Appraiser Registry: 1,412	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
Temporary Practice:	X			No compliance issues noted.	N/A	None	None
National Registry:	X			No compliance issues noted.	N/A	None	None
Application Process:	X			No compliance issues noted.	N/A	None	None
Reciprocity:	X			No compliance issues noted.	N/A	None	None
Education:	X			No compliance issues noted.	N/A	None	None
Enforcement:	X			No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee
Federal Financial Institutions Examination Council

June 17, 2019

Mr. Robert Praytor, Administrator
Mississippi Real Estate Commission
Real Estate Appraiser Licensing and Certification Board
P O Box 12685
Jackson, MS 39236

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

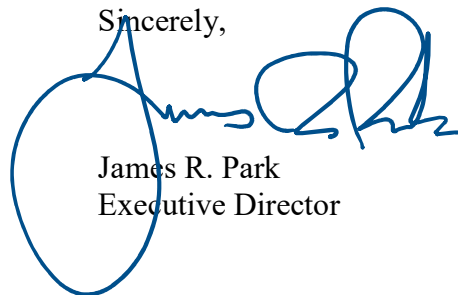
Dear Mr. Praytor:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Mississippi appraiser regulatory program (Appraiser Program) on May 20-23, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Excellent." Mississippi will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Mississippi Appraiser Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Ms. Holly Hood, Administrative Assistant

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor ¹	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

¹ An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, *Reciprocity*; see also Policy Statement 8, *Interim Sanctions*.

ASC State Appraiser Program Compliance Review Report

ASC Finding: Excellent
Final Report Issue Date: June 1, 2019

Mississippi Appraiser Regulatory Program (State)

Mississippi Real Estate Appraiser Licensing and Certification Board (Board) PM: C. Brooks ASC Compliance Review Date: May 20-23, 2019 Review Period: May 2017 to May 2019

Umbrella Agency: Independent Number of State Credentialed Appraisers on Appraiser Registry: 982 Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
Temporary Practice:	X			No compliance issues noted.	N/A	None	None
National Registry:	X			No compliance issues noted.	N/A	None	None
Application Process:	X			No compliance issues noted.	N/A	None	None
Reciprocity:	X			No compliance issues noted.	N/A	None	None
Education:	X			No compliance issues noted.	N/A	None	None
Enforcement:	X			No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

April 29, 2019

Mr. Tyler Kohtz, Director
Nebraska Real Property Appraiser Board
P O Box 94963
Lincoln, NE 68509-4963

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

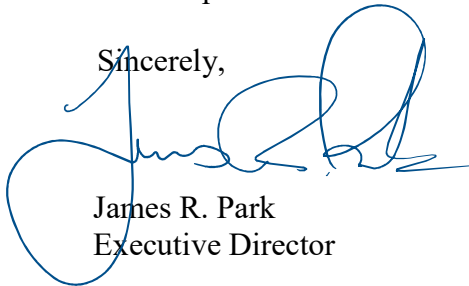
Dear Mr. Kohtz:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Nebraska appraiser regulatory program (Appraiser Program) on March 19-21, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Excellent." Nebraska will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Nebraska Appraiser Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor ¹	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

¹ An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, *Reciprocity*; see also Policy Statement 8, *Interim Sanctions*.

ASC State Appraiser Program Compliance Review Report

ASC Finding: Excellent
Final Report Issue Date: April 29, 2019

Nebraska Appraiser Regulatory Program (State)			
Nebraska Real Property Appraiser Board (Board)	PM: K. Klamet	ASC Compliance Review Date: March 19-21, 2019	Review Period: March 2017 to March 2019
Umbrella Agency: Independent		Number of State Credentialed Appraisers on National Registry: 641	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
Temporary Practice:	X			No compliance issues noted.	N/A	None	None
National Registry:	X			No compliance issues noted.	N/A	None	None
Application Process:	X			No compliance issues noted.	N/A	None	None
Reciprocity:	X			No compliance issues noted.	N/A	None	None
Education:	X			No compliance issues noted.	N/A	None	None
Enforcement:	X			No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

May 9, 2019

Ms. Laura L. Smith, Administrator
South Carolina Real Estate Appraisers Board
Department of Labor, Licensing and Regulation
Synergy Business Park; Kingtree Building
110 Centerview Drive
Columbia, SC 29210

