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Appraisal Subcommittee

Federal Financial Institutions Examination Council

December 21, 2005

Sally Pritchett, Executive Director
Kansas Real Estate Appraisal Board
1100 S.W. Wanamaker Road, Suite 104
Topeka, Kansas 66604

Dear Ms. Pritchett:

Thank you for your November 4, 2005 letter confirming previous emails that the four certified appraisers credentialed based on outdated examinations have successfully completed the appropriate examination. You also included with your response proposed regulatory changes. These changes, if adopted, would eliminate: (1) the regulation allowing Kansas Real Estate Appraiser Board (“Board”) member to claim 14-hours of continuing education for their Board participation; (2) the reference to the American Council on Education in your continuing education regulations; and (3) the authority for applicants to claim experience credit for teaching. These proposals, if adopted, would correct all inconsistencies between Kansas’ regulations and the Appraiser Qualifications Board criteria noted in our May 16, 2005 field review letter.

Assuming that the regulatory proposals are adopted, the Board has fully addressed all of the concerns stated in our field review letter, other than the issue regarding the ability of our staff to attend non-public Board meetings. We sent a response to Ms. Nohe regarding that issue on November 14, 2005. As fully discussed in that letter, we expect that, in the future, ASC staff will be permitted to attend any and all Board meetings, including any non-public meetings or discussions that might occur among Board members, staff, or Board components.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director