Appraisal Subcommittee

Federal Financial Institutions Examination Council

June 19, 2013

The Honorable John Szoka, House of Representatives Room 2223, Legislative Building 16 W. Jones Street Raleigh, NC 27601

RE: Proposed bill HB 565

Dear Representative Szoka:

The North Carolina Appraisal Board is responsible for ensuring that the North Carolina real estate appraiser regulatory program (Program) complies with the requirements of Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended (Title XI). Title XI created the Appraisal Subcommittee of the Federal Financial Institutions Examination Council (ASC) and made it responsible for monitoring State appraiser regulatory programs. Title XI requires that States adhere to the minimum qualification criteria on education, examination and experience as set by the Appraisal Qualifications Board of the Appraisal Foundation (AQB Criteria) in credentialing appraisers eligible to perform federally related transactions. A Program's failure to comply with Title XI can result in a determination that appraisers credentialed by the State are ineligible to perform appraisals for federally-related transactions which include most residential and commercial mortgages.

North Carolina's proposed bill HB 565, titled "An Act to Amend the Laws Regulating Real Estate Appraisers" amends the State laws for the North Carolina Program to comply with requirements of AQB Criteria and Federal law. We support the efforts of the State to maintain compliance with AQB Criteria and ensure that the Program remains compliant with Federal requirements.

Our Annual Report may help you become acquainted with the unique partnership and regulatory structure created by Title XI between the Federal and State governments and the private sector. This report provides detailed information about the ASC's oversight responsibility of your State's program, as well as information regarding the Appraisal Foundation's private sector component of this partnership. The Annual Report may be accessed online at https://www.asc.gov/Documents/AnnualReports/2012AnnualReport.pdf. Additional information about the ASC is available on our website, www.asc.gov.

Sincerely.

Please do not hesitate to contact us if you have any questions.

James R. Park Executive Director

cc: Mr. Don Rodgers, Executive Director North Carolina Appraisal Board