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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

VIA FACSIMILE

July 28, 2006

Charles Clark, Real Estate Commissioner  
Georgia Real Estate Appraisers Board  
Suite 1000, International Tower  
229 Peachtree Street, N.E.  
Atlanta, GA 30303-1605

Dear Mr. Clark:

Thank you for providing us a copy of your June 23, 2006 Notice of Intent to amend §§ 539-1-.01A, 539-1-.02, 539-1-.03, 539-1-.04, 539-1-.05, and 539-1-.06 of the Georgia Real Estate Appraisers Board's rules. We have reviewed the proposed rules and offer one comment.

The proposal, if adopted, requires more documentation from non-resident candidates than currently required. We note that 539-1-.05(11) will require non-resident candidates for classification to produce, "from the licensing body of each state which has licensed the candidate for classification," a credential certification issued no more than 12 months prior to making application in Georgia. The certification must specify the exam type and level taken, if any, and the pre-classification requirements met. It must also include a declaration of good standing at the time of certification.

Historically, the ASC has accepted Georgia's synonymous use of temporary and reciprocal recognition in its extension of a credential to non-resident appraisers, in part, because of the speed and ease of the application process. An aspect of the easy application procedures is that your staff relied on the National Registry to verify the status of non-resident applicants in other jurisdictions.

ASC Policy does not prohibit the more onerous provision requiring a letter of good standing from each in which an individual has held a credential. We, however, encourage the State's sole use of the license history report generated from the National Registry to expedite the application process. We believe the license history reports, almost instantaneously, provide a complete record of an appraiser's standing in all States. Consequently, we discourage the more burdensome requirement proposed. Yet, if adopted, we ask that the staff use the National Registry in conjunction with any other documentation received to verify the status of non-resident candidates.

Please contact us if you have any questions.

Sincerely,

Ben Henson  
Executive Director