

Appraisal Subcommittee

Federal Financial Institutions Examination Council

January 18, 2011

Mr. Thomas O'Bryant, Director
Division of Real Estate
Department of Business and
Professional Regulation
400 W. Robinson Street, Suite N801
Orlando, FL 32801-1772

RE: Appraisal Subcommittee Staff Follow-Up Review

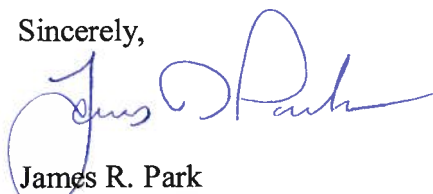
Dear Mr. O'Bryant:

Thank you for your cooperation and your staff's assistance in the December 8, 2010 Appraisal Subcommittee (ASC) staff Follow-up Review. This was a Follow-up Review to the December 3-8, 2009 ASC Compliance Review of Florida's appraiser regulatory program.

As detailed in the attached Follow-up Report, Florida has made progress toward addressing the concern identified in the June 14, 2010 ASC Compliance Review Report. We specifically commend you and your staff for the efforts and progress made in identifying ways to streamline the enforcement process, and in obtaining additional resources for its administration.

Please be advised this letter and the attached Report are public record and available on the ASC website in accordance with the Freedom of Information Act. Please contact us if you have any questions.

Sincerely,



James R. Park
Executive Director

Attachment

cc: Ms. Maureen C. Olson, Deputy Secretary Professional Regulation
Ms. Beverly Ridenauer, Government Analyst II
Mr. Michael Rogers, Chair

ASC Staff Follow-Up Report: 2009 Compliance Review

Florida Appraiser Regulatory Program (Program)

Florida Real Estate Appraisal Board (Board)

Follow-Up Review Date: December 8, 2010

Follow-Up Report Issue Date: January 18, 2011

Umbrella Agency: Department of Business and Professional Regulation, Division of Real Estate (Department)

Compliance Review Date: December 3-8, 2009

Number of State Credentialed Appraisers on National Registry 6733

PM: V. Metcalf

Requirement/Guidance	ASC Staff Assessment Compliance (Yes/No) Areas of Concern (AC)			State Required/Recommended Actions from the June 14, 2010 Compliance Review	Status as of December 8, 2010 Follow-Up	Further Required Actions/Comments
	Yes	No	AC			
Enforcement:		X				
States should resolve all complaints filed against appraisers within one year, except for special documented circumstances. (Title XI § 1118 (a), 12 U.S.C. 3347; ASC Policy Statement 10E.)				<p>The final ASC Compliance Review Report required the Board to:</p> <p>(1) provide a written plan on how the Department and Board will revise its complaint process to address the State's significant backlog of outstanding complaints and facilitate more timely complaint disposition in the future; and</p> <p>(2) send quarterly complaint logs to ASC staff to allow monitoring of the Board's progress towards addressing this situation.</p>	<p>The Department made progress in resolving complaints more expeditiously during the last year. The number of complaints outstanding decreased 17%, from 603 to 500. The number outstanding for more than one year decreased by 15%, from 218 to 186.</p> <p>The Department implemented procedural changes as outlined in their written plan provided to the ASC on August 26, 2010. An additional attorney was assigned to help administer appraisal related complaints. Currently four full-time attorneys are dedicated to facilitating complaint dispositions.</p> <p>Initiatives started by Program leadership have improved the complaint investigation and resolution process. A new internal system allows for immediate transfer of case file materials to appropriate personnel in the main office as well as investigators located in field offices throughout the State. By allowing all appropriate personnel and investigators immediate access to case file materials, the complaint disposition process will likely continue to improve.</p>	<p>Further Required Actions: ASC staff encourages the Department and Board to continue its efforts to examine ways to streamline the complaint disposition process.</p> <p>Comments: The ASC staff appreciates the Board's staff and the Board's commitment to addressing this concern. ASC staff will evaluate the progress during the December 2011 Compliance Review of the Program.</p>