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Appraisal Subcommittee

Federal Financial Institutions Examination Council

July 16, 2008

Mr. William B. Tiller, Education Manager
South Carolina Real Estate Appraisers Board
Department of Labor, Licensing and Regulation
110 Centerview Drive, Suite 201
P.O. Box 11847
Columbia, South Carolina 29211-1847

Dear Mr. Tiller:

We have considered the request you made through Jenny Tidwell of this office for an exception to the 24-month examination validity period for one of your appraisers. We understand that your request was based on an individual that currently holds the Trainee level credential issued by the South Carolina Real Estate Appraisers Board ("Board"). That individual has completed the education towards and passed the examination for the Certified General level credential. We further understand he was working towards obtaining the required experience when he, as an officer in the Navy Reserve, was activated with imminent deployment overseas. Because this deployment would prevent him from completing his experience within the 24-month examination validity period, you requested that the Appraisal Subcommittee ("ASC") make an exception in his case and allow him to complete the necessary experience upon his return, without requiring that he retake the examination at that time.

The 24-month validity of examination results is a requirement of the Appraiser Qualifications Criteria. However, we received the attached letter from the Appraiser Qualifications Board ("AQB") on March 31, 2008 regarding this issue. That letter suggests that the ASC has the discretion to view actions taken by States to assist those seeking licensure or certification, but unexpectedly activated for military service with leniency.

The ASC has long encouraged that application of the AQB Criteria reflect unconditional support for individuals serving our country, and that implementation of the AQB Criteria accommodate those serving in active military duty. Therefore, in response to the AQB's letter, the ASC sent the attached letter. It acknowledges that the ASC will consider reasonable allowances made by the States regarding time-sensitive requirements to accommodate the needs and limitations of individuals who are placed on active military duty while in the process of obtaining a license or certificate, consistent with the spirit and intent of the AQB criteria. This is permissible provided that the accommodation is commensurate with the time of deployment.

Thank you for your request and please contact us if you have any additional questions.

Sincerely,

Virginia M. Gibbs
Chairman

cc: Herbert R. Sass III, SC Real Estate Appraiser Board Chairman
John R. Pitts, SC Real Estate Appraiser Board Administrator