



Wyoming Certified Real Estate Appraiser Board

2020 CAREY AVE. SUITE 100
CHEYENNE, WYOMING 82002-0180
(307) 777-7141 FAX (307) 777-3796
E-MAIL: drice@state.wy.us
WEBSITE: realestate.state.wy.us
DONNA RICE, DIRECTOR

DAVE FREUDENTHAL, GOVERNOR
ROBERT "MACK" PROVART, CHAIRMAN, CODY
DARWIN D. PACE, CHEYENNE
N. MICHAEL PREWITT, CASPER
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MEMBER - ASSOCIATION OF APPRAISER REGULATORY OFFICIALS

November 4, 2004

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

Dear Ms. Gibbs:

The Wyoming Certified Real Estate Appraiser Board received the August 19, 2004, review letter concerning the Wyoming certified appraiser licensing program. The Board discussed the letter at length. The Board also discussed the minimum AQB criteria contained in the 6th Exposure Draft that needs to become effective January 01, 2008. The Board discussed compliance issues involving your letter of August 19, 2004 and the new AQB criteria. The Board is in the process of drafting rules to achieve compliance. I assure you the Board has spent hours working on this issue.

Any change in the Wyoming Certified Real Estate Appraiser Board Rules requires legislative approval and exposure to the public. At a minimum, this takes four (4) months, and more typically six (6) months. The Board is also cognizant of attempting to be fair to two groups of appraisers - those currently working towards certification under the existing requirements, and those who will begin working towards certification in the future.

The Wyoming Certified Real Estate Appraiser Board has decided to adopt a firm date (January 01, 2008) scenario regarding implementation of new AQB criteria. The Board will be forwarding to you a preliminary draft of revised Rules within the next two weeks. These should address your concerns regarding the 7-hour and 15-hour USPAP courses, experience criteria, and distance education. The revised Rules will be available to all Wyoming certified appraisers and trainees immediately upon approval, and will become effective January 01, 2008. This would mean that any trainee for a certified general permit beginning to acquire experience after June 30, 2005, and any trainee for a certified residential permit beginning to acquire experience after December 31, 2005, will be under the Rules that would become effective January 01, 2008.

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In regards to the two-year USPAP Update Course cycle, appraiser permittees in Wyoming are on a three-year renewal cycle. The policy currently in place, and the preliminary draft of the Rules, require a more stringent standard than the two-year cycle set forth in the AQB criteria. Beginning January 01, 2006, any permittee seeking renewal will have to submit documented proof that they have completed two (2) AQB approved 7-hour USPAP courses within the previous three-year permit cycle. To encourage participation in USPAP courses, the Board subsidizes an AQB approved 7-hour USPAP course every January.

In regards to experience criteria the preliminary draft of the Rules changes converts our existing experience criteria from the number of appraisals to the number of hours as outlined in the AQB criteria.

In regards to distance education the preliminary draft of the Rules changes addresses this issue to become AQB compliant.

As stated earlier, the Wyoming Certified Real Estate Appraiser Board is in the process of completing a complete rewrite of the existing Rules. The Board is hoping to only do this once, and work under the existing Rules and Policy Statements in the interim. The Board feels this is an equitable solution to those trainees already working towards certification under the current rules, to those trainees that will begin training in the future, and to our existing certified permittees.

Please review this letter and the preliminary draft of changes to our Rules and provide any suggestions or guidance that you find appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Provar", with a long horizontal flourish extending to the right.

Robert M. Provar, Chairman
Wyoming Certified Real Estate Appraiser Board