

December 3, 2025

Via Email

Marcia Waters, Division Director
Board of Real Estate Appraisers
Colorado Division of Real Estate
1560 Broadway, Suite 925
Denver, CO 80202
Marcia.Waters@state.co.us

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

Dear Marcia Waters:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Colorado AMC regulatory program (AMC Program) on September 23-25, 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) of the Colorado AMC Program is attached.

The ASC identified the following areas of non-compliance:

- States must determine whether State registered AMCs meet the federal definition of an AMC to be eligible to be on the National Registry and if eligible, collect the registry fee;² and
- States must ensure the accuracy of all data submitted to the National Registry.³

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

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. § 3338, 12 U.S.C. § 3347; Policy Statement 9.

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 cursive script that reads "Frederick Grier".

Frederick Grier
Acting Executive Director

Attachment

cc: Garred Lyle, Deputy Director, Garred.Lyle@state.co.us

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.




ASC State AMC Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: December 3, 2025

Colorado AMC Regulatory Program (State)			
Colorado Board of Real Estate Appraisers	PM: A. Nespor	ASC Compliance Review Date: September 23-25, 2025	Review Period: September 2023 to August 2025
Umbrella Agency: Division of Real Estate, Department of Regulatory Agencies	Number of AMCs on National Registry: 108		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
National Registry:		X					
States must determine whether State registered AMCs meet the federal definition of an AMC to be eligible to be on the National Registry and if eligible, collect the registry fee. (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 AMC applications describe the panel size threshold definitions in an ambiguous manner. For instance, some State registered AMCs that meet the federal definition could report themselves as exempt and thus fail to be included on the National Registry and pay the annual Registry fee.	On November 20, 2025, the State reported that, as a result of the Compliance Review, it has updated the AMC applications so that the panel size is not ambiguous.	The State must monitor the use of the updated applications to ensure compliance.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
National Registry (continued):		X					
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 9.)				The State failed to report 5 AMC name changes to the National Registry.	On November 20, 2025, the State reported that it has updated the five records identified and has taken steps to ensure that this issue does not occur again. In addition, the State reported that it has added a workflow step that will require division staff to update the National Registry before processing can be completed. The State also reported that it scheduled a training session with ASC staff so that State staff better understand how to use the National Registry.	The State must monitor its revised procedures for reporting AMC information to the National Registry to ensure compliance.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.

<div></div> <div>ASC State AMC Program Compliance Review Report</div>					ASC Finding: Good						
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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									
					No compliance issues noted.	N/A		None			None