

### Sanction Matrix - Recommendations from National Registry - Information Sharing Subgroup

Type of violation:		Minor 1st	Minor 2nd	Minor 3rd	Material 1st	Material 2nd	Material 3rd	Significant 1st	Significant 2nd	Significant 3rd	Severe 1st	Severe 2nd	Severe 3rd	Subgroup Comments
<b>National Registry (includes Information Sharing)</b>	<b>Policy Statement 3</b>													
Does not transmit a roster listing individuals who have received a State certification or license at least monthly.	3.A, 3.D							1, 3				3, 4	11*	*No new credentials issued.
Places non-AQB compliant appraisers on the Registry.	3.A							1, 3 (if appropriate)				3, 4	9	
For appraisers who choose not to be on the Registry, fails to place a notice on the pocket card.	3.A	1	1	1										
Does not have or enforce a policy to restrict access to submit information to the National Registry.	3.A				1, 3 (if appropriate)	6, 7						4		
Does not remit Registry fees in a timely fashion.	3.B							1 (3 warnings)				4	9	
Has not designated an Authorized Registry Official.	3.C	1	3	4										
Does not report the most serious disciplinary actions (i.e., voluntary surrenders, suspensions and revocations, or any action that interrupts a credential holder's ability to practice) within 5 business days after the action is final.	3.D										1,3,7 4	4,5	11*	No new credentials issued (any of the three: new, renewals, temporary practice)
Does not use the extranet program to report disciplinary action.	3.D				1	3	4							
Must report all disciplinary actions to the National Registry in 30 days.	3.D							3	4				11	

## Sanction Matrix - Recommendations From Enforcement Subgroup

Type of violation:		Minor 1st	Minor 2nd	Minor 3rd	Material 1st	Material 2nd	Material 3rd	Significant 1st	Significant 2nd	Significant 3rd	Severe 1st	Severe 2nd	Severe 3rd	Subgroup Comments
<b>Enforcement</b>	<b>Policy Statement 7</b>													
Cases not resolved within 1 year with no special circumstances <b>documented.</b>	7.B				1, 2, 3	2,3	4,7		4,5	6,7				After discussion at Meeting, moved from Significant 1,2,3 to Material 1, Significant 2, Significant 3.
Dismissal of case without <del>investigation-consideration of merit.</del>	7.B.1										4	7	11	
<del>Persons analyzing complaints are not knowledgeable about USPAP.</del> <b>Persons analyzing complaints for USPAP compliance must be knowledgeable in USPAP.</b>	7.B.2				2,3	4	7	2,3	4	7				After discussion at Meeting, moved from Material to Significant.
Not analyzing to determine if additional violations should be added to the complaint.	7.B.2				1	4	7	1	4	7				After discussion at Meeting, moved from Material to Significant.
Enforcement dispositions are not consistent.					1	2, 3, 7	8							
Enforcement dispositions are not appropriate and equitable.	7.B.2							2, 3	7	4, 8				
Complaint files are not well-documented and do not clearly show the status of the complaints.	7.B.3				1	2, 3	7							
Complaint log inadequate.	7.B.4							1	2, 3	7				
Complaint log missing.	7.B.4										4, 5	6, 7	11	

