



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Business Regulation
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October 3, 2007

VIA FACSIMILE AND REGULAR MAIL

Ben Henson, Executive Director
Federal Financial Institutions Examination Council
Appraisal Subcommittee
2000 K Street, Northwest
Suite 310

RE: Your Letter of September 12, 2007

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Dear Mr. Henson:

Thomas Andolfo, Chairman of the Rhode Island State Appraiser's Board and A. Michael Marques, Director of the Department of Business Regulation, have asked me to reply to your recent letter. As you know, your letter commented upon our efforts to bring our real estate appraisers regulatory program into full compliance with underlying federal statutes and regulations.

Kindly permit me to address the following questions you posed in your letter:

- We hereby confirm that we are following the curative steps in the ASC's June 27 field review letter to bring our complaint investigation and resolution into full compliance. To this point, we will be providing, by October 15, a quarterly complaint tracking report for the quarter ending September 30, 2007. We have also instituted procedures whereby any Board action relating to a complaint will also be memorialized in the complaint file. This will be in addition to the Board maintaining well-documented copies of complaint records, including Board decisions, as reflected in the retention of notes, memoranda and minutes relating to the complaint.
- With regard to inconsistent continuing education courses, we are also hereby confirming that we will shortly be completing Steps 5 and 6 relating to your

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prior field review letter. Appraisers have until October 9, 2007 to submit "make-up" courses, and, pursuant to Step 5, we expect within ten days thereafter (by October 19, 2007) to determine those appraisers without the necessary hours of continuing education courses. We are also striving to complete Step 6, a spreadsheet showing the educational status of those appraisers by October 27, 2007. We are also enclosing as Exhibit I a recent e-mail relating to this issue.

- On Page 4 of your letter, you again referenced the timely completion of Steps 5 and 6 with respect to non-AQB conforming continuing education credit. Similar to our work relating to the continuing education courses, we expect to complete Step 5 by October 19, 2007 and Step 6 by October 29, 2007.
- We are also enclosing for your ready reference and review a copy of the procedures that have been put into place to ensure payments for invoices within 45 days. See Exhibit II.
- You have also asked for the results of our review of all affected approved qualifying education courses. We have previously sent correspondence (see Exhibit III) to all course providers requiring them to verify that all courses will be compliance with the 2008 criteria. We were expecting all replies by October 1, 2007, and intend to remove all non-compliant courses no later than October 15, 2007.

Kindly advise me if you have any questions or comments.

Sincerely,

Richard W. Bernstein
Executive Counsel

RWB:cass

Attachments

cc: Thomas Andolfo, Chairman
A. Michael Marques, Director