

GOVERNMENT OF THE DISTRICT OF COLUMBIA

Department of Consumer and Regulatory Affairs



Business and Professional
Licensing Administration

July 2, 2008

Ms. Virginia M. Gibbs, Chair
Appraisal Subcommittee
Federal Financial Institutions Examination Council
2000 K Street, NW, Suite 310

JUL 03 2008

Dear Ms. Gibbs:

This letter is in response to the Appraisal Subcommittee's ("ASC") findings at the March 2008, audit of the District of Columbia's Real Estate Appraiser Regulatory Program. We would like to take the time to address all of your concerns as outlined in your letter dated May 2, 2008. The first item noted in the letter was:

- ***The District's complaint investigation and resolution process did not comply with Title XI and ASC Policy Statement 10E.***

Our agency is working diligently with the Office of Attorney General and the Office of Administrative Hearings to resolve all backlogged cases. We have recently received nine final orders for a case that has been ongoing since 2002. We understand the importance of expeditiously resolving these cases in order to comply with Title XI and ASC Policy Statement 10E. Accordingly, we are taking every step to ensure that new complaints are tracked and processed more efficiently to ensure timely resolution.

Further, starting July 1, 2008, quarterly electronic complaint logs reflecting the current status of all outstanding complaints will be submitted to ASC by our Program Liaison, Leon Lewis.

The second item noted in your letter stated:

- ***The District's credential renewal regulations and procedures did not conform to AQB continuing education criteria.***

(2)

As soon as our office was alerted that our regulations did not meet the recently revised AQB continuing education standards, we took steps to become compliant. As you know, we contacted Pearson Vue who immediately sent letters to all licensees that were not compliant. That letter stated that the documents they submitted for continuing education for USPAP were not acceptable. Each licensee was given five business days from the date of the letter to provide the appropriate documents or they would be placed on inactive status and reported to the Appraisal Registry.

Further, the Board of Appraisers met on June 26, 2008 to ratify an amendment to the applicable rules which are published under the District of Columbia Municipal Regulations (DCMR). The proposed rulemaking would not require an applicant that has 185 days or less from the renewal date to complete any continuing education courses. However, any applicant that obtains a license within the last 12 months of the license cycle but before the 185 day period must complete 14 hours of continuing education courses. These amendments will go into effect upon publication in the D.C. Register with an allowance of 30 days for public comment.

The third and final issue brought to our attention was:

- ***The District did not submit disciplinary action data to the ASC for inclusion in the National Registry in accordance with ASC Policy Statement 9.***

Once again, after streamlining our tracking system to a central person we are better able to track our cases that come down the pipeline. Now, once a final order has been issued, they are given to Leon Lewis our Program Liaison, who then reports them to the National Registry. Since the audit, _____ and _____ have been reported to the National Registry. As final orders are sent to our office from the Office of Administrative Hearings, we will continue to report them to the National Registry.

We thank you for your time and look forward to working with you in the future. If you should have any questions regarding this letter, please contact Leon Lewis at (202) 442-4345 or via email at Leon.Lewis@dc.gov.

~~Warm Regards,~~

~~Jerome Farrow, Chair~~

Cc: Clifford P. Cooks