

Sanction Matrix - Working Draft of Possible Recommendations From Temporary Practice Subgroup to Entire ASC-AC - 08/27/2014

Type of violation:	Minor 1st	Minor 2nd	Minor 3rd	Material 1st	Material 2nd	Material 3rd	Significant 1st	Significant 2nd	Significant 3rd	Severe 1st	Severe 2nd	Severe 3rd	Subgroup Comments	
Temporary Practice	Policy Statement 2													
State does not have temporary practice system.	2.A	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX	XXXXXXX	XXXXXXX	1	4, 5	12	Clearly essential requirement.	
Does not use National Registry to verify status of applicant.	2.A												No sanctions due to no requirement.	
Does not issue TPP on a temporary assignment basis.	2.B.1.a	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	2, 3	7	XXXXXXX	XXXXXXX	XXXXXXX	XXXXXXX X	XXXXXXX X	XXXXXXX X	Easily cured by training.
Does not issue TPP within 5 business days.	2.B.1.b	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	2, 3	4, 5	XXXXXXX X	XXXXXXX X	XXXXXXX X	Requires process & commitment.
TPP does not have actual date of issuance.	2.B.1.c	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	2, 3	7	XXXXXXX	XXXXXXX	XXXXXXX	XXXXXXX X	XXXXXXX X	XXXXXXX X	Easily cured by training.
Does not take regulatory responsibility for a temporary practitioner's bad acts.	2.B.1.d	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	2, 3	2, 3	XXXXXXX X	XXXXXXX X	XXXXXXX X	Difficult for TPP issuing state so sanction not severe.
Does not notify the appraiser's home state agency in the case of disciplinary action concerning a temporary practitioner.	2.B.1.e	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	2, 3	2, 3	XXXXXXX X	XXXXXXX X	XXXXXXX X	Easily cured by training; monitoring will accomplish goal.
Does not allow at least one extension of TPP.	2.B.1.f	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	4, 5	7	XXXXXXX X	XXXXXXX X	XXXXXXX X	Public pressure with state contact.
Limits the valid time period of a temporary practice permit to less than 6 months.	2.B.2.a	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	4, 5	7	XXXXXXX X	XXXXXXX X	XXXXXXX X	Public pressure with state contact.
Limits an appraiser to one temporary practice permit per calendar year.	2.B.2.b	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	4, 5	7	XXXXXXX X	XXXXXXX X	XXXXXXX X	Public pressure with state contact.
Charges a temporary practice permit fee exceeding \$250, including one extension fee.	2.B.2.c	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	4, 5	7	XXXXXXX X	XXXXXXX X	XXXXXXX X	Public pressure with state contact.
Imposes appraiser qualification requirements upon temporary practitioners that exceed AQB criteria.	2.B.2.d	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX	XXXXXXX	XXXXXXX	1	4, 5	7, 11	Major item but should not stop commerce in state.
Requires temporary practitioners to obtain a certification or license in the state.	2.B.2.e	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX	XXXXXXX	XXXXXXX	1	4, 5	7, 11	Major item but should not stop commerce in state.
Requires temporary practitioners to affiliate with an in-State appraiser.	2.B.2.f	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX	XXXXXXX	XXXXXXX	1	4, 5	7, 11	Major item but should not stop commerce in state.
Refuses to register appraisers seeking temporary practice in a state that does not have a licensed or certified level credential.	2.B.2.g	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX	XXXXXXX	XXXXXXX	1	4, 5	7, 11	Major item but should not stop commerce in state.
Delays the issuance of a written "letter of good standing" or similar document for more than 5 business days after request.	2.B.3.a	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	1	2, 3	4, 5	XXXXXXX X	XXXXXXX X	XXXXXXX X	Requires process & commitment.
Fail to take disciplinary action, if appropriate, when one of its appraisers is disciplined in another state.	2.B.3.b	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	XXXXXXX X	Competency & S.R. Issues 1	Competency & S.R. Issues 2, 3	Competency & S.R. Issues 4, 5	Ethics & Fraud Issues 1	Ethics & Fraud Issues 2, 3	Ethics & Fraud Issues 11, 12	Bifurcated into discipline areas per 2.B.3.b with Ethics & Fraud Critical.

Key Number	Sanctions	Definitions
1	Warning	A letter that informs the State that its program is not conducting its business in compliance with Title XI and ASC Policy Statements.
2	Training - Board members	Requiring all sitting Board members to attend a workshop regarding a specific topic, usually the role of a State appraiser regulatory agency. May also include training in another topic such as USPAP.
3	Training - State Staff members	Requiring some or all State Board staff to attend a workshop regarding a specific topic, such as investigator training or USPAP.
4	Consultation with State authorities	ASC staff and possibly agency members contacting State officials such as the Governor's office or State legislative members. Contact may be in writing or in person.
5	Meeting with affected parties	ASC staff and possibly State agency members contacting parties such as State Banking Commissions and real estate broker/appraiser trade organizations.
6	Expedited review 6 mos - every year	Scheduling a Compliance Review or Follow-up Review before the usual two-year period. May be electronic.
7	Continuous Monitoring	Requiring reports on required or agreed-upon corrective actions on a monthly or quarterly basis. Additional monitoring may include on-site monitoring as well as off-site monitoring.
8	State use of matrix	Requiring the State to use the Matrix in determining sanctions for enforcement of appraiser complaints.
9	Interim suspension of credential	May be an individual credential or group of credentials within a State.
10	Revocation of credential - individual appraiser	May be an individual credential or group of credentials within a State.
11	Interim derecognition of State appraisal program	Scheduling a Compliance Review or Follow-up Review before the usual two-year period. May be electronic.
12	Derecognition of State appraisal program	Removal of credentials from the National Registry issued by a State and not accepting any new credentials from that State. As a result, there would be no appraisals of property within that State that could be used for federally related transactions.