

■ ■ ■ ■ ■ ■ ■

Appraisal Subcommittee
Federal Financial Institutions Examination Council

December 4, 2017

Ms. Nicole Novotny Smith, Executive Director
Wyoming Certified Real Estate Appraiser Board
2617 E. Lincolnway, Suite H
Cheyenne, WY 82002

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

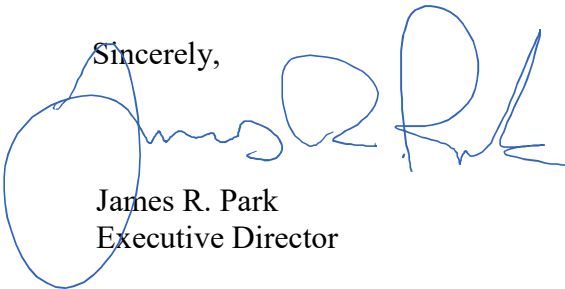
Dear Ms. Novotny Smith:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Wyoming appraiser regulatory program (Program) on August 29-31, 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 "Good." Areas of concern that were identified are being addressed by the Program. Wyoming 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 Compliance Review Report

ASC Finding: Good
Final Report Issue Date: December 4, 2017

Wyoming Appraiser Regulatory Program (State)			
Wyoming Certified Real Estate Appraiser Board (Board)	PM: K. Klamet	ASC Compliance Review Date: August 29-31, 2017	Review Period: September 2015 to August 2017
Umbrella Agency: Wyoming Real Estate Commission		Number of State Credentialed Appraisers on National Registry: 316	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				
States must, at a minimum, adopt and/or implement all relevant AQB Criteria. (12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 1 C, D.)				AQB Criteria requires that Certified General and Certified Residential applicants have a Bachelor's degree or higher from an accredited college or university. Wyoming statutes 33-39-112 (a) and (b) do not include this requirement. The State is currently enforcing the AQB Criteria by regulations and in practice.	On November 20, 2017, the State reported that the Board will not pursue changes to the statutes at this time due to the proposed revisions to AQB Criteria requirements.	The State should amend its statute to bring it into compliance with AQB Criteria and reflect what is done in practice as soon as practicable. A copy of the statute should be provided to ASC staff once finalized.	None
Statutes, Regulations, Policies and Procedures continued:			X				
States must, at a minimum, adopt and/or implement all relevant AQB Criteria. (12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 1 C, D.)				AQB Criteria requires appraisers in all classifications to complete the equivalent of 14 class hours of continuing education for each year during the period preceding renewal. Wyoming Statute 33-39-117 does not require a trainee to present evidence of continuing education to renew. The State is currently enforcing the AQB Criteria by regulations and in practice.	On November 20, 2017, the State reported that the Board will not pursue changes to the statutes at this time due to the proposed revisions to AQB Criteria requirements.	The State should amend its statute to bring it into compliance with AQB Criteria and reflect what is done in practice as soon as practicable. A copy of the statute should be provided to ASC staff once finalized.	None
Temporary Practice:	X						
				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