

Appraisal Subcommittee

Federal Financial Institutions Examination Council

April 14, 1997

Roxanne Gillespie, Chair
Oregon Appraiser Certification
and Licensure Board
350 Winter Street, NE., Room 21
Salem, Oregon 97310

Dear Ms. Gillespie:

Thank you for your and the Board staff's cooperation in the January 28-30, 1997 Appraisal Subcommittee ("ASC") review of the Oregon Appraiser Certification and Licensure Board's ("Board") regulatory program. The Board made all of the changes recommended in the ASC's May 18-19, 1992 field review letter except for the important issue of open complaints. Following are our recommendations for further improvement in your program.

- **The Board has a large number of open complaints dating from 1993, 1994 and 1995 which require expeditious resolution.**

At the time of our review, there were more than 100 complaints which had been open for more than two years. Additionally, of the 219 complaints which had been closed, 52 were open for more than two years before they were resolved. Although the Board uses the services of a group of appraiser volunteers from its Appraisal Review Advisory Committee, the lack of permanent staff investigators hinders the Board's ability to resolve complaints in a timely manner. We also note that the number of steps involved in the complaint process, as evidenced in a January 24, 1997 letter to Representative Devlin's Office and in information gathered during the field review, creates a lengthy resolution process. It is our understanding that Oregon law requires all complaints (and other government documents) to be available to the public, even if the complaint has not been investigated and resolved. This public availability of open complaint documents necessitates the expeditious handling of complaints to ensure that such open complaints do not adversely affect appraiser businesses and professional reputations and do not cause users of appraisal services to doubt the abilities of otherwise competent appraisers.

We strongly recommend that the Board initiate the necessary actions to obtain additional investigative staff to implement a more efficient system and dispose of the backlog of complaints. Furthermore, the Board should maintain an investigative staff to investigate and resolve complaints in a timely manner. For this reason, and the fact that the Board is not authorized to approve staffing levels, we are sending a copy of this letter to the Deputy Director, Department of Consumer and Business Services. Additionally, the Board should encourage simplification of the administrative system which the complaint-resolution process must follow.

- **The Board completed portions of the 1995 *Annual Survey of State Appraiser Regulatory Agencies* (“Annual Survey”) incorrectly and omitted some questions.**

We noted that several questions were incorrectly completed and others omitted when the Board retyped and completed the 1995 Annual Survey. In addition, some headings were changed or omitted. A blank copy of the Annual Survey is enclosed which, upon comparison with the Board's submission for 1995, will indicate questions not answered or changed. In completing future editions of the Annual Survey, please do not change or omit any questions or information requested.

Please respond to our recommendations within the next 60 days. If you have any questions regarding this matter, please do not hesitate to contact us.

Sincerely,

Herbert S. Yolles
Chairman

Enclosure

cc: Debbie Lincoln, Deputy Director
Department of Consumer and Business Services
Linda Riddell, Administrator