



STATE OF MICHIGAN
DEPARTMENT OF LABOR & ECONOMIC GROWTH
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

DAVID C. HOLLISTER
DIRECTOR

September 2, 2004

Ms. Virginia M. Gibbs, Chairman
Appraisal Subcommittee
2000 K Street
Suite 310
Washington, DC 20006

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Re: Response to Appraisal Subcommittee Findings and Recommendations

Dear Ms. Gibbs:

The following is the Bureau of Commercial Services (the Bureau) response to the findings and recommendations of the Appraisal Subcommittee's (ASC) report, dated August 19, 2004, regarding the June 2004 review of Michigan's appraiser regulatory program.

Our response will address the ASC report findings item by item.

Finding: Several sections of the Department's regulations are inconsistent with the Appraiser Qualifications Board ("AQB") criteria.

Response: The Bureau is currently drafting legislative language for presentation during the next legislative session. In addition, we are currently pursuing administrative rules for those items not requiring legislative amendments. Once drafting is complete, we will forward a copy of the proposed language to the ASC for comment.

Finding: A number of complaint cases have been outstanding for more than one year. The limitation of Michigan's Board to two meetings per year continues to contribute to excessive resolution times.

Response: The Bureau agrees that only two Board meetings have been scheduled per year. The Bureau will schedule an additional board meeting each year to address this finding.

Please don't hesitate to contact me with any questions.

Sincerely,

Andrew L. Metcalf, Jr., Director
Bureau of Commercial Services

cc: Robert Swanson
Allen Williams
Archie Millben
Jean Boven
Al Schefke

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