

April 13, 2026

**Via Email**

Jorge I. Vallejo Romeu, President  
Board of Examiners of Professional Real Estate Appraisers  
Department of State  
P.O. Box 9023271  
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RE: Appraisal Subcommittee Staff Follow-Up Review of Puerto Rico's Appraiser Regulatory Program

Dear Jorge Vallejo Romeu:

Thank you for your cooperation and your staff's assistance in the March 10-12, 2026, Appraisal Subcommittee (ASC) Follow-up Review of the Puerto Rico appraiser regulatory program (Appraiser Program). This was a Follow-up Review of the October 8-10, 2024, ASC Compliance Review of the Puerto Rico Appraiser Program.

We commend the Puerto Rico Appraiser Program for its efforts and the progress made in addressing the findings identified in the October 2024 Appraiser Program Report. As detailed in the attached Follow-up Report (Report), Puerto Rico made substantial progress in the following areas:

- The State updated its temporary practice permit log;
- The State updated its National Registry authorization information;
- The State provided a copy of its written policy to ensure the accuracy of data submitted to the National Registry;
- The State provided an explanation of its application processing procedures that included the requirement to review work product samples to analyze compliance with USPAP for all initial and upgrade applications; and
- The State provided an outline of its course approval program processes and provided a list of approved and disapproved courses.

However, Puerto Rico remains non-compliant in the following areas:

- The State must update written procedures to ensure temporary practice permit applications are issued within 5 business days of receipt of a completed application and provide ASC staff a copy once finalized;
- The State must reconcile and pay all outstanding National Registry invoices; and
- The State must continue the process of developing a plan to ensure the State maintains relevant documentation to enable understanding of the facts and determinations of complaints and the reasons for those determinations.

This letter and the attached Follow-up Report are public record and available on the ASC website in accordance with the Freedom of Information Act. Please contact us if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Frederick Griener".

Frederick Griener  
Acting Executive Director

Attachment

cc: Joselle Vazquez, Head of the Board Officers, [JVazquez@estado.pr.gov](mailto:JVazquez@estado.pr.gov)  
Mayra Rivera Cordero, Direct Board Officer, [MaRivera@estado.pr.gov](mailto:MaRivera@estado.pr.gov)

## ASC Staff Follow-Up Report: 2024 Compliance Review

<b>Puerto Rico Appraiser Regulatory Program (Program)</b>		
<b>Puerto Rico Professional Real Estate Appraisers Examiners Board (Board)</b>	Follow-Up Review Date: March 10-12, 2026	Follow-Up Report Issue Date: April 13, 2026
Umbrella Agency: Department of State	ASC Compliance Review Date: October 8-10, 2024	PM: M. Brown
Follow-Up of Compliance Review Report Dated: June 18, 2025	ASC Finding: Not Satisfactory	

Applicable Federal Citations	ASC Staff Assessment Compliance (YES/NO) Areas of Concern (AC)			Required/Recommended State Actions from the June 18, 2025 Compliance Review Report	Status as of March 10-12, 2026 Follow-Up	Further Required Actions/Comments
	Yes	No	AC			
<b>Temporary Practice:</b>		X				
States must issue temporary practice permits within five business days of receipt of a completed application or notify the applicant and document the file as to the circumstances justifying delay or other action. (12 U.S.C. § 3351; Policy Statement 2 B.)				Within 60 days, the State must provide proof that they have adopted written policies and procedures that ensure the issuance of temporary practice permits within five business days of receipt of a completed application or notify the applicant and document the file as to the circumstances justifying delay or other action.	On February 20, 2026, the State provided an explanation of its written procedures for processing temporary practice permit applications that became effective on September 14, 2023.	<p><b>Further Required Actions:</b> The State must update its written procedures to ensure temporary practice permit applications are issued within 5 business days of receipt of a completed application.</p> <p><b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.</p>
<b>Temporary Practice Continued:</b>	X					
States must track all temporary practice permits using a permit log which includes the name of the applicant, date application received, date completed application received, date of issuance, and date of expiration, if any. (12 U.S.C. § 3351; Policy Statement 2 B.)				Within 60 days, the State must provide proof that they have updated their temporary practice permit log to ensure all required data is accurately tracked.	On February 20, 2026, the State provided an updated copy of the temporary practice permit log that includes a comment column indicating the date an application was completed.	<p><b>Further Required Actions:</b> None</p> <p><b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.</p>
<b>National Registry:</b>	X					
States must ensure that staff authorization information provided to the ASC is updated and accurate. (12 U.S.C. § 3347; Policy Statement 3 A, C.)				Within 60 days, the State must provide proof that they have updated their staff authorization information to ensure that it is accurate.	On February 20, 2026, the State confirmed that the authorization information provided to the ASC is accurate.	<p><b>Further Required Actions:</b> None</p> <p><b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.</p>

