



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION

JAY W. DeBOER  
DIRECTOR

August 30, 2007

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Virginia M. Gibbs, Chairman  
Appraisal Subcommittee  
2000 K Street, NW  
Suite 310

Dear Ms. Gibbs:

Thank you for your letter regarding the Appraisal Subcommittee review of Virginia's real estate appraiser program. I will address the areas which your review indicated needed improvement.

Virginia is working with Ray Seward to ensure that it is reporting correct data regarding disciplinary action to the National Registry. The Virginia Real Estate Appraiser Board (the Board) will be submitting amended regulations to amend its regulations through an exempt action to conform with the 2008 AQB criteria changes and to remove ACE/Credit as an approved source for distance learning. The Board will also amend its regulations in this action to require that inactive license/certificate holders complete all continuing education that would have been required had their license not been inactive prior to activating the license.

The Board received advice from its legal counsel with regard to retroactively requiring an individual who has already activated his license to provide more continuing education than the Board's regulations require to comply with the AQB Interpretation. The Board was told it may risk multiple lawsuits if it proceeds to require continuing education that is not required by its regulations. The Board's counsel recommended that the Board revise their regulations in order to comply with the ASC's recommendations. Counsel also recommended that the Board not retroactively require any of the individuals who have already activated their licenses to provide more continuing education than that which is required by the regulations nor should the Board downgrade any appraiser for failure to provide more continuing education. As stated above, the Board is amending its regulations to comply with the September 2005 Interpretation.

I hope this information responds to your findings. If you have any questions, please feel free to contact me.

Sincerely,

REAL ESTATE APPRAISER BOARD

SEP 05 2007

Christine Martine  
Executive Director

Telephone: (804) 367-8500

9960 Mayland Drive, Suite 400, Richmond, VA 23233-1463

<http://www.dpor.virginia.gov>

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