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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

March 20, 2001

Edward O. Greer  
Greer, Patterson & Associates, Inc.  
7522 28<sup>th</sup> Street West  
Tacoma, WA 98466-4112

Dear Mr. Greer:

Thank you for your March 9, 2001 letter expressing your dissatisfaction about the manner in which the Washington Department of Licensing (“Department”) handled two complaints that you filed in 1993. While we appreciate your concerns, please understand that the Appraisal Subcommittee is not a “court of appeals” regarding the Department’s actions, and that we do not have the authority to overrule those actions. We will, however, follow up your comments during our next regularly scheduled review of Washington’s appraiser regulatory program.

We performed an on-site review of Washington’s program in November 2000. A primary focus of that review was an analysis of the State’s complaint investigation and resolution process. Generally, we found the case files well documented, the investigative staff well versed in appraisal methodology and practice, and the disciplinary actions taken fair and equitable. We reviewed a sample of complaint cases and based our conclusions on that sample.

We also observed the November 9, 2000 meeting of the Washington Real Estate Appraiser Commission. It may interest you to know that, at that meeting, a taskforce was established to consider creating rules and procedures for accepting anonymous complaints. If adopted, the Department could act on a complaint without revealing the complainant’s identity. You may wish to follow the progress of this taskforce.

Again, we appreciate your input and trust you will find this information helpful. If you have any further questions, please contact us.

Sincerely,

Ben Henson  
Executive Director