## Appraisal Subcommittee Federal Financial Institutions Examination Council

April 4, 2017

Mr. Ken Warden, Executive Director Kentucky Real Estate Authority Real Estate Appraisers Board 135 West Irvine Street, Suite 301 Richmond, KY 40475

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

Dear Mr. Warden:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Kentucky appraiser regulatory program (Program) on March 22-24, 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." Kentucky 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

James R. Park Executive Director

Attachment cc: Mr. John G. Kenkel, Jr., Chair Mr. Tom Veit, Executive Assistant

## **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

\*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 Final Report Issue Date: April 4, 2017						
Kentucky Appraiser Regulatory	Progra	m (Stat	te)				
Real Estate Appraisers Board (Board) / Advisory				PM: C. Brooks	ASC Compliance Review Date: March 22-24, 2017		Review Period: March 2015 to March 2017
Umbrella Agency: Department of Professional Licensin				ising, Kentucky Real Estate Authority	Number of State Credentialed Appraisers on National Registry: 1,399		Review Cycle: Two Year
Applicable Federal Citations	Compliance (YES/NO) Areas of Concern (AC)			ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments
	YES	NO	AC				
Statutes, Regulations, Policies and Procedures:	x						
				No compliance issues noted.	N/A	None	None
Temporary Practice:	Х						
				No compliance issues noted.	N/A	None	None
National Registry:	X						
				No compliance issues noted.	N/A	None	None
Application Process:	X						
				No compliance issues noted.	N/A	None	None
Reciprocity:	X						
				No compliance issues noted.	N/A	None	None
Education:	x						
				No compliance issues noted.	N/A	None	None
Enforcement:	X						
				No compliance issues noted.	N/A	None	None