

STATE OF COLORADO

BOARD OF REAL ESTATE APPRAISERS
Division of Real Estate

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October 28, 1997

Herbert S. Yolles, Chair
FFIEC Appraisal Subcommittee
2100 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20037

Re: Response to field review letter

Dear Mr. Yolles and Members of the Subcommittee:

Your letter of July 25, 1997 expressed concerns regarding the backlog of unresolved complaints, and the time between receipt and closure of complaints. We have delayed in responding in order that we may report our plans, efforts and progress toward addressing this issue.

Even before the arrival of the field review team we had recognized the problem. Your formal expression of concern was a prod to action. We are pleased to report that in spite of 25 additional complaints being opened in the June through October time period, the backlog has been reduced to 71 complaints.

The first line of effort was a review of all outstanding complaints to identify those with no allegations or apparent violations of law, rules or standards. These were dismissed outright by staff. A second group where there appeared to be very minor deviations from acceptable practice received dismissal letters with advice from the investigator. Twenty six cases were taken to the Board. Of these, the majority await final resolution through stipulated settlement or hearing through the Division of Administrative Hearings.

We will maintain this plan of action, emphasizing quick dismissal of baseless gripes, staff level handling of very minor infractions, and more prompt investigation and reporting of significant violations.

The Board wishes to point out that this catch up effort has required some diversion of resources from other investigative and administrative tasks. The Board of Real Estate Appraisers must function as part of the overall Division of Real Estate, which also regulates real estate brokers and subdivisions. The Division budget is set by the General Assembly; we cannot simply raise fees to fund a higher level of effort. Further, our budgets are closely classified- we cannot divert funds from furniture replacement to investigations.

Sincerely yours,

COLORADO BOARD OF REAL ESTATE APPRAISERS

Stewart A. Leach
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