RE: ASC Compliance Review of South Carolina's Appraiser Regulatory Program

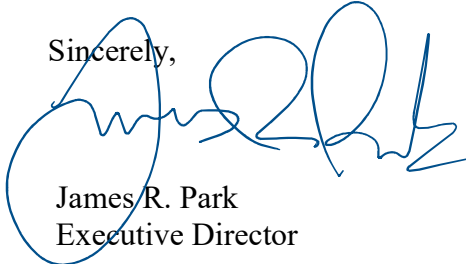
Dear Ms. Smith:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the South Carolina appraiser regulatory program (Appraiser Program) on February 12-15, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Good." An area of concern that was identified is being addressed by the Appraiser Program. South Carolina will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the South Carolina Appraiser Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Mr. George E. Knight Jr., Chairman

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor ¹	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

¹ An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, *Reciprocity*; see also Policy Statement 8, *Interim Sanctions*.

ASC State Appraiser Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: May 9, 2019

South Carolina Regulatory Program (State)			
South Carolina Real Estate Appraisers Board (Board)	PM: N. Fenochietti	ASC Compliance Review Date: February 12-15, 2019	Review Period: February 2017 to February 2019
Umbrella Agency: South Carolina Department of Labor, Licensing and Regulation		Number of State Credentialed Appraisers on National Registry: 2,039	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X						
0				No compliance issues noted.	N/A	None	None
Temporary Practice:	X						
0				No compliance issues noted.	N/A	None	None
National Registry:			X				
States are required to report all disciplinary actions via the extranet application within 5 business days after the disciplinary action is final, as determined by State law. (12 U.S.C. § 3347; 12 U.S.C. § 3338; Policy Statement 3 D.)				The State did not report all disciplinary actions to the ASC National Registry within 5 business days.	On April 2, 2019, the State reported recently adopting Private Disciplinary actions which they did not realize needed to be entered on the National Registry. All discipline was reported to the National Registry prior to the commencement of the Compliance Review.	None	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 3.
Application Process:	X						
0				No compliance issues noted.	N/A	None	None
Reciprocity:	X						
0				No compliance issues noted.	N/A	None	None
Education:	X						
0				No compliance issues noted.	N/A	None	None
Enforcement:	X						
0				No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

June 10, 2019

Ms. Neldy Jean-Francois, Deputy Commissioner and Chief of Staff
Division of Professional Licensure
1000 Washington Street, Suite 710
Boston, MA 02118

RE: Appraisal Subcommittee Staff Follow-Up Review of Massachusetts' Appraiser Regulatory Program

Dear Ms. Jean-Francois:

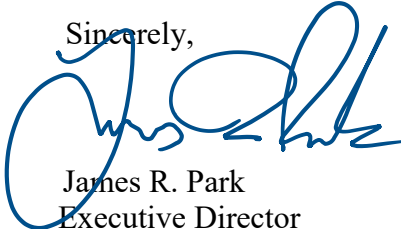
Thank you for your cooperation and your staff's assistance in the May 15, 2019, Appraisal Subcommittee (ASC) staff Follow-up Review of the Massachusetts appraiser regulatory program (Appraiser Program). This was a Follow-up Review of the July 10-12, 2018, ASC Compliance Review of the Massachusetts Appraiser Program.

As detailed in the attached Follow-up Report (Report) of the Massachusetts Appraiser Program, Massachusetts made progress in 4 of the 5 non-compliance concerns identified in the July 10-12, 2018, Appraiser Program Report.

Unfortunately, 2 of the areas identified as areas of concern in the July 10-12, 2018 ASC Appraiser Program Report, were found to be out of compliance during the Follow-up Review. ASC staff is requiring Massachusetts to provide written plans to address the out of compliance issues as detailed in the attached report.

