



GOVERNMENT OF THE VIRGIN ISLANDS  
OF THE  
UNITED STATES

*Department of Licensing and Consumer Affairs*

April 30, 2009

Attention: Virginia Gibbs, Chairman  
Appraisal Subcommittee  
1401 H Street, NW, Suite 760

MAY 11 2009

Dear Ms. Gibbs:

In response to your letter of January 8, 2009 I offer the following:

**Several sections of the USVI's rules and regulations are inconsistent with Appraiser Qualifications Board (AQB) criteria** – Amendments to both the REA Rules and the VI Code were approved by the Board and sent to Government House on February 27, 2009, for approval by Governor John DeJongh.

**USVI's temporary practice procedures do not conform to Title XI and ASC Policy Statement 5** – Local Virgin Islands law requires an applicant to submit to the licensing agency a tax compliance letter from the Internal Revenue Bureau prior to the issuance of a license. The application for a temporary permit was revised and met Board's approval; however, the office is unable to issue a permit subject to receipt of the tax compliance letter. Repeated attempts have been made by the Commissioner and the Board to the Bureau to speed up the process but we have been unable to gain their cooperation. Be advised that not to require the compliance letter would require an act of the Legislature and I do not believe that this would be favorably received by the Senators unless pressure came from the Federal Government.

**USVI failed to submit appraiser data for the National Registry at least monthly** – We have the new system in place and this should no longer be an issue.

Please excuse the delay in this response. If I can provide additional information, feel free to contact me.

Sincerely,

Elisga Rock Runyon  
Board Chair