Answered 4/6-14-04

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## STATE OF TENNESSEE DEPARTMENT OF COMMERCE AND INSURANCE OFFICE OF LEGAL COUNSEL

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June 9, 2004

**CERTIFIED MAIL** 

Mr. Steven D. Fritts, Chairman Appraisal Subcommittee 2000 K Street, NW, Suite 310

RE: Follow-up to April 26th Correspondence

Dear Mr. Fritts:

I am writing to follow-up on our April 26, 2004 request for clarification of Appraiser Qualification Board criteria for examinations, in an effort to prevent any future misinterpretations. The Real Property Appraiser Qualification Criteria and Interpretations of the Criteria adopted February 16, 1994 and effective January 1, 1998, states in the interpretation section that "Applicants have a reasonable period of time (up to 24 months after state approval) to take the examination. Successful completion of the examination is valid for a period of 24 months." (adopted July, 2000). Our Commission Staff's interpretation of this is that an applicant has up to twenty-four (24) months in which to take the certification examination after the state approves the applicant's education. An applicant then has another twenty-four (24) months in which to complete his or her experience requirement from the date that he or she successfully completes the examination. I would appreciate it if you could advise us if this interpretation is correct so that we may properly advise our licensee and certificate holders.

We look forward to your response and thank you for your attentions and courtesies in this matter.

Very truly yours,

Alison G. Zane Staff Attorney

CC: Sandy Moore, Administrative Director of the Tennessee Real Estate Appraiser
Commission
Lewis S. Pipkin, Chairman of the Tennessee Real Estate Appraiser Commission