This letter and the attached Follow-up Report are public record and available on the ASC website in accordance with the Freedom of Information Act. Please contact us if you have any questions.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Mr. Shawn Murphy, Executive Director
Ms. Lynn Read, Agency Counsel
Ms. Kristin Mitchell, Program Coordinator

ASC Staff Follow-Up Report: 2018 Compliance Review

Massachusetts Appraiser Regulatory Program (State)		
Board of Registration of Real Estate Appraisers (Board)	Follow-Up Review Date: May 15, 2019	Follow-Up Report Issue Date: June 10, 2019
Umbrella Agency: Division of Professional Licensure	ASC Compliance Review Date: July 10-12, 2018	PM: C. Brooks
Follow-Up of Compliance Review Report Dated: December 3, 2018	ASC Finding: Needs Improvement	

Applicable Federal Citations	ASC Staff Assessment			Required/Recommended State Actions from the December 3, 2018 Compliance Review Report	Status as of May 19, 2019 Follow-Up	Further Required Actions/Comments
	Compliance (YES/NO)	Areas of Concern (AC)				
	Yes	No	AC			
Temporary Practice:		X				
States must issue temporary practice permits within five business days of receipt of a completed application, or notify the applicant and document the file as to the circumstances justifying delay or other action. (12 U.S.C. § 3351; Policy Statement 2.)				The State must monitor temporary practice permit processing to ensure compliance with Title XI and ASC Policy Statement 2.	ASC staff reviewed a sampling of 16 temporary practice application files issued since the last Compliance Review. Of 16 files reviewed, 5 were not issued within 5 business days of receipt of the completed application. These 5 applications were received during a time when the staff person assigned to process temporary practice applications was on extended leave and the temporary personnel assigned to the task left the Program.	<p>Further Required Actions: Within 60 days from the date of this Report, the State must provide a written plan to ASC staff on procedures it will implement to ensure Temporary Practice applications are processed within 5 business days of a completed application.</p> <p>Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 2 during the next Review.</p>
National Registry:		X				
States must submit all disciplinary actions to the ASC for inclusion on the National Registry. (12 U.S.C. § 3347; 12 U.S.C. § 3338; Policy Statement 3 A, D, E.)				The State should develop a procedure to ensure that all disciplinary actions are submitted to the Appraiser National Registry in a timely manner.	ASC staff monitored the discipline on the quarterly enforcement logs submitted by the State and found discipline imposed against 7 respondents was not reported to the National Registry until prompted by ASC staff.	<p>Further Required Actions: Within 60 days from the date of this Report, the State must develop and provide a written plan to ASC staff to ensure that all disciplinary actions are submitted to the Appraiser National Registry within 5 days after the disciplinary action is final, as determined by State law.</p> <p>Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 3 during the next Review.</p>

ASC Staff Follow-Up Report: 2018 Compliance Review

Massachusetts Appraiser Regulatory Program (State)						
Board of Registration of Real Estate Appraisers (Board)			Follow-Up Review Date: May 15, 2019	Follow-Up Report Issue Date: June 10, 2019		
Umbrella Agency: Division of Professional Licensure			ASC Compliance Review Date: July 10-12, 2018	PM: C. Brooks		
Follow-Up of Compliance Review Report Dated: December 3, 2018			ASC Finding: Needs Improvement			
Applicable Federal Citations						
	ASC Staff Assessment			Required/Recommended State Actions from the December 3, 2018 Compliance Review Report	Status as of May 19, 2019 Follow-Up	Further Required Actions/Comments
	Compliance (YES/NO)	Areas of Concern (AC)				
	Yes	No	AC			
National Registry continued:		X				
States must notify the ASC as soon as practicable of voluntary surrenders, suspensions, revocations, or any other action that interrupts a credential holder's ability to practice. (12 U.S.C. § 3347; Policy Statement 3 D, E.)				The State should develop a procedure to ensure that all disciplinary actions are submitted to the Appraiser National Registry in a timely manner.	ASC staff monitored the discipline on the quarterly enforcement logs submitted by the State and found a credential holder who voluntarily surrendered the credential in lieu of discipline was not reported to the National Registry until prompted by ASC staff.	<p>Further Required Actions: Within 60 days from the date of this Report, the State must develop and provide a written plan to ASC staff to ensure that all disciplinary actions are submitted to the Appraiser National Registry within 5 days after the disciplinary action is final, as determined by State law.</p> <p>Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 3 during the next Review.</p>
National Registry continued:	X					
States must ensure the accuracy of all data submitted to the National Registry. (12 U.S.C. § 3347; Policy Statement 3 A, D, E.)				The State should monitor the new process to ensure the information submitted to the Appraiser National Registry is up to date and accurate.	During the Follow-up Review ASC staff did not find any instances where the data submitted to the National Registry was inaccurate.	<p>Further Required Actions: None</p> <p>Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 3 during the next Review.</p>
Applications:	X					
States must maintain adequate documentation to support verification of all claimed education. (12 U.S.C. § 3347; Policy Statement 4 B, C.)				The State should implement an effective policy and procedure to ensure in the future, documentation used to validate education claims are properly retained and available to ASC staff during the Compliance Review.	During the Follow-up Review all documentation requested by ASC staff was provided.	<p>Further Required Actions: None</p> <p>Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 4 during the next Review.</p>
Application Process continued:	X					
States must complete audits of affidavits for continuing education credit claimed within sixty days from the date the renewed credential is issued. (12 U.S.C. § 3347; Policy Statement 4 F.)				The State should monitor the new process for CE audits to ensure compliance with ASC Policy Statement 4.	During the Follow-up Review, ASC staff found the State is completing audits of affidavits for CE within 60 days.	<p>Further Required Actions: None</p> <p>Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 4 during the next Review.</p>

