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Appraisal Subcommittee

Federal Financial Institutions Examination Council

June 14, 1999

Manuel M. Pangelinan, Chairman
Board of Professional Licensing
PO Box 2078
Saipan, MP 96950

Dear Mr. Pangelinan:

Thank you for the Board of Professional Licensing's ("Board") cooperation and your staff's assistance in the May 4, 1999 Appraisal Subcommittee ("ASC") review of the Commonwealth of the Northern Mariana Islands' ("CNMI") appraiser regulatory program ("Program"). We are pleased to inform you that, based on our review, most aspects of your Program function well. The following areas, however, need attention.

- **Under Board regulations, applicants for temporary practice must take and pass a "local" examination.**

Applicants for temporary practice are required to pass the abbreviated "Part B" of the "local" examination. The local exam is intended to ensure that new and visiting appraisers are aware of statutes and regulations that affect property ownership and transfer in CNMI. Under Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 ("Title XI"), temporary practice requirements must not be burdensome or excessive. Under Title XI and ASC Policy Statement 5, the local examination requirement is burdensome and must be eliminated for temporary practice applicants.

We note that a pending amendment to the Board's enabling legislation, if passed, will address temporary practice by adding a temporary practice section that specifically allows any person licensed or certified by another jurisdiction to practice in CNMI for one year. Further, it states that an extension will be granted to complete a specific assignment. The amendment does not mention passing a local examination as a condition of approval. We will monitor the legislative status of this bill.

- **National Registry Data is not submitted in a timely fashion.**


CNMI does not always provide monthly National Registry data as required by ASC Policy Statement 8. While data rarely change, CNMI must submit, at the very least, a letter or email each month verifying that no changes have occurred.

Your response should be submitted for our receipt within 60 days from the date of this letter. Until the expiration of that period or the receipt of your response, we consider this field review to be an open matter. After receiving your response or the expiration of the 60-day response period, whichever is earlier, this letter, your response and any other correspondence between you and the

ASC regarding this field review become releasable to the public under the Freedom of Information Act and will be made available on our Web site.

If you have any questions, please contact us.

Sincerely,



Herbert S. Yolles
Chairman