

Real Estate Appraisal Administration Division

December 7, 2000

Ben Henson, Executive Director Appraisal Subcommittee 2000 K Street NW !ashington, DC 20006

Dear Director Henson:

Please accept my apology for the tardiness of this response to your specific questions remaining from the Subcommittee's July 24, 2000 field review of our Agency's Appraisal Program. We have not ignored you requests. We have been in contact with Mr. Dennis Green concerning several issues as well as taking the remedial actions necessary to correct any remaining problems. In a recent exchange of phone calls with Dennis, I was under the impression that written guidance would be forth coming concerning those licensees that were awarded appraisal experience for Real Estate sales activities.

The Appraisal Division has not issued any upgraded license that included Real Estate sales experience since the initial offering of this credit in 1998 & 1999. The Agency in our September 26, 2000 letter detailed efforts to obtain legislative relief from this portion of the Illinois Appraiser's Act. Deputy Commissioner Brady outline our efforts to legislatively correct a number of problems with the Illinois Appraiser Act. To date there have bee no further experience credit requests received. I am under the impression that these actions fulfill our obligation under your **Action Step #1.**

Our audit of licenses identified as having applied for Real Estate credit toward appraisal experience reveals the following:

Three Appraisal Licensees Receiving Real Estate Sales Credit To Upgrade [DELETION]

Two Appraisal Licensees Who Failed To Respond To The Audit [DELETION]

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At this time we await guidance from our Legal Consul, given the Real Estate experience was allowed by Illinois Law for a disposition of these five licensees'. I believe that we have been in compliance with your Action Steps #2-4, with only the final disposition of the five licenses to be reported to the Subcommittee.

The Agency is painfully aware of the problems of the complaint log. As we have detailed to you, a yearlong rebuilding of the log has been undertaken. The log that was supplied to the Subcommittee has already undergone revision. At this time we are undertaking a second inventory of "back logged" Appraisal Complaints and will hopefully have a reconciliation of actual complaints and those that appear on our system after the first of the year. While on the surface this would seem to be a simple accounting task, I can assure you that it is far from simple.

It is our belief that as of January 1, 2001 the Agency will be current in the investigation and prosecution of appraisal complaints. In fact our time line for resolution of complaints is stricter than the Subcommittee's suggested one year to resolution contained in ASC Policy Statement 10.

Thank you for your attention to our request for a Subcommittee review of the proposed Illinois Appraiser's Act rewrite. The exchange of information from the Subcommittee was very beneficial to us. I am under the impression that we will receive your comments in written form soon. While we kept notes on each point

Thank you again for your assistance.

Sincerely

Mike Brown, Director

cc: Commissioner William Darr Deputy Commissioner Patrick Brady Appraisal Board Members