

August 21, 2025

Via Email

Katy McGinnis, Director
Division of Real Estate
Department of Business and Professional Regulation
400 West Robinson Street, Suite N801
Orlando, FL 32801
Katy.McGinnis@myfloridalicense.com

RE: ASC Compliance Review of Florida's Appraiser Regulatory Program

Dear Katy McGinnis:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Florida appraiser regulatory program (Appraiser Program) on February 10-13, 2025, to determine the Appraiser Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.¹

The ASC considered the preliminary results of the Review and the State's response to those results. The Appraiser Program has been awarded an ASC Finding of "Good." The final ASC Compliance Review Report (Report) of the Florida Appraiser Program is attached. The ASC identified the following areas of non-compliance:

- 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.² While two temporary practice permits were found to have been issued outside the prescribed time frame, the ASC recognizes that the State processed over 800 temporary practice permits in a timely manner.
- States must ensure the accuracy of all data submitted to the Appraiser Registry.³ Again, despite this finding, it is acknowledged that the State submitted a substantial number of appraiser records to the National Registry and has over 5,000 state-credentialed appraisers, where only one record was found in which the accuracy was in question.
- States must maintain adequate documentation to support verification of all claimed education.⁴ While one application file was found to be inadequate in terms of documentation, the ASC recognizes that 58 other application files examined were appropriately documented.

¹ 12 U.S.C. §§ 3331-3356.

² 12 U.S.C. § 3351; Policy Statement 2 B.

³ 12 U.S.C. § 3338; 12 U.S.C. § 3347; Policy Statement 3 A, D.

⁴ 12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 4 B, C.

- States must maintain sufficient documentation to support that all approved appraiser courses conform to AQB Criteria.⁵ There were five qualifying education (QE) courses out of the 30 QE files reviewed, and one continuing education (CE) course out of the 27 CE course files reviewed that were found to have been renewed without ensuring the approvals for course content and delivery mechanism were current.
- States must resolve all complaints filed against appraisers within one year (12 months) of the complaint filing date in the absence of special documented circumstances.⁶ While four complaints were aged without exemptions for special documented circumstances, the ASC recognizes that the State received 477 complaints and closed 385 complaints during the period under review.

ASC staff will confirm that appropriate corrective actions have been taken during the next Review. Florida will remain on a two-year Review Cycle.

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,



Frederick Grier
Acting Executive Director

Attachment

cc: Jesse Hebert, Deputy Director, Jesse.Hebert@myfloridalicense.com

⁵ 12 U.S.C. § 3347; Policy Statement 6 A.


⁶ 12 U.S.C. § 3347; Policy Statement 7 B.


ASC Finding Descriptions


ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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**	<ul style="list-style-type: none"> 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 5, Reciprocity; see also Policy Statement 12, Interim Sanctions.

<div><div>ASC State Appraiser Program Compliance Review Report</div></div>							ASC Finding: Good					
							Final Report Issue Date: August 21, 2025					
Florida Appraiser Regulatory Program (State)												
Florida Real Estate Appraisal Board			PM: T. Lewis		ASC Compliance Review Date: February 10-13, 2025			Review Period: January 2023 to January 2025				
Umbrella Agency: Department of Business and Professional Regulation				Number of State Credentialed Appraisers on Appraiser Registry: 5505			Review Cycle: Two Year					
Applicable 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:		X										
					No compliance issues noted.		N/A		None		None	
Temporary Practice:			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.)					The State failed to process 2 requests for temporary practice permits within 5 business days of receiving a completed application.		On April 28, 2025, the State reported that during the period under review, it processed and issued over 800 temporary practice permit applications in a timely manner.		The State must ensure all temporary practice permits are issued within 5 business days of receipt of application.		During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.	

