

□ □ □ □ □ □

Appraisal Subcommittee

Federal Financial Institutions Examination Council

November 25, 2008

Ms. Elizabeth Luce, Director
Department of Licensing
P.O. Box 9020
Olympia, WA 98507-9020

Dear Ms. Luce:

Thank you for your October 30th letter responding to our July 7, 2008 field review letter. As discussed below, it appears that you are taking actions to address the concerns identified in our field review letter to bring Washington's real estate appraiser regulatory program into substantial compliance with Title XI.

- **Washington's complaint investigation and resolution process did not comply with Title XI and ASC Policy Statement 10E.**

In our field review letter, we noted that Washington's complaint investigation and resolution process did not comply with Title XI and ASC Policy Statement 10E. Many complaints were not investigated and resolved in a timely manner, and the Department's complaint log was not kept current. In your October 30th letter, you advised us that after our field review, one of your investigators resigned on short notice and the Governor imposed a hiring freeze. Despite these obstacles, you stated that the Department has taken the following steps to try and address the concerns from our field review:

1. Requested exception to the hiring freeze for the investigator position.
2. Reallocated real estate investigators to investigate real estate appraiser complaints.
3. Provided the real estate investigators with basic appraisal training.
4. Placed a higher priority on appraiser cases in all phases of the process.
5. Hired a full-time employee to update and maintain the complaint tracking system.

We appreciate your efforts and hope that they will be successful in improving Washington's complaint investigation program, bringing it into compliance with Title XI and ASC Policy Statement 10E. We expect to see a substantial reduction in the number of outstanding and aged complaints, and anticipate that your complaint investigation and resolution program will be in full compliance when we perform the next full field review of your Program during 2010. Please let us know if we can be of assistance to you in accomplishing this goal such as writing letters or making calls in support of your requested exemption to the hiring freeze.

Our field review letter, your response, and any other previous correspondence between us regarding the field review now are publicly available on our Web site.

Please contact us if you have any questions.

Sincerely,



Vicki Ledbetter
Acting Executive Director

cc: Ralph Osgood, Assistant Director
Lee Malott, Administrator
Ralph Birkedahl, Program Manager
Cheryl Farivar, Chair
Roosevelt Currie, Chief Administrative Law Judge
Jody Lee Campbell, Assistant Attorney General