



NATIONAL CREDIT UNION ADMINISTRATION  
Washington, D.C. 20456

April 25, 1990

Office of General Counsel

Harlan A. Loeb, Esq.  
Lindquist & Vennum  
4200 IDS Center  
Minneapolis, MN 55402-2205

Re; Appraisal Designation Guidelines (Your April 3,  
1990, Letter)

Dear Mr. Loeb:

You have objected to the granting of broad authority in the certification and licensing process to the Appraisal Foundation in NCUA's proposed appraisal regulation. Section 1110 of Title XI of the Federal Financial Institutions Reform, Recovery and Enforcement Act of 1989 ("FIRREA") requires that real estate appraisal standards issued by NCUA, at a minimum:

. . . be performed in accordance with generally accepted appraisal standards as evidenced by the appraisal standards promulgated by the Appraisal Standards Board of the Appraisal Foundation . . . .

In addition section 1116(b) of FIRREA requires that:

. . . no individual shall be a State certified real estate appraiser under this section unless such individual has achieved a passing grade upon a suitable examination administered by a State or territory that is consistent with and equivalent to the Uniform State Certification Examination issued or endorsed by the Appraiser Qualification Board of the Appraisal Foundation. . . .

FOIA

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NCUA does not have the discretion to change or ignore the statute passed by Congress. Your objections concerning the authority of the Appraisal Foundation in the certification and licensing process should be directed to Congress.

Sincerely,

*Hattie M. Ulan*

Hattie M. Ulan  
Associate General Counsel

GC/MM:sg  
SSIC 3501  
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