ARIZONA BOARD OF APPRAISAL

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February 24, 1997

Mr. Fred D. Finke, Chairman Appraisal Subcommittee 2100 [Deletion] Avenue, Suite 200 [Deletion], !.C. 20037

Dear Mr. Finke:

We are in receipt of your letter regarding the Appraisal Subcommittee ("ASC"), November 7-8, 1996, field review of the Arizona Board of Appraisal ("Board"). We have noted all recommendations given to the Board for consideration.

The following comments are intended as response to the recommendations:

• The Board should ensure that all complaints receive equitable and consistent disposition.

In considering your recommendation to reopen file No. [redaction] the Board voted to reopen the case to determine if any preferential treatment was given or if the dismissal was equitable and consistent with disciplinary actions taken regarding other appraisers. The Board will begin their review of this matter on March 11, 1997 and will inform you of the outcome as soon as a determination has been made.

• The Board should Initiate the process of updating the necessary regulations in a timely manner to ensure that appraisers in Arizona are preparing appraisals in accordance with the most current version of USPAP.

Because the Arizona State constitution makes it impossible to incorporate any document into being before the date of its adoption, we cannot incorporate "future versions" of USPAP into our rules. We will however attempt to change our rules as quickly as possible following the adoption of each edition of the USPAP. The rule making process is not a very speedy procedure in Arizona. The last time we made a change in our rules we began trying to incorporate the 1994 edition of USPAP into our rules and by the time the process was completed (18 months) we were able to insert the 1995 edition. We are now in the process of changing the rules to incorporate the 1997 edition of USPAP.

• Board policy allows appraisers to receive their certificate or license prior to paying the National Registry fee.

At the November 8, 1996 meeting a discussion was held concerning the Federal Registry fee. At that time the Board decided that an administrative policy requiring appraisers to pay the National Registry fee before receiving a certificate or license would be in order. This policy is now in effect.

The Board staff is submitting our documentation of Federal Registry fees paid to the ASC in hopes that any question of unpaid fees will be resolved.

If you have any questions, please do not hesitate to contact us at 602-542-1539.

Sincerely,

Shirley L. Berry Executive Director