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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

November 14, 2000

Gordon Maynard, Chairman  
New Hampshire Real Estate Appraiser Board  
25 Capitol Street, Room 426  
Concord, NH 03301-6312

Dear Mr. Maynard:

Thank you for your cooperation and your staff's assistance in the October 3-4, 2000 Appraisal Subcommittee ("ASC") review of the New Hampshire Real Estate Appraiser Board ("Board") and appraiser regulatory program ("Program"). We are pleased to inform you that, based on our review, your Program functions effectively and, in most respects, in a manner consistent with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended ("Title XI"). The following areas need your attention.

- **The Board has not adopted administrative rules to implement statutory temporary practice authority.**

The Board's enabling statute gives the Board the authority to issue temporary practice permits, in accordance with administrative rules adopted by the Board. Although, in practice, the Board complies with Title XI's temporary practice provisions, the Board needs to adopt appropriate administrative rules as provided in its enabling statute that are consistent with the requirements of Title XI and ASC Policy Statement 5.

- **The Board does not document adequately its education review process.**

Although the Board reviews qualifying and continuing education courses, the Board's education files do not contain adequate documentation to support whether the courses met the Appraiser Qualifications Board ("AQB") minimum criteria. The Board needs to establish and maintain file documentation to support the course approval/disapproval process. At a minimum, the documentation needs to include enough information to support whether courses meet the AQB criteria.

Please respond to our findings and recommendations within 60 days from the date of this letter. Until the expiration of that period or the receipt of your response, we consider this field review to be an open matter. After receiving your response or the expiration of the 60-day response period, whichever is earlier, this letter, your response and any other correspondence between you and the ASC regarding this field review become releasable to the public under the Freedom of Information Act and will be made available on our Web site.

If you have any questions, please contact us.

Sincerely,

Thomas E. Watson, Jr.  
Chairman