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Umbrella Agency: Department of Business and Professional Regulation				Number of State Credentialed Appraisers on Appraiser Registry: 5505			Review Cycle: Two Year					
Applicable Federal Citations		Compliance (YES/NO) Areas of Concern (AC)		ASC Staff Observations		State Response		Required/Recommended State Actions		General Comments		
		YES	NO	AC								
National Registry:			X									
States must ensure the accuracy of all data submitted to the Appraiser Registry. (12 U.S.C. § 3338; 12 U.S.C. § 3347; Policy Statement 3 A, D.)					The State failed to ensure accuracy of 1 appraiser record submitted to the National Registry. On April 28, 2025, the State reported that the ASC failed to specify which data was inaccurate that was submitted to the National Registry. During the on-site review performed on February 10-13, 2025, the appraiser record in question was identified to the State. On March 28, 2025, the State was contacted again in an attempt to discuss the preliminary report and confirm the findings. However, the State did not respond. On May 8, 2025, the State was contacted, and a detailed explanation of the ASC Staff's findings was presented along with a request for a response from the State. On May 14, 2025, an additional attempt was made to contact the State by ASC Staff. On May 15, 2025, the State indicated that they stood by their original response.		The State must ensure the licensee has met all requirements or take appropriate action.		During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.			

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Umbrella Agency: Department of Business and Professional Regulation				Number of State Credentialed Appraisers on Appraiser Registry: 5505			Review Cycle: Two Year					
Applicable Federal Citations		Compliance (YES/NO) Areas of Concern (AC)		ASC Staff Observations		State Response		Required/Recommended State Actions		General Comments		
		YES	NO	AC								
Application Process:			X									
States must maintain adequate documentation to support verification of all claimed education. (12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 4 B, C.)					1 application file did not contain adequate documentation to support education claims on an initial application for appraiser credentialing.		On April 28, 2025, the State reported that all its applicants meet the qualifications for licensure. During the on-site review performed on February 10-13, 2025, the application file in question was identified to the State. On March 28, 2025, the State was contacted again in an attempt to discuss the preliminary report and confirm the findings. However, the State did not respond. On May 8, 2025, the State was contacted, and a detailed explanation of the ASC Staff's findings was presented along with a request for a response from the State. On May 14, 2025, an additional attempt was made to contact the State by ASC Staff. On May 15, 2025, the State indicated that they stood by their original response.		The State must ensure the applicant has met AQB Criteria or take appropriate action.		During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.	
Reciprocity:		X										
					No compliance issues noted.		N/A		None		None	

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Applicable Federal Citations		Compliance (YES/NO) Areas of Concern (AC)		ASC Staff Observations	State Response	Required/Recommended State Actions		General Comments	
	YES	NO	AC						
Education:		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.)				The State renewed 5 qualifying education courses and 1 continuing education course without ensuring the approval for course content and delivery mechanism were current.	On April 28, 2025, the State reported that all education courses were compliant at the time of renewal. During the on-site Compliance Review performed February 10-13, 2025, the application file in question was identified to the State. On March 28, 2025, the State was contacted again in an attempt to discuss the preliminary report and confirm the findings. However, the State did not respond. On May 8, 2025, the State was contacted, and a detailed explanation of the ASC Staff's findings was presented along with a request for a response from the State. On May 14, 2025, an additional attempt was made to contact the State by ASC Staff. On May 15, 2025, the State indicated that they stood by their original response.	The State must review all approved courses to determine whether they have proper AQB delivery mechanism approval and remove the courses or hours that do not.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.		

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Applicable Federal Citations		Compliance (YES/NO) Areas of Concern (AC)		ASC Staff Observations	State Response	Required/Recommended State Actions	General Comments	
		YES	NO	AC				
Enforcement:			X					
States must resolve all complaints filed against appraisers within one year (12 months) of the complaint filing date in the absence of special documented circumstances. (12 U.S.C. § 3347; Policy Statement 7 B.)					The State had 4 aged complaints without the exemption for special documented circumstances.	On April 28, 2025, the State reported that the ASC failed to specify the 4 aged complaints in question. During the on-site review performed February 10-13, 2025, the 4 complaint files in question were identified to the State. On March 28, 2025, the State was contacted again in an attempt to discuss the preliminary report and confirm the findings. However, the State did not respond. On May 8, 2025, the State was contacted, and a detailed explanation of the ASC Staff's findings was presented along with a request for a response from the State. On May 14, 2025, an additional attempt was made to contact the State by ASC Staff. On May 15, 2025, the State indicated that they stood by their original response.	The State must employ ways to process all complaints in a timely manner.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.