

September 1, 2026

Via Email

MiChell Bird, Executive Director
Real Estate Appraiser Board
Division of Occupational and Professional Licenses
11341 West Chinden Boulevard
Building 4
Boise, ID 83714
Michell.Bird@dopl.idaho.gov

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

Dear MiChell Bird:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Idaho appraiser regulatory program (Appraiser Program) on June 2-4, 2026, to determine the 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 Idaho 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
- States must obtain and maintain sufficient relevant documentation pertaining to an application for issuance of a credential by reciprocity so as to enable understanding of the facts and determinations in the matter and the reasons for those determinations;³
- States must ensure that appraiser education courses are consistent with AQB Criteria;⁴ and
- 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.⁵

¹ 12 U.S.C. §§ 3331-3356.

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

³ 12 U.S.C. § 3351; Policy Statement 5 D.

⁴ 12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 6 A.

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

ASC staff will confirm that appropriate corrective actions have been taken through offsite monitoring and during the next Review. Idaho 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 cursive script that reads "Frederick Griever".

Frederick Griever
Acting Executive Director

Attachment

cc: Jessica Spoja, Licensing Program Manager, Jessica.Spoja@dopl.idaho.gov
Ron Bassett, Board Support Program Manager, Ron.Bassett@dopl.idaho.gov
Skip Liddle, Investigations Program Manager, Skip.Liddle@dopl.idaho.gov
Ryan Allstott, Licensing Supervisor, Ryan.Allstott@dopl.idaho.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 5, Reciprocity; see also Policy Statement 12, Interim Sanctions.



Final Report Issue Date: September 1, 2026

Idaho Appraiser Regulatory Program (State)

Review Period: May 2024 to May 2026

Review Cycle: Two Year

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ASC State Appraiser Program Compliance Review Report

ASC Finding: Good
Final Report Issue Date: September 1, 2026

Idaho Appraiser Regulatory Program (State)							
Real Estate Appraiser Board			PM: T. Lewis		ASC Compliance Review Date: June 2-4, 2026		Review Period: May 2024 to May 2026
Umbrella Agency: Division of Occupational and Professional Licenses					Number of State Credentialed Appraisers on National Registry: 816		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				
Reciprocity:		X					
States must obtain and maintain sufficient relevant documentation pertaining to an application for issuance of a credential by reciprocity so as to enable understanding of the facts and determinations in the matter and the reasons for those determinations. (12 U.S.C. § 3351; Policy Statement 5 D.)				Out of 11 reciprocal applications examined, the State issued 4 credentials without adequate documentation that the applicant held a valid credential in another State. However, none of the 4 reciprocal credentials issued were found to have been issued to applicants that did not hold a valid credential in another State.	On August 14, 2026, the State indicated that, as part of a new process and documentation procedures, staff would be required to obtain and review a National Registry report confirming the applicant holds an active out-of-state credential and preserve the report in the application file. These steps would be recorded along with the verification date prior to issuance.	The State must monitor this new process and ensure that all documentation to support its validation methods are available to ASC staff for future Compliance Reviews.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
Education:		X					
States must ensure that appraiser education courses are consistent with AQB Criteria. (12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 6 A.)				Out of 7 continuing education (CE) courses approved during the period under review, the State approved 1 CE course with content that appeared to be inconsistent with AQB Criteria.	On August 14, 2026, the State addressed this finding by noting that it has prepared and proposed new course-approval policy revisions and implemented related Online Services application changes.	The State must implement this new course approval policy and changes to the online application to ensure that appraiser education courses are consistent with AQB Criteria and that documentation is sufficient to support course approval.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.



ASC State Appraiser Program Compliance Review Report

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Umbrella Agency: Division of Occupational and Professional Licenses		Number of State Credentialed Appraisers on National Registry: 816	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				
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 6 aged complaints which were unresolved for more than 2 years without the exemption for special documented circumstances. This concern was also identified in the 2024 Final Compliance Review Report.	On August 14, 2026, the State acknowledged the ASC’s finding regarding six complaints pending more than two years and accepts responsibility for monitoring each case through final resolution. Since replacing its contract prosecutor in June 2025, the State contends that it has strengthened oversight of prosecution referrals. According to the State, the Board will revisit the older complaints at its August 2026 meeting. To prevent recurrence, the State notes that it has set a 120-day complaint-resolution goal, trained staff to investigate complaints promptly, strengthened prosecution contract requirements, and configured its licensing database to support Policy Statement 7’s well-documented enforcement requirements. The State goes on to say that based on these improvements, it does not anticipate future findings in this area.	The State must continue with its efforts to modify its complaint handling process and documentation requirements and address the 6 aged cases that have remained unresolved for more than 2 years. In addition, commencing October 2026, the State must send quarterly complaint logs to ASC staff along with a detailed description of the progress on the 6 aged cases. If progress is not made, the ASC may place additional requirements upon the State.	Through offsite monitoring and during the next Compliance Review, ASC staff will pay particular attention to this area for compliance.