The Commonwealth of Massachusetts Division of Registration Leverett Saltonstall Building, Government Center 100 Cambridge Street, Boston 02202

April 10,1997

Diane L. Garmus, Chairperson APPRAISAL SUBCOMMITTEE 2100 !ennsylvania Avenue, NW. Suite 200 !ashington, !.C. 20037

Re: Letter dated December 12, 1996/Review - Appraiser Regulatory Program

Dear Chairperson Garmus:

The Massachusetts Board of Registration of Real Estate Appraisers (Board) is in receipt of your letter dated December 12, 1996 regarding the review conducted by the Appraisal Subcommittee in the Fall of 1996. The Board has reviewed the issues highlighted in your letter and provide the following comments in response to your concerns.

Since the date of the review, the Governor has appointed two new members to the Board, bringing the current membership to a full complement of seven members.

The Division of Registration, on behalf of the Board, will forward updated licensee data and fees to the National Registry on a quarterly basis (January, April, July and October). The Board will notify the Registry whenever a Massachusetts licensed appraiser surrenders or resigns a license. The Board will review your comments regarding partial year registration fees related to the birthday expiration date, however, the Division does not pro-rate licensure fees. Additionally, the total fees collected (\$ 75.00 per licensee) are forwarded to the Registry at the commencement of the licensure period (vs. \$ 25.00 per licensee to the Registry at the outset of each year of the licensure period). The Registry also retains the fee collected for any licensee who surrenders a license to the Board.

With respect to education requirements for licensure as a "trainee", the Board will consider the suggestions of the Subcommittee regarding adoption of the Appraiser Qualification Board standard.

The Board and the Division of Registration are aware of the number and nature of the complaints currently pending in the legal and investigative units. In no case do the nature of the allegations present a public safety priority. It is anticipated that the additional

enforcement staff recently added to the Division will result in timely processing of complaints.

The Board thanks the Subcommittee for its comments and suggestions.

David A. Murphy

Chair BOARD OF REGISTRATION OF REAL ESTATE APPRAISERS

c: Anne L. Collins, Deputy Director Division of Registration