

□ □ □ □ □ □

Appraisal Subcommittee

Federal Financial Institutions Examination Council

June 2, 2006

Bob Keith, Administrator
Appraiser Certification and Licensure Board
1860 Hawthorne Avenue, NE, Suite 200
Salem, OR 97303

Dear Mr. Keith:

Thank you for the opportunity to review the proposed changes to Chapter 161 of the Oregon Administrative Rules. We have reviewed the proposed rules in that Notice and have one minor, technical comment regarding § 161-020-0010(8). That Section authorizes the Appraiser Certification and Licensure Board (“Board”) to provide renewing appraisers “on active duty in the United States Armed Forces a military deferral/waiver allowing for their otherwise complete renewal application, including fee and evidence of continuing education, to be considered timely if received by the Board within 180 days of release from active duty.”

The Appraiser Qualifications Board recently adopted a new Interpretation to its appraiser qualification criteria regarding the treatment of appraisers returning from active military duty. That Interpretation makes it clear that *waiivers* of unsatisfied continuing education requirements may not be granted to returning servicemen and women; only *deferrals* can be granted. At a minimum, please remove the word “waiver” from this section, as it applies to renewing certified appraisers. For administrative reasons, you also may wish to make this change applicable to renewing appraisers who hold non-certified credentials. Finally, you may wish to include language in the section, consistent with the new Interpretation, clarifying that affected appraisers will remain on active status during the deferral period.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director