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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

January 15, 1999

Bobby Moorer, Chairman  
Alabama Real Estate Appraisers Board  
P.O. Box 304355  
Montgomery, Alabama 36130-4355

Dear Mr. Moorer:

Thank you for your cooperation and your staff's assistance in the December 9-10, 1998 Appraisal Subcommittee ("ASC") review of the Alabama Real Estate Appraisers Board ("Board") and appraiser regulatory program ("Program").

Our review revealed that, in most respects, the Alabama Program is efficient and well operated. Following are areas that we believe need attention.

- **The Board must revise its regulations for Temporary Practice to comply with Title XI and ASC Policy Statement 5.**

By Alabama regulation, temporary practice permits are granted for a 90-day period. As directed by Title XI of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 ("Title XI"), in ASC Policy Statement 5 we identify as burdensome any restriction that limits the valid time period of a temporary practice permit to less than six months or does not provide a temporary practitioner with an effortless method for obtaining an extension of the time period.

As agreed during the December 1998 Board meeting attended by ASC staff, the Board will amend its rules to conform to Title XI, as set forth in ASC Policy Statement 5.

- **The Board needs to investigate and resolve complaints in a timely manner.**

The Board's complaint files are well documented and complete as a result of excellent work by the Board and staff. Enforcement matters are carefully investigated and fairly administered in a timely manner, with the exception that some cases are unduly delayed by individual Board members conducting the final review. The Board's Executive Director recently received approval for an additional staff investigator and replaced another with an experienced appraiser.

As was discussed at your December meeting, the Board has a huge task with its active involvement in investigating complaint files. Because your staff has proven its ability to carry out this work effectively, the Board may wish to delegate much of the investigative process to staff, as resources become available. Such delegation would free the Board members' time and allow them to devote more time to Board meetings and to reviewing staff findings. Board members also will have more time to focus on those complaints that require the Board's involvement.

Please respond to our findings and recommendations within 60 days from the date of this letter. Until the expiration of that period or the receipt of your response, we consider this field

review to be an open matter. After receiving your response or the expiration of the 60-day response period, whichever is earlier, this letter, your response and any other correspondence between you and the ASC regarding this field review become releasable to the public under the Freedom of Information Act and will be made available on our Web site.

If you have any questions, please contact us.

Sincerely,

Herbert S. Yolles  
Chairman