

March 9, 2026

Via Email

Alycia Smith, Executive Director
Real Estate Appraisal Board
Jayhawk Tower
700 SW Jackson, Suite 804
Topeka, KS 66603
Alycia.N.Smith@ks.gov

RE: Appraisal Subcommittee Staff Follow-Up Review of Kansas's Appraiser Regulatory Program

Dear Alycia Smith:

Thank you for your cooperation and your staff's assistance in the February 17-19, 2026, Appraisal Subcommittee (ASC) Follow-up Review of the Kansas appraiser regulatory program (Appraiser Program). This was a Follow-up Review of the November 19-21, 2024, ASC Compliance Review of the Kansas Appraiser Program.

As detailed in the attached Follow-up Report (Report), Kansas made progress in all of the seven non-compliance concerns identified in the July 2025 Appraiser Program Report. In addition, Kansas addressed recommended actions to strengthen the Program. We commend the Kansas Appraiser Program for its efforts and the progress made.

This letter and the attached Follow-up Report are public record and available on the ASC website in accordance with the Freedom of Information Act. Please contact us if you have any questions.

Sincerely,



Frederick Grier
Acting Executive Director

Attachment

cc: Jeff Meyer, Chair, WJeffMeyer@yahoo.com

ASC Staff Follow-Up Report: 2024 Compliance Review

Kansas Appraiser Regulatory Program (State)

Kansas Real Estate Appraisal Board	Follow-Up Review Date: February 17-19, 2026	Follow-Up Report Issue Date: March 9, 2026
Umbrella Agency: Independent	ASC Compliance Review Date: November 19-21, 2024	PM: A. Nespor
Follow-Up of Compliance Review Report Dated: July 1, 2025	ASC Finding: Needs Improvement	

Applicable Federal Citations	ASC Staff Assessment Compliance (YES/NO) Areas of Concern (AC)			Required/Recommended State Actions from the July 1, 2025 Compliance Review Report	Status as of February 17-19, 2026 Follow-Up	Further Required Actions/Comments
	Yes	No	AC			
Statutes, Regulations, Policies and Procedures:		X				
State requirements for trainee appraisers and supervisory appraisers must meet or exceed the AQB Criteria. (12 U.S.C. § 3345; 12 U.S.C. § 3347; Policy Statement 1 C.)				The State's practice of allowing unregistered trainees to comply with only some of the minimum AQB requirements in contrast to its "Provisional Trainees," who must fully adhere to the AQB Criteria, is inconsistent with Title XI. As such, the State must amend its Statutes and Regulations to bring them into compliance with AQB Criteria and provide ASC staff with a copy once finalized.	On February 4, 2026, the State responded that the Board had approved statutory and regulatory amendments to bring Kansas into compliance with AQB Criteria. The State went on to say that, in light of the "First Exposure Draft of Proposed Changes to the Real Property Appraisal Qualification Criteria (Criteria)" updated on December 4, 2025, the Board has paused the regulation amendment process. The State further responded that comments on the exposure draft are not due until March 3, 2026, which may result in additional changes to the AQB Criteria, including the possible removal of continuing education requirements for trainee appraisers. The State continued that, because Kansas has an extensive statutory and regulatory revision process, the Board does not want to initiate amendments that may need to be revised again once the Criteria are finalized.	Further Required Actions: The State must require that all trainees, regardless of registration status, comply with all minimum AQB Criteria. In addition, the State must continue to monitor the status of the proposed changes to the AQB Criteria and must continue the process to amend its Statutes and Regulations to bring them into compliance with AQB Criteria and provide ASC staff with a copy once finalized. Comments: During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
Temporary Practice:	X					
States must track all temporary practice permits using a permit log which includes the name of the applicant, date application received, date completed application received, date of issuance, and date of expiration, if any. (12 U.S.C. § 3351; Policy Statement 2 B.)				Within 30 days, the State must provide ASC staff with a copy of its new Temporary Practice Log.	The State provided a copy of the new Temporary Practice Log that tracks the date the completed application was received.	Further Required Actions: None Comments: During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.

