

June 24, 2026

**Via Email**

Kimberly Gleason, Executive Officer  
Iowa Department of Inspections, Appeals, & Licensing  
Real Estate Appraiser Examining Board  
6200 Park Avenue, Suite 100  
Des Moines, IA 50321  
[Kimberly.Gleason@dia.iowa.gov](mailto:Kimberly.Gleason@dia.iowa.gov)

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

Dear Kimberly Gleason:

The Appraisal Subcommittee (ASC) staff conducted an ASC Compliance Review (Review) of the Iowa appraiser regulatory program (Appraiser Program) on May 5-7, 2026, to determine the Program's compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.<sup>1</sup>

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 Iowa Appraiser Program is attached.

The ASC identified the following areas of non-compliance:

- States must have policies, practices and procedures consistent with Title XI,<sup>2</sup> and
- States must ensure the accuracy of all data submitted to the Appraiser Registry.<sup>3</sup>

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

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<sup>1</sup> 12 U.S.C. §§ 3331-3356.

<sup>2</sup> 12 U.S.C. § 3347; Policy Statement 1 A.

<sup>3</sup> 12 U.S.C. § 3338; 12 U.S.C. § 3347; Policy Statement 3 A, D.

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: Charles Hill, Bureau Chief, [Charles.Hill@dia.iowa.gov](mailto:Charles.Hill@dia.iowa.gov)

## ASC Finding Descriptions

ASC Finding	Rating Criteria	Review Cycle*
Excellent	<ul style="list-style-type: none"> <li>• State meets all Title XI mandates and complies with requirements of ASC Policy Statements</li> <li>• State maintains a strong regulatory Program</li> <li>• Very low risk of Program failure</li> </ul>	2-year
Good	<ul style="list-style-type: none"> <li>• State meets the majority of Title XI mandates and complies with the majority of ASC Policy Statement requirements</li> <li>• Deficiencies are minor in nature</li> <li>• State is adequately addressing deficiencies identified and correcting them in the normal course of business</li> <li>• State maintains an effective regulatory Program</li> <li>• Low risk of Program failure</li> </ul>	2-year
Needs Improvement	<ul style="list-style-type: none"> <li>• State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements</li> <li>• Deficiencies are material but manageable and if not corrected in a timely manner pose a potential risk to the Program</li> <li>• State may have a history of repeated deficiencies but is showing progress toward correcting deficiencies</li> <li>• State regulatory Program needs improvement</li> <li>• Moderate risk of Program failure</li> </ul>	2-year with additional monitoring
Not Satisfactory	<ul style="list-style-type: none"> <li>• State does not meet all Title XI mandates and does not comply with all requirements of ASC Policy Statements</li> <li>• Deficiencies present a significant risk and if not corrected in a timely manner pose a well-defined risk to the Program</li> <li>• State may have a history of repeated deficiencies and requires more supervision to ensure corrective actions are progressing</li> <li>• State regulatory Program has substantial deficiencies</li> <li>• Substantial risk of Program failure</li> </ul>	1-year
Poor**	<ul style="list-style-type: none"> <li>• State does not meet Title XI mandates and does not comply with requirements of ASC Policy Statements</li> <li>• Deficiencies are significant and severe, require immediate attention and if not corrected represent critical flaws in the Program</li> <li>• State may have a history of repeated deficiencies and may show a lack of willingness or ability to correct deficiencies</li> <li>• High risk of Program failure</li> </ul>	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: June 24, 2024

<b>Iowa Appraiser Regulatory Program (State)</b>			
Iowa Real Estate Appraiser Examining Board	PM: T. Lewis	ASC Compliance Review Date: May 5-7, 2026	Review Period: June 2024 to April 2026
Umbrella Agency: Department of Inspections, Appeals, & Licensing		Number of State Credentialed Appraisers on National Registry: 1,206	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				
<b>Statutes, Regulations, Policies and Procedures:</b>		X					
States must have policies, practices and procedures consistent with Title XI. (12 U.S.C. § 3347; Policy Statement 1 A.)				The State's regulations permit out-of-state credential holders to renew their licenses by submitting an affidavit certifying they will fulfill their home state's continuing education (CE) obligations.	On June 16, 2026, the State responded that the preliminary compliance review found the State's regulations inconsistent with Title XI because out-of-state appraisers were permitted to certify through affidavit that they had met or would meet CE requirements based on their home state requirements. The State noted that this rule had been in effect since December 5, 2007, and had not been identified in prior ASC reviews. The State reported that it took immediate corrective action by updating its online renewal system to remove this option and strengthening renewal audits to verify course dates, eliminate duplicates, and confirm that all required courses are reported. The State also indicated that it plans to address this issue during an upcoming formal rule review, which may include removing the rule that permits this practice.	The State must continue the process to amend its regulations and processes to bring them into compliance with AQB Criteria, and provide ASC staff with a copy once finalized.	During the next Compliance Review, ASC staff will pay particular attention to this area for compliance.
<b>Temporary Practice:</b>	X						
				No compliance issues noted.	N/A	None	None



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	YES	NO	AC				
<b>National Registry:</b>		X					
States must ensure the accuracy of all data submitted to the Appraiser Registry. (12 U.S.C. § 3338; 12 U.S.C. § 3347; Policy Statement 3 A, D.)				1 out-of-state credential holder was entered on the National Registry whose CE requirements were not verified by the State for completion in accordance with Title XI and the AQB Criteria.	On June 16, 2026, the State acknowledged in its response that the compliance review raised a separate concern about the accuracy of data reported to the National Registry. The State reported that it promptly verified that the credential holder met the minimum CE requirements for renewal. The State noted that removing the automated renewal affidavit option for out-of-state licensees would prevent similar issues going forward.	N/A	The State addressed the concern.
<b>Application Process:</b>	X						
				No compliance issues noted.	N/A	None	None
<b>Reciprocity:</b>	X						
				No compliance issues noted.	N/A	None	None
<b>Education:</b>	X						
				No compliance issues noted.	N/A	None	None
<b>Enforcement:</b>	X						
				No compliance issues noted.	N/A	None	None