ASC Staff Follow-Up Report: 2018 Compliance Review

Massachusetts Appraiser Regulatory Program (State)		
Board of Registration of Real Estate Appraisers (Board)	Follow-Up Review Date: May 15, 2019	Follow-Up Report Issue Date: June 10, 2019
Umbrella Agency: Division of Professional Licensure	ASC Compliance Review Date: July 10-12, 2018	PM: C. Brooks
Follow-Up of Compliance Review Report Dated: December 3, 2018	ASC Finding: Needs Improvement	

Applicable Federal Citations	ASC Staff Assessment			Required/Recommended State Actions from the December 3, 2018 Compliance Review Report	Status as of May 19, 2019 Follow-Up	Further Required Actions/Comments
	Compliance (YES/NO)	Areas of Concern (AC)				
	Yes	No	AC			
Enforcement:	X					
States must document and maintain files to enable understanding of facts, determinations, and rationale for those determinations. (12 U.S.C. § 3347; Policy Statement 7 B.)				The State must ensure all cases on the enforcement log submitted for ASC staff's review have supporting documentation and entries that are not the subject of a complaint are identified as such.	During the Follow-up Review all documentation requested by ASC staff was provided and the enforcement log appeared accurate.	Further Required Actions: None Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 7 during the next Review.
Enforcement continued:			X			
States must resolve all complaints filed against appraisers within one year (12 months) of the complaint filing date in the absence of special documented circumstances. (12 U.S.C. § 3347; Policy Statement 7 B.)				While the number of aged complaints has been reduced, the number of complaints the State received decreased from 309 during the 2014 Review Cycle to 74 during this Review Cycle. The State must ensure that the complaints of appraiser misconduct or wrongdoing are resolved on a timely basis as required by ASC Policy Statement 7. The State must continue to submit complaint logs to ASC staff quarterly. Staff will analyze each log. If progress is not made, the ASC may place additional requirements upon the State.	During the Follow-up Review, the State had 24 outstanding complaints of which 3 were unresolved for more than 1 year without the exemption for special documented circumstances. The State has been providing the quarterly complaint logs to ASC staff as requested.	Further Required Actions: The State must continue to submit complaint logs to ASC staff quarterly. Comments: ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 7 during the next Review.

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

July 10, 2019

Mr. David Mangler, Director
Division of Professional Regulation
Council on Real Estate Appraisers
861 Silver Lake Blvd, Suite 203
Dover, DE 19904

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

Dear Mr. Mangler:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Delaware AMC regulatory program (AMC Program) on March 19 - 21, 2019, to determine the AMC Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

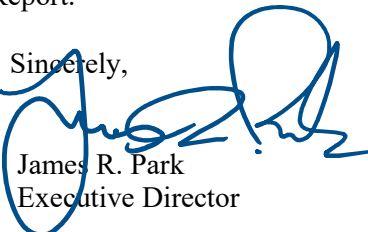
The ASC considered the preliminary results of the Review and the State's response to those results. The AMC Program has been awarded an ASC Finding of "Good." The final ASC Compliance Review Report (Report) is attached.

