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TO: Brian D. Montgomery, Assistant Secretary for Housing - Federal Housing
Commissioner, H

Joan S. Hobbs

FROM: Joan S. Hobbs, Regional Inspector General for Audit, Region IX, 9DGA

SUBJECT: HUD Did Not Have Adequate Internal Controls over Its FHA Appraiser Roster

HIGHLIGHTS

What We Audited and Why

We audited the U.S. Department of Housing and Urban Development's (HUD) controls over the Federal Housing Administration (FHA) appraiser roster in accordance with the Office of Inspector General's regional audit plan for fiscal year 2007. The audit recommendation was generated in response to a single-family loan origination audit that had raised concerns about FHA appraisers and appraisals.

We reviewed HUD's FHA appraiser roster (roster) to determine whether HUD's controls over the roster were adequate to ensure that only qualified/eligible appraisers were placed on the roster and whether the oversight and maintenance of the roster were sufficient to ensure that only currently eligible appraisers remained on the roster.

What We Found

HUD had significant weaknesses in its internal controls used to maintain the roster. These weaknesses caused the roster to contain unreliable data which included the listing of 3,480 appraisers with expired licenses and 119 appraisers that had been state sanctioned. Additionally, 28 of the appraisers listed with expired licenses and eight of the sanctioned appraisers conducted appraisals.

Specifically, HUD

- Did not conduct roster quality control reviews in accordance with its written roster quality control plan;
- Did not perform regular monitoring of the roster to ensure data reliability;
- Instructed and/or approved its contractor to use logic statements when developing the software program that updates the roster, which were not in accordance with HUD regulations and did not always work properly; and
- Did not retain initial application packages for all active appraisers listed on its roster as required by HUD's record disposition schedule.

What We Recommend

We recommend that HUD implement stronger internal controls to ensure that only eligible appraisers are placed on its roster and that oversight and maintenance of the roster are sufficient to ensure that only eligible appraisers remain on the roster. Specifically, HUD should conduct quality control reviews in accordance with its established roster quality control plan, perform regular monitoring of the data contained on the roster, remove inappropriate logic statements from the software used to update the roster, and retain appraiser initial application packages until the appraiser is no longer an active participant in HUD's single-family home mortgage insurance program.

For each recommendation without a management decision, please respond and provide status reports in accordance with HUD Handbook 2000.06, REV-3. Please furnish us copies of any correspondence or directives issued because of the audit.

Auditee's Response

We provided HUD the draft report on January 4, 2008, and held an exit conference with HUD officials January 8, 2008. HUD generally agreed with our report.

HUD provided its written comments to our draft report on February 8, 2008. The complete text of the auditee's response, along with our evaluation of that response, can be found in appendix A of this report.

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BACKGROUND AND OBJECTIVES

The U.S. Department of Housing and Urban Development (HUD) is responsible for the oversight and maintenance of the appraiser roster. HUD's Computerized Homes Underwriting Management System contains the roster, which can be accessed through the FHA Connection. The roster contains licensing information for more than 32,000 appraisers. An appraiser must be listed on the roster to be selected by a HUD-approved lender to conduct HUD-related appraisals. It is the responsibility of HUD to determine the eligibility of an appraiser and to monitor the roster to ensure that listed appraisers continue to meet eligibility requirements. HUD maintains the roster through a software program developed by a contractor. The software program updates licensing information found on the roster using data from the National Registry database (registry) contained on the Appraisal Subcommittee Web site.

Appraisal Subcommittee

In August 1989, Congress enacted the Financial Institutions Reform, Recovery, and Enforcement Act of 1989. Title XI of the Act required federally regulated financial institutions, such as federally insured banks, thrifts, and credit unions, to use state-certified or licensed appraisers to perform appraisals in connection with federally related transactions. Title XI also created the Appraisal Subcommittee to oversee the activities of the states and the Appraisal Foundation. The Appraisal Foundation is the parent organization of the Appraiser Qualifications Board, which establishes the minimum education, experience, and examination requirements for real property appraisers to obtain a state certification.

The Appraisal Subcommittee's Web site contains the registry, which contains selected information about the nation's state-certified and licensed real estate appraisers. Only state-certified or licensed appraisers listed in the database as having currently valid certifications or licenses are authorized under federal law to perform appraisals in connection with federally related transactions. The expiration dates of certificates or licenses in this database specifically relate to the legal authority of certified or licensed appraisers to perform federal appraisals.

Objectives

Our objectives were to determine whether HUD's controls over its roster were adequate to ensure that only qualified (eligible) appraisers were placed on its roster and whether the oversight and maintenance of the roster were sufficient to ensure that only eligible appraisers remained on the roster.

RESULTS OF AUDIT

Finding 1: HUD Did Not Have Adequate Internal Controls over Its Appraiser Roster

HUD did not have adequate internal controls over its appraiser roster. We attribute the deficiency to HUD's failure to conduct quality control reviews in accordance with its established roster quality control plan, perform regular monitoring of the roster to ensure data reliability, and instruct and/or approve its contractor to develop logic statements within the software program that were in accordance with HUD regulations and always worked properly. As a result, the roster contained unreliable data which included the listing of 3,480 appraisers with expired licenses and 119 appraisers that had been state sanctioned. Additionally, at least 28 of the appraisers listed with expired licenses and eight of the sanctioned appraisers conducted appraisals.

Quality Control Reviews Not Conducted in Accordance with Established Plan

According to Office of Management and Budget requirements, HUD had a responsibility to develop and implement appropriate management controls, assess the adequacy of those controls, and take corrective action if improvements to those controls were needed. However, since December 2006, HUD has chosen not to conduct quality control reviews to enable its staff to process a large influx of appraiser applications for initial placement on the roster.

According to HUD's written quality control plan, reviews must be conducted monthly and include reviewing applications and verifications of eligibility for all new and renewal appraiser roster applicants. The plan states that applications for review will be selected randomly and include five percent of all

- New applicants who were approved and placed on the roster,
- New applicants who were denied and not placed on the roster,
- Renewal applicants who were approved for continued listing on the roster, and
- Renewal applicants who were denied for continued listing on the roster.

According to the plan, the quality control reviewers would be independent valuation team members who were not responsible for the day-to-day review of applications and/or data entry for placement or retention of appraisers on the roster.

We determined through interviews with HUD staff that individuals were instructed to disregard the quality control reviews and focus on the initial eligibility reviews of new applications. In addition, quality control reviews conducted before December 2006 did not follow the quality control plan. Specifically, the applications selected for review were not random, did not represent five percent of each applicant group, and were conducted by the same valuation team members who were responsible for day-to-day review of applications.

Regular Monitoring Not Performed

According to Office of Management and Budget regulations, HUD had a responsibility to develop and maintain effective internal controls, which provided assurance that significant weaknesses in the design or operation of internal controls would be prevented or detected in a timely manner. Additionally, HUD had a responsibility to design those controls to ensure that ongoing monitoring occurred in the course of normal operations.

During interviews with HUD staff, we determined that HUD did not conduct monitoring of the

- Roster to ensure the accuracy of appraiser data contained on the roster,
- Data retrieved from the registry to ensure that the data used to update the roster were consistent with information found in appraiser application files (records), or
- Software program used to retrieve licensing information from the registry to ensure that it was working properly.

We reviewed the licensing information shown for 420 (appendix B) of 957 appraisers that were listed on the roster with expired licenses and found that 341 (81 percent) had information that was inconsistent with that shown in the registry. We determined that the software developed for updating the roster contained logic statements that allowed editing of license information retrieved from the registry by removing letters, numbers, spaces, and periods. However, we also observed roster licensing information which showed letters and/or numbers added to that contained in the registry. Additionally, the software program allowed ineligible appraisers to remain listed on the roster indefinitely. As a result, the licensing information shown on the roster did not mirror that found in the registry. The software program logic statements are detailed in the last two sections of this finding entitled Software Logic Statements Violated Regulations and Software Logic Statements Not Working Properly.

Unreliable Data

According to Office of Management and Budget requirements, HUD had a responsibility to ensure that the data contained on the roster and the data in the registry were timely and reliable.

HUD contracted with a software developer to create a software program that would retrieve appraiser licensing data contained in the national registry and use the data to update the roster. However, the software program was not working properly and caused the data shown on the roster to be different from the data shown in the registry. For example, the roster showed appraiser 1B4S0Q with a California state license number of 1600476, however, the registry showed a Washington state license number of 1600476 and no California license (appendix B). Additionally, the roster showed appraiser 2SC4VS with a Michigan state license number of J821805, whereas the registry showed the license number as 1201008224 (appendix B).

HUD did not perform any monitoring or testing of the data contained on the roster or the data in the registry to ensure that the software was updating the roster with timely and reliable information. Based on interviews with HUD staff, we determined that HUD did not

- Perform tests to determine whether the data contained in the registry were timely and reliable for use in updating the roster;
- Use the appraiser “error reports,” built into the software system to update the roster, to determine whether appraisers should be terminated from the roster; and
- Perform tests on its software system, used to update the roster, to ensure that it was updating the roster with timely and reliable data.

We reviewed the data for 420 appraisers (appendix B) listed on the roster with expired licenses and found

- 203 instances in which an appraiser’s state license number(s) shown on the roster did not match what was shown in the registry due to data being removed from the number when license information was updated,
- 162 instances in which an appraiser’s state license number(s) shown on the roster did not match what was shown in the registry due to data being added to the number when license information was updated,
- 40 instances in which an appraiser’s state license number(s) shown in the registry was not listed on the roster,
- 15 instances in which an appraiser’s name shown on the roster was different from that shown in the registry,
- 12 instances in which an appraiser’s state license number(s) shown on the roster was completely different from that shown in the registry, and

- 6 instances in which an appraiser’s state license number(s) shown on the roster was not found in the registry.

Logic Statements

According to Office of Management and Budget requirements, HUD had a responsibility to ensure that its software program was working properly and achieved its intended results by updating the roster in a manner consistent with all laws and regulations.

The roster has data fields that show appraisers’ initial placement date, name and address, license number(s) and state(s) in which they are licensed, license expiration date, and a terminate date. The “terminate date” field allows appraisers to remain listed on the roster indefinitely. HUD contracted with a software developer to create a program that would retrieve appraiser licensing data from the registry and use the data to update the data fields contained on the roster. The following inappropriate logic statements were applied to the update program

- Appraisers in HUD’s Computerized Homes Underwriting Management System that are terminated will not have their expiration dates updated,
- Appraisers in the Computerized Homes Underwriting Management System that have expired licenses are allowed a one-month grace period (license expirations are treated as being one month later than actual),
- Appraisers in the Computerized Homes Underwriting Management System that have open disciplinary actions will have their expiration dates updated,
- Attempt to match license numbers from the registry and the Computerized Homes Underwriting Management System exactly as they are except for the state of New Hampshire. If an exact match is not found on license numbers from the registry and the Computerized Homes Underwriting Management System, then both license numbers are edited by removing
 1. Embedded periods.
 2. Embedded spaces.
 3. Embedded commas.
 4. Leading zeros.

Software Logic Statements Violated Regulations

HUD instructed and/or approved its contractor to develop logic statements in the software program that were not in accordance with regulations. The logic statements (specifically the first three bullets above) within the software program caused 3,480 appraisers with expired licenses and 119 appraisers that had received a state sanction to remain listed on

the roster indefinitely. According to HUD requirements, appraisers that had been terminated, received a sanction, or had an expired license were to be removed from the roster. However, HUD did not remove the appraisers and instead used a terminate date to identify those appraisers that should have been terminated and later removed.

Sanctioned appraisers were not terminated/removed from the roster in a timely manner and were able to conduct appraisals due to the logic statement that allowed appraisers to remain listed on the roster indefinitely. We determined 119 appraisers had received a state sanction but remained listed on the roster (appendix C). Of those, 118 showed a date in the “terminate date” field, and more than half (65) showed terminate dates that were more than 30 days after the receipt of a state sanction. Additionally, one sanctioned appraiser remained listed on the roster and did not have a date shown in the “terminate date” field. In addition, eight of the appraisers had conducted a total of 27 appraisals after the receipt of a state sanction. The ineligible appraisers were able to conduct appraisals because they remained listed on the roster after the receipt of a state sanction.

Further, appraisers with expired licenses were able to conduct appraisals due to the logic statement that allowed a one-month grace period for expired licenses and the logic statement that allowed appraisers to remain listed on the roster indefinitely. We reviewed 420 of the 3,480 appraisers who had expired licenses but were still listed on the roster and found that 28 appraisers had conducted a total of 361 appraisals after their state license had expired. More than half (19) had conducted 345 appraisals more than 30 days after their licenses had expired (appendix D).

Software Logic Statements Not Working Properly

HUD instructed and/or approved its contractor to develop inappropriate logic statements in the software program that did not work properly. We found logic statements (specifically the fourth bullet above) within the software that edited data retrieved from the registry which were not working properly. During the editing process, the software was adding data, numbers and/or letters to appraiser license number(s) shown in the registry. For example, the roster showed appraiser 8547BH with a license number of WA27017BECKERW374KB, however the registry showed the license number as BECKERW374KB (appendix B). In addition, the software was inappropriately removing periods from license numbers which caused at least one appraiser that had not received a sanction to be associated with an appraiser that had received a sanction. The roster showed appraiser S5SCIT with an Illinois state license number of 156000296 (non-sanctioned appraiser), however, the registry showed the license number as 156.000296 (sanctioned appraiser).