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National Registry:	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 3 A, D.)				The State must review files of all applicants for appraiser credentials during the Review Period and identify those that did not provide proof of experience consistent with AQB Criteria, contact those identified to obtain the needed documentation for the file, and report the results of their examination to ASC staff within 30 days. The State must ensure all appraiser(s) meet AQB Criteria or inactivate the credential(s) on the National Registry.	On February 4, 2026, the State responded that the Board reviewed the relevant files and determined there were not any instances in which applicants provided proof of experience that was inconsistent with the AQB Criteria.	Further Required Actions: None Comments: During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
Application Process:	X					
States must exercise due diligence in determining whether submitted documentation of experience, or work product demonstrates 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.)				The State must review files of all applicants for appraiser credentials during the Review Period, identify those who did not provide proof of submission of USPAP compliant experience consistent with AQB Criteria and contact those identified to obtain the needed documentation for the file. The State must report the results of its examination to ASC staff within 30 days. The State must ensure all appraiser(s) meet AQB Criteria or take appropriate action.	On February 4, 2026, the State responded that the Board’s appraiser members reviewed the relevant applicant files and determined that they were compliant with USPAP standards and no further documentation was needed from applicants. The State further responded that, according to the Generic Experience Criteria, it is within the Board’s authority to determine what evidence is sufficient to support a finding of USPAP compliance. The State went on to say that, based on that discretion, Board staff placed the documentation from the Board member reviews in the files to support the conclusion that the work is compliant with USPAP standards. Finally, the State responded that the Board did not contact the individuals whose files were reviewed due to the determination that they were USPAP compliant when their credentials were issued.	Further Required Actions: None Comments: During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.

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Education:	X					
States must maintain sufficient documentation to support that approved appraiser courses conform to AQB Criteria. (12 U.S.C. § 3347; Policy Statement 6 A.)				Within 60 days, the State must review all approved courses using their new process to determine whether they meet AQB Criteria, remove the courses or hours that do not, and notify ASC staff in writing of the State's findings.	On February 4, 2026, the State responded that at the end of calendar year 2025, the Board's approved continuing education courses expired. (K.A.R 117-6-3(g)). The State says that the Board ensures continuing education courses comply with Kansas law, including approving or renewing courses that cover real property related appraisal topics stated in K.A.R 117-6-3(b). The State went on to say that partial approval may be granted if a portion of the course(s) covers real estate related appraisal topics and the length of that portion is at least two classroom hours. (K.A.R 117-6-3(c)). The State further responded that any courses that do not meet AQB Criteria and Kansas law are sent to the Board for review. The State provided the example in which, at the last Board meeting, the Board voted to deny renewal of a continuing education course that did not meet the requirements of Kansas law and AQB Criteria.	Further Required Actions: None Comments: During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
Enforcement:	X					
States must maintain relevant documentation to enable understanding of the facts and determinations in the matter and the reasons for those determinations. (12 U.S.C. § 3347; Policy Statement 7 B.)				Within 60 days, the State must develop a plan to ensure that disposition of case resolution is consistent, appropriate and equitable; and the complaint process is well documented and available to ASC staff during the on-site portion of the Review. The State must provide ASC staff with a copy of its plan within 60 days.	On February 4, 2026, the State responded that on January 8, 2026, the Board approved a "Complaint Resolution Plan" which was provided for review. The State went on to say that any complaints closed prior to January 8, 2026, did not follow the process outlined in the Complaint Resolution Plan; however, for all complaints that are pending after January 8, 2026, the Board is following the process outlined in the Complaint Resolution Plan.	Further Required Actions: None Comments: During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.

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Enforcement (continued):	X					
States must maintain relevant documentation to enable understanding of the facts and determinations in the matter and the reasons for those determinations. (12 U.S.C. § 3347; Policy Statement 7 B.)				The examination of the State's complaint files found inconsistency with how FNMA "Tips" communications were treated. Some cases were opened, while in other cases the State did not pursue an investigation. The State should include sufficient documentation to support a decision for the dismissal of an allegation that it contends does not rise to the level of a complaint.	No FNMA "Tips" were dismissed during the period under follow-up review.	Further Required Actions: None Comments: During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.