The ASC identified the following area of non-compliance:

- Participating States must enforce and document ownership limitations for State-registered AMCs.¹
- Participating States must impose requirements on AMCs consistent with the AMC Rule.²

ASC staff will confirm that appropriate corrective actions have been taken during the next Review. Delaware will remain on a two-year Review Cycle.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,

James R. Park
Executive Director

Attachment

cc: Ms. Jennifer Witte, Administrative Specialist II
Dr. Pamela Zickafoose, Executive Director

¹ 12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; Policy Statement 8.

² 12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; Policy Statement 8.

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

ASC State AMC Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: July 10, 2019

Delaware AMC Regulatory Program (State)			
Council on Real Estate Appraisers (Council)	PM: V. Metcalf	ASC Compliance Review Date: March 19-21, 2019	Review Period: January 2017 to March 2019
Umbrella Agency: Division of Professional Regulation		Number of AMCs on National Registry: 120	Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:		X					
Participating States must enforce and document ownership limitations for State-registered AMCs. (12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; Policy Statement 8.)				An AMC shall not be registered or included on the AMC National Registry if such AMC, in whole or in part, directly or indirectly, is owned by any person who has had an appraiser license or certificate refused, denied, cancelled, surrendered in lieu of revocation, or revoked in any State for a substantive cause. The State limits the requirement to owners of 10% or more.	On June 5, 2019, the State reported that section three of House Bill 154, which was introduced on May 14, 2019, eliminates the current allowance in Delaware for a revoked or suspended real estate appraiser to have an ownership interest in an AMC.	The State must continue the process to amend its Statute to bring it into compliance with the AMC Rule and provide the ASC staff with a copy once finalized.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI, the AMC Rule and ASC Policy Statement 8.
Statutes, Regulations, Policies and Procedures continued:		X					
Participating States must impose requirements on AMCs consistent with the AMC Rule. (12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; Policy Statement 8.)				A regulated AMC must notify appraisers on its appraiser panel before their removal from the panel. The State allows regulated AMCs to remove an appraiser from its panel, without notice, within the first sixty days after the appraiser is first added to the appraiser panel.	On June 5, 2019, the State reported that section four of House Bill 154, which was introduced on May 14, 2019, disallows AMCs from removing an appraiser from its appraiser panel without prior notice.	The State must continue the process to amend its Statute to bring it into compliance with the AMC Rule and provide the ASC staff with a copy once finalized.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI, the AMC Rule and ASC Policy Statement 8.
National Registry:	X						
				No compliance issues noted.	N/A	None	None
Enforcement:	X						
				No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

April 29, 2019

Mr. Tyler Kohtz, Director
Nebraska Real Property Appraiser Board
P O Box 94963
Lincoln, NE 68509-4963

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

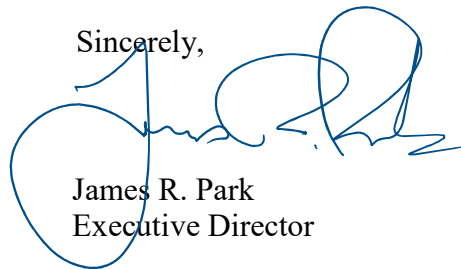
Dear Mr. Kohtz:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Nebraska AMC regulatory program (AMC Program) on March 19-21, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The AMC Program has been awarded an ASC Finding of "Excellent." Nebraska will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Nebraska AMC Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,



James R. Park
Executive Director

Attachment

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

ASC State AMC Program Compliance Review Report

ASC Finding: Excellent
 Final Report Issue Date: April 29, 2019

Nebraska AMC Regulatory Program (State)

Nebraska Real Property Appraiser Board (Board) PM: K. Klamet ASC Compliance Review Date: March 19-21, 2019 Review Period: March 2017 to March 2019

Umbrella Agency: Independent Number of AMCs on National Registry: 6 Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X						
				No compliance issues noted.	N/A	None	None
National Registry:	X						
				No compliance issues noted.	N/A	None	None
Enforcement:	X						
				No compliance issues noted.	N/A	None	None

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee
Federal Financial Institutions Examination Council

May 9, 2019

Ms. Laura L. Smith, Administrator
South Carolina Real Estate Appraisers Board
Department of Labor, Licensing and Regulation
Synergy Business Park; Kingstree Building
110 Centerview Drive
Columbia, SC 29210

