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Appraisal Subcommittee
Federal Financial Institutions Examination Council

September 17, 1997

Mr. James W. Fauver, Chairman
Utah Appraiser Registration and Certification Board
Division of Real Estate
Utah Department of Commerce
160 East 300 South
Salt Lake City, UT 84145-0806

Dear Mr. Fauver:

Thank you for your cooperation and the Division staffs assistance in our July 28-29, 1997 review of the Utah Appraiser Registration and Certification Board's ("Board") regulatory program. We appreciate the changes you made in the Board's program following our 1992 field review. We realize that several of the program changes required amendments to statutes and regulations and that such changes are not easily accomplished.

As a result of our current review, we have determined that the following changes are needed to improve your program and comply with Title XI.

- **The Board must provide for at least one renewal of Temporary Practice permits.**

Your statute and regulation authorize a six-month, nonrenewable temporary practice permit. As you know, we recently adopted changes to our Policy Statements pertaining to temporary practice. As provided in revised Policy Statement 5, each State must allow an appraiser to renew a temporary practice permit at least once. While such an extension may seldom be needed, we believe that it is important to afford the opportunity for renewal should the necessity arise. To comply with Title XI, you must initiate the necessary actions to amend your statute and regulation to implement this policy.

- **There is a discrepancy between the National Registry and the State's record of certified and licensed appraisers.**

Based on the most recent National Registry data that you submitted to us, there is a difference of 57 appraisers between your records and the National Registry. After processing your data, we identified 57 appraisers for whom Registry fees are owed, but were not submitted. Our staff is working with the Division of Real Estate staff to resolve this difference.


- **It appears that the Board does not receive adequate funding for training and educational purposes and other important appraisal functions.**

We have noted Utah's lack of attendance and participation at national and regional appraiser-related conferences (particularly those conducted by us and by other State appraiser regulatory organizations) during recent years. We believe that the training, educational benefits and

exchange of ideas and solutions that occur at these meetings are very beneficial to State appraiser regulatory officials. We encourage you to attempt to obtain additional budgetary funding to allow Board and staff representatives to attend these conferences.

Please respond to this letter within the next 60 days. If you have any questions regarding these matters, please do not hesitate to contact us.

Sincerely,



Herbert S. Yofles
Chairman