



Bob Holden,  
Governor

Division of Professional Registration  
Marilyn Taylor Williams, Director

Joseph L. Driskill  
Director

---

MISSOURI REAL ESTATE APPRAISERS COMMISSION  
3605 Missouri Boulevard  
P. O. Box 1335  
Jefferson City, MO 65102-1335  
573-751-0038  
573-526-3489 FAX  
800-735-2966 TTY Relay Missouri  
800-735-2466 Voice Relay Missouri  
<http://www.ecodev.state.mo.us/pr/rea/>

Rodger L. Fitzwater  
Executive Director

January 15, 2002

Thomas E. Watson, Jr. Chairman  
Appraisal Subcommittee  
2000 K Street, NW  
Suite 310  
Washington, D.C.  
20006

Dear Mr. Watson:

The Missouri Real Estate Appraisers Commission (MREAC) received your letter dated December 19, 2001 regarding the results of the ASC review of the Missouri appraiser program.

In your letter, you requested that the Commission respond to the findings of the reviewers. The following is provided:

- **The Complaint investigation and resolution program needs improvement.**

The MREAC has established a system for complaints that will ensure accurate and timely tracking of each complaint filed against a licensee. The system, a component of Missouri's licensing program (PROMO), allows authorized personnel to easily determine where a complaint falls in the complaint process. This includes committee recommendations, investigator assignments, witnesses, etc.

The new complaint tracking system also includes a database of complaints that tracks each event in the complaint process: committee or commission decisions, correspondence between MREAC, the Attorney General, the complainant, and the respondent, memoranda and orders from the Administrative Hearing Commission.

The MREAC has instituted a Complaint/Anonymous Complaint Committee, which has reduced the turnaround time for complaints. Previously, the full commission reviewed all complaints at quarterly meetings. The Complaint Committee meets and reviews complaints monthly. Only those complaints determined to contain possible USPAP or statutory violations are forwarded to the full commission for review.

*Due to Missouri's complaint process, not all complaints can be resolved within the ASC recommended one-year period. If a licensee receives a complaint that the MREAC deems credible, a complaint is filed by the MREAC against the licensee with the Administrative Hearing Commission (AHC). The AHC is an independent administrative tribunal that decides disputes involving state agencies and another party. The AHC typically decides the cases after a trial-type hearing. It hears evidence and arguments from the state agency and from the other party. Any party, including the state agency, may seek review of the Administrative Hearing Commission's decision from the judicial branch. If a complaint cannot be resolved within the recommended time frame, appropriate information will be placed in the complaint file to provide reviewers the reason for such a delay*

- **Missouri's appraiser-related statute permits appraisers to "warehouse" examinations up to three years.**

The MREAC will introduce legislation for the 2003 legislative session that will *allow* examinations to remain valid for a period of two (2) years, after which, applicants must retake the examination.

- **A number of approved educational courses do not appear to conform to AQB criteria.**

The Education Committee of the MREAC will carefully evaluate each of the courses noted by the ASC as the course comes up for review. If the Committee determines that the course(s) conform to ASC criteria, the course will be renewed. The Committee shall note in the file that the course has undergone review for ASC criteria compatibility. If, in the opinion of the Committee, a course does not meet the criteria, it shall not be renewed until such time as the course is corrected to meet minimum criteria.

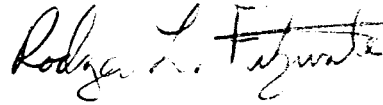
- **Temporary practice terms might not conform to ASC Policy Statement 5 requirements.**

As of October 12, 2001, all approved applications for temporary practice in the State of Missouri were authorized for a period of six (6) months.

The Missouri Real Estate Appraisers Commission appreciates the time and assistance offered by the Appraisal Subcommittee. Continued cooperation between our agencies will ensure maximum protection for the public and for our real estate appraisers.

If you should have any questions, please do not hesitate to contact this office at the number listed above.

Sincerely,

A handwritten signature in black ink that reads "Rodger L. Fitzwater". The signature is written in a cursive style with a large, prominent 'R' and 'F'.

Rodger L. Fitzwater  
Executive Director

Cc: Willie McCann, MREAC Chairman