

■ ■ ■ ■ ■ ■

Appraisal Subcommittee

Federal Financial Institutions Examination Council

February 20, 2001

Charles Kazlo, Executive Director
Maryland Commission of Real Estate Appraisers
500 N. Calvert Street, 3rd Floor
Baltimore, MD 21202-3651

Dear Mr. Kazlo:

As requested in your recent email, we have performed a cursory review of Maryland House Bill 379, *State Commission of Real Estate Appraisers and Home Inspectors*. The bill proposes, among other things, to create a licensing program for home inspectors and to modify the current Commission of Real Estate Appraisers to become the State Commission of Real Estate Appraisers and Home Inspectors.

Conceptually, modifying the Commission of Real Estate Appraisers to become the State Commission of Real Estate Appraisers and Home Inspectors and including the home inspector regulatory program would not create a specific conflict with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended ("Title XI"). It would, however, cause us some concern.

In our April 21, 2000 field review letter to Chairman Glover, we conveyed our concern that Maryland's complaint investigation and resolution process was unreasonably lengthy, requiring an average of two years for case investigation and resolution. By comparison, most States investigate and resolve most complaints within 6-12 months. We further stated, "the Maryland legislature is considering bills...to incorporate home inspector licensing within the Commission's responsibilities. Each of these bills, if enacted, could have significant impact on the Commission's workload." We remain concerned about any action that would place increased demands on the Commission's workload without providing sufficient additional resources. If the Maryland legislature moves forward with the bill, it should ensure that the Commission has adequate resources to carry out its Title XI responsibilities effectively regarding real estate appraiser supervision and regulation.

Thank you for the opportunity to review the bill. Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director

cc: Chairman Glover