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


Dear Ms. Smith:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the South Carolina AMC regulatory program (AMC Program) on February 12-15, 2019, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

The ASC considered the preliminary results of the Review and the State's response to those results. The AMC Program has been awarded an ASC Finding of "Excellent." South Carolina will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the South Carolina AMC Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,


James R. Park
Executive Director

Attachment

cc: Mr. George E. Knight Jr., Chairman

ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> • State meets all Title XI mandates and complies with requirements of ASC Policy Statements • State maintains a strong regulatory Program • Very low risk of Program failure 	2-year
Good	<ul style="list-style-type: none"> • State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements • Deficiencies are minor in nature • State is adequately addressing deficiencies identified and correcting them in the normal course of business • State maintains an effective regulatory Program • Low risk of Program failure 	2-year
Needs Improvement	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program • State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies • State regulatory Program needs improvement • Moderate risk of Program failure 	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> • State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements • Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program • State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing • State regulatory Program has substantial deficiencies • Substantial risk of Program failure 	1-year
Poor	<ul style="list-style-type: none"> • State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements • Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program • State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies • High risk of Program failure 	Continuous monitoring

*Program history or nature of deficiency may warrant a more accelerated Review Cycle.

ASC State AMC Program Compliance Review Report

ASC Finding: Excellent
 Final Report Issue Date: May 9, 2019

South Carolina AMC Regulatory Program (State)

South Carolina Real Estate Appraisers Board (Board) PM: N. Fenochietti ASC Compliance Review Date: February 12-15, 2019 Review Period: February 2017 to February 2019

Umbrella Agency: South Carolina Department of Labor, Licensing and Regulation Number of AMCs on National Registry: 0 Review Cycle: Two Year

Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	X			No compliance issues noted.	N/A	None	None
National Registry:	X			No compliance issues noted.	N/A	None	None
Enforcement:	X			No compliance issues noted.	N/A	None	None

Statement: Raising Commercial Appraisal Threshold Puts U.S. Economy at Greater Risk

(WASHINGTON) July 19, 2019 – The Appraisal Foundation President David Bunton today raised concerns about the action taken by the National Credit Union Administration, which quadrupled the threshold for commercial transactions requiring an appraisal from \$250,000 to \$1,000,000.

"The Appraisal Foundation is deeply concerned that the action taken yesterday by the National Credit Union Administration is yet another needless attempt to dilute the federal financial and public policy protections of Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, which requires real estate appraisals to be used in federally related transactions.

Yesterday's action and the proposed rule by federal banking regulators to raise the threshold amount for residential real estate, combined with the years of accumulated carve outs, waivers, and exemptions, has jeopardized the U.S. economy by putting it at greater risk.

The protections originally envisioned by Title XI are facing a death by a thousand cuts, and unfortunately, the 1000th may be too close for comfort."

The Appraisal Foundation is the nation's foremost authority on the valuation profession. The organization sets the Congressionally-authorized standards and qualifications for real estate appraisers, and provides voluntary guidance on recognized valuation methods and techniques for all valuation professionals. This work advances the profession by ensuring appraisals are independent, consistent, and objective. More information on The Appraisal Foundation is available at www.appraisalfoundation.org (<http://www.appraisalfoundation.org/>).

—End—

*Media Contact: David Greer
Director of Communications
The Appraisal Foundation
dgreer@appraisalfoundation.org
direct phone 202.624.3048*



Connect with us

Welcome to The Appraisal Foundation's Website

Appraisal Standards Board Considering Creating Standards for Evaluations

ASB to Issue Concept Paper and Hold Public Hearing

(Washington, DC) August 1, 2019 – The Appraisal Standards Board (ASB), an independent board of The Appraisal Foundation, announced today that it intends to examine the concept of creating standards for evaluations, which are alternatives to appraisals used by financial institutions. Currently, there are no uniform standards for appraisers to follow when conducting an evaluation, which leads to greater risk to the safety and soundness of the real estate transaction and diminished protections for consumers. The ASB intends to issue the concept paper around Labor Day, and will follow up with a public hearing with panels of constituents on October 18, 2019 in Washington, DC. As with all public meetings of the ASB, the public hearing will be broadcast via livestream.