During our review of sanctioned appraisers and appraisers with expired licenses listed on the roster (appendix B), we found

- 162 instances in which an appraiser’s state license number(s) shown on the roster did not match what was shown in the registry due to data being added to the number when license information was updated and
- 12 instances in which an appraiser’s state license number(s) shown on the roster was completely different from that shown in the registry.

Conclusion

HUD had significant weaknesses in its internal controls used to maintain its roster. HUD did not conduct quality control reviews in accordance with its quality control plan, did not perform regular monitoring of the roster, and instructed and/or approved its contractor to develop logic statements in the software program that were not in accordance with HUD regulations and did not always work properly. These weaknesses caused the roster to contain unreliable data which included the listing of 3,480 appraisers with expired licenses and 119 appraisers that had been state sanctioned. This allowed users of HUD’s FHA Connection to select at least 36¹ ineligible appraisers who later conducted 388 appraisals.

Recommendations

We recommend that HUD’s Assistant Secretary for Housing – Federal Housing Commissioner

- 1A. Conduct quality control reviews in accordance with its established quality control plan for the appraiser roster eligibility verification as it was written to ensure that only eligible appraisers are listed on the appraiser roster.
- 1B. Perform regular monitoring and quality control checks of the data contained within the Computerized Homes Underwriting Management System (roster) and the data contained in the registry to ensure that the data are reliable and accurately represent the qualifications and eligibility of those appraisers who are used by approved lenders.
- 1C. Remove inappropriate logic statements from the software used for updating/maintaining the Computerized Homes Underwriting Management System (roster) and replace them with appropriate and effective logic statements that are in accordance with applicable HUD regulations and requirements. The logic statements should also ensure that only eligible appraisers are listed on the roster and the data for those appraisers are consistent within the roster and the registry.

¹ Eight sanctioned appraisers conducted 27 appraisals and 28 appraisers with expired licenses conducted 361 appraisals.

Finding 2: HUD Did Not Retain Initial Application Packages for All Active Appraisers Listed on Its FHA Appraiser Roster

HUD did not retain initial application packages for all active appraisers listed on its appraiser roster as required by its record disposition policy. We attribute this deficiency to HUD not following its record disposition policy. As a result, HUD destroyed a projected 24,013 active appraiser records, which left HUD with the inability to resolve inconsistencies found between the appraiser licensing data shown on its roster and data shown in the national registry.

Active Appraiser Records Destroyed

According to HUD's record disposition schedule, it had a responsibility to retain application packages (records) for all appraisers listed on the appraiser roster until the appraiser was no longer actively participating in HUD's single-family home mortgage insurance program.

The roster contains licensing information for more than 32,000 appraisers. Appraiser records are a vital part of validating the eligibility and licensing information for all active appraisers listed on the roster. However, HUD destroyed a projected 24,013 records for appraisers who were actively participating in the appraisal process.

We requested records for 64 randomly selected appraisers to determine whether they were eligible for placement on the roster. HUD provided 14 of the 64 records requested but had destroyed the remaining files (appendix E). HUD stated that the records were disposed of in accordance with HUD policy. However, we determined that the records were for active participants of the appraisal process and, thus, should have been available for review. The error rate (destruction of files) of 78 percent (50/64) was projected to the universe of 30,737 active appraisers which resulted in an estimated 24,013 appraiser records destroyed. Our interviews with HUD personnel disclosed that staff was unaware of and/or misinterpreted HUD's record disposition policy. When interviewed, HUD staff stated that HUD policy was to retain records from three to five years but had no written documentation to support the statement.

We reviewed the available records to determine initial roster eligibility and found all 14 appraisers initially eligible. However, we found roster data that were inconsistent with registry data. According to the registry, five appraisers held state licenses not listed on the roster, and three appraisers had state license numbers that did not match the numbers shown on the roster. We were unable to validate the remaining 50 records in our sample because the records were destroyed.

Conclusion

HUD did not have assurance that state licensing information for appraisers on its roster was reliable and that appraisers listed on the roster were eligible to perform appraisals. The destruction of more than an estimated 24,000 appraiser records left HUD with the inability to reconcile any inconsistencies between the data contained on the roster and the data shown in the registry.

Recommendations

We recommend that HUD's Assistant Secretary for Housing – Federal Housing Commissioner

- 2A. Retain initial application files until an appraiser is no longer an active participant in HUD's single-family home mortgage insurance program.

SCOPE AND METHODOLOGY

We performed the audit work between April 24 and December 4, 2007. Our audit generally covered the period July 1, 2005, through March 31, 2007, and was expanded or changed as needed. We focused on whether HUD's controls over the appraiser roster were adequate to ensure that only eligible appraisers were placed on the roster and that the roster was maintained in a manner to ensure that all appraisers on the roster continued to be eligible.

To accomplish our audit objectives, we

- Reviewed relevant HUD regulations, Office of Management and Budget circulars, and other pertinent information.
- Reviewed HUD's policies and procedures associated with oversight, maintenance, and updating of the roster.
- Interviewed HUD personnel to obtain an understanding of roster operations and internal controls.
- Interviewed HUD's software contractor to obtain relevant information regarding the software program used to update the roster.
- Reviewed HUD's software programming documentation.
- Reviewed a random attribute sample of 64 active appraiser's applications to determine initial eligibility for placement on the roster and projected the error rate (destruction of files) of 78 percent (50/64) to the universe of 30,737 active appraisers which resulted in an estimated 24,013 appraiser records destroyed (appendix E).
- Tested all appraisers listed on the roster to determine whether any had received a sanction and possibly conducted appraisals while under sanction (appendix C).
- Tested 420 appraisers listed on the roster to determine whether licensing information was consistent in both the registry and roster databases (appendix B).
- Tested 420 appraisers listed on the roster with expired licenses to determine whether any had conducted appraisals while their licenses were expired (appendix D).

We performed our review in accordance with generally accepted government auditing standards.

INTERNAL CONTROLS

Internal control is an integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved:

- Effectiveness and efficiency of operations,
- Reliability of financial reporting, and
- Compliance with applicable laws and regulations.

Internal controls relate to management's plans, methods, and procedures used to meet its mission, goals, and objectives. Internal controls include the processes and procedures for planning, organizing, directing, and controlling program operations. They include the systems for measuring, reporting, and monitoring program performance.

Relevant Internal Controls

We determined the following internal controls were relevant to our audit objectives:

- Policies and procedures that management had in place to ensure that roster data and registry data were current, valid, and reliable.
- Policies and procedures that management had in place to ensure that its software program was updating the roster in a manner that complied with applicable laws and regulations and met program objectives.

We assessed the relevant controls identified above.

A significant weakness exists if management controls do not provide reasonable assurance that the process for planning, organizing, directing, and controlling program operations will meet the organization's objectives.

Significant Weaknesses

Based on our review, we believe the following items are significant weaknesses:

- HUD did not (1) conduct quality control reviews in accordance with its established quality control plan for the appraiser roster eligibility verification as it was written, (2) perform regular monitoring of the roster to ensure data reliability, and (3) ensure that appropriate logic statements were used in the development of the software program that updates the roster (finding 1).

- HUD did not retain initial application packages for all active appraisers who were listed on its appraiser roster as required by HUD's record disposition schedule (finding 2).


APPENDIXES

Appendix A

AUDITEE COMMENTS AND OIG'S EVALUATION

Ref to OIG Evaluation

Auditee Comments

 U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20416-8000

ASSISTANT SECRETARY FOR HOUSING:
FEDERAL HOUSING COMMISSIONER

FEB 29 2008

MEMORANDUM FOR Joan S. Hobbs, Regional Inspector General for Audit, 9DGA

FROM: Brian D. Montgomery, Assistant Secretary for Housing-
Federal Housing Commissioner, H

SUBJECT: Response to Discussion Draft Audit Report -FHA Single Family
Insurance Program – Controls over the Appraisal Process

This is in response to the Office of Inspector General's (OIG) draft revised audit, dated January 23, 2008, regarding the FHA Appraiser Roster. We appreciate the opportunity to respond prior to OIG's publication of the audit.

The draft report contains two findings which, along with HUD's responses, are summarized below.

Finding 1:
The report concludes that HUD did not have adequate internal controls to maintain its Appraiser Roster. Specifically, the draft states that HUD did not perform regular quality control reviews in accordance with its quality control plan; did not perform regular monitoring of the roster to ensure data reliability, and instructed and/or approved its contractor to develop logic statements in the software program that were not in accordance with HUD regulations and did not always work properly. The report concludes that these weaknesses caused the roster to contain unreliable data which included the listing of 3,480 appraisers with expired licenses and 119 appraisers that had been state sanctioned which allowed users of HUD's FHA Connection to select at least 36 ineligible appraisers who later conducted 388 appraisals.

Finding 1 provides the following three recommendations:

Recommendation 1A: Conduct quality control reviews in accordance with its established quality control plan for the appraiser roster eligibility verification as it was written to ensure that only eligible appraisers are listed on the roster.

HUD Response:

During the exit conference, OIG indicated that it had reviewed and was satisfied with FHA's Quality Control Plan for the FHA Appraiser Roster. Due to staff changes as well as staff shortages during the 2007 calendar year, FHA was unable to carry out its Quality Control Plan in a timely and regular manner. FHA is enacting measures to renew implementation of its Quality Control Plan and instructing the appropriate staff to ensure adherence to the plan. Anticipated completion date is

www.hud.gov espanol.hud.gov

Comment 1

spring 2008.

Recommendation 1B: Perform regular monitoring and quality control checks of the data contained within the Computerized Home Underwriting Management System (roster) and the data contained in the registry to ensure that the data are reliable and accurately represent the qualifications and eligibility of those appraisers who are used by approved lenders.

HUD Response:

As previously indicated, FHA is enacting measures and working with appropriate staff to ensure that its Quality Control Plan for the FHA Appraiser Roster is fully implemented and adhered to.

The following addresses the assertion in Finding 1 that the FHA Appraiser Roster contains unreliable data:

Comment 2

The legend contained in Appendix C (Summary of Sanctioned Appraisers) of the audit report indicates that of the 119 appraisers who were sanctioned by a state, **only** 1 appraiser was not terminated. If an appraiser is removed (terminated) from the Roster due to sanctioning by the state, their name is removed from the FHA Connection and a lender is not able to assign an appraisal to that individual. Of the 119 state sanctioned appraisers, 65 were terminated more than 30 days after the effective date (administered by the state) of the sanction. This delay is due to the lack of timeliness in reporting sanctioning by the states to the ASC (Appraisal Subcommittee), which in turn generates a report that FHA relies upon for terminating state sanctioned appraisers from the Appraiser Roster. The states report to the ASC on a monthly basis but periodically (and as evidenced by cautionary postings on the ASC website) some states are 60 days or more late in submitting appraiser data (which includes sanctioning information). Therefore, FHA may not be aware that an appraiser has been sanctioned by a state for 30 to 60 or more days after the date of sanctioning.

Comment 3

Because of the lack of timeliness on the part of the states, FHA permits a 30 day grace period beyond the license/certification expiration date shown on ASC's National Registry provided the appraiser can provide evidence of actual license/certification renewal. Such evidence usually consists of a copy of the actual license or certification. There are built-in fields, however, in FHA Connection denoting such sanctioning or expiration of license/certification (after the 30 day grace period) which prevents lenders from assigning an appraisal to the appraiser until the sanction has been lifted or the license/certification renewed.

Comment 4

FHA recognizes that the delay in receipt of information does cause some sanctioned appraisers to remain on the roster after the sanctioning date, but has taken every precaution, within its ability and resources, to keep appraiser status information as up-to-date as possible by assuring its timely entry into CHUMS as soon as the information becomes available. Furthermore, the 50 states and U.S. territories are under **no** burden to cooperate with FHA and report such information.

Comment 5

FHA Roster appraisers are also sanctioned by FHA's Homeownership Centers (HOCs). If, after a review of an appraisal, the HOC staff determines the appraiser has been out of compliance with FHA policy and appraisal procedures, the appraiser may be sanctioned and lose the right to perform

FHA appraisals for a period of time. These HOC sanctioned appraisers, as well as appraisers with expired licenses/certifications, will show on the FHA Connection.

Recommendation 1C: Remove inappropriate logic statements from the software used for updating/maintaining the Computerized Homes Underwriting Management System (roster) and replace them with appropriate and effective logic statements that are in accordance with applicable HUD regulations and requirements. The logic statements should also ensure that only eligible appraisers are listed on the roster and the data for those appraisers are consistent within the roster and the registry.

HUD Response:

Comment 6

There are no inappropriate logic statements in CHUMS. FHA's contractor has developed matching criteria that does not automatically reject a license/certification number if there is not an exact match between the two data bases. FHA staff manually input information in CHUMS for new appraisers and update license/certification changes and renewals for current roster appraisers. During the input process, zeroes, dashes, periods, etc. found in the state issued license/certification numbers were not consistently entered. Additionally, over time, states would add leading zeroes, dashes, periods, etc. to existing license/certification numbers.

