

September 9, 2025

Via Email

Kristin Mitchell, Executive Director
Board of Registration of Real Estate Appraisers
Division of Occupational Licensure
One Federal Street, Suite 600
Boston, MA 02110
Kristin.M.Mitchell@mass.gov

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

Dear Kristin Mitchell:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Massachusetts AMC regulatory program (AMC Program) on June 10-12, 2025, to determine the AMC 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 AMC Program has been awarded an ASC Finding of "Good." The final ASC Compliance Review Report (Report) is attached.

The ASC identified the following areas of non-compliance:

- States must collect and transmit the registry fees for AMCs that meet the federal definition of an AMC.² The ASC recognizes that the Board has approved an amendment to its regulations to bring them into compliance.
- States must enforce and document ownership limitations for State-registered AMCs.³ The ASC recognizes that the Board has submitted a request to the appropriate State agency to bring the application language into compliance.
- States must ensure the accuracy of all data submitted to the AMC Registry.⁴ The ASC understands that the State corrected the information on the AMC Registry and strengthened its review and data entry procedures.

¹ 12 U.S.C. §§ 3331-3356

² 12 U.S.C. § 3338; 12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; 12 CFR 1102.403; Policy Statements 8 and 9.

³ 12 U.S.C. § 3353; 12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; Policy Statement 8.

⁴ 12 U.S.C. § 3347; Policy Statement 9.

ASC staff will confirm that appropriate corrective actions have been taken during the next Review. Massachusetts 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,

A handwritten signature in dark ink that reads "Frederick Grier". The script is cursive and fluid.

Frederick Grier
Acting Executive Director

Attachment


cc: Colleen Maloney, Associate Deputy Commissioner, Colleen.R.Maloney3@mass.gov
Richard Holtz, Deputy General Counsel, Richard.Holtz@mass.gov


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></div><div>ASC State AMC Program Compliance Review Report</div></div>							ASC Finding: Good					
							Final Report Issue Date: September 9, 2025					
Massachusetts AMC Regulatory Program (State)												
Massachusetts Board of Registration of Real Estate Appraisers (Board)			PM: N. Fenochietti			ASC Compliance Review Date: June 10-12, 2025		Review Period: May 2023 to June 2025				
Umbrella Agency: Massachusetts Division of Occupational Licensure				Number of AMCs on AMC Registry: 117				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									
States must collect and transmit the registry fees for AMCs that meet the federal definition of an AMC. (12 U.S.C. § 3338; 12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26;12 CFR 1102.403; Policy Statements 8 and 9.)					The State's regulations set the 12-month period used to calculate the panel size threshold to be the 12-month period ending on the AMC's registration expiration date. Registration renewals may be submitted prior to expiration. This is inconsistent with the AMC Rule.		On August 22, 2025, the State reported that on July 10, 2025, the Board approved an amendment to the AMC regulation ending the calculation period 60 days prior to the registration expiration date in compliance with the federal AMC Rule.		The State must continue the process to amend its regulations to bring them into compliance with the AMC Rule, and provide ASC staff with a copy once finalized.		During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.	
Statutes, Regulations, Policies and Procedures: (continued)			X									
States must enforce and document ownership limitations for State-registered AMCs. (12 U.S.C. § 3353; 12 CFR 34.210 – 34.216; 12 CFR 225.190 – 225.196; 12 CFR 323.8 -323.14; 12 CFR 1222.20 – 1222.26; Policy Statement 8.)					The State's AMC applications allow the applicant to determine substantive cause for appraiser discipline issued by another State. This is inconsistent with the AMC Rule.		On August 22, 2025, the State reported that program staff has submitted a request to the Executive Office of Technology Services and Security to remove the phrase characterizing discipline on owners’ licenses as “for substantive cause” from the attestation in both the current licensing platform and the Division’s new platform that will become effective about February 2026.		The State must ensure that the AMC Ownership Limitations are correctly enforced.		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				
National Registry:		X					
States must ensure the accuracy of all data submitted to the AMC Registry. (12 U.S.C. § 3347; Policy Statement 9.)				The State failed to report to the ASC 2 AMC name changes and to inactivate 2 AMCs on the AMC Registry.	On August 22, 2025, the State reported that licensing staff understood that the licensing platform had been configured to transmit changes of name and deactivations automatically to the National Registry. Staff is now transmitting name changes and deactivations to the National Registry manually and will continue to do so until it confirms that the platform will transmit such changes automatically to the National Registry.	The State must ensure that the information provided to the AMC Registry is accurate and that when an AMC becomes inactive that the AMC Registry is updated as soon as practicable.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
Enforcement:		X					
				No compliance issues noted.	N/A	None	None