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REAL ESTATE APPRAISER PREPROGRAM
STATE OF HAWAII
PROFESSIONAL & VOCATIONAL LICENSING DIVISION
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
P.O. BOX 3489
HONOLULU, HAWAII 96801
September 3, 1999

Ben Henson, Executive Director
Appraisal Subcommittee
Federal Financial Institutions Examination Council
2000 K Street, NW Suite 310
Washington, D.C. 20006-1809

Dear Mr. Henson:

This is to confirm what is **required** of the Hawaii Real Estate Appraiser Program. We understand that we must verify that certified residential appraisers (CRA), who upgraded from state licensed appraiser (SLA) status after January 1, 1995, did indeed take the CRA examination which was approved by the Appraisal Qualifications Board (AQB).

In reviewing our files, we came across the following:

- A State Licensed Appraiser's license expires in 12/95 and is forfeited in 12/97. He applies for a CRA license in 3/98 and is approved in 4/98. He has been unlicensed from 12/95 to 4/98. Since this person already had his SLA examination on file with the Department, he was allowed to use that examination toward his CRA license.
- A Transitional State Licensed Appraisers (TLA) license expires in 12/93. He applies for a CRA license in 3/95 and is approved in 4/95. This person was never a SLA, but took the SLA examination to obtain his TLA license, and was allowed to use that examination toward his CRA license. This person was unlicensed from 12/93 to 4/95.

In both of the examples above, we would consider the applicant for a CRA license as a new applicant, not an upgrade from a SLA. In the first example, the person did not hold a valid SLA license at the time of application for the CRA license. In the second example, this person was never a SLA. In addition he was not licensed at the time of application for the CRA license, therefore we consider him as a new applicant. How does the Appraisal Subcommittee define "upgrade"?

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Also, we have a few CRA's who were licensed after 1 -1 -95, but took the CRA examination prior to 1-1-95. Are these licensed CRA's in compliance with federal requirements?

Thank you for your attention to this matter. Should you have any questions, please call me at (808) 586-2704.

Sincerely,



Candace Ito
Executive Officer