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Appraisal Subcommittee

Federal Financial Institutions Examination Council

May 9, 2019

Ms. Laura L. Smith, Administrator
South Carolina Real Estate Appraisers Board
Department of Labor, Licensing and Regulation
Synergy Business Park; Kingtree Building
110 Centerview Drive
Columbia, SC 29210

RE: ASC Compliance Review of South Carolina's Appraiser Regulatory Program

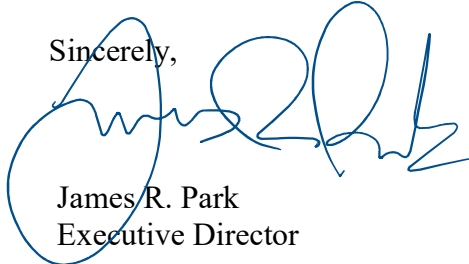
Dear Ms. Smith:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the South Carolina appraiser regulatory program (Appraiser Program) on February 12-15, 2019, 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 Appraiser Program has been awarded an ASC Finding of "Good." An area of concern that was identified is being addressed by the Appraiser Program. South Carolina will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the South Carolina Appraiser Program 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., Chairman

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 State Appraiser Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: May 9, 2019

South Carolina Regulatory Program (State)

South Carolina Real Estate Appraisers Board (Board) PM: N. Fenochietti ASC Compliance Review Date: February 12-15, 2019 Review Period: February 2017 to February 2019

Umbrella Agency: South Carolina Department of Labor, Licensing and Regulation Number of State Credentialed Appraisers on National Registry: 2,039 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						
0				No compliance issues noted.	N/A	None	None
Temporary Practice:	X						
0				No compliance issues noted.	N/A	None	None
National Registry:			X				
States are required to report all disciplinary actions via the extranet application within 5 business days after the disciplinary action is final, as determined by State law. (12 U.S.C. § 3347; 12 U.S.C. § 3338; Policy Statement 3 D.)				The State did not report all disciplinary actions to the ASC National Registry within 5 business days.	On April 2, 2019, the State reported recently adopting Private Disciplinary actions which they did not realize needed to be entered on the National Registry. All discipline was reported to the National Registry prior to the commencement of the Compliance Review.	None	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and ASC Policy Statement 3.
Application Process:	X						
0				No compliance issues noted.	N/A	None	None
Reciprocity:	X						
0				No compliance issues noted.	N/A	None	None
Education:	X						
0				No compliance issues noted.	N/A	None	None
Enforcement:	X						
0				No compliance issues noted.	N/A	None	None