



OKLAHOMA REAL ESTATE APPRAISER BOARD

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December 9, 1998

DEC 11 1998

Herbert S. Yolles, Chairperson
Appraisal Subcommittee
Federal Financial Institutions Examination Council
2000 K Street, NW, Suite 310
Washington, D.C. 20006

Dear Mr. Yolles:

The members of the Oklahoma Real Estate Appraiser Board ("Board") extend their appreciation to the Appraisal Subcommittee ("ASC") for granting the requested extension of the response time until December 11, 1998. This letter provides the responses to themselves findings and recommendations as set out in your letter to the Board dated September 14, 1998.

- **Oklahoma's fee structure for temporary practice permits is structured such that, on occasion, the fee exceeds \$150 per assignment.**

The Board accepts this recommendation by the ASC and will attempt to place a cap of \$150 per appraisal assignment on temporary practice fees.

- **In some cases, the Board is not exercising its jurisdictional responsibilities in the complaint investigation and resolution process.**

The Board accepts this recommendation by the ASC. The function of determining jurisdiction on complaints will be assigned to board staff. The chart supplied to appraisers has been revised to quote the statutory language (copy attached).

- **For pre-licensure and pre-certification education, the Board has approved a number of highly specialized courses that do not appear to meet Appraiser Qualifications Board criteria.**

The Board accepts this recommendation by the ASC. The Board will complete a comprehensive rebuilding of the education system to be undertaken as follows: 1) Divide the pre-licensing education into two categories, basic and upgrade, and separate the courses into appropriate categories along AQB recommended guidelines; 2) implement redesigned education forms as recommended by staff, and 3) communicate with providers to implement new forms and determine which providers wish to continue. This will take some time to accomplish, but is a necessary and worthwhile endeavor.

- **The Board grants experience credit to assessors applying for licensure and certification based on an affidavit from the assessor's supervisor. This practice may not meet AQB criteria.**

The Board accepts this recommendation by the ASC. The Board staff will prepare an appropriate log form and accompanying instructions for issue to those applying for certification. Mass appraisers will be required to submit copies of work product in the areas identified and coordination will be effected with the Ad Valorem Division of the Oklahoma Tax Commission to distribute a letter to each of the county assessor's offices detailing these requirements.

- **Board rules permitting members of the Board and its committees to apply time spent in service to the State toward fulfillment of their continuing education requirement may not conform to AQB criteria.**

A letter was sent to the AQB on November 2, 1998 requesting clarification on the ASC's recommendation (letter attached). As of December 4, 1998, the Board had not received a response from the AQB and a second request was sent on that date. As soon as we receive a reply from the AQB, the Board will respond further to this recommendation.

- **Most of the States maintaining agreements with Oklahoma do not offer reciprocal recognition at the license level due to Oklahoma's absence of an experience requirement.**

The Board appreciates this recommendation. However, the Board does not wish to establish an experience requirement for the license level at this time. See 12 U.S.C.A. §3345(e).

- **Oklahoma does not participate in national and regional appraiser regulatory conferences.**

The Board appreciates the concern of the ASC regarding this matter and accepts their recommendation. As of September 14, 1998, the Oklahoma Real Estate Appraiser Board has become a member of AARO.

Some of these changes may require statute and rule changes. The changes set out herein will be implemented as quickly as possible. The AQB and ASC will be notified when the changes become effective.

If you have any questions or need additional information, please do not hesitate to contact us.

Sincerely,



JOHN P. CRAWFORD, Chairman
Oklahoma Real Estate Appraiser Board

cc: Real Estate Appraiser Board Members