“This important development by the ASB shows how the Board has their ear to the ground, listening to the concerns of working appraisers in a rapidly evolving marketplace where there is an increasing demand for different valuation products,” said David Buntun, president of the Foundation. “They are balancing that with their responsibility to protect the public trust in valuation by creating uniform standards that are subject to oversight.”

Currently, the *Interagency Appraisal and Evaluation Guidelines* for federally regulated financial institutions provide guidance on evaluations, but that guidance is directed at lenders, not appraisers. Furthermore, the courts have found such guidance to be unenforceable. “This puts appraisers in a difficult, untenable position,” said John Brenan, vice president of appraisal issues at the Appraisal Foundation. “Appraisers often struggle when asked to perform evaluations, since most are mandated to comply with the *Uniform Standards of Professional Appraisal Practice*. It’s almost a Catch-22 situation.”

Under federal regulations, evaluations may be performed by non-appraisers who have not demonstrated a level of expertise through education, training, and examination. If appraisers are not completing an evaluation, there is no recourse for a lender or consumer to appeal a bad evaluation. With the increased use of evaluations in the marketplace lenders and consumers are being exposed to an unnecessary level of risk not seen since the 1980s when national appraiser qualifications and appraisal standards had not yet been created.

“Appraisers are valuation experts. When hiring a licensed or certified real property appraiser to develop and report market value, the client should expect the work to be performed in accordance with the *Uniform Standards of Professional Appraisal Practice*,” said Wayne Miller, chair of the Appraisal Standards Board. “The Board is eager to receive stakeholder feedback from the planned concept paper and public hearing on the impediments, if any, to appraisers completing evaluations in accordance with *USPAP*. As always, the Board’s goal is to allow *USPAP* to evolve in an ever-changing real estate valuation environment, while continuing to promote and maintain a high level of public trust in the valuation profession.”

For these reasons, the ASB is considering creating standards for developing and reporting evaluations, which would apply to those appraisers who want to perform evaluations while complying with state laws. The concept is to draw a bright line between evaluations and appraisals in *USPAP*.

Based on feedback from the concept paper and the public hearing, the ASB could consider moving forward with a discussion draft or an exposure draft by late 2019. The question of when evaluation standards would go into effect is likely to be part of the discussion in the concept paper and at the public meeting.

The Appraisal Foundation is the nation's foremost authority on the valuation profession. The organization sets the Congressionally-authorized standards and qualifications for real estate appraisers, and provides voluntary guidance on recognized valuation methods and techniques for all valuation professionals. This work advances the profession by ensuring appraisals are independent, impartial, and objective. More information on The Appraisal Foundation is available at www.appraisalfoundation.org (<http://www.appraisalfoundation.org/>).

—End—

Media Contact: David Greer
Director of Communications
The Appraisal Foundation
dgreer@appraisalfoundation.org
direct phone 202.624.3048



Connect with us

<https://www.facebook.com/appraisalfoundation>

<https://twitter.com/uspap>

<http://www.linkedin.com/company/the-appraisal-foundation>

<https://www.youtube.com/user/appraisalfoundation>

Welcome to The Appraisal Foundation's Website

Learn more »

http://tafapp.advsolhosting.net/imis/TAF/About_Us/TAF/About_Us.aspx?hkey=800ad342-8e15-4010-b123-64e5e2159269

Copyright ©2019, The Appraisal Foundation 1155 15th Street NW, Suite 1111, Washington, DC 20005 Phone: 202-347-7722, Web: www.appraisalfoundation.org (<http://www.appraisalfoundation.org/>)

116TH CONGRESS
1ST SESSION

H. R. 3619

To amend the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 to provide the Appraisal Subcommittee with the authority to modify annual registry fees for appraisal management companies, to maintain a registry of trainees and charge a lower trainee registry fee, and to allow grants to States to assist appraiser and potential appraiser compliance with the Real Property Appraiser Qualification Criteria, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

JULY 5, 2019

Mr. CLAY introduced the following bill; which was referred to the Committee on Financial Services

