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Appraisal Subcommittee

Federal Financial Institutions Examination Council

July 28, 2006

Clifford P. Cooks, Application Officer
Department of Consumer and Regulatory Affairs
Occupational and Professional Licensing Administration
941 North Capitol Street, NE Suite 7W50
Washington, DC 20002

Dear Mr. Cooks:

Thank you for your June 29th response to our April 18, 2006 field review letter to the District of Columbia (“District”) Board of Appraisers (“Board”). Our April 18th letter addressed three concerns regarding the District’s appraiser regulatory program (“Program”).

- **The Complaint Investigation and Resolution Process**

Based on your response, it appears that the District continues to make some progress in this area. At the time of our March 2006 field review, the District had received 43 complaints. Your letter indicates that the District now has received 49 complaints, an apparent increase of six complaints since April. Also based on your response, the number of cases resolved increased to 14.

It appears that the number of outstanding complaints has increased from 34 to 35 (4 complaints outstanding; 20 at OAG (Office of Attorney General); and 11 at OAH (Office of Administrative Hearing)). We again stress the importance of maintaining a good working relationship with these two offices to help facilitate timely dispositions.

We look forward to receiving your monthly complaint logs and will continue using them to track your progress toward resolving this concern. We plan our next field review in February 2007, and expect to see significant improvement in reducing the backlog of outstanding complaint cases.

- **Board Membership and Participation**

We are pleased to see that the permanent statutory amendment revising the Board’s composition became effective May 12, 2006. We understand, also, that the Board continues to meet regularly. Please continue to send copies of the Board’s monthly meeting minutes for our review. ASC Policy Manager Vicki Ledbetter plans to attend the Board’s September 20th meeting.

- **Temporary Practice**

We are pleased to learn of the June 27th final publication of the new regulatory amendments adopting the revised Appraiser Qualification Board Criteria and specifically permitting temporary license holders one extension of the temporary license term upon written request. This

change and the Board's reduction of the temporary practice fee to \$150 bring the District's temporary practice provisions into conformance with ASC Policy Statement 5.

We appreciate the District's continued efforts to resolve these serious and longstanding concerns. As stated in our previous correspondence, we will perform annual field reviews of your Program to ensure that the District continues to provide the financial, personnel, and other resources needed for an effective Program. We tentatively plan to conduct the next field review in February 2007 and will coordinate the dates and times with you within the next month.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director

cc: Gregory Syphax, Chair