



Mississippi Real Estate Appraiser
Licensing and Certification Board

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November 8, 2007

Mr. Marc L. Weinberg
APPRAISAL SUBCOMMITTEE
2000 K. Street, NW
Suite 310

IN RE: RESPONSE TO LETTER DATED 10/31/2007

Dear Mr. Weinberg:

Please accept this letter as a timely response to your letter dated October 31, 2007 (received in our office on November 6, 2007) as addressing the concerns of the Appraisal Subcommittee (ASC) following the most recent Staff Field Review. The staff of the Mississippi Real Estate Appraiser Licensing and Certification Board (MAB) has researched "all" USPAP courses that have been submitted to our office for approval and we have been unable to identify any courses that are not fully compliant with the criteria established by the Appraisal Qualifications Board (AQB). We have researched and reviewed all submissions, approvals, rejections, and course documents back to January 1, 2005. While not wanting to appear presumptuous, we are of the opinion that your June 27, 2007 field review letter indicated that specific USPAP courses or other approved courses were not AQB compliant.

The MAB approval process for Qualifying Education (QE) and for Continuing Education (CE) courses is such that all courses are approved for no longer than a 2-year period of time. The only USPAP courses which will be considered eligible for approval after January 1, 2008 will be those courses which have been revised to comply with the 2008 USPAP.

The USPAP courses that have been approved since June 1, 2006 are all compliant with the June, 2006 edition of USPAP. The majority, if not all, of the courses which have been approved by the MAB are the identical courses that had been reviewed previously, they had been MAB approved, and they were in the MAB files during your April, 2005

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Compliance Field Review of our agency. The review letter that was sent to the MAB following the April, 2005 visit did not indicate that the MAB had approved any courses which were not AQB compliant.

We have, therefore, completed our detailed review of USPAP courses beginning as of July 1, 2005, which is the date that the new staff and personnel was hired by the Appraisal Board. Since July 1, 2005, the MAB has approved the renewal of seventeen (17) QE courses as being "15-Hour USPAP" compliant and the MAB has approved only one (1) new USPAP course that it considered compliant. In a like manner, since July 1, 2005, the MAB has approved the renewal of ten (10) CE courses as being "7-Hour USPAP Update" courses and five (5) new CE courses as being "7-Hour USPAP Update" courses. As hard as we have tried, we are still unable to identify the courses you are referencing in your Review Letter as being non-compliant. To further assist this agency in complying with the guidelines of the ASC, the MAB requested a listing of the courses that are considered to be non-complaint. Even though we have not received a response from the ASC, the MAB staff believes that the protocols that are presently in place are such that no licensee will be granted credit for any course that does not meet the criteria established by the ASC. If you do not have a listing of MAB approved courses which are not AQB compliant, it is our conclusion that all courses completed by MS appraisers were compliant.

From July 1, 2005 to the present, all applicants that have applied for a Licensed Appraiser, Certified Residential Appraiser License, or a Certified General Appraiser License have been required to furnish proof that they successfully completed a "15-Hour USPAP course (QE) since January 1, 2003. This requirement has been enforced for those licensees who had taken and passed a USPAP course prior to 2003.

Included is a listing of appraisers certified from July 2005 to October 2007 with the USPAP provider and date the course was taken.

Sincerely,

Michael E. McGee
MAB Deputy Director

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