

September 11, 2025

Via Email

Laurie Egan, Board Chair
Chad Koch, Administrator
Oregon Appraiser Certification & Licensure Board
200 Hawthorne Avenue SE, Suite C-306
Salem, OR 97301
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Laurie@eganoffice.com
Chad.Koch@oregon.gov

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

Dear Laurie Egan and Chad Koch:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Oregon appraiser regulatory program (Appraiser Program) on June 24-26, 2025, 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 Oregon Appraiser Program is attached.

The ASC identified the following areas of non-compliance:

- States must ensure the delivery mechanism for distance education courses offered by a non-academic provider, including secondary providers, has been approved by an AQB-approved organization providing approval of course design and delivery.² The ASC acknowledges that the State reported it has revised its process in setting course expiration dates.
- 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.³ The ASC recognizes that the State reported it is taking steps to improve its enforcement process through additional tools and resources.

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

¹ 12 U.S.C. §§ 3331-3356.

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

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

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: Paul Lindsay, Budget Manager, Paul.Lindsay@aclb.oregon.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.



ASC State Appraiser Program Compliance Review Report

ASC Finding: Good

Final Report Issue Date: September 11, 2025

Oregon Appraiser Regulatory Program (State)			
Oregon Appraiser Certification & Licensure Board (Board)	PM: M. Brown	ASC Compliance Review Date: June 24-26, 2025	Review Period: June 2023 to June 2025
Umbrella Agency: Independent		Number of State Credentialed Appraisers on Appraiser Registry: 1456	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						
				No compliance issues noted.	N/A	None	None
National Registry:	X						
				No compliance issues noted.	N/A	None	None
Application Process:	X						
				No compliance issues noted.	N/A	None	None
Reciprocity:	X						
				No compliance issues noted.	N/A	None	None
Education:		X					
States must ensure the delivery mechanism for distance education courses offered by a non-academic provider, including secondary providers, has been approved by an AQB-approved organization providing approval of course design and delivery. (12 U.S.C. § 3347; Policy Statement 6 B.)				The State approved 1 distance education continuing education course beyond the expiration date of the delivery mechanism approval certificate.	On August 29, 2025, the State reported it aligned its expiration date for the course with the course's AQB approval period, which was beyond the expiration date of the delivery mechanism's certificate. The State notified the course provider that the expiration date for the course was aligned to match the expiration date of the delivery mechanism certificate. The State further reported that approval dates for course applications requiring delivery mechanism certificates will be aligned with the earliest expiration date of both the AQB approval period and delivery mechanism certificate.	The State must monitor the results of its revised process to ensure all courses approved are compliant with AQB Criteria.	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 72 outstanding complaints of which 21 were unresolved for more than 1 year and 51 were unresolved for more than 2 years, without the exemption for special documented circumstances.	On August 29, 2025, the State reported it had enhanced its compliance audits and consultant processes with updated tools and resources to streamline processes.	The State must monitor its revised processes to ensure complaints are resolved timely and the backlog of aged complaints is eliminated.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.