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Appraisal Subcommittee

Federal Financial Institutions Examination Council

January 17, 2001

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Dear [DELETION]

Thank you for your October 30, 2000 letter describing the difficulties you have experienced in obtaining a Puerto Rico Certified Residential appraiser credential. We apologize for our delayed response. We were awaiting information from the Puerto Rico Board of Real Estate Appraiser Examiners (“Board”) regarding your application.

You asked several questions in your letter:

1. “Does a CG appraiser that relocates to another state, say Florida from, say Maryland with 20 years of experience has to start all over again in order to obtain its Florida Certification?”

Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended, (“Title XI”) requires States to conform to the Appraiser Qualifications Board’s (“AQB”) minimum qualifications criteria for certified appraisers. Title XI permits States to impose additional provisions, provided those provisions are not inconsistent with the AQB criteria. Title XI and the AQB criteria are silent regarding how States implement the AQB criteria, including experience criteria. Therefore, a State can require an applicant to obtain part or all of his/her qualifying experience within a given State.

2. “Or any other states including territories?”

It is unusual for a State or Territory to refuse to accept appraiser experience gained in other States. As discussed above, however, States can have such a provision. Puerto Rico, therefore, can limit acceptable appraiser experience to experience obtained in Puerto Rico. Puerto Rico, in fact, requires an appraiser to have 24 months of experience valuing Puerto Rico properties under a Puerto Rico license before he or she may be issued a Certified General credential.

3. “Why am I not qualified to obtain a Residential Certification in my state?”

As discussed above, a State must conform to the AQB criteria for certified appraiser qualifications, but may exceed those criteria if it chooses to do so. According to the Board, you have not met all of Puerto Rico’s requirements – specifically, you have not accumulated 24 months of valuing Puerto Rico properties under a Puerto Rico license. The Board informed us that you would meet this requirement in April 2001.

Our next scheduled on-site review of Puerto Rico's appraiser regulatory program is March 2001. During that review, we will review your application file in detail.

Sincerely,

Ben Henson
Executive Director