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Appraisal Subcommittee

Federal Financial Institutions Examination Council

VIA FAX

January 2, 2002

Bob Keith, Administrator
Oregon Appraiser Certification & Licensure Board
1860 Hawthorne Avenue NE, Suite 200
Salem, OR 97303

Dear Mr. Keith:

Thank you for providing us with an opportunity to review the Oregon Appraiser Certification & Licensure Board's ("Board") proposed changes to Oregon Administrative Rules ("OAR") Chapter 161. We have the following comments.

First, the proposals do not account for recent October 2001 changes in the Appraiser Qualifications Board's ("AQB") Criteria relating to improving Uniform Standards of Professional Appraisal Practice ("USPAP") education. These changes will become effective on January 1, 2003, and the Board must have conforming amendments to its rules in place at that time. In that regard, Oregon's USPAP course instructor qualifications will need amendment to reflect the AQB's requirement that persons wishing to teach USPAP must be AQB-certified under its USPAP instructor qualification program. Oregon also needs to require its appraisers to complete the AQB's seven-hour National USPAP Update Course, or its equivalent, at a minimum of every two years. To obtain details regarding these changes, please refer to the Appraisal Foundation's Web site at <https://www.appraisalfoundation.org/html/qualifications.asp?FileName=program>.

Next, please consider amending § 161-020-0140, *Correspondence Courses and Video TV Educational Offerings*, to conform to the AQB's distance education Criteria and two recently adopted Interpretations to the Criteria. These Interpretations are located on the Foundation's Web site at <https://www.appraisalfoundation.org/html/PDF-Images/CAPDEInterpretation.pdf>. Also, the AQB's Distance Education Criteria may be viewed on the Foundation's Web site at https://www.appraisalfoundation.org/html/qualifications.asp?FileName=real_property.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director