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Appraisal Subcommittee

Federal Financial Institutions Examination Council

September 8, 1998

Renato Donato
Assistant Secretary of State
Division of Licensing Services
84 Holland Avenue
Albany, New York 12208-3490

Dear Mr. Donato:

Thank you for coming to Washington last week along with Real Estate Appraiser Board Chair Jack Rose and Member Dominick Pompeo. We welcome the opportunity to hear your plans for resolving issues presented in our July 24, 1998 letter to the board.

As a result of this meeting I will discuss with the AQB this week, their interpretations of qualification criteria to determine if an applicant's satisfaction of the education and experience requirements at an early date, and under criteria acceptable at the time of application, are sufficient when the examination is not completed until a later date under increased requirements.

The ASC staff understands your greatest concern is with the decertification of appraisers who were issued licenses or certificates after January 1, 1998 and that you have stopped certification in New York until the problem is resolved. However, the emergency rules adopted by the board at the August 10, 1998 board meeting have not been published so are not yet in effect.

You presented several proposals for dealing with the certification issue during our meeting that the ASC should review. I understand that you will write to the ASC with these proposals by October 1, 1998 and possibly make a presentation at their October 13, 1998 meeting.

Please call me with any questions.

Sincerely,

Ben Henson
Executive Director