



June 25, 2024

Via Email

Chelsea Buchholtz, Executive Director Texas Appraiser Licensing and Certification Board Texas Real Estate Commission 1700 N. Congress Ave., #400 Austin, TX 78701 Chelsea.Buchholtz@trec.texas.gov

RE: ASC Compliance Review of Texas' Appraisal Management Company (AMC) Regulatory Program

Dear Chelsea Buchholtz:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Texas AMC regulatory program (AMC Program) on April 9-11, 2024, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989.

The ASC considered the preliminary results of the Review and the State's response to those results. The AMC Program has been awarded an ASC Finding of "Excellent." Texas will remain on a two-year Review Cycle. The final ASC Compliance Review Report (Report) of the Texas AMC Program is attached.

This letter and the attached Report are public records and available on the ASC website. Please contact us if you have any questions about this Report.

Sincerely,

James R. Park
Executive Director

Attachment

cc: Melissa Tran, TALCB Director, Melissa.Tran@talcb.texas.gov
Kathleen Santos, TALCB General Counsel, Kathleen.Santos@talcb.texas.gov

ASC Finding Descriptions

| ASC Finding | Rating Criteria | Review Cycle* |
|----------------------|---|-----------------------------------|
| Excellent | State meets all Title XI mandates and complies with requirements of ASC Policy Statements State maintains a strong regulatory Program Very low risk of Program failure | 2-year |
| Good | State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements Deficiencies are minor in nature State is adequately addressing deficiencies identified and correcting them in the normal course of business State maintains an effective regulatory Program Low risk of Program failure | 2-year |
| Needs Improvement | State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies State regulatory Program needs improvement Moderate risk of Program failure | 2-year with additional monitoring |
| Not Satisfactory | State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing State regulatory Program has substantial deficiencies Substantial risk of Program failure | 1-year |
| Poor** | State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies High risk of Program failure | Continuous monitoring |

^{*}Program history or nature of deficiency may warrant a more accelerated Review Cycle.

^{**}An ASC Finding of "Poor" may result in significant consequences to the State. See Policy Statement 12, Interim Sanctions.



ASC State AMC Program Compliance Review Report

ASC Finding: Excellent

Final Report Issue Date: June 25, 2024

| Texas AMC Regulatory Program | (State) | | | | | | |
|---|---|----|-----|-----------------------------|--|------------------------------------|--|
| Texas Appraiser Licensing and Certification Board | | | ard | PM: T. Lewis | ASC Compliance Review Date: April 9-11, 2024 | | Review Period: February 2022 to March 2024 |
| Umbrella Agency: Texas Real Estate Commission | | | | | Number of AMCs on AMC Registry: 162 | | Review Cycle: Two Year |
| Applicable Federal Citations | plicable Federal Citations Compliance (YES/NO) Areas of Concern (AC) | | | ASC Staff Observations | State Response | Required/Recommended State Actions | General Comments |
| | YES | NO | AC | | | | |
| Statutes, Regulations, Policies and Procedures: | х | | | | | | |
| | | | | No compliance issues noted. | N/A | None | None |
| National Registry: | Х | | | | | | |
| | | | | No compliance issues noted. | N/A | None | None |
| Enforcement: | Х | | | | | | |
| | | | | No compliance issues noted. | N/A | None | None |