## Appraisal Subcommittee

Federal Financial Institutions Examination Council

September 26, 2019

Ms. Christine McEntire, Director Mr. Stephen C. Walton, Vice-Chair Oklahoma Real Estate Appraiser Board Five Corporate Plaza 3625 N.W. 56th Street, Suite 100 Oklahoma City, OK 73112

RE: ASC Compliance Review of Oklahoma's Appraisal Management Company (AMC) Regulatory Program

Dear Ms. McEntire and Mr. Walton:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Oklahoma AMC regulatory program (AMC Program) on September 4-6, 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 AMC Program has been awarded an ASC Finding of "Excellent." Oklahoma will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Oklahoma AMC 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

## **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	<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.

ASC State AMC Program Compliance Review Report  ASC Finding: Excellent Final Report Issue Date: September 26, 2019									
									Oklahoma AMC Regulatory Program (State)
Oklahoma Real Estate Appraiser Board (Board) PM: C. Brooks			PM: C. Brooks	ASC Compliance Review Date: September 4-6, 2019		Review Period: September 2017 to September 2019			
Umbrella Agency: Independent					Number of AMCs on AMC Registry: 0		Review Cycle: Two Year		
Applicable Federal Citations Compliance (YES/NO)		S/NO)	ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments			
	Areas of Concern (AC)								
	YES	NO	AC						
Statutes, Regulations, Policies									
and Procedures:	Х								
				No compliance issues noted.	N/A	None	None		
National Registry:	Х								
				No compliance issues noted.	N/A	None	None		
Enforcement:	Х								
				No compliance issues noted.	N/A	None	None		