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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

August 25, 2000

Charles Clark, Commissioner  
Georgia Real Estate Appraisers Board  
International Tower - Suite 1000  
229 Peachtree Street, N.E  
Atlanta, GA 30303-1605

Dear Mr. Clark:

Thank you for your July 20, 2000 letter following up on issues first raised in our April 27<sup>th</sup> field review letter, and discussed in subsequent written and telephone communications. At issue is whether certain provisions of Georgia's continuing and distance education provisions are consistent with the Appraiser Qualification Criteria promulgated by the Appraisal Foundation ("AQB Criteria").

Based on the information and examples provided in your July 20<sup>th</sup> letter, we now conclude that Georgia's continuing education program, specifically as it applies to "carry over" issues, conforms to the AQB Criteria.

Regarding distance education, we agree that Georgia's requirements are much more comprehensive than the minimum requirements established in the AQB Criteria. States may establish and enforce more stringent requirements than the AQB's minimum criteria. It remains Georgia's responsibility, under Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, to ensure that the State, at a minimum, conforms to the AQB Criteria for certified appraisers, in addition to any more stringent requirements it may establish.

We very much appreciate your efforts to discuss and resolve these issues. Please contact us if you have any questions.

Sincerely,

Ben Henson  
Executive Director

