Appraisal Subcommittee

Federal Financial Institutions Examination Council

February 9, 2015

Ms. Nikole Avers, Executive Director Tennessee Real Estate Appraisers Commission Davy Crockett Tower 500 James Robertson Parkway, 4th Floor Nashville, TN 37243-1166

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

Dear Ms. Avers:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Tennessee appraiser regulatory program (Program) on January 12-14, 2015, 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 Program has been awarded an ASC Finding of "Excellent." Tennessee will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) 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	 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	 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	 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	 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	 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 Finding: Excellent Final Report Issue Date: February 9, 2015						
Tennessee Appraiser Regulatory	/ Progra	m (Sta	te)				
Tennessee Real Estate Appraisers Commission PM: K.				PM: K. Klamet	ASC Compliance Review Date: January 12-14, 2015		Review Period: January 2013 to January 2015
(Commission)/Decision Making							
Umbrella Agency: Department of Commerce & Insurance, R			& Insur	ance, Regulatory Boards	y Boards Number of State Credentialed Appraisers on National Registry: 1,886		Review Cycle: Two Year
Applicable Fadaval Citations	Comp	lianco (VI	ES (NIO)	ASC Staff Observations	State Bernause	Degratized/Degrammended State Astrono	Concret Commonts
Applicable Federal Citations Compliance (YES/NO) Areas of Concern (AC)			ASC Starr Observations	State Response	Required/Recommended State Actions	General Comments	
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	Х						
				No compliance issues noted.	N/A	None	None
Temporary Practice:	Х						
				No compliance issues noted.	N/A	None	None
National Registry:	Х						
				No compliance issues noted.	N/A	None	None
Application Process:	Х						
				No compliance issues noted.	N/A	None	None
Reciprocity:	Х						
				No compliance issues noted.	N/A	None	None
Education:	Х						
				No compliance issues noted.	N/A	None	None
Enforcement:	Х						
				No compliance issues noted.	N/A	None	None