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

September 24, 2010

Appraisal Qualifications Board  
The Appraisal Foundation  
1155 15<sup>th</sup> Street, NW  
Suite 1111  
Washington, DC 20005

RE: Appraisal Subcommittee Staff Comments on the July 1, 2010  
Exposure Draft applying to the *Real Property Appraiser Qualification Criteria*

Dear Appraisal Qualifications Board,

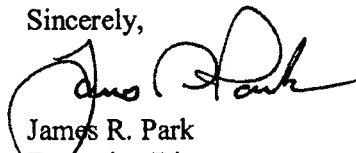
The Appraisal Subcommittee (ASC) staff appreciates the opportunity to comment on the Appraiser Qualifications Board's (AQB) July 1, 2010 Exposure Draft of Interpretations applying to the *Real Property Appraiser Qualification Criteria* (AQB Criteria). The following comments reflect only the opinions of the ASC staff, and are not the opinions of the ASC or its member agencies.

Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended (Title XI) empowered the ASC with the responsibility to monitor and review the practices, procedures, activities, and organizational structure of the Appraisal Foundation and its boards. Title XI also empowered the ASC to monitor State appraiser certifying and licensing agencies for the purpose of determining whether a State agency's policies, practices, and procedures are consistent with Title XI. Additionally, the ASC is responsible for ensuring that States effectively adopt and enforce AQB Criteria in the credentialing of their State appraisers. Accordingly, ASC staff has reviewed the Exposure Draft particularly in light of whether the proposed changes would enhance the understandability and enforceability of the AQB Criteria as it relates to the validity period for examination results.

We are concerned the proposed language may not completely correct the State and ASC enforcement issues addressed. Specifically, the new language refers to a "complete application", which implies that an applicant only fills out one application to satisfy the entire credentialing process. In fact, the process varies. For example, some States have an application to initiate the entire process for becoming an appraiser, then another application to sit for the exam, then a separate application to submit experience credit. Enforceability will likely be difficult in that there is no clear standard for a "complete application" from State to State. In addition, the proposed interpretation does not provide a means to ensure that a State will complete its processing of applications and issue a credential in a timely manner. States could still take months or even years to actually issue the credential.

Thank you again for the opportunity to comment. Please contact us if you have any questions.

Sincerely,

  
James R. Park  
Executive Director