



MAY 20 2007

STATE OF WEST VIRGINIA

REAL ESTATE APPRAISER LICENSING AND CERTIFICATION BOARD

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May 2, 2007

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

Dear Ms. Gibbs:

Following the review of West Virginia's real estate appraiser regulatory program, we received correspondence from you outlining three areas of concerns which needs the Board's attention. The following is in response to those concerns:

1. The Board's legislative rules do not reference the most current version of the Uniform Standards of Professional Appraisal Practice (USP AP).

The Board is working with its Assistant Attorney General to develop, propose, adopt and implement statutory and/or regulatory language that would allow incorporation of the most current edition of US PAP by reference.

2. The Board's legislative rules regarding reinstatement of an appraiser from inactive status do not conform to Appraiser Qualifications Board (AQB) criteria.

The Board's legislative rules currently allow an appraiser to place his or her credential in inactive status for an unlimited amount of time, provided the appraiser pays the annual fees. The regulations require that to reactivate a license or certification from inactive to active status the appraiser must take 14 hours of continuing education and the current 7-hour national USPAP update course.

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The Board finds that the AQB's interpretation regarding waivers and deferrals of continuing education to be vague and confusing and until this issue is clarified, the Board will not initiate amendments to its legislative rule.

3. The Board needs to ensure that complaints are investigated and resolved in a timely manner.

The Board shares the Appraisal Subcommittee's concerns with respect to resolving complaints timely. The Board has obtained a commitment from the Attorney General's office to increase the amount of time its Assistant Attorney General devotes to Board issues. However, the Subcommittee needs to recognize that an individual's due process rights in disciplinary matters is also an issue in resolving complaints within a specified timeframe.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharron L. Knotts", with a long horizontal flourish extending to the right.

Sharron L. Knotts
Executive Director

Cc: Ben Henson, Executive Director
Appraisal Subcommittee