### Sanction Matrix - Recommendations From Temporary Practice Subgroup

Type of violation:		Minor 1st	Minor 2nd	Minor 3rd	Material 1st	Material 2nd	Material 3rd	Significant 1st	Significant 2nd	Significant 3rd	Severe 1st	Severe 2nd	Severe 3rd	Subgroup Comments
<b>Temporary Practice</b>	<b>Policy Statement 2</b>													
State does not have temporary practice system.	2.A										1	4, 5	12	Clearly essential requirement.
Does not use National Registry to verify status of applicant.	2.A													No sanctions due to no requirement.
Does not issue TPP on a temporary assignment basis.	2.B.1.a				1	2, 3	7							Easily cured by training.
Does not issue TPP within 5 business days.	2.B.1.b							1	2, 3	4, 5				Requires process & commitment.
TPP does not have actual date of issuance.	2.B.1.c				1	2, 3	7							Easily cured by training.
Does not take regulatory responsibility for a temporary practitioner's bad acts.	2.B.1.d							1	2, 3	2, 3				Difficult for TPP issuing state so sanction not severe.
Does not notify the appraiser's home State agency in the case of disciplinary action concerning a temporary practitioner.	2.B.1.e							1	2, 3	2, 3				Easily cured by training; monitoring will accomplish goal.
Does not allow at least one extension of TPP.	2.B.1.f							1	4, 5	7				Public pressure with State contact.
Limits the valid time period of a temporary practice permit to less than 6 months.	2.B.2.a							1	4, 5	7				Public pressure with State contact.
Limits an appraiser to one temporary practice permit per calendar year.	2.B.2.b							1	4, 5	7				Public pressure with State contact.
Charges a temporary practice permit fee exceeding \$250, including one extension fee.	2.B.2.c							1	4, 5	7				Public pressure with State contact.
Imposes appraiser qualification requirements upon temporary practitioners that exceed AQB Criteria.	2.B.2.d										1	4, 5	7, 11	Major item but should not stop commerce in State.
Requires temporary practitioners to obtain a certification or license in the State.	2.B.2.e										1	4, 5	7, 11	Major item but should not stop commerce in State.
Requires temporary practitioners to affiliate with an in-State appraiser.	2.B.2.f										1	4, 5	7, 11	Major item but should not stop commerce in State.
Refuses to register appraisers seeking temporary practice in a State that does not have a licensed or certified level credential.	2.B.2.g										1	4, 5	7, 11	Major item but should not stop commerce in State.
Delays the issuance of a written "letter of good standing" or similar document for more than 5 business days after request.	2.B.3.a							1	2, 3	4, 5				Requires process & commitment.
Fail to take disciplinary action, if appropriate, when one of its appraisers is disciplined in another State.	2.B.3.b							Competency & S.R. Issues 1	Competency & S.R. Issues 2, 3	Competency & S.R. Issues 4, 5	Ethics & Fraud Issues 1	Ethics & Fraud Issues 2, 3	Ethics & Fraud Issues 11, 12	Bifurcated into discipline areas per 2.B.3.b with Ethics & Fraud severe.

Key	Sanctions	Definitions
1	Warning	A letter that informs the State that its program is not conducting its business in compliance with Title XI and ASC Policy Statements.
2	Training - Board members	Requiring all sitting Board members to attend a workshop regarding a specific topic, usually the role of a State appraiser regulatory agency. May also include training in another topic such as USPAP.
3	Training - State Staff members	Requiring some or all State Board staff to attend a workshop regarding a specific topic, such as investigator training or USPAP.
4	Consultation with State authorities	ASC staff and possibly agency members contacting State officials such as the Governor's office or State legislative members. Contact may be in writing or in person.
5	Meeting with affected parties	ASC staff and possibly State agency members contacting parties such as State Banking Commissions and real estate broker/appraiser trade organizations.
6	Expedited review 6 mos - every year	Scheduling a Compliance Review or Follow-up Review before the usual two-year period. May be electronic.
7	Continuous Monitoring	Requiring reports on required or agreed-upon corrective actions on a monthly or quarterly basis. Additional monitoring may include on-site monitoring as well as off-site monitoring.
8	State use of matrix	Requiring the State to use the Matrix in determining sanctions for enforcement of appraiser complaints.
9	Interim suspension of credential	May be an individual credential or group of credentials within a State.
10	Revocation of credential - individual appraiser	May be an individual credential or group of credentials within a State.
11	Interim derecognition of State appraisal program	Derecognizing some or all of the credentials issued by the State. Also, no new credentials will be issued; no upgrades will be issued to specific credential(s); <b>or</b> no temporary practice permits will be issued.
12	Derecognition of State appraisal program	Removal of credentials from the National Registry issued by a State and not accepting any new credentials from that State. As a result, there would be no appraisals of property within that State that could be used for federally related transactions.