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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

February 7, 2005

[DELETION]

Dear Mr. [DELETION]:

This letter responds to your December 13, 2004 letter to John Brennan, Director of Research at the Appraisal Foundation. Mr. Brennan forwarded your letter to us for response because the issues involved concern the operation of Florida's appraiser regulatory program. The Appraisal Subcommittee ("ASC") is authorized by Federal law to oversee State appraiser regulatory programs.

In your letter, you attached a December 1, 2004 letter from Florida's Department of Business and Professional Regulation ("DBPR") notifying you of its determination that you did not meet one or more of the State's requirements for renewal of your certified general credential. As you may know, the ASC reviewed Florida's appraiser regulatory program this past summer and discovered several serious weaknesses in that program. The December 1<sup>st</sup> letter was a result of Florida's efforts to cure these deficiencies.

DBPR is required by Federal law, as incorporated into Florida law, to ensure that each certified residential or certified general appraiser seeking renewal meets the Appraiser Qualifications Board's minimum continuing education requirements. The State is responsible for making that determination on a case-by-case basis. If you disagree with the State's determination regarding the acceptability of your continuing education courses, you should contact the appropriate DBPR officials to discuss those issues.

In reviewing the documentation you provided with your letter, we can understand that Florida would have questions about whether your continuing education meets AQB Criteria.

- The document provided by Allied Real Estate Schools, Inc. ("Allied") does not provide the dates that you took the three courses;
- The title "Federal and State Laws and Regulations" is too vague for a State to determine whether that course covers appropriate appraisal subject matter;
- The title "California Real Estate Principles" is too vague for a State to determine whether the course would be pertinent to a Florida appraiser credential; and
- All three courses indicate that they are distance education courses, but the documentation you provide to us does not document whether the course provider complied with applicable AQB criteria.

DBPR might have questions in addition to the ones we identified above. You should contact DPBR to discuss the specifics of your continuing education issues.

Please contact us if you have questions regarding specific items involved in your credential renewal.

Sincerely,

Ben Henson  
Executive Director