A BILL

To amend the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 to provide the Appraisal Subcommittee with the authority to modify annual registry fees for appraisal management companies, to maintain a registry of trainees and charge a lower trainee registry fee, and to allow grants to States to assist appraiser and potential appraiser compliance with the Real Property Appraiser Qualification Criteria, 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,*

1 **SECTION 1. SHORT TITLE.**

2 This Act may be cited as the “Appraisal Reform Act
3 of 2019”.

4 **SEC. 2. ANNUAL REGISTRY FEES FOR APPRAISAL MANAGE-
5 MENT COMPANIES.**

6 Subparagraph (B) of section 1109(a)(4) of the Fi-
7 nancial Institutions Reform, Recovery, and Enforcement
8 Act of 1989 (12 U.S.C. 3338(a)(4)(B)) is amended—

9 (1) in clause (ii), by striking the period at the
10 end and inserting a semicolon; and

11 (2) by inserting after and below clause (ii) the
12 following:

13 “except that if the Appraisal Subcommittee de-
14 termines that the fees established under clause
15 (i) or (ii) result in adverse consequences or are
16 otherwise not appropriately tailored to meet the
17 goals of this paragraph, the Appraisal Sub-
18 committee may establish a new formula for
19 fees, which new formula may not take effect
20 until the Appraisal Subcommittee submits a re-
21 port to the Congress justifying its decision to
22 establish such a new formula, setting forth the
23 new formula, and explaining how the new for-
24 mula will affect such fees.”.

1 **SEC. 3. TRAINEE APPRAISERS.**

2 (a) MAINTENANCE ON NATIONAL REGISTRY.—Para-
3 graph (3) of section 1103(a) of the Financial Institutions
4 Reform, Recovery, and Enforcement Act of 1989 (12
5 U.S.C. 3332(a)(3)) is amended by striking “and licensed”
6 and inserting “, licensed, and trainee”.

7 (b) ANNUAL REGISTRY FEES.—Subparagraph (A) of
8 section 1109(a)(4) of the Financial Institutions Reform,
9 Recovery, and Enforcement Act of 1989 (12 U.S.C.
10 3338(a)(4)(A)) is amended—

11 (1) by inserting “including trainee appraisers,”
12 after “transactions,”;

13 (2) by inserting “except that the Appraisal Sub-
14 committee may, in its discretion, charge a fee for
15 trainee appraisers not exceeding \$20” after “\$40,”;
16 and

17 (3) by inserting before the semicolon the fol-
18 lowing: “; except that nothing in this subparagraph
19 may be construed to require a State to establish or
20 operate an program for trainee appraisers”.

21 (c) DEFINITION.—Section 1121 of the Financial In-
22 stitutions Reform, Recovery, and Enforcement Act of
23 1989 (12 U.S.C. 3350) is amended by adding at the end
24 the following new paragraph:

25 “(12) TRAINEE APPRAISER.—The term ‘trainee
26 appraiser’ means an individual who meets the min-

1 imum criteria established by the Appraiser Qualifica-
2 tion Board for a trainee appraiser license and is
3 credentialed by a State appraiser certifying and li-
4 censing agency.”.

5 **SEC. 4. GRANTS TO NONPROFITS AND INSTITUTIONS OF**
6 **HIGHER EDUCATION FOR COMPLIANCE EF-**
7 **FORTS.**

8 Paragraph (5) of section 1109(b) of the Financial In-
9 stitutions Reform, Recovery, and Enforcement Act of
10 1989 (12 U.S.C. 3338(b)(5)) is amended by inserting
11 “nonprofit organizations, and institutions of higher edu-
12 cation” after “licensing agencies,”.

13 **SEC. 5. REQUIREMENT TO DISCLOSE APPRAISAL FEES.**

14 Section 4(c) of the Real Estate Settlement Proce-
15 dures Act of 1974 (12 U.S.C. 2603(c)) is amended by
16 striking “may” and inserting “shall”.

17 **SEC. 6. INCLUSION OF DESIGNEE OF SECRETARY OF VET-**
18 **ERANS AFFAIRS ON APPRAISAL SUB-**
19 **COMMITTEE.**

20 The first sentence of section 1011 of the Federal Fi-
21 nancial Institutions Examination Council Act of 1978 (12
22 U.S.C. 3310) is amended by inserting “the Department
23 of Veterans Affairs,” after “Protection,”.

○