In building the interface to automate the updating of license/certification dates for appraisers currently on the Roster, the contractor developed criteria that would allow an appraiser to be updated if the match between the two systems was sufficiently similar to have a high confidence level that the lack of a match was due to other factors, such as human data entry error or additional periods, spaces, commas or zeros in the state issued number. A matching algorithm was created and includes such components as name, social security number and license number and masks out leading zeroes, periods, dashes, etc. If an exact match is required in the interface updates, statistics show that only a small percentage of the tens of thousands of licenses/certifications would be updated. The interface **does not** update appraiser license/certification numbers, only FHA staff may update license/certification numbers (ex: an appraiser may be upgrading their license status to a certification status). The interface does not change license/certification numbers.

Comment 7

The following example provided in the audit report illustrates the way this matching criterion works. The appraiser, whose identification number is S5SCIT, is described as having an invalid license number (IL 156000296). In researching this further, this appraiser is listed in ASC's National Registry with the exact same license number. Additionally, the same appraiser also has a license number 156.0000296 (adding a period and leading zero). This clearly is a case of a state changing the format of the license number. This appraiser's license expired in 2001, long before the interface was operational. Therefore, the interface is not responsible for the discrepancy. In reviewing sanctioning data on ASC's National Registry, FHA's contractor found no sanctions for this appraiser to corroborate the audit statement regarding the sanction.

Comment 8

FHA relies upon the ASC's National Registry as a baseline and has no control or authority over the states to ensure timely reporting of appraiser data (including state sanctioning information) to the ASC. Even if a state reports appraisal data to the ASC on a timely basis (once a month), it is possible that the sanctioning of an appraiser will not be reported to the ASC until the following

Comment 9

month if the sanctioning was administered by the state in the latter part of the month after the state had submitted its appraisal data to the ASC.

As indicated in FHA's response to Recommendation 2A below, FHA is working with its contractor to automate the appraiser roster application process which will entail, among other things, the applicant entering the required data in the FHA Connection. In this update to the FHA Connection, FHA will require an exact match between what is shown on the National Registry for the appraiser's license/certification number and what is input by the applicant in FHA Connection.

Finding 2:

The second finding concluded that HUD did not retain initial application packages for all the active appraisers listed on its appraiser roster. As a result, the report concluded that HUD destroyed more than (projected) 24,000 active appraiser records, which left HUD with the inability to reconcile any inconsistencies between the data contained on the roster and the data shown in the registry.

Finding 2 provides the following two recommendations:

Recommendation 2A: Retain initial application files until an appraiser is no longer an active participant in HUD's single-family home mortgage insurance program.

HUD Response:

FHA is working with ATS, the contractor responsible for CHUMS and FHA Connection, to automate the appraiser roster application and renewal process. Requirements include retention and archiving of all electronic application files in accordance with HUD's document retention policy. Testing and implementation of the automated application process and data retention is anticipated to be completed by spring 2008.

Recommendation 2B: Locate missing records for all active appraisers listed on the roster or reconstruct the records by obtaining licensing information for all active appraisers listed on the roster to provide evidence of eligibility.

HUD Response:

The Records Disposition Schedule 20, contained in Handbook 2225.6, which delineates record retention requirements for Single Family Home Mortgage Insurance Program Records, does not provide a clearly defined record retention policy for the FHA Appraiser Roster. Therefore, FHA is working on creating a clear and definitive retention policy that will specifically apply to the FHA Appraiser Roster and related documents.

Comment 10**Comment 11**

FHA does obtain current license information on each appraiser on the roster at renewal/recertification time. Thus, when an appraiser's license is due to expire, he/she must provide a current copy of a license with expiration date. Upon receipt of the renewal request, HUD staff verifies eligibility by running checks on the Appraisal Subcommittee (ASC) website, the General Services Administration's Suspension and Debarment List, HUD's Limited Denial of

Participation (LDP) List, and HUD's Credit Alert Interactive Voice Response System (CAIVRS). Therefore, even though old records were destroyed by REAC, all appraisers currently active on the roster have provided evidence of eligibility via the renewal process which occurs every one to three years depending on the state where the appraiser is licensed or certified.

Comment 9

The new automated application/renewal process described in FHA's response to Recommendation 2A will require that all appraisers who wish to apply for placement on the roster, or remain active on the roster, make application online through the FHA Connection. Key data fields the appraiser must complete in order to successfully apply and/or remain on the roster have been identified and are incorporated into the input screens. Additionally, new applicants and currently approved appraisers who are renewing their appraisal license/certification will be required to check a box on screen indicating acknowledgement of the appraiser certifications contained in the application. New applicants will be required to upload a PDF file containing signed copies of the application and a valid license.

OIG Evaluation of Auditee Comments

Comment 1 We did state that the Quality Control Plan appeared to be satisfactory. However, we were unable to test the plan because it was not currently being used. Therefore, we cannot be certain that the quality control plan will be sufficient to identify roster deficiencies. HUD should not only carry out its quality control plan, but test the plan in accordance with Office of Management and Budget regulations as stated in recommendation 1B. We commend HUD for taking action to correct the identified deficiency.

Comment 2 We would like to clarify the term “removed”. HUD regulations state that an appraiser who has been sanctioned by a state must be automatically removed from the roster. However, HUD allows state sanctioned appraisers to remain listed on the roster, but uses a field called "terminate date" to identify any appraiser who received a state sanction. We assert that had eight of the state sanctioned appraisers been completely removed (not listed) from the roster, 27 appraisals conducted by those sanctioned appraisers would not have occurred. We assert that the reason the appraisers were selected from the roster was because they remained listed and the "terminate date" field did not prevent their selection.

Further, we understand the concern of untimely reporting by the states, however 44 of the 65 (68 percent) sanctioned appraisers still listed on the roster showed a termination date ranging from 61 days to eight years (see table below). Therefore, timely reporting is not the issue.

| Days (range) on Roster after receiving discipline and prior to termination. | Number of Appraisers |
|---|----------------------|
| 3000 - 3200 (8 - 9 Years) | 2 |
| 1081 - 2999 (3 - 8 Years) | 2 |
| 721 -1080 (2 - 3 Years) | 5 |
| 361 -720 days (1 - 2 Years) | 8 |
| 271 - 360 days (9 - 12 Months) | 6 |
| 181 -270 days (6 - 9 Months) | 5 |
| 91 - 180 days (3 - 6 Months) | 11 |
| 61 - 90 days (2 - 3 Months) | 5 |
| 31 - 60 days (1 - 2 Months) | 21 |
| Total | 65 |

Comment 3 We understand why the 30 day grace period was placed into the software logic. However, allowing a 30 day grace period violates HUD regulations and does not prevent appraisers with expired licenses to conduct appraisals. As stated in the report 28 appraisers conducted a total of 361 appraisals after their state licenses expired, and 19 of the 28 (68 percent) conducted a total of 345 of the 361 (96 percent) appraisals more than 30 days after their state license expired.

Comment 4 We disagree. HUD allowed all appraisers to remain listed on the roster indefinitely. The appraisers remain listed on the roster whether they hold a valid license or not. As stated in comment two, HUD uses a "terminate date" field to identify those appraisers that should not be listed on the roster. Further, the finding showed that the listing of 36 state sanctioned or unlicensed (expired) appraisers were allowed to conduct a total of 388 appraisals. We assert that it is HUD's responsibility to ensure that the appraisers listed on

its roster are eligible to conduct appraisals. Therefore recommendation 1B should be implemented and regular monitoring of the roster by HUD staff should be conducted to identify any deficiencies between the National Registry database and HUD's database. Any discrepancies should be cleared by HUD staff checking the appraiser file, which should include a current copy of a valid license as stated in recommendation 2A.

- Comment 5** We cannot comment on appraisers sanctioned by the Homeownership Centers because it was outside the scope of our audit.
- Comment 6** We disagree. HUD's contractor developed an interface (software program) to update licensing information and the process has been automated since 2003. We reviewed the programming documentation and found that the software program retrieves licensing information from the National Registry and performs matching tests. If the licensing information from the National Registry is different than that in the Computerized Homes Underwriting Management System (roster), the program edits the license number. The programming documentation specifies that the editing process includes the removal of data from individual licenses. However, our finding illustrates that data was added to the licensing information retrieved from the National Registry and updated to the roster which made the licensing data for 162 of 420 (39 percent) reviewed appraisers inconsistent between the two databases. Therefore the automated updating system (program) is not working as intended.
- Comment 7** We would like to clarify that we did not state that the appraiser had an invalid license. The example that HUD referred to in its comments showed that HUD's software program is removing decimal points (periods) as stated in HUD's software programming documentation. The removal of decimal points is inappropriate because the state of Illinois uses decimal points (periods) to distinguish various license numbers. The example HUD referred to in its comments, which showed the appraiser identification number S5SCIT involved two separate appraisers, both from Illinois. One appraiser was listed on the roster (15600026) and the other was not a roster appraiser (156.000296). When we conducted our analysis of sanctioned appraisers, we used a computer program to match the roster to the National Registry database of sanctioned appraisers. The match returned a hit on appraiser 15600026. The match was actually a false positive due to the software program removing the decimal point. This illustrates that HUD's software program that removes decimal points could cause two or more appraisers (roster and/or non-roster) to be associated with one appraiser identification number shown on the roster.
- Comment 8** We acknowledge the potential risk of delayed reporting by the states to the National Registry, which can impact the accuracy of appraisal data reported in the database. Therefore it is important that HUD implement recommendation 2A to ensure HUD will have an accurate licensing history for its roster appraisers. In addition, recommendation 1A should be implemented to ensure that quality control checks of the roster are conducted.
- Comment 9** We commend HUD for taking action to correct the identified deficiency. However, data entered into the FHA Connection should also be validated with documentation (copy of current valid license) placed into the appraiser's file (record) as suggested by the recommendation.
- Comment 10** We commend HUD for taking action to create a clear and definitive record retention policy for the FHA appraiser roster. However, the lack of a clearly defined record

retention policy for the roster in HUD Handbook 2225.6, Single Family Home Mortgage Insurance Program Records, does not excuse the destruction of a projected 24,013 active appraiser records. The Handbook requires that technical and miscellaneous reference files, including program participant files, should not be destroyed until superseded or obsolete. During our fieldwork we also spoke with the HUD supervisory management analyst that assisted with drafting the policies in the Handbook. The analyst confirmed that the Handbook intended that the applications for placement on the FHA appraiser roster be retained until the appraiser was no longer on the roster to allow for verification of information on the roster if needed.

Comment 11 We disagree with HUD and our position is clearly supported by evidence illustrated in Finding 1. Finding 1 illustrated that 3,480 appraisers were listed on the roster with expired licenses and 28 conducted appraisals. Additionally 119 appraisers that had received a state sanction remained listed on the roster and 8 conducted appraisals. Therefore, several appraisers currently listed on the roster are not eligible to perform FHA appraisals. However, we agree that complying with recommendation 2B might be an extreme burden for HUD staff therefore we have rescinded the recommendation.

Appendix B

SUMMARY OF DEFICIENCIES (INCONSISTENCIES)

Legend

- A** Appraiser Count
- B** Appraiser Identification Number
- C** Roster shows State license that was not found in Registry
- D** Registry shows additional State license(s) not shown on roster
- E** Registry shows different name than that shown on roster
- F** Roster State license(s) number different due to removed data
- G** Roster State license(s) number different due to added data
- H** Roster State license(s) number completely different
- I** Appraiser had one or more deficiencies

| | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I |
|--|---|--------|---|---|---|---|---|---|---|--|---|--------|---|---|---|---|---|---|---|--|---|--------|---|---|---|---|---|---|---|
| | X | E3TQ6P | | | | | X | | X | | X | BY2432 | | | X | X | | | X | | X | YMUQJN | | | | | X | | X |
| | X | 6DTUG1 | | | | | X | | X | | X | CFT5KZ | | | | X | X | | X | | X | YQ849R | | | | | | | |
| | X | 9NQW4V | | | | | X | | X | | X | CQMNQB | X | | | | | | X | | X | Z0JWRQ | | | | X | | | X |
| | X | K0FZ2F | | | | X | | | X | | X | CU1Q4B | | | | X | | | X | | X | Z6FM75 | | | | X | X | | X |
| | X | 2LLKGV | | | | X | X | | X | | X | CUL2SU | | | | | | | | | X | 0LKM9L | | | | | | | |
| | X | 386KQU | | | | X | | | X | | X | D6TRYB | | | | | X | | X | | X | 11A3AL | | X | | | | | X |
| | X | 6SIFVW | | | | X | | | X | | X | D84ZMS | | | | X | | | X | | X | CMQSU4 | | | | X | | | X |
| | X | 8683I9 | | | | X | | | X | | X | DAKCJZ | X | | | | | | X | | X | F54XJM | | | | X | X | X | X |
| | X | BELX9H | | | | X | | | X | | X | DGW7KF | | | | X | | | X | | X | FSEJ7R | | | | X | | | X |
| | X | D43N52 | | X | | X | | | X | | X | E8TMXF | | | | | | | | | X | HK5UBG | | | | X | X | | X |
| | X | G475YB | | | | X | | | X | | X | EAZGRY | | | | | | | | | X | L8L56J | | X | | | | | X |
| | X | L4YACE | | | | X | | | X | | X | ECS7MC | | | | X | | | X | | X | YVY9A1 | | | | | | | |
| | X | N2MBXR | | | | X | X | | X | | X | EQKQJZ | | | | X | | | X | | X | 1JXDCG | | | | | | | |
| | X | RH9MSJ | | | | X | | | X | | X | EWYFDR | | | | X | | | X | | X | 592CS9 | | | | | | | |
| | X | V1VLJT | | | | X | | | X | | X | FUU0IC | | | | X | X | | X | | X | 9Q7U5T | | X | | | | | X |
| | X | WQ19JF | | | | X | | | X | | X | FXZUSY | | | | X | | | X | | X | 9QZLUW | | | | X | | | X |
| | X | XM88TF | | | | X | | | X | | X | G2FZGL | | | | | | | | | X | A1E5Q0 | | | | X | | | X |
| | X | CZL7KZ | | X | | X | | | X | | X | GR45PD | | | | | X | | X | | X | D63ZH3 | | | | | | | |

| | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I | | |
|--|---|--------|---|---|---|---|---|---|---|--|---|--------|---|---|---|---|---|---|---|---|---|---|--------|--------|---|---|---|---|---|---|---|
| | X | 29LMLY | | | | X | | | X | | X | GSKQBC | | X | | | | | X | | | X | FZ1GYS | | | | X | | | X | |
| | X | L2KV6Y | | X | | X | | | X | | X | GWVJDF | | X | | X | | | | X | | X | HIFU2N | | | | X | | | X | |
| | X | P54XYY | | | | | | | | | X | GZDUWN | | | | X | X | | | X | | X | IKCZ2I | | | | | X | | X | |
| | X | CHUW7U | | | | X | | | X | | X | HAW8EJ | | | | X | | | | X | | X | L3WRSK | | | | | X | | X | |
| | X | XBG96G | | | | | X | | X | | X | HBE0PC | | | | | | | | | | X | MSRP24 | | | | X | | | X | |
| | X | MY4SWW | | | | | | | | | X | HMB4KG | | X | | | | | | | | X | NHI9NU | | | | X | | | X | |
| | X | XMK9KW | | | | | X | | X | | X | HT17JK | | X | | X | | | | | | X | NVN7DY | | | | | X | | X | |
| | X | 9JN0MV | | | | X | | | X | | X | HTUPMI | | | | X | | | | | | X | QS1ZMI | | | | X | X | | X | |
| | X | T0A4FC | | X | | | | | X | | X | IJ58JT | | | | X | X | | | | | X | V2KKNY | | | | X | | | X | |
| | X | 65LP45 | | | | X | | | X | | X | J9NMRF | | | | | | | X | X | | X | W2LBDK | | | | X | X | | X | |
| | X | 3BHGBH | | | | X | | | X | | X | JQS5IK | | | | | | X | X | | | X | Z1LNPF | | | | X | | | X | |
| | X | 6RPW2K | | | | | | X | X | | X | KLKTA5 | | | | | | | | | | X | ZFUQ9L | | | | X | X | | X | |
| | X | 89Z2G6 | | | | X | | | X | | X | L1BST0 | | X | | | | | X | X | | X | ZLS9E3 | | | | X | | | X | |
| | X | 2KEU69 | | X | | | X | | X | | X | L5JA0M | | | | X | | | | | | X | ZRP4PZ | | X | | | X | | X | |
| | X | 7Z90EY | | | | | X | | X | | X | LU1A17 | | | | | | | | | | X | ZZGD8Q | | | | X | X | | X | |
| | X | 5B8ZGA | | | | | | | | | X | MYIBE1 | | | | | | | | | | X | EZTAPF | | | | | | | | |
| | X | 5H2Z97 | | | | X | X | | X | | X | N4L1ZK | | | | | X | | | | | X | J10JFE | | X | | X | X | | X | |
| | X | CDBQUW | | | | | X | | X | | X | N8FRDX | | | | | | | | | | X | XFLLW | | | | | | | | |
| | X | UP4MYW | | | | | | | | | X | NKBCKB | | | | | | | X | X | | | X | ZLEC4V | | | | X | | | X |
| | X | R7BKIT | | | | | X | | X | | X | P2LRBT | | | | | | | | | | X | GWLV4J | | | | | | | | |
| | X | ZSUR8M | | X | | X | X | | X | | X | PA8VDS | | | | | X | | | | | X | MKWJ7C | | | | X | X | | X | |
| | X | 1VIVQS | | | | X | X | | X | | X | PFB2T6 | | | | X | | | | | | X | 5Y1LMH | | | | | X | | X | |
| | X | 1XW046 | | | | | | | | | X | PQS1PU | | | | X | | | | | | X | CAC2AY | | | | X | | | X | |
| | X | 21M7EA | | | | | X | | X | | X | PR0TVA | | | | | X | | | | | X | HHLUPK | | X | | X | | | X | |
| | X | 29QKV5 | | X | | X | | | X | | X | Q96THY | | | | X | | | | | | X | NW1M67 | | | | X | | | X | |
| | X | 2IHJX0 | | X | | X | | | X | | X | R6S1KA | | | | X | | | | | | X | NXVZE1 | | | | X | X | X | X | |
| | X | 2J8DPS | | | | | | | | | X | RGAB8U | | | | | | | | | | X | V9PHSU | | | | | X | | X | |
| | X | 2MF9Q7 | | | | X | | | X | | X | RWELJT | | | | | | | | | | X | 3WFTUL | | X | | X | | | X | |
| | X | 2QK9DF | | | | X | | | X | | X | S7RY2L | | | | | X | | | | | X | 7PHL4Q | | | | X | | | X | |
| | X | 2XW58Y | | X | | X | | | X | | X | SANS60 | | X | | X | | | X | X | | X | FISTR7 | | | X | | X | | X | |
| | X | 2ZSEH2 | | | | | X | | X | | X | SK99M4 | | | | X | | | | | | X | FKBFHS | | | | X | | | X | |

| | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I | |
|--|---|--------|---|---|---|---|---|---|---|--|---|--------|---|---|---|---|---|---|---|---|---|---|--------|---|---|---|---|---|---|---|
| | X | 355RPM | X | | | X | | | X | | X | TDECQR | | | | | | | | | | X | GUIYT3 | | | | | X | | X |
| | X | 41NL56 | | | | | X | | X | | X | TFLTM7 | | | | X | | | | X | | X | 1REWS6 | | | | | X | | X |
| | X | 43LZLP | | | | X | | | X | | X | TQK7VA | | | | X | | | | X | | X | 1VG2FS | | | | | X | | X |
| | X | 4HG45X | | | | | X | | X | | X | U9098L | | | | X | | | | X | | X | 2R5S13 | | | | | X | | X |
| | X | 4LEDAA | | | | X | | | X | | X | UA257S | | | | | | | | | | X | 2Z3F8M | | | | | | | |
| | X | 4NP3JM | | | | X | | | X | | X | UYZG00 | | | | X | | | | X | | X | 42KDKW | | | | X | | | X |
| | X | 57EC4P | | | X | | | | X | | X | V1BUN2 | | | | | | | | | | X | 4CXX7I | | | | | X | | X |
| | X | 5AUYJ3 | | | | | | | | | X | V28AJ4 | | | | | X | | | X | | X | 5QUFR1 | | | | | X | | X |
| | X | 5F7BXC | | | | X | | | X | | X | V7JUJR | | | | X | | | | X | | X | 5TW5K5 | | | | | | | |
| | X | 5PMS2S | | | | | X | | X | | X | VANVMB | | | | | | | | | | X | 5XSQYQ | | | | | X | | X |
| | X | 5SAV8Z | | | | X | | | X | | X | VQMKUI | | | | X | | | | X | | X | 7GWCVL | | | | | X | | X |
| | X | 6Q30SB | | | | X | | | X | | X | VQYCIL | | | | | X | | | X | | X | 7Y2SN1 | | | | | X | | X |
| | X | 7NNJCN | | | | X | | | X | | X | W12QJZ | | | | | | | | | | X | 8SLUU1 | | | | | X | X | X |
| | X | 7R0Z8N | | | | | | | | | X | WWHTU0 | | | | | | | | | | X | 9Q0YYM | | | | | X | | X |
| | X | 85VDJ2 | | | | X | | | X | | X | X3R2LG | | | | | | | | | | X | ACG0GE | | | X | | X | | X |
| | X | 8XUZ1M | | | | X | | | X | | X | X59S90 | | | | X | X | | | X | | X | AXLKUY | | | | | | | |
| | X | 9CECTT | | | | X | X | | X | | X | XFZ9QT | | | | X | | | | X | | X | B671LE | | | | | X | | X |
| | X | 9EKPM3 | | | | | | | | | X | XRIHWR | | | | X | | | | X | | X | CCKDHQ | | | | | | | |
| | X | 9KF9RW | | | | | | | | | X | XVGT96 | | | | | | | | | | X | FBPXZG | | | | X | X | | X |
| | X | AAK47S | | | | | X | | X | | X | XVS2W8 | | | | | | | | | | X | GDBK2N | | | | X | X | | X |
| | X | BID1BH | | | X | X | X | | X | | X | XX3UVZ | | | | X | | | | X | | X | GK86ZA | | | | | X | | X |
| | X | BXASWU | | | | X | | | X | | X | Y5IGQ1 | | | | X | | | | X | | X | KVKSTU | | | X | | X | | X |
| | X | 88EAWQ | | | | | X | | X | | X | Y5SYG9 | | | | X | | | | X | | X | MRK6Z7 | | | | | X | | X |
| | X | 44CLVE | | | | | X | | X | | X | 8AH8U4 | X | | | X | | | | X | | X | 6SHQGF | | | | | | | |
| | X | 466557 | | X | | | | | X | | X | 8DIYIM | | | | X | | | | X | | X | 6SL0N0 | | | | X | | | X |
| | X | 46EQUJ | | | | X | | | X | | X | 8EAISE | | | | | | | | | | X | 6UXSMD | | | | | | | |
| | X | 47194K | | | | X | | | X | | X | 8ELCHW | | | | X | | | | X | | X | 6YFSX3 | | | X | X | | | X |
| | X | 474XEE | | | | X | X | | X | | X | 8G5SI6 | | | | X | | | | X | | X | 6ZQYBD | | X | | | X | | X |
| | X | 4896CU | | | | | X | | X | | X | 8HISGL | | | | | | | | | | X | 714XVD | | | | | X | | X |
| | X | 48Y8SD | | | | | | | | | X | 8JCDCG | | | | | | | | | | X | 73KBMZ | | | | | X | | X |
| | X | 4A7G1U | | | | X | | | X | | X | 8KGWMV | | | | X | | | | X | | X | 74HQD3 | | | | X | | | X |
| | X | 4B5YXP | | | | X | | | X | | X | 8NXWZR | | | | | X | | | X | | X | 74I15Z | | | | | | | |

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|--|---|--------|---|---|---|---|---|---|---|--|---|--------|---|---|---|---|---|---|---|---|---|--------|---|---|---|---|---|---|---|
| | X | 4BULJT | | X | | | | | X | | X | 8VHCCB | | | | X | X | | X | | X | 75CN5B | | | | X | | | X |
| | X | 4C6DID | | | | X | | | X | | X | 8XKZVP | | | | | X | | X | | X | 76X7WK | | | | | | | |
| | X | 4F0K6C | | | | X | | | X | | X | 8Z43VY | | | | X | | | | X | X | 77EDEF | | | | X | X | | X |
| | X | 4FCHCW | | | | | | | | | X | 909103 | | | | | | | | | X | 7B8KVJ | | | | X | | | X |
| | X | 4IG2VP | | | | X | | | X | | X | 90KTQ1 | | | | X | | | | X | X | 7ED2IL | | | | X | | | X |
| | X | 4JCC7G | | | | X | | | X | | X | 954GUU | | | | X | | | | X | X | 7G0SRQ | | | | | X | | X |
| | X | 4MLIKM | | | | | X | | X | | X | 97ZRZM | | | | | X | | | X | X | 7HZ3DK | | X | | | | | X |
| | X | 4MLQGC | | | | | | | | | X | 99PSEY | | | | | | | | | X | 7I8BWT | | | | | | | |
| | X | 4RCM42 | | | | | | | | | X | 9AR82F | | | | X | | | | X | X | 7IMC68 | | | | X | | | X |
| | X | 4TLTPW | | | | X | | | X | | X | 9BSQVP | X | | X | | | | | X | X | 7KT3GM | | | | X | X | | X |
| | X | 54PS78 | | | | X | | | X | | X | 9CIAPV | | X | | | | | | X | X | 7RYD9U | | | | X | X | | X |
| | X | 556LDN | | | | | | | | | X | 9DCHZU | | | | X | | | | X | X | 7SADP8 | | | | | | | |
| | X | 5A6S9B | | | | | X | | X | | X | 9FQLC9 | | | | X | | | | X | X | 7SREGW | | | | | X | | X |
| | X | 5C0IX8 | | X | X | | X | | X | | X | 9GNURC | | | | X | X | | | X | X | 7UE78Z | | | | | X | | X |
| | X | 5DNSAF | | | | | | | | | X | 9IK9LR | | | | | X | | | X | X | 7VFDEQ | | | | | X | X | X |
| | X | 5E17DU | | | | | X | | X | | X | 9JNUZM | | | X | | | | | X | X | 7X2AFX | | | | | X | | X |
| | X | 5GV8IW | | | | X | | | X | | X | 9K4L8Q | | | | | X | | | X | X | 80736J | X | X | | X | | | X |
| | X | 5HFUR9 | | | | X | X | | X | | X | 9MAV0C | | | | | X | | | X | X | 8491FX | | | | X | | | X |
| | X | 5K2KEP | | | | X | | | X | | X | 9N1LFP | | | | X | | | | X | X | 8547BH | | | | | X | | X |
| | X | 5MUYSR | | | | X | X | | X | | X | 9PXX3D | | | | | X | | | X | X | 87FT3M | | | | | X | | X |
| | X | 5NR7JU | | | | | X | | X | | X | 9QCN05 | | | | X | | | | X | X | 88KQUT | | | | | X | | X |
| | X | 5QJKJ6 | | | | | | | | | X | 9S9TYP | | X | | X | X | | | X | X | 5Z3WJB | | | | | X | | X |
| | X | 5V2F5C | | | | | X | X | X | | X | 9UG7NL | | | | X | | | | X | X | 62QREC | | | | | | | |
| | X | 5XQXP5 | | | | | | | | | X | 9UHJFV | | | | X | | | | X | X | 9W5HTY | | | | | X | | X |
| | X | MYGS20 | | | | | X | | X | | X | ARK69T | | | | | X | | | X | X | 20LGA4 | | | | | X | | X |
| | X | NBUSA2 | | | | | X | | X | | X | ARN32U | | | | | X | | | X | X | 20MASU | | | | | | | |
| | X | NMBS8B | | X | | X | | | X | | X | ATTJ8A | | | | | | | | X | X | 2131JE | | | | X | | | X |
| | X | P4P6YQ | | | | | | | | | X | B2JAR8 | | | | X | | | | X | X | 25LD5U | | | | X | | | X |
| | X | PIY0XZ | | | X | X | X | | X | | X | B5AX04 | | | | X | X | | | X | X | 28TLZH | | | | | | | |
| | X | TZ3V0X | | | | X | X | | X | | X | B77UPJ | | | | | | | | X | X | 2D80LB | | | | | X | | X |
| | X | VJ4ABN | | | | | X | | X | | X | B8G2ZC | | | | X | | | | X | X | 2HAURJ | | | | | X | | X |
| | X | X7ANPH | | | | | X | | X | | X | B9SR2D | | | | | | | | X | X | 2I0832 | | X | | | | | X |

| | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I | | A | B | C | D | E | F | G | H | I | | | | | | | | | |
|---------------|-----|--------|---|----|---|----|----|---|-----|--|-----|--------|---|----|---|----|----|---|-----|---|-----|--------|--------|----|---|----|----|---|-----|---|---|---|---|---|---|---|---|---|
| | X | XY4CP7 | | | | | X | | X | | X | BB5YVJ | | | | | X | | X | | X | 2J8PYY | | | | | | | | | | | | | | | | |
| | X | ZXW4EC | | | | | X | | X | | X | 9W655R | | | | | | | | | X | 2KQN30 | | | | | | | | | | | | | | | | |
| | X | 026P8Y | | | | X | | | X | | X | 9WACAB | | | | X | X | | | X | X | 2NUSSA | | | | | X | | | X | | | | | | | | |
| | X | 03YE6V | | | | X | X | | X | | X | 9Z3GHP | | | | | X | | | | X | 2QC0LG | | | | | X | X | | | X | | | | | | | |
| | X | 08RSSU | | | | | | | | | X | 9ZRSCL | | | | X | | | | | X | 2QL6X0 | | | | | | | | | | | | | | | | |
| | X | 0913MM | | | | X | | | X | | X | A2UHSN | | | | | X | | | X | X | 2QP8FL | | | | X | | | | | X | | | | | | | |
| | X | 09LDXF | | | | X | | X | X | | X | A39W3M | | | | | X | | | X | X | 2SC4VS | | | | | X | X | | | X | | | | | | | |
| | X | 0AZ4DI | | | | X | | | X | | X | A3XVTU | | | | | | | | | X | 2ZJXKD | | | | X | X | | | | X | | | | | | | |
| | X | 0BQ4KC | | | | | X | | X | | X | A6G3CG | | | | | X | | | X | X | 3134GN | | | | X | | | | | | X | | | | | | |
| | X | 0EQP2U | | | | X | | | X | | X | A7LLP4 | | X | | | | | | X | X | 31DNLU | | | | | | | | | | | | | | | | |
| | X | 0KGDHY | | X | | | | | X | | X | 6AAQNF | | | | X | | | | X | X | 33U72A | | | | X | | | | | | | X | | | | | |
| | X | 0QJDST | | | | X | | | X | | X | 6ACY5Z | | | | | X | | | X | X | 359WXN | | | | X | | | | | | | | X | | | | |
| | X | 0QK2IS | | | | | X | | X | | X | 6FC3B9 | | | | | X | | | X | X | 3CC3B5 | | | X | | X | | | | | | | | X | | | |
| | X | 0QNUJH | | | | | X | | X | | X | 6FKFME | | | | | X | | | X | X | 3CPA0I | | | | | X | | | | | | | | X | | | |
| | X | 0QSH0M | | | | X | | | X | | X | 6QF6LL | | | | X | | | | X | X | 3EWAPZ | | | | X | | | | | | | | | | X | | |
| | X | 0S1F6K | | | | | X | | X | | X | 65S8QN | | | | X | X | | | X | X | 3JHIB5 | | | X | X | X | | | | | | | | | X | | |
| | X | 0VH4ZU | | | | | X | | X | | X | 661BGX | | | | X | | | | X | X | 3N889X | | X | | | | | | | | | | | | | X | |
| | X | 0VLG9G | | | | X | | | X | | X | 5Y5N4H | | X | | | X | | | X | X | 3SRNDW | | | | X | | | | | | | | | | | X | |
| | X | 0Y33G7 | | | | X | | X | X | | X | 1FWDCJ | | | | | X | | | X | X | 3UU5S7 | | | | X | X | | | | | | | | | | X | |
| | X | 11L6CX | | | | | X | | X | | X | 11JR84 | | | | | X | | | X | X | 3ZMM9E | | | | | X | | | | | | | | | | X | |
| | X | 132102 | | | | X | | | X | | X | 11YNI1 | | | | | X | | | X | X | A8WA0Y | | | | X | | | | | | | | | | | X | |
| | X | 15FSDE | | | | X | X | | X | | X | 1JBACU | | | | | | | | | X | X | ABNDF3 | | | X | X | | | | | | | | | | | X |
| | X | 18253N | | | | X | | | X | | X | 1MZIMM | | | X | X | | | | X | X | AHRJJK | | X | | X | X | | | | | | | | | | | X |
| | X | 19BI20 | | | | | X | | X | | X | 1N2UIH | | | | | X | | | X | X | AIE7R5 | | | | | X | | | | | | | | | | | X |
| | X | 1AL763 | | | | X | | | X | | X | 1NP7GP | | | | X | X | | | X | X | AQLTJ2 | | | | | | | | | | | | | | | | |
| | X | 1B4S0Q | X | X | | X | | | X | | X | 1Q953Q | | | | | X | | | X | X | AR8PCS | | | | X | | | | | | | | | | | | X |
| | X | 1VZCMF | | X | | X | X | | X | | X | 1RAVSN | | | | | X | | | X | X | ARESRY | | | | X | | | | | | | | | | | | X |
| Totals | 140 | | 2 | 16 | 4 | 77 | 52 | 4 | 120 | | 140 | | 2 | 12 | 4 | 62 | 46 | 5 | 108 | | 140 | | 2 | 12 | 7 | 64 | 64 | 3 | 113 | | | | | | | | | |

| | LEGEND | TOTALS |
|---|---|--------|
| A | Appraiser Count | 420 |
| B | Appraiser Identification Number | N/A |
| C | Roster shows State license that was not found in Registry. | 6 |
| D | Registry shows additional State license(s) not shown on roster. | 40 |
| E | Registry shows different name then that shown on roster. | 15 |
| F | Roster State license(s) number different due to removed data. | 203 |
| G | Roster State license(s) number different due to added data. | 162 |
| H | Roster State license(s) number completely different | 12 |
| I | Appraiser had one or more deficiencies | 341 |

Appendix C

SUMMARY OF SANCTIONED APPRAISERS

Legend

- A** Appraiser Identification Number
- B** Appraiser received sanction
- C** Appraiser received sanction and was not terminated
- D** Appraiser terminated more than 30 days after receipt of sanction
- E** Appraiser conducted appraisals while under sanction
- F** Number of appraisals conducted while under sanction

| | A | B | C | D | E | F | | A | B | C | D | E | F | | A | B | C | D | E | F | |
|--|--------|---|---|---|---|----|--|--------|---|---|---|---|---|--|--------|---|---|---|---|---|---|
| | P2P825 | X | | X | | | | 18L3FR | X | | X | | | | 9EUFJG | X | | | | X | 1 |
| | CQN5AC | X | | X | | | | V3PFSL | X | | | | | | 4R4LGN | X | | | | | |
| | S1ZQIK | X | | X | | | | G54DJY | X | | X | | | | 5Z2CID | X | | | | | |
| | UKKP5X | X | | X | | | | 67PZBL | X | | X | | | | 1D8BKG | X | | | | | |
| | DTS5Q9 | X | | X | | | | 6R17TP | X | | | | | | JK1L7B | X | | | X | | |
| | 4Y9WQG | X | | X | | | | RLWGS1 | X | | | | | | XSU2G6 | X | | | X | | |
| | CH0HM5 | X | | X | | | | V06JY0 | X | | | | | | F35GRB | X | | | X | | |
| | EHDNDB | X | | X | | | | 8Y17AA | X | | X | | | | EIR611 | X | | | X | | |
| | RAQRMZ | X | | X | | | | X3R2LG | X | | X | | | | C4AS9H | X | | | | | |
| | UIEI7I | X | | X | X | 10 | | BNBAC7 | X | | X | | | | TG14TI | X | | | | | |
| | PA5H7T | X | | X | | | | H48WYD | X | | X | | | | LFMYRL | X | | | | | |
| | 16KHTW | X | | X | | | | 9VDLFH | X | | X | | | | A3PAX9 | X | | | X | | |
| | IUJWVZ | X | | X | | | | S47AT4 | X | | | | | | 2J8DPS | X | | | X | X | 4 |
| | TZMVQ6 | X | | X | | | | X77UBH | X | | X | | | | DMIHCN | X | | | X | | |
| | V469EL | X | | X | | | | UKKSQP | X | | X | | | | 2QT5VC | X | | | | | |
| | KZLCYP | X | | X | | | | MRYJC0 | X | | X | | | | K5PTPK | X | | | | | |
| | 6CXMIU | X | | X | | | | ZB8XG2 | X | | | | | | VEYWJU | X | | | | | |
| | 63HHMA | X | | X | | | | JRB4V3 | X | | | X | 7 | | 8RGGRN | X | | | | | |
| | SUT4WU | X | | X | | | | Z0VFTA | X | | X | | | | 3SH9C8 | X | | | | | |
| | VCPG85 | X | | X | | | | 4DRKN9 | X | | X | | | | 6HZRDQ | X | | | | | |
| | TKIKV5 | X | | X | | | | PIY0XZ | X | X | | X | 1 | | D9EFBN | X | | | | | |
| | 5ZLIS2 | X | | X | | | | K2SZDR | X | | | | | | WKLWB3 | X | | | | | |
| | DB38MQ | X | | | | | | 9UUPRN | X | | X | | | | BLAWDW | X | | | | | |
| | V1T7CG | X | | X | | | | 0WPF4E | X | | X | | | | KX86ZA | X | | | | | |
| | 94UPU3 | X | | X | | | | WZD6P8 | X | | | | | | VE6XKF | X | | | | | |
| | FYQLFM | X | | X | | | | GD85T5 | X | | X | | | | 0JLLCW | X | | | | | |
| | SE0JH7 | X | | X | | | | NVF9R7 | X | | X | | | | 1XCRI0 | X | | | | | |
| | W6E7ND | X | | X | | | | KI1UNK | X | | | | | | FD11I4 | X | | | | | |
| | RAI3ZQ | X | | X | | | | ABKP24 | X | | | | | | KFCS23 | X | | | X | | |
| | 7HTG13 | X | | X | X | 1 | | ELCJYZ | X | | | | | | IHVW3Q | X | | | X | | |
| | PG7JIP | X | | | | | | W9E2RU | X | | | | | | HQ3HGU | X | | | X | | |
| | 25UIHH | X | | X | | | | 256R19 | X | | | | | | QN2RTY | X | | | X | X | 1 |
| | RG84D2 | X | | X | | | | EN1R14 | X | | | | | | Y47B5E | X | | | | | |
| | AII6BL | X | | | | | | DV6MBL | X | | | | | | A78NRK | X | | | X | | |
| | ZZHFX0 | X | | X | | | | W9LYJW | X | | | | | | 50HEQ3 | X | | | X | X | 2 |
| | B7X9LH | X | | X | | | | ILUJHB | X | | | | | | 3NLI1W | X | | | X | | |

| | A | B | C | D | E | F | | A | B | C | D | E | F | | A | B | C | D | E | F | |
|--------|--------|----|---|----|---|----|--|--------|----|---|----|---|---|--|--------|----|---|----|---|---|--|
| | 429SXU | X | | | | | | F2UR1K | X | | | | | | XMPPLL | X | | | | | |
| | CAQIC2 | X | | | | | | AA36GP | X | | | | | | GFKCZK | X | | | | | |
| | NMLVZH | X | | X | | | | IDDX44 | X | | | | | | F82DHJ | X | | | | | |
| | | | | | | | | 079RP2 | X | | | | | | 8N2D5P | X | | | | | |
| Totals | | 39 | 0 | 34 | 2 | 11 | | | 40 | 1 | 17 | 2 | 8 | | | 40 | 0 | 14 | 4 | 8 | |

| | B | C | D | E | F |
|--------|-----|---|----|---|----|
| Totals | 119 | 1 | 65 | 8 | 27 |

| Legend | |
|--------|--|
| A | Appraiser identification number |
| B | Appraiser received sanction. |
| C | Appraiser received sanction and was not terminated. |
| D | Appraiser terminated more than 30 days after receipt of sanction |
| E | Appraiser conducted appraisals while under sanction. |
| F | Number of appraisals conducted while under sanction |

