

ARKANSAS



APPRAISER LICENSING & CERTIFICATION BOARD

101 East Capitol - Suite 430
Little Rock, Arkansas 72201

June 7, 2007

Mr. Ben Henson, Executive Director
The Appraisal Subcommittee
2000 "K" Street, NW, Suite 310
Washington, DC 20006

Dear Ben,

I know you must think we are just full of questions, but events of late have led us to raise yet another question which heretofore would have gone unasked.

Today's question relates to an appraiser who has requested to transfer his certification from Arizona, to which he transferred by reciprocity from Minnesota. It is this Board's standing policy in order to transfer credentials from an out-of-state to a resident basis to require the appraiser to provide, among other things, a list of qualifying education as well as copies of completion certificates filed with his home state. This is part of our due diligence to establish a master file on transferees comparable to that required of resident appraisers. In this instance, we requested the appraiser to provide the education listing that would indicate compliance with AQB criteria. In his response, not only can he not provide verification, he informs us that it was not required by Minnesota at the time he became credentialed. This individual was initially certified in September 1, 1991 by the Minnesota agency and their status letter indicates the applicants upgrade to certified residential met AQB criteria. (See enclosed [DELETED])

Our concern is (1) the appraiser has stated to our office that in 1991 Minnesota did not require documentation of qualifying education as a "pre-requisite to sit for the exam" but "grandfathered" in appraisers based on either education or experience and (2) he can provide no proof of having met AQB educational criteria at the time credentialed. Our Board will of course deal with the applicant for transfer based on this apparent deficiency as it sees fit.

My question to you Ben, is if this is an accurate representation of how Minnesota credentialed appraisers in 1991 shouldn't the ASC program auditors look back into this

state's operation and make a determination of noncompliance with AQB required criteria? A review of the March 1991 AQB criteria on file at the Arkansas board indicates an applicant was required to meet the "pre-requisites to sit for the exam" of 105 hours of education including 15 hrs. USPAP and experience. Also, included in that criteria was the condition that "the applicant must demonstrate that the education involved coverage of all topics listed below ". Maybe you have already discovered this serious noncompliance and caused the Minnesota Board to take corrective action by downgrading those certified, without proper documentation of education, to State License. Or could it be they now have documented the education that supports the credential held. Or could it possibly be that the potential transferee was already in Arizona at the time Minnesota corrected this noncompliance and he slipped through the cracks?

In the event however, the Subcommittee has taken no action on this issue, could it be said that Minnesota failed to comply with the minimum AQB criteria in 1991 in regards to the educational pre-requisite and that all of those appraisers issued certifications without meeting the minimum AQB educational requirement should be held by the ASC to some form of corrective action that demonstrates compliance?

Is it unreasonable to assume that other states should be held to the same retroactive degree of accountability as Arkansas?

Respectfully,

A handwritten signature in black ink, appearing to read "Jim Martin", with a large, stylized flourish at the end.

Jim Martin
Executive Director

PS. I trust you folks have better luck than we have had in talking to a real person in Minnesota. We give up!!