

**Keith Schrimsher, Chair**  
**New Mexico Real Estate Appraisers Board**  
**P. O. Box 25101**  
**Santa Fe, NM 87504**

October 22, 2001

Thomas E. Watson, Jr., Chairman  
Appraisal Subcommittee  
Federal Financial Institutions Examination Council  
Washington, DC 20006

Dear Mr. Watson:

In response to your letter dated August 22, 2001, I am addressing the issues concerning the New Mexico Real Estate Appraisers Board and appraiser regulatory program as follows:

- **Program Staffing** - Due to Government downsizing, providing adequate staffing is quite a complicated issue. All state agencies are required to make every effort to reduce their workforce and costs; therefore, making it difficult to recruit and/or retain employees. However, recently the Board has been able to employ additional support staff.
  
- **Appraiser credential (license and certificate) overstepping and Submittal of inaccurate data to the Appraisal Subcommittee (ASC) for inclusion in the National Registry** - The Regulations and Licensing Department has experienced many obstacles since the implementation of the new computer system. To further hinder the system, the Board converted from an annual birth month renewal to a triannual April renewal. Also, there have been computer crashes, down time, and viruses, which have added to corrupting the computer system. The system is in the process of being reprogrammed and new software is being purchased, which should allow for a more user-friendly system with enhanced accuracy and less problems. With this new system permitting us additional access, our intention is to implement a new program for licenses and certificates, which would include correcting Registry information along with correcting other vital information. To update and make corrections we will send out a letter, in audit form, to all licensees. This audit would require verification of applicable information, including a Federal Registry Form. Once the information is returned and verified, the database will be updated. Given the above, the first test phase will begin within 30 days. A copy of the audit letter will be provided.

- **Complaint investigation, resolution, and tracking** - Presently, a Board member oversees the overall complaint process. Also, the Board is currently establishing steps and has approved a new complaint logging system, which will be further developed to incorporate identifying timeframes for completion of each step and to determine whether the appraiser is within his/her scope of practice. A report will be distributed to the Board at each meeting at which point the Board will provide the ASC with information on all disciplinary actions taken.
- **Distance education courses** - At our October 24, 2001 meeting, the Board will rescind its approval of the distance education courses not meeting the Appraiser Qualifications Board (AQB) criteria. The Board shall follow the AQB's distance education criteria in the future.
- **Continuing education verification** - The Board has discussed and tentatively agreed that all future license renewals must submit documentation verifying their continuing education credits by attaching copies of their continuing education certificates. This issue will be finalized at the 10/24/01 meeting.
- Temporary practice extension - Our first opportunity to make statutory changes will be in 2003 when the legislature convenes.
- **"Housekeeping" of New Mexico's appraiser-related statute and regulations**  
-Upon your return visit, we will discuss which areas of our statute and regulations are unclear, conflicting, and need clarification.

In the last six months the Board has made many improvements to our overall program. However, due to Government downsizing, high employee turnover, and computer complications the Board's efforts have been hampered.

Although obstacles have been encountered, please be assured the Board is taking positive measures to alleviate the problems by hiring additional staff, which are presently being trained and working with the data processing department. In addressing our most challenging issue of program staffing and computer discrepancies, our new staff is formulating a training and procedures manual.

The Board will continue to take steps in improving its program with special emphasis on the complaint process. The Board will further study alternatives to streamline this process.

The Board is and will continue to apply every effort to ensure we are in compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended ("Title XI") and ASC's policies. I am confident in the future success of the New Mexico Real Estate Appraisers Board and appraiser regulatory program.

I look forward to the ASC's next visit. At that time we can discuss changes to the statute and regulations, and evaluate our progress.

Sincerely,

KEITH SCHRIMSHER/BY R.  
Keith Schrimsher, Chair