



Commonwealth of Massachusetts
Division of Registration
239 Causeway Street • Boston, Massachusetts 02114

ARGEO PAUL CELLUCCI
GOVERNOR
JANE SWIFT
LIEUTENANT GOVERNOR
JENNIFER DAVIS CAREY
OFFICE OF CONSUMER AFFAIRS
WILLIAM G. WOOD
DIRECTOR

AUG - 4

Thomas E. Watson
Chairman
Appraisal Subcommittee
Federal Financial Institutions Examination Council
2000 K Street, NW
Suite 310
Washington, D.C. 20006
Dear Mr. Watson,

July 31, 2000

On behalf of the Board of Registration of Real Estate Appraisers and the Massachusetts Division of Registration, please accept my thanks for your letter dated June 19, 2000, in which you outlined four areas of suggested improvement for the Board's program. Please accept the following comments in response to your suggestions.

1. Statute and regulations

It is the board's intention to revise its regulations (264 CMR *et seq.*) to conform them to Federal requirements.

2. Appraiser Licensing and Certification Applications

Prior to January, 2000, pending printing of a new application, an old application was used with an insert containing new requirements. All applicants were required to meet those requirements. A revised new application is now being used and contains all current requirements.

3. Education

All applications for course approval require provision of the names of instructors for each course and a complete curriculum vitae for each instructor. If a complaint is filed against an instructor, the board has the capability to check each application to determine who was approved to teach the course. Further, the board now maintains a separate file for each course that contains the curriculum vitae of the instructor approved to teach the course. Please note that, to date, the board has not received any complaints against an instructor.



4. The Complaint Investigation and Resolution Process

The Board has instituted a system to track compliance with Consent Agreements. Failure to comply results in notification to the licensee and, absent a response satisfactory to the board, referral to the Division's Office of Prosecutions for adjudicatory action.

Please let me know if you have any questions or comments regarding this response.

Very truly yours,



Michael J. Brooks
General Counsel

Cc: William Pastuszek, Chairman'
Judy Meltzer, Executive Director