

■   ■   ■   ■   ■   ■

# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

November 15, 2004

Rodger L. Fitzwater, Executive Director  
Missouri Department of Economic Development  
Division of Professional Registration  
Missouri Real Estate Appraisers Commission  
3605 Missouri Boulevard  
P.O. Box 1335  
Jefferson City, MO 65102-1335

Dear Mr. Fitzwater:

This letter responds to your November 5, 2004 letter, which we received by fax on November 8, 2004. In your letter, you stated your belief that the Missouri Real Estate Appraisers Commission (“MREAC”) is not required to comply with the Appraiser Qualifications Board’s (“AQB”) interpretation to its criteria that specifies that the passing score on a State credentialing examination is valid for no more than 24 months after the date the examination was successfully completed. You note that the AQB incorporated this interpretation into the AQB criteria beginning on January 1, 2008, and therefore, it will not apply to MREAC until that date.

While the AQB has incorporated this and other interpretations into its revised criteria beginning on January 1, 2008, that does not change the fact that the existing interpretation currently is effective and binding on MREAC and applicants for certification in Missouri. This requirement applies both to persons applying to become certified appraisers for the first time and to appraisers seeking to upgrade from a non-certified classification to certified residential or certified general status. This interpretation became effective on July 1, 2000, and the AQB notified Missouri, and all the other Title XI jurisdictions, about this requirement in an April 28, 2000 letter. Additionally, the interpretation has been included in each issue of the AQB’s *Real Property Appraiser Qualifications Criteria and Interpretations of the Criteria* since that date.

Please contact us if you have further questions.

Sincerely,

Ben Henson  
Executive Director

cc: Marilyn Taylor Williams, Division Director, Professional Registration