



February 2, 2007

Ms. Virginia M. Gibbs  
Chairman  
Appraisal Subcommittee  
2000 K Street NW  
Suite 310  
Washington, DC 20006

Dear Ms. Gibbs:

We have reviewed the findings of the follow-up compliance audit performed for Puerto Rico during November 2006.

We submit the following:

**Complaints not investigated or resolved in a timely manner.**

Complaint: (March 2004)- [DELETION]. The board is waiting for a court decision in this case.

Complaint: (October 2005)-According to our records, all cases in the month of October 2005 were resolved. Please submit additional information of case being referenced.

Complaint: (November 2006) [DELETION]

Case was under legal advisement from the Puerto Rico State Department attorney. We recently received their answer and the Appraiser under investigation is being summoned for an administrative Hearing.

**Temporary Practice is not administered in a manner consistent with Title XI and ASC Policy Statement.**

The Board is still trying to resolve this issue with the local State Department but the board does not receive the requests in a timely manner. This matter cannot be done as a clerical function and board meetings are supposed to be only once per month. We are doing

everything possible to resolve this issue to comply with ASC Policy and Puerto Rico Regulations.

**Puerto Rico issued appraiser credentials without ensuring that the applicants' experience was obtained over the appropriate time frame as required by AQB criteria**

The Board wrote these Appraisers and asked for additional experience lists to comply with AQB criteria and the additional lists were received. The board is taking additional measures when reviewing applicants for licensure to prevent this from happening again.

**Puerto Rico renewed appraiser credentials without ensuring that the applicants had taken the 7-hour National USPAP Update Course, as required by AQB Criteria.**

We did not have any certified teachers in Puerto Rico that could give the new USPAP course until 2004 and even then only one certified teacher. The first seven hour course was not given until April 2005. For this reason renewals were accepted without this prerequisite. To resolve this situation, we are now accepting the 7- hour course whether taken in classroom or Internet as long as it is AQB certified or compliant.

**National Registry fees were not submitted promptly in accordance with ASC Policy Statement**

We are trying to set up a meeting with the Puerto Rico Treasury Department to resolve this problem. A copy this letter will be submitted.

**Puerto Rico did not submit disciplinary action data to the ASC for inclusion in the National Registry in accordance with ASC Policy Statement 9A.**

This item will take a little time to complete. You will be receiving within 120 days the information requested.

It was our pleasure to have your visit here on the Island and hope that on your next review visit all these items will be resolved.

Sincerely,

Luis E. Rodriguez Lopez  
President  
Board of Examiners of Professional  
Real Estate Appraisers

Cc: Juan R. Caraballo higoyell  
Auxiliary SecretalY for Examining Boards

Cannen A. Can'ems, Esq.  
Assistant SecretalY for Examining Board  
State Depmtment