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Appraisal Subcommittee
Federal Financial Institutions Examination Council

January 19, 2010

Ms. Kim Holland, Commissioner
Oklahoma Insurance Department
Oklahoma Real Estate Appraiser Board
Post Office Box 53408
Oklahoma City, OK 73152-3408

Dear Ms. Holland:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of Oklahoma's appraiser regulatory program on September 30-October 2, 2009. This is the final ASC Compliance Review Report (Report) on that Review.

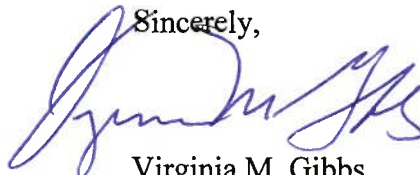
The ASC has considered the staff's preliminary findings regarding the Review and the State's response. The ASC has determined that the Program is in substantial compliance with Title XI of the Financial Institutions, Reform, Recovery, and Enforcement Act of 1989, as amended (Title XI). However, the ASC did identify the following concerns:

- Oklahoma must maintain sufficient documentation to support that approved courses conform to AQB Criteria.¹

In the response, the State indicated it has taken corrective actions, which are detailed in the attached Report. During the next Review, ASC staff will confirm that these corrective actions have taken place and are appropriate. Please also be advised that this letter and the attached 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,



Virginia M. Gibbs
Chairman

Attachment

cc: Mr. George R. Stirman III, Director

¹ Title XI § 1116 (a), 12 U.S.C. 3345; Title XI § 1118 (a), 12 U.S.C. 3347; AQB Real Property Appraiser Qualification Criteria; ASC Policy Statement 10F

ASC Compliance Review Report

Finding: In Substantial Compliance

Oklahoma Appraiser Regulatory Program (Program)			
Oklahoma Real Estate Appraiser Board (Board)		ASC Compliance Review (Review) Date: September 30-October 2, 2009	
Umbrella Agency: Oklahoma Insurance Dept.		PM: K. Klamet	
		Number of State credentialed appraisers on National Registry: 1,114	
		Review Period: 08/2007 to 09/2009	
		Issue Date: January 19, 2010	

Requirement/Guidance	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required State Actions	Recommended State Actions	General Comments
	YES	NO	AC					
Oklahoma Statutes, Regulations, Policies and Procedures:	X							
				No compliance issues noted.	N/A	None	None	None
Temporary Practice:	X							
				No compliance issues noted.	N/A	None	None	None
National Registry:	X							
				No compliance issues noted.	N/A	None	None	None
Application Process:	X							
				No compliance issues noted.	N/A	None	None	None
Reciprocity:	X							
				No compliance issues noted.	N/A	None	None	None
Education:	X							
States must maintain sufficient documentation to support that approved courses conform to AQB Criteria. (Title XI § 1116 (a), 12 U.S.C. 3345; Title XI § 1118 (a), 12 U.S.C. 3347; AQB Real Property Appraiser Qualification Criteria; ASC Policy Statement 10F.)	X			Four education course files selected for Compliance Review (three continuing education and one qualifying education) did not contain sufficient documentation to determine that the courses meet AQB Criteria.	<p>On December 7, 2009, the Board reported additional documentation was obtained from the course providers for three of the four courses identified in our Compliance Review. Based on the documentation received, two of the courses were verified to be properly approved; one course was deemed not suitable for appraisers and the approval was withdrawn. The approval for the fourth course identified in the Compliance Review was also withdrawn because the course provider failed to provide supporting documentation.</p> <p>The Board also advised that the above courses were approved prior to the course review process change in October 2008. A checklist was developed and the review is now performed by Program staff with a recommendation to the Board regarding approval. Furthermore, Program staff is in the process of reviewing the documentation for all education files approved prior to October 2008 to ensure each file contains sufficient support for the Board's decision.</p>	None	None	During the next Review, the ASC will pay particular attention to this area for compliance with AQB criteria and Policy Statement 10F.
Enforcement:	X							
				No compliance issues noted.	N/A	None	None	None