

Florida Capital Bank, N.A., is required by the agencies to ensure third party originators including Non-Delegated and Correspondent Customers have written policies and procedures to comply with the Appraiser Independence Requirements (AIR).

These requirements include, but are not limited to, adequate training and disciplinary rules on appraiser independence and ensure your organization's ability to obtain quality Appraisal Reports completed in compliance with Fannie Mae, Freddie Mac, FHA and USDA's Appraisal Vendor Management and Appraiser Independence Requirements to Florida Capital Bank, N.A. (FLCBank) during the loan origination process through loan delivery.

This certification is intended to confirm your organization's compliance with these requirements.

NDC Company Name: _____

FLCBank Institution ID: _____

AMC company names and full addresses for all AMC's used:

Complete the **Appraisal Management Risk Self-Assessment Questions for NDC**

✓ *Check all that apply*

	Selection of qualified appraisal services providers (appraisers and appraisal management companies) in accordance with agency requirements, including the Appraiser Independent Requirements (AIR).
	Ensuring employees of sales and loan production are restricted from the appraisal process (which includes ordering appraisals and/or communicating with the appraiser).
	Safeguards in place to ensure no restricted parties defined as Mortgage Brokers, Loan Officers, Loan Originators, production staff employee, as well as director, agent of the seller, or any third party acting on behalf of the seller influences the ordering, development, reporting, result, or review of an appraisal through coercion, extortion, collusion, compensation, inducement, intimidation, bribery, or in any other manner.
	Established controls in place to prevent the mortgage loan originator from selecting from an approved appraiser list or an approved appraisal management company (AMC) list.
	Maintain an approved AMC list and/or maintain an approved appraiser list and review the appraiser's credentials to ensure they are currently licensed in the state of operation.
	Manage the distribution of appraisal assignments in compliance with AIR.
	Provide a copy of the appraisal to the borrower(s) or obtain a signed waiver at least three days prior to closing. Ensuring transferred conventional appraisals are ordered in adherence to AIR.
	Ensure that assigned appraisers have active credentials and appropriate license level to complete appraisal assignments based on complexity and transaction amount.
	Ensure appraisers assigned have the knowledge required to perform a professional quality appraisal for the specific geographic location and particular property type; and have the knowledge and access to, all necessary and appropriate local data sources for the subject property's geographic area, including multiple listing service(s) and government records.
	Ensure that the appraiser/AMC fully understands that discriminatory valuation and appraisal reporting practices is illegal and that appraisal reports are not in violation of any unacceptable appraisal practices.

	Ensure the appraiser has used sound reasoning and provided evidence to support the methodology chosen to develop the value opinion, particularly in cases that are not explicitly covered by Fannie Mae/Freddie Mac/FHA/USDA policies and is knowledgeable of and fully complies with all federal, state, and local laws, including any antidiscrimination laws, rules applicable to the subject property, or any provision of the Fair Housing Act.
	All appraisals are successfully submitted to the Uniform Collateral Data Portal® (UCDP®)
	Continually evaluating the appraiser's work through the quality control process and have a dedicated staff/department responsible for appraisal quality.
	Maintain policies and procedures in place for a borrower-initiated reconsideration of value (ROV) if applicable, and adhere to all applicable local, state, and federal laws.
	AMCs have a process in place to track changes in appraisal values after reports are submitted, and to track incoming calls/requests to ensure they are not from sales or production staff.
	If using an AMC, a formal oversight process to monitor the outcomes (including defects) of work produced and said outcomes were completed in a competent, independent, impartial, and objective manner with no discrimination based on characteristics that are protected by federal, state, or local laws. In addition, the scope of work is not misrepresented, misleading or fraudulent.
	Comparing potential new appraisers to in-house exclusionary lists, other investor exclusionary lists.
	Referral of appraiser misconduct to the applicable state appraiser certifying and licensing agency or other relevant regulatory bodies.
	Ensure that appraisers, property data collectors, property data collection company, any entity or person related to the property data collector, and/or AMC's have not been subject to a suspension, debarment, listed in Fannie Mae's AQM List , listed in Freddie Mac's Exclusionary List or under a Limited Denial of Participation (LDP) or excluded from participating in U.S. Department of Housing and Urban Development (HUD) programs through the System for Award Management (SAM/GSA).
	Certify compliance with Property Data Collector Independence Requirements (PDCIR) standards safeguarding the independence, objectivity, and impartiality of property data collectors and other Independent Parties throughout the property data collection process when/if appraisers, appraisal companies or appraisal management companies are engaged to perform the property data collection process.

By signing below, I certify, represent, and warrant that I have direct knowledge of the facts attested herewith.

Signature: _____

Date: _____

Printed Name and Title: _____