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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

December 14, 2004

Anne Petit, Superintendent  
Ohio Division of Real Estate and Professional Licensing  
77 South High Street, 20<sup>th</sup> floor  
Columbus, Ohio 43215-6133

Dear Ms. Petit:

Thank you for providing a copy of your December 3, 2004 Notice of Public Hearing on several proposed rule changes. The proposed amendments, among other things, would require apprentice appraisers to enter the profession with a minimum level of competency, authorize the use of settlement agreements, and enable the Board collect funds from certified and licensed appraisers for a recovery fund. We have reviewed the proposals and offer the following comment.

The Appraiser Qualifications Board recently adopted substantial changes to the Real Property Appraiser Qualification Criteria. These changes will become effective January 1, 2008. The new Criteria state that a trainee's qualifying experience must be earned under the direct supervision of a supervising appraiser in good standing, who must be State certified. Your proposed rules, however, allow experience under the supervision of a *licensed* or certified appraiser. While conformance with the AQB's trainee criteria is not required under Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended, you may wish to conform to the January 1, 2008 change and reduce this source of possible regulatory confusion in the future.

Please contact us if you have any questions.

Sincerely,

Ben Henson  
Executive Director

cc: Margaret Hambleton, Board Chairperson  
Ohio Real Estate Appraiser Board  
77 South High Street, 20<sup>th</sup> floor  
Columbus, Ohio 43215-6133

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