

January 23, 2026

Via Email

Sharath Chandra, Real Estate Administrator
Nevada Commission of Appraisers of Real Estate
Nevada Real Estate Division
Department of Business and Industry
3300 W. Sahara Avenue, Suite 350
Las Vegas, NV 89102
SChandra@red.nv.gov

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

Dear Sharath Chandra:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Nevada appraiser regulatory program (Appraiser Program) on July 7-10, 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. While the ASC acknowledges and appreciates that the State has made improvements as indicated below, the Appraiser Program is given an ASC Finding of "Needs Improvement." The final ASC Compliance Review Report (Report) of the Nevada Appraiser Program is attached.

The ASC identified the following area(s) of non-compliance:

- 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;²
- States must analyze a representative sample of the applicant's work product for compliance with USPAP on all initial or upgrade applications for appraiser credentialing;³
- States are required to report all disciplinary actions via the extranet application within 5 business days after the disciplinary action is final, as determined by State law;⁴
- States must ensure that staff authorization information provided to the ASC is updated and accurate;⁵ and

¹ 12 U.S.C. §§ 3331-3356.

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

³ 12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 4 D.

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

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

- States must maintain sufficient documentation to support that supervisory appraisers conform to AQB Criteria;⁶

The ASC acknowledges that the State has experienced staff turnover since the last Compliance Review. In response, the State has taken steps to revise its practices and procedures to address areas of non-compliance moving forward.

For example, the State reported updates to its procedures, including:

- Capturing screenshots of the National Registry when reviewing Supervisory Appraiser applications;
- Implementing protocols to ensure the timely reporting of disciplinary actions to the National Registry; and
- Establishing procedures for the periodic review and update of authorized Registry users.

The State also reported that it has resolved the challenges that contributed to the complaint backlog and has taken additional measures to promote timely complaint resolution.

These meaningful actions provide a foundation for addressing the remaining areas of non-compliance identified in the Compliance Review Report. ASC staff will prioritize verifying that the steps taken—and those still in progress—support the State's overall compliance with Title XI as evaluated based on the ASC Policy Statements.

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



Luke H. Brown
Acting Chair

Attachment

cc: Charvez Foger, Deputy Administrator, CFoger@red.nv.gov
Rebecca Bruce, Program Manager, RJBruce@red.nv.gov

⁶ 12 U.S.C. § 3347; Policy Statement 1 C.

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: Needs Improvement

Final Report Issue Date: January 23, 2026

Nevada Appraiser Regulatory Program (State)							
Nevada Commission of Appraisers of Real Estate		PM: J. Stewart			ASC Compliance Review Date: July 07-10, 2025		Review Period: June 2023 to June 2025
Umbrella Agency: Nevada Real Estate Division				Number of State Credentialed Appraisers on Appraiser Registry: 963		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 maintain sufficient documentation to support that supervisory appraisers conform to AQB Criteria. (12 U.S.C. § 3347; Policy Statement 1 C.)				The State's Supervisory Appraiser files did not contain sufficient documentation to determine the State is ensuring that Supervisory Appraiser applicants met all AQB Criteria requirements.	On September 12, 2025, the State reported that it has updated its procedures to include taking a screenshot of the Registry and uploading it alongside the Intern Application Checklist.	Within 30 days, the State must provide ASC staff a copy of the new procedures.	During the next Compliance Review, ASC staff will pay particular attention to this area.
Temporary Practice:	X						
				No compliance issues noted.	N/A	None	None
National Registry:		X					
States are required to report all disciplinary actions via the extranet application within 5 business days after the disciplinary action is final, as determined by State law. (12 U.S.C. § 3347; 12 U.S.C. § 3338; Policy Statement 3 D.)				The State reported 12 disciplinary actions to the National Registry. The State failed to report 2 of those disciplinary actions to the National Registry within 5 business days.	On September 12, 2025, the State reported that it has implemented procedures to ensure timely reporting of all disciplinary actions to the National Registry.	Within 30 days, the State must provide ASC staff a copy of the new procedures.	This concern was also identified in the August 13, 2018, and May 16, 2024, Final Compliance Review Reports.
National Registry Continued:		X					
States must ensure that staff authorization information provided to the ASC is updated and accurate. (12 U.S.C. § 3347; Policy Statement 3 A, C.)				The State failed to notify the ASC to inactivate 6 individual's Registry access.	On September 12, 2025, the State reported that it has implemented procedures to ensure periodic review and update of authorized users.	Within 30 days, the State must provide ASC staff a copy of the new procedures.	During the next Compliance Review, ASC staff will pay particular attention to this area.

This concern was also identified in the August 13, 2018, and May 16, 2024, Final Compliance Review Reports.

During the next Compliance Review, ASC staff will pay particular attention to this area.



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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				
Application Process:		X					
States must analyze a representative sample of the applicant’s work product for compliance with USPAP on all initial or upgrade applications for appraiser credentialing. (12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 4 D.)				ASC Staff reviewed 18 application files. 1 of those files did not contain documentation to support that the State analyzed a representative sample of the applicant’s work product for compliance with USPAP as part of an application.	On September 12, 2025, the State reported that the file that did not include a USPAP checklist was completed by a former employee at the very beginning of the review period, and used outdated experience logs, and did not include the USPAP checklist. The State went on to report that the Appraisal Manager reviewed all other files completed during and after the review period and confirmed that USPAP checklists were consistently included.	The State must monitor its process to ensure applicant work product is evaluated for USPAP compliance.	During the next Compliance Review, ASC staff will pay particular attention to this area.
Reciprocity:	X						
				No compliance issues noted.	N/A	None	None
Education:	X						
				No compliance issues noted.	N/A	None	None
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 closed a total of 56 complaints during the period under review. The State had 9 aged complaints, of which 6 were unresolved for more than 1 year and 3 were unresolved for more than 2 years, without the exemption for special documented circumstances.	On September 12, 2025, the State reported that the challenges that resulted in the case backlog have been resolved. The State went on to report that it has taken several new steps to ensure timely complaint resolution.	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.	This concern was also identified in the August 13, 2018, and May 16, 2024, Final Compliance Review Reports. During the next Compliance Review, ASC staff will pay particular attention to this area.