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**Appraisal Subcommittee**  
*Federal Financial Institutions Examination Council*

March 10, 2000

Arlen Mills, Chair Appraiser  
Qualifications Board  
The Appraisal Foundation 1029  
Vermont Avenue, N.W. Suite  
900  
Washington, D.C. 20005-3517

Dear Mr. Mills:

The Appraisal Subcommittee (“ASC”) requests that the Appraiser Qualifications Board (“AQB”) review the following situation concerning “warehousing” examination results and issue at your earliest convenience a written opinion regarding whether it is consistent with your current qualification criteria. If it is consistent, please determine whether you believe that future AQB action is needed to address this situation. At this time, we are aware of at least one State allowing this practice.

State law permits an appraiser up to five years from the date the appraiser passes a license or certification examination to document that he or she has the necessary experience to qualify for the requested credential. During this interim period, applicants are not necessarily required to take continuing education or Uniform Standards of Professional Appraisal Practice (“USPAP”) update courses. For example, an applicant passed the certified general examination on April 20, 1995, but did not document the required experience hours until September 1, 1999, at which time the applicant was awarded a certified general credential. This situation raised concerns because:

- The applicant was not licensed or certified during the interim 52-month period, and we found no evidence that he or she took continuing education or USPAP update courses during that time; and
- The applicant submitted 165 hours of education to qualify to take the examination in 1995, but you increased the education requirement to 180 effective January 1, 1998, 20 months before the certified general credential was issued.

Your assistance in this matter is appreciated. Please contact us if you have further questions.

Sincerely,



Ben Henson  
Executive Director