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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

August 27, 1998

Scott R. Williams, Chair  
Appraiser Qualifications Board  
1029 Vermont Avenue, NW, Suite 900  
Washington, DC 20005-3517

Dear Scott:

Thank you for your August 19, 1998 letter informing us of: (1) Louisiana's request for clarification about whether "reciprocity applicants have to prove they meet the new higher [January 1, 1998 Appraiser Qualifications Board ("AQB")] requirements or is it sufficient that they hold an existing credential and are in good standing"; and (2) a State appraiser regulatory agency's recommendation that the Appraisal Subcommittee ("ASC") maintain on its Web site a list of States that meet the AQB's appraiser qualifications criteria. You further stated that the AQB will be taking up the reciprocity issue at its October 9, 1998 meeting.

Regarding reciprocity, Title XI and ASC Policy Statement 6, *Reciprocity*, already clearly address this issue. Section 1122(b) of Title XI states: "The Appraisal Subcommittee shall encourage the States to develop reciprocity agreements that readily authorize appraisers who are licensed or certified in one State (and who are in good standing with their State appraiser certifying or licensing agency) to perform appraisals in other States." Policy Statement 6, among other things, reiterates this section. The critical factors in approving an appraiser's reciprocity application should be whether the appraiser is licensed or certified and in good standing in his or her home State. The January 1, 1998 AQB changes, except for continuing education, should not affect a State's reciprocity determinations for appraisers who were licensed or certified before January 1, 1998. While the ASC must encourage reciprocity, State statutes and regulations govern whether reciprocity is offered and, if so, set out the State's requirements. Accordingly, it is up to each State to interpret its own statute, regulations, and/or policies to determine whether the January 1, 1998 changes impact the State. We are unsure what would be accomplished by the AQB stating "its intent on this issue," but will be interested in discussing it with you in St. Louis.

We appreciate your second suggestion, although we are concerned about trying to implement it. Our Web site, at the "State Appraiser Regulatory Agencies" page, currently has a chart containing each State's licensing and certification qualification requirements. The chart is based on data provided by States in the ASC Annual Survey. It is very difficult to keep this chart up to date. States change their requirements periodically. Often, we do not learn of these changes until we perform an on-site review of the State or we receive the Annual Survey. Because on-site reviews are performed once every three years and surveys are completed annually, our data regarding State requirements is not up-to-date. Therefore, we are concerned with publishing data on our Web site that indicates that a State does or does not meet the AQB Qualification Criteria.

Please contact us if you have any questions.

Sincerely,

Ben Henson  
Executive Director