APPRAISAL SUBCOMMITTEE
CLOSED SESSION MEETING MINUTES
MARCH 9, 2016

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

ATTENDEES

ASC MEMBERS: FRB – Art Lindo (Chair)
CFPB – Mira Marshall
FDIC – Rae-Ann Miller
FHFA – Robert Witt
HUD – Ada Bohorfoush
NCUA – Tim Segerson
OCC – Richard Taft

ASC STAFF: Executive Director – Jim Park
General Counsel – Alice Ritter
Financial Manager – Girard Hull
Attorney-Advisor – Dan Rhoads
Policy Manager – Claire Brooks
Policy Manager – Neal Fenochietti
Policy Manager – Kristi Klamet
Policy Manager – Vicki Metcalf
Policy Manager – Jenny Tidwell
Management & Program Analyst – Lori Schuster
Administrative Officer – Brian Kelly
Administrative Assistant – Maria Cahn

OBSERVERS: FDIC – Richard Foley
FDIC – Suzy Gardner
FDIC – Marianne Hatheway
FDIC – Kim Stock
FRB – Carmen Holly
FRB – Matt Suntatg
OCC – Kevin Lawton
OCC – Chris Manthey
OCC- Joanne Williams

The Meeting was called to order at 11:30 a.m. by A. Lindo.

- **ASC Chairman Term**

  A. Lindo noted that his ASC Chairman term expires on March 31st. He said he is amenable to serving another two-year term. A. Lindo said if other members are interested in the position, to please let the FFIEC know by March 14th. The FFIEC will meet on March 29th and will make the appointment at that meeting.

- **State Preliminary Investigation**

  A. Ritter said the ASC received a complaint from an attorney in Georgia against the Georgia appraiser regulatory agency (GREAB) and the company in Georgia that administers approved qualifying exams, AMP. The basis for the complaint is that the complainant, a licensed appraiser seeking to upgrade to a certified credential, did not meet the January 1, 2015 deadline to sit for the exam. As a result, he is now subject to the new Appraiser Qualifications Board (AQB) Criteria (AQB Criteria), which requires a college degree for a certified credential. The complaint includes a request that the ASC open a formal investigation pursuant to § 1102.38, *ASC Rules of Practice for Proceedings*. The complaint also seeks an order from the ASC requiring GREAB to grant a one-time exception to retroactively apply the 2014 Criteria for the complainant.

  The AQB set a firm deadline of January 1, 2015, for the AQB Criteria to go into effect. The only exception for implementing the AQB Criteria was for applicants in the Reserve components called to active duty.

  ASC staff conducted a preliminary investigation into the action taken by GREAB. GREAB asserts that this appraiser did have opportunities to sit for the exam at the end of December 2014, as there was availability at three different AMP exam sites. ASC staff recommends that a formal investigation not be commenced. V. Metcalf commented that GREAB's Deputy Director asked AMP if the appraiser requested to take the exam and AMP said they had no record of the appraiser applying to sit for the exam. In previous correspondence between GREAB and the appraiser, he was aware of the 2015 Criteria changes effective on January 1, 2015. The appraiser submitted his application to GREAB on December 17th and GREAB contacted the appraiser on December 23rd by both phone and letter notifying him that his application had been approved. She added that the message the appraiser said he received is not the typical wording that AMP uses to denote no availability at testing sites. A. Bohorfoush said it appears that the appraiser wants the ASC to tell GREAB that it handled his application incorrectly. She added that she does not think the ASC has the authority to tell GREAB that they handled this situation incorrectly nor can the ASC offer any remedies to the appraiser. A. Lindo said a letter should be sent to the appraiser stating that the ASC has found insufficient evidence to start an investigation.

  The Closed Session adjourned at 11:55 a.m.