

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
OCCUPATIONAL AND PROFESSIONAL LICENSING ADMINISTRATION
941 NORTH CAPITOL STREET, N.E., SUITE 7W50, WASHINGTON, D.C. 20002
(202) 442-4340

BOARD OF APPRAISERS



~~JUN 27 2006~~

JUN 30 2006

Virginia M. Gibbs
Acting Chairman
Appraisal Subcommittee
2000 K Street, NW, Suite 310

June 29, 2006

Dear Ms. Gibbs:

On behalf of the DC. Board of Appraisers, the staff at DCRA and the staff at Promissor, we would like to thank your staff for the recommendation and guidance that they have provided during this challenging time. I would like to assure you that the Board take your comments very seriously and will continue to work toward continuously making progress to avoid any adverse actions by the Appraisal Subcommittee. We are appreciative of your decision.

The following is a brief discussion of the areas which you have identified as concerns:

- **Concerns regarding complaint investigation and resolution, to bring the Program into substantial compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended (Title XI).**

The Board has addressed the issue of the investigations and resolutions process by putting the following procedures in place.

- *The Board of Appraisers has secured the resources to hire contract investigators that are real estate appraisal professionals.*
- *Entering into annual agreement with three individuals in September 2005 which call for them to (review the appraisal in question, visit the property and comparables if necessary, serve as an expert witness if it goes to hearing, etc..., prepare written report)*
- *The Board distributes cases to those individuals and request responses within a thirty to sixty day process.*
- *As the reports come in staff prepare them for monthly board meeting*

(appraiser subcommittee letter continued)

- *The reviewer come in and discuss findings and recommendations in detail*
- *The Board send the report over to the Office of Attorney General for findings*
- *The Attorney General assigns one or two attorney's in the office on the cases and our staff work very closely with any necessary follow up*
- *The Appraiser at that time has to decide whether they want a hearing or want to settle the case.*

In regards to our formal complaint procedures, we are very pleased in the progress that the contract appraisers have made. (See chart below, and detail chart enclosed)

COMPLAINTS RECEIVED	COMPLAINTS OUTSTANDING	OAG	OAH	CLOSED
49	4	20	11	14

- The District must provide the ASC staff the minutes of each Board meeting and monthly complaint log showing the current status of all outstanding complaints, also the District must provide final statutory and regulatory amendments that have been process.

We will provide the ASC staff with copies of our monthly minutes ten days after the Boards approval; also we will send a monthly report regarding the status of the complaint.

In regards to the rules a Notice of Proposed Rulemaking was published in the D. C. Register on May 26, 2006. In response to these comments the Director and the Board have amended the proposed rules and they have been published again for an additional 30-day. On June 27, 2006 the proposed rules will be published as final. (Copy enclosed)

- **ASC staff person will attend two Board meetings each year, one in connection with the field review and another to be scheduled in consultation with the Board.**

The DC Board of Appraisers welcome the ASC staff to attend monthly Board meetings.

(appraiser subcommittee letter continued)

- **To ensure that the ASC stays abreast of your progress in this area, please submit monthly complaint logs to ASC staff reflecting the current status of all outstanding complaints.**

We will provide the ASC staff with a monthly status of our complaint logs.

- **One of the key components to this plan was a planned statutory amendment to replace one appraiser position on the Board with that of a licensed realtor or broker.**

The DC Board of Appraisers is consist of 5 members, of whom three shall be real estate appraisers licensed and in good standing in the District with not less than 3 years experience in real estate appraising immediately preceding his or her appointment to the Board, one of whom shall be a real estate broker licensed and in good standing in the District, and one shall be a consumer member.

- **Board members agreed to meet on the third Wednesday of each month and to incorporate those meetings into their personal schedules; also the Board staff will notify Ronald Collins, Director of the Boards and Commissions when a Board member has two unexcused absences.**

The DC Board of Appraisers has met on their regularly scheduled meeting date. We have not had to have Ronald Collins from Board and Commissions to intervene.

Sincerely,

Clifford P. Cooks
Application Officer
Business and Professional License Administration