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Appraisal Subcommittee

Federal Financial Institutions Examination Council

March 6, 2003

VIA FACSIMILE

Renee Romero, Board Administrator
New Mexico Real Estate Appraisers Board
P.O. Box 25101
Santa Fe, NM 87504

Dear Ms. Romero:

Thank you for providing us a copy of Senate Bill 562 ("Bill"). We reviewed the amendments and support the proposed changes.

In our August 22, 2001 field review letter and subsequent correspondence, we requested that New Mexico amend its statute to correct inaccurate or unclear references and to make several housekeeping changes to conform the statute to Federal law. In particular, we appreciate the proposed changes in the education and experience requirements for licensed and certified appraisers. We also are pleased to see provisions relating to the funding of contract investigative services and the addition of civil money penalties. These changes should strengthen your State's enforcement program, consistent with the findings in our previous correspondence.

We would like to comment, however, on two aspects of the Bill. First, Section 12 (D) of the Bill implies that registered Apprentices can appraise property in connection with federally related transactions with the payment of the National Registry fee. Registered Apprentices are not eligible to perform appraisals in federally related transactions without the direct supervision of a State certified or licensed appraiser. Second, Section 15 (I) of the Bill states that the temporary practice fee cannot exceed \$200. We would like to remind you that ASC Policy Statement 5 requires the fee not to exceed \$150.

Again, we appreciate the opportunity to review the proposal. Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director