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Appraisal Subcommittee

Federal Financial Institutions Examination Council

November 8, 2001

James Martin, Executive Director
Arkansas State Appraisal Board
2725 Cantrell Road, Suite 202
Little Rock, AR 72202

Dear Jim:

This letter responds to your October 18, 2001 letter regarding actions taken by the Oklahoma Real Estate Appraisal Board. Specifically, you expressed concern with Oklahoma's practice of revoking the Oklahoma appraiser credentials of Arkansas resident appraisers for their "failure to renew" credentials.

We reviewed Oklahoma's licensing/certification procedures regarding this issue several years ago. We emailed Michelle Dobbs, Oklahoma's Appraisal Board Director, and verified that our information was correct. Oklahoma issues appraiser credentials for three-year terms. However, Oklahoma collects fees for only one year at a time. Appraisers are responsible for paying the second and third year fees as each becomes due. If an appraiser fails to pay the annual fee, Oklahoma revokes his or her credential for nonpayment.

When an individual applies for and receives an Oklahoma appraiser credential, he or she receives a three-year credential and is obligated to pay for all three years. Renewal does not occur until the end of the three-year licensing cycle. Oklahoma's revocations result from appraisers' nonpayment of fees, not from their failure to renew their credentials. Oklahoma applies this policy equally to resident and non-resident appraisers. Oklahoma's position is that allowing the appraisers three years to pay their fees reduces the financial burden of obtaining an appraiser credential.

If you have additional questions, please let us know.

Sincerely,

Ben Henson
Executive Director