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Kristi Klamet
Executive Director

July 25, 2006

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

Dear Ms. Gibbs:

Thank you for your letter of June 26, 2006 regarding the findings of the Appraisal Subcommittee's (ASC) May 2006 Missouri Field Review. We are pleased that the ASC found our program to be improved since the previous field review in October 2004. This letter is in response to the remaining concerns identified by the ASC from the May 2006 and October 2004 field reviews regarding Missouri's statutes that provide for continuing education waivers; the statutes and regulations that do not conform to 2003 AQB Criteria; and Missouri's timely adoption of the 2008 AQB criteria.

Enclosed please find our proposed statutory and regulatory amendments that address these concerns. The proposed statutory amendments will be presented to the Missouri General Assembly during the next legislative session which convenes January 3, 2007. As you know, these changes were presented to the Missouri General Assembly during the 2006 legislative session and, although we received no opposition, the bills did not pass. We are very confident that we will be successful in getting these changes made during this next session. However, guaranteed passage of any legislation is beyond the Commission's control. The MREAC would like to take this opportunity to thank the ASC for providing written support for our changes. Those supporting documents will be used again for the upcoming session.

The enclosed regulatory amendments will be filed with the Missouri Office of the Secretary of State upon their final approval by the Commission at the August 10, 2006 meeting. Therefore, it is anticipated that the rulemaking process will begin by September 1st and that all rules will be in effect prior to July 1, 2007.

As a side note, please be advised that, although current Missouri law allows for the Commission to waive continuing education (CE) requirements, the Commission will not grant any CE waivers. If a licensee insists on receiving a waiver then the Commission will advise the licensee and the ASC that he/she will no longer hold an "active" status on the National Registry.

In response to the ASC's comments regarding Missouri's needs to continue to improve its complaint investigation and resolution program to provide for more timely resolution in accordance with ASC Policy Statement 10, please be assured that the Commission will continue to explore ways to expedite and enhance the complaint handling and resolution process. As you have noted in the ASC's findings of May 2006, the Commission has made significant progress towards resolving the backlog of complaints. Unfortunately, there are issues beyond the Commission's control that can impede the timely resolution of a complaint. Attached, for your information, is a draft complaint questionnaire that the Commission plans to utilize for collecting information from a licensee when responding to a complaint. The Commission believes that this additional tool will assist them in making a more timely determination of whether or not cause exists to pursue disciplinary action against the licensee. The Commission will be finalizing the complaint questionnaire at their upcoming August meeting.

Thank you for giving the MREAC the opportunity to respond to your concerns. The MREAC will keep the ASC apprised of its progress as we move through the statutory and regulatory adoption process. If any of the criteria you have identified concerns with have not been addressed in our statutory and regulatory proposals, please advise us at once.

Please let us know if you have any questions or need any additional information.

Respectfully yours,



Kristi Klamet
Executive Director

Cc: Commission Members
David Broeker, Division Director
Craig Jacobs, Assistant Attorney General
Kimberly Grinston, Division Legal Counsel
David Barrett, Division Legal Counsel