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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

January 7, 2009

Sharron Knotts, Executive Director  
West Virginia Real Estate Appraiser  
Licensing and Certification Board  
2110 Kanawha Blvd. East, Suite 101  
Charleston, WV 25311

Dear Ms. Knotts:

Thank you for your November 17, 2008 response to the Appraisal Subcommittee's (ASC) September 15, 2008 field review letter regarding our August 2008 field review of West Virginia's real estate appraiser regulatory program. In your letter you responded to each of the following concerns outlined in our letter:

- **The Board's legislative rules did not reference the most current version of the Uniform Standards of Professional Appraisal Practice (USPAP).**
- **The Board's legislative rules regarding reinstatement of an appraiser from Inactive status did not conform to Appraiser Qualifications Board (AQB) criteria.**
- **West Virginia Legislative Rules regarding the number of continuing education hours required to be completed in a partial year of a continuing education cycle did not conform to AQB Criteria.**
- **West Virginia's complaint investigation and resolution process did not comply with Title XI and ASC Policy Statement 10.**

Our September 15, 2008 field review letter stated that, in practice, Board staff enforces the AQB criteria regarding the first three items. However, the Board needed to initiate the necessary amendments to Board legislative rules to ensure compliance with AQB criteria.

In your response, you stated that you are working with your assigned Senior Assistant Attorney General to draft the needed changes and have them addressed during this legislative session. Thank you for your attention to this concern. Please keep us informed of your progress and provide us, within seven days from the date of its adoption, a copy of the Legislative Rules as finally adopted.

Our September 15, 2008 field review letter also stated that West Virginia's complaint investigation and resolution process did not comply with Title XI and ASC Policy Statement 10E because some complaints were not investigated and resolved in a timely manner. In your response, you stated that the Board has made several changes in the way complaints are handled which should speed up the process. We understand that the Standards Board has begun to meet monthly instead of quarterly. Also, the Executive Director has begun to submit complaints directly to the Standards Board instead of presenting them to the full Board at its quarterly

meeting. Given these procedural changes, the Board believes that it will be able to reduce the backlog of aged complaint cases and address new cases in a timely manner. If these changes fail to allow the Board to properly address this concern, the Board will need to take other appropriate actions to ensure that complaints are investigated and resolved in a timely manner.

Again, thank you for your response. Our field review letter, your response, and any other previous correspondence between us regarding the field review are now publicly available on our Web site. Please contact us if you have further questions.

Sincerely,

Vicki Ledbetter  
Acting Executive Director

Cc:Linda York, Chair