

Appraisal Subcommittee
2100 Pennsylvania Ave. NW
Washington DC 20037

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To: Appraisal Policy Manager

In 1992 when I first became interested in becoming a real property appraiser in North Dakota, the state century code had two professional requirements, to become fully licensed to do Federally related residential property appraisals. One was to complete 75 hours of appraisal education and the other was to have 240 points of appraisal experience. 240 points was supposed to be the same as 2000 experience hours.

I completed the 165 hours of education and the 2000 hours of experience to become a Certified Residential Real Property appraiser in the State of Minnesota. In North Dakota it took several months longer to get the necessary 240 points of appraisal experience.

After I submitted my application to become a fully licensed appraiser it was several months before I heard back from the North Dakota State Appraisal licensing board. At that time I was informed that they had added a new requirement for licensing. The new requirement was that the applicant to become fully licensed had to submit three completed appraisals for evaluation. This after the applicant has completed over 2000 experience hours without having had any disciplinary action taken against the appraiser.

Changing the requirements for licensing during the period which a prospective licensee is working to obtain their license does not seem to be fair. In addition wouldn't it be a simple way to restrict the number of appraisers in the state? Particularly if the board was made up mainly of appraisers. My practice includes review appraising and I have never found an appraisal I couldn't find some errors in.

In addition on the North Dakota application for licensing (a copy enclosed) question #11 asks, "Have you ever practiced real estate appraisal in any state when in fact you were not certified or licensed to do so?" Does that mean that in North Dakota (a volunteer state I understand) to do a residential property appraisal under \$250,000 you have to be licensed? Further if you did a de minimus appraisal in the state without being licensed, would that


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