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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

February 1, 2006

Kristi Klamet, Executive Director  
Real Estate Appraiser Commission  
Division of Professional Registration  
P.O. Box 1335  
Jefferson City, MO 65102-1335

Dear Ms. Klamet:

Thank you for your January 26, 2006 letter requesting Appraisal Subcommittee (“ASC”) support for several soon-to-be-proposed statutory amendments. These amendments have been designed to amend several statutory provisions authorizing continuing education waivers or extensions. As discussed in our November 18, 2004 field review letter and November 2, 2005 follow-up review letter, those provisions currently do not comply with the Appraiser Qualifications Board’s (“AQB”) certification criteria, which are legally enforceable under Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

We strongly urge the Missouri legislature to adopt the proposed amendments as quickly as possible. As discussed in our January 19, 2006 follow-up review response letter, we are pleased that proposed § 339.519 no longer would authorize the Missouri Real Estate Appraisers Commission (“MREAC”) to waive continuing education requirements for retired or disabled licensed or certified appraisers or for other good cause. We also are pleased that current § 339.525(6) would be deleted, and in its place, new language would be adopted authorizing Missouri to issue inactive licenses or certifications. That language would allow Missouri’s certified and licensed appraisers who otherwise would have been able to obtain a continuing education waiver or extension to obtain some relief while still conforming to AQB criteria.

Finally, regarding § 41.946 which exempts persons in regulated professions who are on active military duty from needing to complete or make up any continuing education, we understand that the AQB plans to revisit this issue during 2006. While we do not expect that the AQB will authorize waivers of continuing education requirements, it is possible that the AQB might authorize extensions based on active military service. You might want to wait until the AQB reviews this issue before addressing § 41.946.

Again, thank you for your continuing efforts to address our concerns. Please contact us if you have further questions or need further assistance in your legislative efforts.

Sincerely,

Ben Henson  
Executive Director