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Appraisal Subcommittee
Federal Financial Institutions Examination Council

October 26, 2007

Mr. Paul Morgan, Chairman
Idaho Real Estate Appraiser Board
1109 Main Street, Suite 220
Boise ID 83702-5642

Dear Mr. Morgan:

Thank you for your October 15, 2007 letter regarding the Appraisal Subcommittee's ("ASC") August 27-29, 2007 field review of Idaho's real estate appraiser regulatory program ("Program").

In your letter, you reported that, since our August field review, the Bureau of Occupational Licenses ("Bureau") completed its most recent continuing education audit and found that all audited appraisers complied with the Appraiser Qualifications Board's continuing education criteria. Please continue sending your monthly summaries regarding your continuing education audits to Denise Graves at denise@asc.gov.

Finally, you asked if the Idaho Real Estate Appraiser Board ("Board") must ask for residential appraisal reports from Certified General applicants. ASC Policy Statement 10 G 3. states, in part, "When awarding experience credit toward certification, States need to make reasonable determinations that the applicant is capable of performing the work authorized by the requested credential. For example, when awarding a certified general credential, States need to review both residential and commercial work product." Therefore, the Board, in general, needs to review at least one residential work product from each certified general applicant to determine USPAP compliance. The Board, however, would not need to perform such a review if the certified general applicant is upgrading his or her credential, and the Board previously performed a USPAP compliance review of the appraiser's residential appraisal work product.

Please contact us if you have further questions.

Sincerely,

Ben Henson
Executive Director

cc: Tana Cory, Bureau Chief