## Appraisal Subcommittee

Federal Financial Institutions Examination Council

March 20, 2017

Ms. Laura Smith, Administrator South Carolina Real Estate Appraisers Board Department of Labor, Licensing and Regulation P O Box 11329 Columbia, SC 29211-1847

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 (Program) on February 13-17, 2017, 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." South Carolina 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

cc: Mr. George E. Knight, Jr., Board Chair

## **ASC Finding Descriptions**

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul> <li>State meets all Title XI mandates and complies with requirements of ASC Policy Statements</li> <li>State maintains a strong regulatory Program</li> <li>Very low risk of Program failure</li> </ul>	2-year
Good	<ul> <li>State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements</li> <li>Deficiencies are minor in nature</li> <li>State is adequately addressing deficiencies identified and correcting them in the normal course of business</li> <li>State maintains an effective regulatory Program</li> <li>Low risk of Program failure</li> </ul>	2-year
Needs Improvement	<ul> <li>State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements</li> <li>Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program</li> <li>State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies</li> <li>State regulatory Program needs improvement</li> <li>Moderate risk of Program failure</li> </ul>	2-year with additional monitoring
Not Satisfactory	<ul> <li>State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements</li> <li>Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program</li> <li>State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing</li> <li>State regulatory Program has substantial deficiencies</li> <li>Substantial risk of Program failure</li> </ul>	1-year
Poor <sup>1</sup>	<ul> <li>State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements</li> <li>Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program</li> <li>State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies</li> <li>High risk of Program failure</li> </ul>	Continuous monitoring

<sup>\*</sup>Program history or nature of deficiency may warrant a more accelerated Review Cycle.

<sup>&</sup>lt;sup>1</sup> 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 **ASC Compliance Review Report** Final Report Issue Date: March 20, 2017 South Carolina Appraiser Regulatory Program (State) South Carolina Real Estate Appraisers Board (Board) / Decision Making PM: J. Tidwell ASC Compliance Review Date: February 13-17, 2017 Review Period: May 2015 to Feb 2017 Umbrella Agency: South Carolina Department of Labor, Licensing and Regulation Review Cycle: Two Year Number of State Credentialed Appraisers on National Registry: 1,991 Compliance (YES/NO) State Response **Applicable Federal Citations ASC Staff Observations** Required/Recommended State Actions **General Comments** Areas of Concern (AC) YES NO AC Statutes, Regulations, Policies Χ and Procedures: N/A No compliance issues noted. None None Temporary Practice: Χ No compliance issues noted. N/A None None National Registry: Χ No compliance issues noted. N/A None None **Application Process:** Χ No compliance issues noted. N/A None None Χ Reciprocity: No compliance issues noted. N/A None None Χ **Education:** No compliance issues noted. N/A None None **Enforcement:** Χ N/A No compliance issues noted. None None