

**Appraisal Subcommittee**  
*Federal Financial Institutions Examination Council*

August 22, 1997

Stephen G. Williams, Chairman  
Appraiser Qualifications Board  
The Appraisal Foundation  
1029 Vermont Avenue, N.W, Suite 900  
Washington, D.C 20005-3517

Dear Mr. Williams:

We have enclosed two August 4, 1997 letters from State appraiser regulatory agencies for your attention. Both letters address the Appraiser Qualifications Board's ("AQB") June 16, 1997 letter responding to our inquiry about the AQB 's continuing education standards.

The first letter is from Lynne Schmolke, Board Administrator for the New Mexico Real Estate Appraisers Board. Her State has a three-year continuing education cycle and a one-year credential renewal period, which is inconsistent with your recent interpretation of your continuing education standards. New Mexico requests flexibility from the ASC, which only the AQB can provide under Title XI.

The second letter is from Jim Martin, Executive Director for the Arkansas Appraiser Licensing & Certification Board. Arkansas has a two-year continuing education cycle and a one-year renewal period. They are considering shifting to a two-year renewal cycle and/or an annual continuing education period. They raise the issue of "carryover" of excess continuing education credits from one renewal period to the next period. They believe that your interpretation would not allow such carryover, and, for the reasons stated in the letter, "suggest that you take another look at the issue of allowing carry over in view of the limited course opportunities for quality education." Mr. Martin represents that some States already allow carryover.

Before addressing the carryover issue to the States, we would like to have a written opinion from the AQB. Please advise us at your earliest convenience about whether carryover would be consistent with the AQB's continuing education standard. If you determine that carryover is inconsistent with your standard, we will notify States of this inconsistency and their need to modify their practices, if carryover already is allowed, to meet your standards and Title XI. We will use your written response to us as an attachment to our notification to the States. Because many States are addressing the continuing education issue at this time, your prompt response regarding these issues would be appreciated.

Sincerely,

Ben Henson  
Executive Director

Enclosures