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<b>National Registry Continued:</b>		<b>X</b>				
States must reconcile and pay registry invoices in a timely manner. (12 U.S.C. § 3338; 12 U.S.C. § 3347; 12 U.S.C. § 3338; Policy Statement 3 B.)				Within 60 days, the State must provide written policies and procedures that ensure the reconciliation of National Registry invoices and payment in a timely manner.	On February 20, 2026, the State reported the Department of State processes National Registry fees through electronic payment via the Department of the Treasury.  The State went on to report that the Board distributed an email outlining the procedure for registering with the ASC through the Puerto Rico Department of the Treasury, including the applicable registration link, and provided an outline regarding the 8 outstanding invoices.	<b>Further Required Actions:</b> The State must reconcile and pay all outstanding invoices.  <b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
<b>National Registry Continued:</b>	<b>X</b>					
States must ensure the accuracy of all data submitted to the National Registry. (12 U.S.C. § 3338; 12 U.S.C. § 3347; Policy Statement 3 A, D.)				Within 60 days, the State must adopt written policies and procedures that ensure the accuracy of all data submitted to the National Registry.	On February 20, 2026, the State provided a copy of its written policy.	<b>Further Required Actions:</b> None  <b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
<b>Application Process:</b>	<b>X</b>					
States must analyze a representative sample of the applicant's work product for compliance with USPAP on all initial or upgrade applications for appraiser credentialing. (12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 4 D.)				Within 60 days, the State must review its application procedures to ensure that a representative sample of the applicant's work product is analyzed for compliance with USPAP on all initial and upgrade applications. The State must then notify ASC staff in writing of its findings within 15 days of the completion of its review.	On February 20, 2026, the State reported that applications are submitted through its website and then reviewed and discussed by the Board during regularly scheduled meetings. The State went on to describe the process: Following initial review, the Board assigns each case to an external ad honorem reviewer. The reviewer completes a USPAP Appraisal Review Compliance Form and reports the findings to the Board. Based on the review outcome, the applicant is notified by the Board's administrative office of a pass or fail decision. The State further reported that all related documentation is securely maintained in the Department of State's official files.	<b>Further Required Actions:</b> None  <b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.

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<b>Education:</b>	X					
States must maintain sufficient documentation to support that approved appraiser courses conform to AQB Criteria. (12 U.S.C. § 3347; Policy Statement 6 A.)				Within 60 days, the State must review its approved appraiser courses to ensure sufficient documentation is present to support that courses conform to AQB Criteria. The State must then notify ASC staff in writing of its findings within 15 days of the completion of its review.	On February 20, 2026, the State reported that applications for courses and instructors are received by the Board’s administrative office and forwarded to the Board for review at the next regularly scheduled meeting. During the review process, the Board evaluates course outlines, instructional hours, valuation topics, learning objectives, and the instructors’ qualifications, including subject matter competency and professional experience. The State further reported that 2 seminar applications were denied due to failure to meet competency requirements. The State went on to say that all applications and corresponding Board decisions are documented in the official meeting minutes and maintained in the Department of State’s records.  The State provided a list of approved and disapproved courses and seminars.	<b>Further Required Actions:</b> None  <b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.

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<b>Enforcement:</b>		<b>X</b>				
States must maintain relevant documentation to enable understanding of the facts and determinations in the matter and the reasons for those determinations. (12 U.S.C. § 3347; Policy Statement 7 B.)				<p>Within 60 days, the State must develop a plan to ensure that the complaint process is well documented and available to ASC staff during the on-site portion of the Review.</p>	<p>On February 20, 2026, the State reported that the Board is in the process of developing a formal written complaint procedure in alignment with the local Administrative Procedures Act.</p> <p>The State went on to report that the Board has received legal guidance regarding due process requirements applicable to the administration of complaints and has begun addressing certain complaints under this framework. The State further reported that progress in fully implementing the complaint process has been impacted by staffing challenges related to the Department of State’s attorney hiring process, including high turnover rates that have affected normal complaint handling procedures. The State contends that these circumstances are outside the Board’s direct control but have had a direct impact on its operational duties and compliance with due process requirements. The Board submitted a copy of its Annual Report to the Department of State, formally documenting the challenges it has faced.</p>	<p><b>Further Required Actions:</b> The State must continue the process of developing a plan to ensure the State maintains relevant documentation to enable understanding of the facts and determinations in the matter and the reasons for those determinations.</p> <p><b>Comments:</b> During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.</p>