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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

June 22, 2007

Mr. Jay B. Clark  
6515 W. Villa Theresa Drive  
Glendale, AZ 85308

Dear Mr. Clark:

This letter responds to your May 1<sup>st</sup> letter in which you expressed your concerns about the effectiveness of the Arizona Board of Appraisal. Specifically, you asserted that the Board fails to interact with and/or communicate with Arizona appraisers appropriately, and fails to take appropriate disciplinary actions when investigating complaints. You stated that in the past two years, “there have been no revocations of any appraiser licensed by the board and only two persons who chose to surrender their license rather than face litigation.”

In actuality, according to data in our National Registry database and available on our Web site, from January 1, 2005 through June 15, 2007, Arizona revoked four appraiser credentials and suspended four appraiser credentials in addition to the two voluntary surrenders in lieu of disciplinary action that you noted. Additionally, Arizona, like other States, takes a number of disciplinary actions that are not public information on our Web site. These actions include requiring the payment of monetary penalties, completion of specified education, and placement on probation.

As part of our responsibilities under Federal law, on a regular basis, the Appraisal Subcommittee reviews and evaluates State appraiser regulatory programs to determine whether the programs are in compliance with Federal law. Our most recent on-site field review of Arizona occurred in November 2005. The results of our field review were communicated to the Arizona Board in our January 19, 2006 field review letter. That letter is available in the FOIA Reading Room section of our Web site – [www.asc.gov](http://www.asc.gov).

Many of the concerns you expressed in your letter, such as the Board’s communication with and responsiveness to appraisers, are State issues and not subject to Federal law. You need to contact the appropriate State agency regarding those concerns.

Regarding issues that fall within our purview, such as effective supervision of appraisers and complaint investigations, we need specific examples to investigate. If you provide us with specific examples in which you believe the Board failed to adequately investigate and/or take appropriate disciplinary action, we will review those actions during our next on-site field review.

If you have any questions, please let us know.

Sincerely,

Ben Henson  
Executive Director