

October 12, 2023

**Via Email**

Jodie R. Campbell, Executive Secretary  
North Dakota Real Estate Appraiser Qualifications and Ethics Board  
PO Box 1336  
Bismarck, ND 58502-1336  
[jcampbell@bis.midco.net](mailto:jcampbell@bis.midco.net)

RE: ASC Compliance Review of North Dakota's Appraiser Regulatory Program

Dear Jodie Campbell:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the North Dakota appraiser regulatory program (Appraiser Program) on May 23-25, 2023, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989.

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." The final ASC Compliance Review Report (Report) of the North Dakota Appraiser Program is attached.

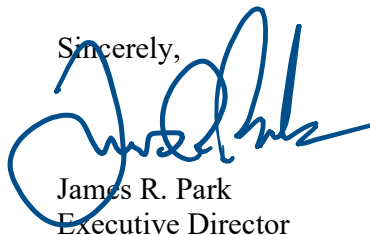
The ASC identified the following area(s) of non-compliance:

- States must report all disciplinary action taken against an appraiser to the ASC.<sup>1</sup>

ASC staff will confirm that appropriate corrective actions have been taken during the next Review. North Dakota will remain on (or be moved to) a two-year Review Cycle.

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

<sup>1</sup> 12 U.S.C. § 3347; 12 U.S.C. § 3338; Policy Statement 3 A, D.

Attachment

cc: Corey Kost, Board Chair, [corey@dakotaappraisal.net](mailto:corey@dakotaappraisal.net)

## ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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.

\*\* An ASC Finding of “Poor” may result in significant consequences to the State. See Policy Statement 5, Reciprocity; see also Policy Statement 12, Interim Sanctions.



## ASC State Appraiser Program Compliance Review Report

ASC Finding: Good  
 Final Report Issue Date: October 12, 2023

**North Dakota Appraiser Regulatory Program (State)**

<b>North Dakota Real Estate Appraiser Qualifications and Ethics Board (Board)</b>	PM: K. Klamet	ASC Compliance Review Date: May 23-25, 2023	Review Period: June 2021 to May 2023
Umbrella Agency: Independent		Number of State Credentialed Appraisers on Appraiser Registry: 328	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				
<b>Statutes, Regulations, Policies and Procedures:</b>	X			No compliance issues noted.	N/A	None	None
<b>Temporary Practice:</b>	X			No compliance issues noted.	N/A	None	None
<b>National Registry:</b>		X					
States must report all disciplinary action taken against an appraiser to the ASC. (12 U.S.C. § 3347; 12 U.S.C. § 3338; Policy Statement 3 A, D.)				The State did not report all disciplinary actions to the Appraiser Registry.	On August 30, 2023, the State reported that this was an oversight and will strive to report all future disciplinary actions in a timely manner.  In addition, the State reported the missing disciplinary actions to the Appraiser Registry.	None	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance with Title XI and Policy Statement 3 A, D.
<b>Application Process:</b>	X			No compliance issues noted.	N/A	None	None
<b>Reciprocity:</b>	X			No compliance issues noted.	N/A	None	None
<b>Education:</b>	X			No compliance issues noted.	N/A	None	None
<b>Enforcement:</b>	X			No compliance issues noted.	N/A	None	None