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Appraisal Subcommittee

Federal Financial Institutions Examination Council

January 23, 2009

Clinton P. Sayers, Chairman
Texas Appraiser Licensing and Certification Board
P. O. Box 12188
Austin, Texas 78711-2188

Dear Mr. Sayers:

Thank you for your December 16, 2008 response to the Appraisal Subcommittee's (ASC) November 19, 2008 field review letter regarding our October 2008 field review of the Texas real estate appraiser regulatory program. In your letter you responded to each of the two concerns outlined in our letter as follows.

- **The Texas complaint investigation and resolution process did not comply with Title XI and ASC Policy Statement 10.**

Our November 19th field review letter stated that Texas' complaint investigation and resolution process did not comply with Title XI and ASC Policy Statement 10E because many complaints were not investigated and resolved in a timely manner. We were encouraged by the state's actions to remedy its longstanding concern in this area; however, more time was needed to see whether the new changes would fully address our concerns.

In your response, you stated that with the addition of staff to the Board's enforcement function, the Board is confident that when the ASC returns in 2009, it will see a significant decrease in the number of complaints over one year old.


- **Texas' statute and regulations regarding the review of appraisal work product for applicants for certification did not comply with ASC Policy Statements 10F and G.**

Our November 19th field review letter stated that, in practice, Texas was conforming to ASC Policy Statements 10F and G; however, statute and regulatory amendments still needed to be made to bring them into compliance.

In your response, you stated that this issue will be addressed through a housekeeping bill in the next legislative session, which begins this month. Please keep us informed of your progress and provide us a copy of the legislative bill as finally adopted.

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: Gwen Jackson
Deloris Kraft-Longoria