Appendix D

SUMMARY OF INELIGIBLE APPRAISALS

Legend

- A** Appraiser Count
- B** Appraiser Identification Number
- C** Number of appraisals conducted before Registry showed valid license
- D** Number of appraisals conducted after Registry showed expired license
- E** Number of appraisals conducted after Registry showed expired license but before 30-day control
- F** Number of appraisals conducted more than 30 days after license expiration
- G** Total number of appraisers who conducted appraisals after license expiration
- H** Number of appraisers who conducted appraisals after 30-day control

| | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H |
|--|---|--------|----|----|---|----|---|---|--|---|--------|---|-----|---|-----|---|---|---|---|--------|---|---|---|---|---|---|
| | X | 6YFSX3 | 77 | 0 | 0 | 0 | | | | X | 4FCHCW | 0 | 0 | 0 | 0 | | | | X | 7GWCVL | 0 | 0 | 0 | 0 | | |
| | X | 76X7WK | 70 | 0 | 0 | 0 | | | | X | 4IG2VP | 0 | 0 | 0 | 0 | | | | X | 7Y2SN1 | 0 | 0 | 0 | 0 | | |
| | X | 9PXX3D | 68 | 0 | 0 | 0 | | | | X | 4JCC7G | 0 | 15 | 0 | 15 | | X | X | X | 9Q0YYM | 0 | 0 | 0 | 0 | | |
| | X | 4A7G1U | 0 | 61 | 0 | 61 | X | X | | X | 4MLQGC | 0 | 0 | 0 | 0 | | | | X | FBPXZG | 0 | 0 | 0 | 0 | | |
| | X | 7I8BWT | 37 | 0 | 0 | 0 | | | | X | 4RCM42 | 0 | 0 | 0 | 0 | | | | X | GDBK2N | 0 | 0 | 0 | 0 | | |
| | X | 8NXWZR | 36 | 0 | 0 | 0 | | | | X | 4TLTPW | 0 | 0 | 0 | 0 | | | | X | MYGS20 | 0 | 0 | 0 | 0 | | |
| | X | HHLUPK | 35 | 0 | 0 | 0 | | | | X | 556LDN | 0 | 0 | 0 | 0 | | | | X | NBUSA2 | 0 | 0 | 0 | 0 | | |
| | X | A39W3M | 34 | 0 | 0 | 0 | | | | X | 5C0IX8 | 0 | 0 | 0 | 0 | | | | X | NMBS8B | 0 | 0 | 0 | 0 | | |
| | X | 4BULJT | 33 | 0 | 0 | 0 | | | | X | 5DNSAF | 0 | 0 | 0 | 0 | | | | X | PIY0XZ | 0 | 0 | 0 | 0 | | |
| | X | 62QREC | 31 | 0 | 0 | 0 | | | | X | 5E17DU | 0 | 0 | 0 | 0 | | | | X | VJ4ABN | 0 | 0 | 0 | 0 | | |
| | X | 8EAISE | 31 | 0 | 0 | 0 | | | | X | 5GV8IW | 0 | 0 | 0 | 0 | | | | X | ZXW4EC | 0 | 0 | 0 | 0 | | |
| | X | ARN32U | 31 | 0 | 0 | 0 | | | | X | 5HFUR9 | 0 | 100 | 0 | 100 | X | X | | X | 026P8Y | 0 | 0 | 0 | 0 | | |
| | X | 6ZQYBD | 30 | 0 | 0 | 0 | | | | X | 5MUYSR | 0 | 0 | 0 | 0 | | | | X | 03YE6V | 0 | 0 | 0 | 0 | | |
| | X | 661BGX | 29 | 0 | 0 | 0 | | | | X | 5QJKJ6 | 0 | 0 | 0 | 0 | | | | X | 08RSSU | 0 | 0 | 0 | 0 | | |
| | X | 73KBMZ | 0 | 29 | 0 | 29 | X | X | | X | 5V2F5C | 0 | 0 | 0 | 0 | | | | X | 0913MM | 0 | 0 | 0 | 0 | | |
| | X | 44CLVE | 25 | 0 | 0 | 0 | | | | X | 5Y5N4H | 0 | 0 | 0 | 0 | | | | X | 09LDXF | 0 | 0 | 0 | 0 | | |
| | X | 6FC3B9 | 25 | 0 | 0 | 0 | | | | X | 5Z3WJB | 0 | 0 | 0 | 0 | | | | X | 0AZ4DI | 0 | 0 | 0 | 0 | | |
| | X | 8G5SI6 | 24 | 0 | 0 | 0 | | | | X | 65S8QN | 0 | 0 | 0 | 0 | | | | X | 0BQ4KC | 0 | 0 | 0 | 0 | | |
| | X | NXVZE1 | 0 | 23 | 0 | 23 | X | X | | X | 6AAQNF | 0 | 0 | 0 | 0 | | | | X | 0EQP2U | 0 | 0 | 0 | 0 | | |
| | X | 57EC4P | 19 | 0 | 0 | 0 | | | | X | 6ACY5Z | 0 | 0 | 0 | 0 | | | | X | 0KGDHY | 0 | 0 | 0 | 0 | | |
| | X | 3SRNDW | 18 | 0 | 0 | 0 | | | | X | 6FKFME | 0 | 0 | 0 | 0 | | | | X | 0QJDST | 0 | 0 | 0 | 0 | | |
| | X | 97ZRZM | 17 | 0 | 0 | 0 | | | | X | 6UXSMD | 0 | 0 | 0 | 0 | | | | X | 0QK2IS | 0 | 0 | 0 | 0 | | |
| | X | 2QP8FL | 16 | 0 | 0 | 0 | | | | X | 714XVD | 0 | 0 | 0 | 0 | | | | X | 0QSH0M | 0 | 0 | 0 | 0 | | |
| | X | NW1M67 | 15 | 0 | 0 | 0 | | | | X | 75CN5B | 0 | 0 | 0 | 0 | | | | X | 0VH4ZU | 0 | 0 | 0 | 0 | | |
| | X | AXLKUY | 15 | 0 | 0 | 0 | | | | X | 77EDEF | 0 | 0 | 0 | 0 | | | | X | 0VLG9G | 0 | 0 | 0 | 0 | | |
| | X | 11L6CX | 15 | 0 | 0 | 0 | | | | X | 7B8KVJ | 0 | 0 | 0 | 0 | | | | X | 0Y33G7 | 0 | 0 | 0 | 0 | | |
| | X | 2QC0LG | 14 | 0 | 0 | 0 | | | | X | 7G0SRQ | 0 | 0 | 0 | 0 | | | | X | 132102 | 0 | 0 | 0 | 0 | | |
| | X | 8547BH | 0 | 14 | 0 | 14 | X | X | | X | 7HZ3DK | 0 | 0 | 0 | 0 | | | | X | 15FSDE | 0 | 0 | 0 | 0 | | |

| | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H |
|--|---|--------|----|----|---|----|---|---|--|---|---------|---|---|---|---|---|---|--|---|--------|---|---|---|---|---|---|
| | X | 8XKZVP | 14 | 0 | 0 | 0 | | | | X | 7IMC68 | 0 | 0 | 0 | 0 | | | | X | 18253N | 0 | 0 | 0 | 0 | | |
| | X | 8DIYIM | 0 | 11 | 0 | 11 | X | X | | X | 7RYD9U | 0 | 0 | 0 | 0 | | | | X | 19BI20 | 0 | 0 | 0 | 0 | | |
| | X | B77UPJ | 11 | 0 | 0 | 0 | | | | X | 7SADP8 | 0 | 0 | 0 | 0 | | | | X | 1AL763 | 0 | 0 | 0 | 0 | | |
| | X | 2J8PYY | 10 | 0 | 0 | 0 | | | | X | 7SREGW | 0 | 0 | 0 | 0 | | | | X | 1B4S0Q | 0 | 0 | 0 | 0 | | |
| | X | 4MLIKM | 10 | 0 | 0 | 0 | | | | X | 7VFDEQ | 0 | 0 | 0 | 0 | | | | X | 1FWDCJ | 0 | 0 | 0 | 0 | | |
| | X | MRK6Z7 | 9 | 0 | 0 | 0 | | | | X | 7X2AFX | 0 | 0 | 0 | 0 | | | | X | 11JR84 | 0 | 0 | 0 | 0 | | |
| | X | 6SHQGF | 9 | 0 | 0 | 0 | | | | X | 80736J | 0 | 0 | 0 | 0 | | | | X | 11YNI1 | 0 | 0 | 0 | 0 | | |
| | X | 7UE78Z | 0 | 9 | 0 | 9 | X | X | | X | 8491FX | 0 | 0 | 0 | 0 | | | | X | 1MZIMM | 0 | 0 | 0 | 0 | | |
| | X | 8VHCCB | 9 | 0 | 0 | 0 | | | | X | 87FT3M | 0 | 0 | 0 | 0 | | | | X | 1N2UIH | 0 | 0 | 0 | 0 | | |
| | X | 9N1LFP | 9 | 0 | 0 | 0 | | | | X | 88KQUT | 0 | 0 | 0 | 0 | | | | X | 1NP7GP | 0 | 0 | 0 | 0 | | |
| | X | VQYCIL | 0 | 8 | 0 | 8 | X | X | | X | 8AH8U4 | 0 | 0 | 0 | 0 | | | | X | 1Q953Q | 0 | 0 | 0 | 0 | | |
| | X | 5QUFR1 | 8 | 0 | 0 | 0 | | | | X | 8ELCHW | 0 | 0 | 0 | 0 | | | | X | 1RAVSN | 0 | 0 | 0 | 0 | | |
| | X | 5XSQYQ | 8 | 0 | 0 | 0 | | | | X | 8HISGL | 0 | 0 | 0 | 0 | | | | X | 1VZCMF | 0 | 0 | 0 | 0 | | |
| | X | KVKSTU | 8 | 0 | 0 | 0 | | | | X | 8KGWMV | 0 | 0 | 0 | 0 | | | | X | 20LGA4 | 0 | 0 | 0 | 0 | | |
| | X | 0QNUJH | 8 | 0 | 0 | 0 | | | | X | 909103 | 0 | 0 | 0 | 0 | | | | X | 20MASU | 0 | 0 | 0 | 0 | | |
| | X | 3ZMM9E | 7 | 0 | 0 | 0 | | | | X | 90KTQ1 | 0 | 0 | 0 | 0 | | | | X | 2131JE | 0 | 0 | 0 | 0 | | |
| | X | 54PS78 | 7 | 0 | 0 | 0 | | | | X | 954GUU | 0 | 0 | 0 | 0 | | | | X | 25LD5U | 0 | 0 | 0 | 0 | | |
| | X | 8Z43VY | 6 | 0 | 0 | 0 | | | | X | 99PSEY | 0 | 0 | 0 | 0 | | | | X | 28TLZH | 0 | 0 | 0 | 0 | | |
| | X | 9WACAB | 0 | 6 | 0 | 6 | X | X | | X | 9AR82F | 0 | 0 | 0 | 0 | | | | X | 2I0832 | 0 | 0 | 0 | 0 | | |
| | X | 0S1F6K | 5 | 0 | 0 | 0 | | | | X | 9BSQVP | 0 | 0 | 0 | 0 | | | | X | 2KQN30 | 0 | 0 | 0 | 0 | | |
| | X | 6SL0N0 | 5 | 0 | 0 | 0 | | | | X | 9CIAPV | 0 | 0 | 0 | 0 | | | | X | 2NUSSA | 0 | 0 | 0 | 0 | | |
| | X | 9JNUZM | 5 | 0 | 0 | 0 | | | | X | 9DCHZU | 0 | 0 | 0 | 0 | | | | X | 2QL6X0 | 0 | 0 | 0 | 0 | | |
| | X | 9W5HTY | 5 | 0 | 0 | 0 | | | | X | 9FQLC9 | 0 | 0 | 0 | 0 | | | | X | 2SC4VS | 0 | 0 | 0 | 0 | | |
| | X | 9W655R | 5 | 0 | 0 | 0 | | | | X | 9GNURC | 0 | 0 | 0 | 0 | | | | X | 2ZJXKD | 0 | 0 | 0 | 0 | | |
| | X | BB5YVJ | 5 | 0 | 0 | 0 | | | | X | 9IK9LR | 0 | 0 | 0 | 0 | | | | X | 3134GN | 0 | 0 | 0 | 0 | | |
| | X | 5F7BXC | 4 | 0 | 0 | 0 | | | | X | 9MAV0C | 0 | 0 | 0 | 0 | | | | X | 31DNLU | 0 | 0 | 0 | 0 | | |
| | X | GUIYT3 | 4 | 0 | 0 | 0 | | | | X | 9QCN05 | 0 | 0 | 0 | 0 | | | | X | 33U72A | 0 | 0 | 0 | 0 | | |
| | X | 8SLUU1 | 4 | 0 | 0 | 0 | | | | X | 9S9TYP | 0 | 0 | 0 | 0 | | | | X | 359WXN | 0 | 0 | 0 | 0 | | |
| | X | GK86ZA | 4 | 0 | 0 | 0 | | | | X | 9UG7NL | 0 | 0 | 0 | 0 | | | | X | 3CPA0I | 0 | 0 | 0 | 0 | | |
| | X | TZ3V0X | 4 | 0 | 0 | 0 | | | | X | 9UHJFV | 0 | 0 | 0 | 0 | | | | X | 3JHIB5 | 0 | 0 | 0 | 0 | | |
| | X | XY4CP7 | 4 | 0 | 0 | 0 | | | | X | 9Z3GHP | 0 | 0 | 0 | 0 | | | | X | 3N889X | 0 | 0 | 0 | 0 | | |
| | X | 2HAURJ | 4 | 0 | 0 | 0 | | | | X | 9ZRSCL | 0 | 0 | 0 | 0 | | | | X | 3UU5S7 | 0 | 0 | 0 | 0 | | |
| | X | 5K2KEP | 0 | 4 | 0 | 4 | X | X | | X | A2UHSN | 0 | 0 | 0 | 0 | | | | X | 466557 | 0 | 0 | 0 | 0 | | |
| | X | 8JCDCG | 4 | 0 | 0 | 0 | | | | X | A7LLP4 | 0 | 0 | 0 | 0 | | | | X | 46EQUJ | 0 | 0 | 0 | 0 | | |
| | X | 5Y1LMH | 3 | 0 | 0 | 0 | | | | X | A8WA0Y | 0 | 0 | 0 | 0 | | | | X | 47194K | 0 | 0 | 0 | 0 | | |
| | X | CCKDHQ | 3 | 0 | 0 | 0 | | | | X | ABNDF3 | 0 | 0 | 0 | 0 | | | | X | 474XEE | 0 | 0 | 0 | 0 | | |
| | X | 1JBACU | 3 | 0 | 0 | 0 | | | | X | AHRJJK | 0 | 0 | 0 | 0 | | | | X | 4896CU | 0 | 0 | 0 | 0 | | |
| | X | 5A6S9B | 0 | 3 | 0 | 3 | X | X | | X | AIE7R5 | 0 | 0 | 0 | 0 | | | | X | 48Y8SD | 0 | 0 | 0 | 0 | | |
| | X | 5NR7JU | 3 | 0 | 0 | 0 | | | | X | AQLTJ2 | 0 | 0 | 0 | 0 | | | | X | 4B5YXP | 0 | 0 | 0 | 0 | | |
| | X | 74HQD3 | 3 | 0 | 0 | 0 | | | | X | AR8PCS | 0 | 0 | 0 | 0 | | | | X | 4C6DID | 0 | 0 | 0 | 0 | | |
| | X | 7ED2IL | 3 | 0 | 0 | 0 | | | | X | ARESTRY | 0 | 0 | 0 | 0 | | | | X | 4F0K6C | 0 | 0 | 0 | 0 | | |
| | X | 9K4L8Q | 3 | 0 | 0 | 0 | | | | X | ARK69T | 0 | 0 | 0 | 0 | | | | X | 4HG45X | 0 | 0 | 0 | 0 | | |
| | X | 2QK9DF | 2 | 0 | 0 | 0 | | | | X | ATTJ8A | 0 | 0 | 0 | 0 | | | | X | 4NP3JM | 0 | 0 | 0 | 0 | | |
| | X | 4CXX7I | 2 | 0 | 0 | 0 | | | | X | B2JAR8 | 0 | 0 | 0 | 0 | | | | X | 5AUYJ3 | 0 | 1 | 1 | 0 | X | |
| | X | B671LE | 2 | 0 | 0 | 0 | | | | X | B5AX04 | 0 | 0 | 0 | 0 | | | | X | 5PMS2S | 0 | 1 | 0 | 1 | X | X |
| | X | P4P6YQ | 2 | 0 | 0 | 0 | | | | X | B8G2ZC | 0 | 0 | 0 | 0 | | | | X | 5SAV8Z | 0 | 0 | 0 | 0 | | |
| | X | 2D80LB | 2 | 0 | 0 | 0 | | | | X | B9SR2D | 0 | 0 | 0 | 0 | | | | X | 6Q30SB | 0 | 0 | 0 | 0 | | |
| | X | 5XQXP5 | 0 | 2 | 0 | 2 | X | X | | X | JQS5IK | 0 | 0 | 0 | 0 | | | | X | 7NNJCN | 0 | 0 | 0 | 0 | | |

| | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H |
|--|---|--------|---|----|---|----|---|---|--|---|--------|----|---|---|---|---|---|--|---|--------|---|---|---|---|---|---|
| | X | 74115Z | 2 | 0 | 0 | 0 | | | | X | KLKTA5 | 0 | 0 | 0 | 0 | | | | X | 7R0Z8N | 0 | 0 | 0 | 0 | | |
| | X | 7KT3GM | 2 | 0 | 0 | 0 | | | | X | L1BST0 | 0 | 0 | 0 | 0 | | | | X | 85VDJ2 | 0 | 0 | 0 | 0 | | |
| | X | A6G3CG | 2 | 0 | 0 | 0 | | | | X | L5JA0M | 0 | 0 | 0 | 0 | | | | X | 8XUZ1M | 0 | 0 | 0 | 0 | | |
| | X | MY4SWW | 0 | 1 | 1 | 0 | X | | | X | LU1A17 | 0 | 0 | 0 | 0 | | | | X | 9CECTT | 0 | 0 | 0 | 0 | | |
| | X | XMK9KW | 0 | 1 | 0 | 1 | X | X | | X | MYIBE1 | 0 | 0 | 0 | 0 | | | | X | 9EKPM3 | 0 | 0 | 0 | 0 | | |
| | X | 4LEDAA | 1 | 0 | 0 | 0 | | | | X | N4L1ZK | 0 | 0 | 0 | 0 | | | | X | 9KF9RW | 0 | 0 | 0 | 0 | | |
| | X | 88EAWQ | 1 | 0 | 0 | 0 | | | | X | N8FRDX | 0 | 0 | 0 | 0 | | | | X | AAK47S | 0 | 0 | 0 | 0 | | |
| | X | ACG0GE | 1 | 0 | 0 | 0 | | | | X | NKBCKB | 0 | 0 | 0 | 0 | | | | X | BID1BH | 0 | 0 | 0 | 0 | | |
| | X | X7ANPH | 1 | 0 | 0 | 0 | | | | X | P2LRBT | 0 | 0 | 0 | 0 | | | | X | BXASWU | 0 | 0 | 0 | 0 | | |
| | X | 3CC3B5 | 0 | 55 | 0 | 55 | X | X | | X | PA8VDS | 0 | 0 | 0 | 0 | | | | X | BY2432 | 0 | 0 | 0 | 0 | | |
| | X | 3EWAPZ | 0 | 1 | 0 | 1 | X | X | | X | PFB2T6 | 0 | 0 | 0 | 0 | | | | X | CFT5KZ | 0 | 0 | 0 | 0 | | |
| | X | 6QF6LL | 1 | 0 | 0 | 0 | | | | X | PQS1PU | 0 | 0 | 0 | 0 | | | | X | CQMNQB | 1 | 0 | 0 | 0 | | |
| | X | A3XVTU | 1 | 0 | 0 | 0 | | | | X | PROTVA | 0 | 0 | 0 | 0 | | | | X | CU1Q4B | 0 | 0 | 0 | 0 | | |
| | X | E3TQ6P | 0 | 0 | 0 | 0 | | | | X | Q96THY | 0 | 0 | 0 | 0 | | | | X | CUL2SU | 0 | 0 | 0 | 0 | | |
| | X | 6DTUG1 | 0 | 0 | 0 | 0 | | | | X | R6S1KA | 0 | 0 | 0 | 0 | | | | X | D6TRYB | 0 | 0 | 0 | 0 | | |
| | X | 9NQW4V | 0 | 0 | 0 | 0 | | | | X | RGAB8U | 14 | 0 | 0 | 0 | | | | X | D84ZMS | 0 | 0 | 0 | 0 | | |
| | X | K0FZ2F | 0 | 0 | 0 | 0 | | | | X | RWELJT | 0 | 0 | 0 | 0 | | | | X | DAKCJZ | 0 | 0 | 0 | 0 | | |
| | X | 2LLKGV | 0 | 0 | 0 | 0 | | | | X | S7RY2L | 0 | 1 | 0 | 1 | X | X | | X | DGW7KF | 0 | 0 | 0 | 0 | | |
| | X | 386KQU | 0 | 0 | 0 | 0 | | | | X | SANS60 | 0 | 0 | 0 | 0 | | | | X | E8TMXF | 0 | 0 | 0 | 0 | | |
| | X | 6SIFVW | 0 | 0 | 0 | 0 | | | | X | SK99M4 | 0 | 0 | 0 | 0 | | | | X | EAZGRY | 0 | 0 | 0 | 0 | | |
| | X | 8683I9 | 0 | 0 | 0 | 0 | | | | X | TDECQR | 0 | 0 | 0 | 0 | | | | X | ECS7MC | 2 | 0 | 0 | 0 | | |
| | X | BELX9H | 0 | 0 | 0 | 0 | | | | X | TFLTM7 | 0 | 0 | 0 | 0 | | | | X | EQKQJZ | 0 | 0 | 0 | 0 | | |
| | X | D43N52 | 0 | 0 | 0 | 0 | | | | X | TQK7VA | 0 | 0 | 0 | 0 | | | | X | EWYFDR | 0 | 0 | 0 | 0 | | |
| | X | G475YB | 0 | 0 | 0 | 0 | | | | X | U9098L | 0 | 0 | 0 | 0 | | | | X | FUU0IC | 0 | 0 | 0 | 0 | | |
| | X | L4YACE | 0 | 0 | 0 | 0 | | | | X | L2KV6Y | 0 | 0 | 0 | 0 | | | | X | FXZUSY | 0 | 0 | 0 | 0 | | |
| | X | N2MBXR | 0 | 0 | 0 | 0 | | | | X | P54XYY | 0 | 0 | 0 | 0 | | | | X | G2FZGL | 0 | 0 | 0 | 0 | | |
| | X | RH9MSJ | 0 | 0 | 0 | 0 | | | | X | CHUW7U | 0 | 0 | 0 | 0 | | | | X | GR45PD | 0 | 0 | 0 | 0 | | |
| | X | V1VLJT | 0 | 0 | 0 | 0 | | | | X | XBG96G | 0 | 0 | 0 | 0 | | | | X | GSKQBC | 0 | 0 | 0 | 0 | | |
| | X | WQ19JF | 0 | 0 | 0 | 0 | | | | X | 9JN0MV | 0 | 0 | 0 | 0 | | | | X | GWVJDF | 0 | 0 | 0 | 0 | | |
| | X | UA257S | 0 | 0 | 0 | 0 | | | | X | D63ZH3 | 0 | 0 | 0 | 0 | | | | X | 65LP45 | 0 | 0 | 0 | 0 | | |
| | X | UYZG00 | 0 | 0 | 0 | 0 | | | | X | FZ1GYS | 0 | 0 | 0 | 0 | | | | X | 3BHGBH | 0 | 0 | 0 | 0 | | |
| | X | V1BUN2 | 0 | 0 | 0 | 0 | | | | X | HIFU2N | 0 | 0 | 0 | 0 | | | | X | 6RPW2K | 0 | 0 | 0 | 0 | | |
| | X | V28AJ4 | 0 | 0 | 0 | 0 | | | | X | IKCZ2I | 0 | 0 | 0 | 0 | | | | X | 89Z2G6 | 0 | 0 | 0 | 0 | | |
| | X | V7JUJR | 0 | 0 | 0 | 0 | | | | X | L3WRSK | 0 | 0 | 0 | 0 | | | | X | 2KEU69 | 0 | 0 | 0 | 0 | | |
| | X | VANVMB | 0 | 0 | 0 | 0 | | | | X | MSRP24 | 0 | 0 | 0 | 0 | | | | X | 7Z90EY | 0 | 0 | 0 | 0 | | |
| | X | VQMKUI | 0 | 0 | 0 | 0 | | | | X | NHI9NU | 0 | 0 | 0 | 0 | | | | X | 5B8ZGA | 0 | 1 | 1 | 0 | X | |
| | X | W12QJZ | 0 | 0 | 0 | 0 | | | | X | NVN7DY | 0 | 0 | 0 | 0 | | | | X | 5H2Z97 | 0 | 0 | 0 | 0 | | |
| | X | WWHTU0 | 0 | 5 | 4 | 1 | X | X | | X | QS1ZMI | 0 | 0 | 0 | 0 | | | | X | CDBQUW | 0 | 0 | 0 | 0 | | |
| | X | X3R2LG | 0 | 1 | 1 | 0 | X | | | X | V2KKNY | 0 | 0 | 0 | 0 | | | | X | UP4MYW | 0 | 0 | 0 | 0 | | |
| | X | X59S90 | 0 | 1 | 1 | 0 | X | | | X | W2LBDK | 0 | 0 | 0 | 0 | | | | X | R7BKIT | 0 | 1 | 1 | 0 | X | |
| | X | XFZ9QT | 0 | 0 | 0 | 0 | | | | X | Z1LNPF | 0 | 0 | 0 | 0 | | | | X | ZSUR8M | 0 | 0 | 0 | 0 | | |
| | X | XRIHWR | 0 | 0 | 0 | 0 | | | | X | ZFUQ9L | 0 | 0 | 0 | 0 | | | | X | 1VIVQS | 0 | 0 | 0 | 0 | | |
| | X | XVGT96 | 0 | 0 | 0 | 0 | | | | X | ZLS9E3 | 0 | 0 | 0 | 0 | | | | X | 1XW046 | 0 | 0 | 0 | 0 | | |
| | X | XVS2W8 | 0 | 0 | 0 | 0 | | | | X | ZRP4PZ | 0 | 0 | 0 | 0 | | | | X | 21M7EA | 0 | 1 | 1 | 0 | X | |
| | X | XX3UVZ | 0 | 0 | 0 | 0 | | | | X | ZZGD8Q | 0 | 0 | 0 | 0 | | | | X | 29QKV5 | 0 | 0 | 0 | 0 | | |
| | X | Y5IGQ1 | 0 | 0 | 0 | 0 | | | | X | EZTAPF | 0 | 0 | 0 | 0 | | | | X | 2IHJX0 | 0 | 1 | 1 | 0 | X | |
| | X | Y5SYG9 | 2 | 0 | 0 | 0 | | | | X | JIOJFE | 0 | 0 | 0 | 0 | | | | X | 2J8DPS | 0 | 0 | 0 | 0 | | |
| | X | YMUQJN | 0 | 0 | 0 | 0 | | | | X | XFXLLW | 0 | 0 | 0 | 0 | | | | X | 2MF9Q7 | 0 | 0 | 0 | 0 | | |

| | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H | | A | B | C | D | E | F | G | H |
|-------|-----|--------|-----|-----|---|-----|----|----|--|-----|--------|----|-----|---|-----|---|---|--|-----|--------|---|----|---|---|---|---|
| | X | YQ849R | 0 | 0 | 0 | 0 | | | | X | ZLEC4V | 0 | 0 | 0 | 0 | | | | X | 2XW58Y | 0 | 0 | 0 | 0 | | |
| | X | Z0JWRQ | 0 | 0 | 0 | 0 | | | | X | GWLV4J | 0 | 0 | 0 | 0 | | | | X | 2ZSEH2 | 0 | 0 | 0 | 0 | | |
| | X | Z6FM75 | 0 | 0 | 0 | 0 | | | | X | MKWJ7C | 0 | 0 | 0 | 0 | | | | X | 355RPM | 0 | 0 | 0 | 0 | | |
| | X | 0LKM9L | 0 | 0 | 0 | 0 | | | | X | CAC2AY | 0 | 0 | 0 | 0 | | | | X | 41NL56 | 0 | 4 | 4 | 0 | X | |
| | X | 11A3AL | 0 | 0 | 0 | 0 | | | | X | V9PHSU | 0 | 0 | 0 | 0 | | | | X | 43LZLP | 0 | 0 | 0 | 0 | | |
| | X | CMQSU4 | 0 | 0 | 0 | 0 | | | | X | 3WFTUL | 0 | 0 | 0 | 0 | | | | X | HBE0PC | 0 | 0 | 0 | 0 | | |
| | X | F54XJM | 0 | 0 | 0 | 0 | | | | X | 7PHL4Q | 0 | 0 | 0 | 0 | | | | X | HMB4KG | 0 | 0 | 0 | 0 | | |
| | X | FSEJ7R | 0 | 0 | 0 | 0 | | | | X | FISTR7 | 0 | 0 | 0 | 0 | | | | X | HT17JK | 0 | 0 | 0 | 0 | | |
| | X | HK5UBG | 0 | 0 | 0 | 0 | | | | X | FKBFHS | 0 | 0 | 0 | 0 | | | | X | HTUPMI | 0 | 0 | 0 | 0 | | |
| | X | L8L56J | 0 | 0 | 0 | 0 | | | | X | 1REWS6 | 0 | 0 | 0 | 0 | | | | X | IJ58JT | 0 | 0 | 0 | 0 | | |
| | X | YVY9A1 | 0 | 0 | 0 | 0 | | | | X | 1VG2FS | 0 | 0 | 0 | 0 | | | | X | J9NMRF | 0 | 0 | 0 | 0 | | |
| | X | 1JXDCG | 0 | 0 | 0 | 0 | | | | X | 2R5S13 | 0 | 0 | 0 | 0 | | | | X | GZDUWN | 0 | 0 | 0 | 0 | | |
| | X | 592CS9 | 0 | 0 | 0 | 0 | | | | X | 2Z3F8M | 0 | 0 | 0 | 0 | | | | X | HAW8EJ | 0 | 0 | 0 | 0 | | |
| | X | 9Q7U5T | 0 | 0 | 0 | 0 | | | | X | 42KDKW | 0 | 0 | 0 | 0 | | | | X | XM88TF | 0 | 0 | 0 | 0 | | |
| | X | 9QZLUW | 0 | 0 | 0 | 0 | | | | X | 5TW5K5 | 0 | 0 | 0 | 0 | | | | X | CZL7KZ | 0 | 0 | 0 | 0 | | |
| | X | A1E5Q0 | 0 | 0 | 0 | 0 | | | | X | T0A4FC | 0 | 0 | 0 | 0 | | | | X | 29LMLY | 0 | 0 | 0 | 0 | | |
| TOTAL | 140 | | 985 | 235 | 7 | 228 | 18 | 15 | | 140 | | 14 | 116 | 0 | 116 | 3 | 3 | | 140 | | 3 | 10 | 9 | 1 | 7 | 1 |

| | LEGEND | TOTALS |
|---|---|--------|
| A | Appraiser Count | 420 |
| B | Appraiser Identification Number | N/A |
| C | Number of appraisals conducted prior to Registry showing valid license | 1002 |
| D | Number of appraisals conducted after Registry showed expired license. | 361 |
| E | Number of appraisals conducted after Registry showed expired license, but prior to 30 day control | 16 |
| F | Number of appraisals conducted more than 30 days after license expiration. | 345 |
| G | Total number of appraisers that had conducted appraisals after license expiration | 28 |
| H | Number of appraisers that conducted appraisals after 30 day control. | 19 |

Appendix E

SUMMARY OF APPRAISER APPLICATION PACKAGES REQUESTED

| Summary of application packages requested | | | | |
|---|-----------|----------|--------------|--------------|
| Appraiser key | Requested | Provided | Not provided | Not required |
| 9DNEQY | X | | | X |
| 9WLE7C | X | | | X |
| YGH3TK | X | | | X |
| 0HVAB0 | X | X | | |
| 3Q96F8 | X | X | | |
| 5GPCKL | X | X | | |
| 5QON07 | X | X | | |
| A94I0P | X | X | | |
| B2JW2C | X | X | | |
| IHBX6R | X | X | | |
| JDAGLJ | X | X | | |
| L9FMKP | X | X | | |
| TQLRZW | X | X | | |
| UFLT44 | X | X | | |
| WBXS3L | X | X | | |
| YD6LV5 | X | X | | |
| Z17D5X | X | X | | |
| 0TI9UN | X | | X | |
| 19Y7VH | X | | X | |
| 1BUJK2 | X | | X | |
| 24AMRK | X | | X | |
| 2QL6X0 | X | | X | |
| 3FA10E | X | | X | |
| 3QESDU | X | | X | |
| 51AWML | X | | X | |
| 52V8KC | X | | X | |
| 5DA6VZ | X | | X | |
| 5DJZ9R | X | | X | |
| 5ZQWBK | X | | X | |
| 6HLB0P | X | | X | |
| 75G046 | X | | X | |
| 7F9HJG | X | | X | |
| 7RWG36 | X | | X | |
| 7WAJY0 | X | | X | |
| 8WPGZZ | X | | X | |
| 92GKRU | X | | X | |
| 9Q9ZGW | X | | X | |
| 9SELC9 | X | | X | |
| AQETAU | X | | X | |
| FKP2JP | X | | X | |
| GH3V8J | X | | X | |
| HAERMG | X | | X | |
| HPSLDA | X | | X | |
| HXKE5F | X | | X | |
| I1GKFE | X | | X | |
| JRKY9P | X | | X | |
| K3TVHU | X | | X | |
| KYQIYX | X | | X | |
| NA0758 | X | | X | |
| NBMMCU | X | | X | |
| NZ47BW | X | | X | |
| PNNIJW | X | | X | |
| PPHACX | X | | X | |
| Q60832 | X | | X | |
| QB73TL | X | | X | |
| QPT9W | X | | X | |
| RMS5I2 | X | | X | |

| Summary of application packages requested | | | | |
|---|-----------|-----------|--------------|--------------|
| Appraiser key | Requested | Provided | Not provided | Not required |
| SCFVFJ | X | | X | |
| SHRDYQ | X | | X | |
| SQWMDL | X | | X | |
| SYD8VI | X | | X | |
| TIBXPC | X | | X | |
| W8GB03 | X | | X | |
| Y4MR04 | X | | X | |
| YK2SRX | X | | X | |
| YMPPJA | X | | X | |
| ZGBNJ6 | X | | X | |
| Totals | 67 | 14 | 50 | 3 |

Appendix F

CRITERIA

- A. Office of Management and Budget (OMB) Circular A-123, Management Accountability and Control (effective June 21, 1995), attachment II, Establishing Management Controls, states, “[m]anagement controls are the organization, policies, and procedures used to reasonably ensure that (i) programs achieve their intended results; (ii) resources are used consistent with agency mission; (iii) programs and resources are protected from waste, fraud, and mismanagement; (iv) laws and regulations are followed; and (v) reliable and timely information is obtained, maintained, reported and used for decision making....A subset of management controls are the internal controls used to assure that there is prevention or timely detection of unauthorized acquisition, use, or disposition of the entity’s assets....management controls shall be consistent with...Compliance With Law and Separation of Duties and Supervision.”
- B. OMB Circular A-123, Management’s Responsibility for Internal Control (effective beginning fiscal year 2006), appendix A section I, Introduction, states, “Management is responsible for developing and maintaining effective internal control,” which “provides assurance that significant weaknesses in the design or operation of internal control....would be prevented or detected in a timely manner.” “Continuous monitoring and testing should help to identify poorly designed or ineffective controls... .”
- C. The Government Accountability Office’s Standards for Internal Control in the Federal Government (GAO/AIMD-00-21.3.1), Risk Assessment (page 10), states, “internal control should provide for an assessment of the risks the agency faces from both external and internal sources.” Page 20, Monitoring, states, “monitoring should assess the quality of performance over time and ensure that the findings of audits and other reviews are properly resolved” and “should generally be designed to assure that ongoing monitoring occurs in the course of normal operations.”
- D. HUD Handbook 2225.6, appendix 20, item number 13(a), Technical and Miscellaneous Reference Files, states, “participant files should be destroyed when superseded or obsolete.”
- E. Mortgagee Letter 94-54, dated November 7, 1994, section IV, states, “[t]o be eligible for placement on the Lender Selection Roster, and appraiser must be state licensed or certified in accordance with the minimum licensing criteria established by the Appraiser Qualifications Board (AQB) of the Appraisal Foundation to be placed on HUD’s FHA appraiser roster. The AQB minimum requirements for licensing are 75 hours of education, 2000 hours of experience and passing a written examination.”
- F. Mortgagee Letter 96-26, effective May 1, 1996, Competency, states that appraisers must be either state licensed or certified to be placed on HUD’s FHA appraiser roster. Mortgagee Letter 99-35, dated November 24, 1999, states, “appraisers must be state licensed or certified in accordance with the minimum licensing criteria established by the Appraiser Qualifications Board, not be listed on either the General Services Administration’s

Suspension or Debarment List, HUD's Limited Denial of Participation List, or HUD's Credit Alert Interactive Voice Response System, and pass a HUD/FHA examination on appraisal methods and reporting.”

- G. HUD Handbook 4150.2, section 1-1, effective July 1, 1999, requires that all appraisers be state licensed or certified to be placed on the FHA appraiser roster.
- H. *Federal Register* 4620-F-02, effective June 13, 2003, Final Rule the Summary, states, “appraisers on the roster must have credentials based on the minimum licensing/certification standards required by the Appraiser Qualifications Board of the Appraisal Foundation.”
- I. Regulations at 24 CFR [*Code of Federal Regulations*] 200.204, effective June 13, 2003, state, “[a]n appraiser, whose license or certification in any state has been revoked, suspended, or surrendered as a result of a state disciplinary action, will be automatically removed from the Appraiser Roster. This removal will remain in effect until HUD receives evidence demonstrating that the state-imposed sanction has been lifted.” Additionally, “[a]n appraiser whose licensing or certification in a state has expired is automatically removed from the Appraiser Roster in that state and may not conduct FHA appraisals in that state. This removal will remain in effect until HUD receives evidence of the appraiser license with certification renewal.” Further, “[r]easons for removal from roster include...failure to maintain eligibility requirements for placement on the Appraiser Roster.”
- J. Mortgagee Letter 2003-09, dated June, 20, 2003, Highlights of Final Rule, states that causes for removal from the FHA appraiser roster include an appraiser's failing to maintain eligibility requirements for placement on the roster.