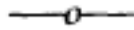


GOVERNMENT OF THE VIRGIN ISLANDS  
OF THE  
UNITED STATES

*fax recd  
9-20-01*



*Department of Licensing and Consumer Affairs*

September 10, 2001

Kathryn Gearheard  
Senior Appraisal Policy Manager  
The Appraisal Subcommittee  
2000 K Street NW, Suite 3 10  
Washington, DC 20006

*, P 2 A*

Dear Ms. Gearheard:

This correspondence is in response to the Appraisal Subcommittee's letter of May 11, 2001, which identified several deficiencies with the Virgin Islands appraisal regulatory program. Since the March 8-9, 2001 field review, several steps have been taken to ensure compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended.

- **Board Vacancies**

The Commissioner of the Department of Licensing and Consumer Affairs sent correspondence to the Governor requesting his immediate attention in appointing new members to the Board. In an effort to expedite the process, Commissioner Rutnik identified (4) appraisers who have expressed an interest in serving on the Board.

- **Appraisers Examination**

The Board procured the appraiser's examination from the State of Mississippi on May 26, 2001. The appraiser's examination will be administered (4) times per year. The initial exam was administered on June 19, 2001.

- **Temporary Practice Permit**

Applications for temporary practice permits are processed by the Administrator for Boards and Commissions within 48 hours of receipt. Applicants who do not have the required tax clearance letter at the time of approval, must provide one within 30 days from the issue date of the temporary permit. Applicants approved for temporary permits are advised in writing that, they are entitled to one renewal without additional cost.

- **Complaint Investigation and Resolution Process**

The Board has not yet addressed this issue, however, it is anticipated that policies and procedures will be established at the Board's October 19, 2001 meeting.

- **AQB Criteria for Upgrading Credentials**

The Board has committed to exercise greater scrutiny when reviewing request for upgrades, as required by the AQB. Applicants who were incorrectly given upgrades without examination and/or sufficient education and experience, were notified of their deficiencies. Applicants who fail to comply with the Board's request by the September 19, 2001 will be downgraded.

- **AQB Criteria for Approval of Educational Courses**

The Board anticipates developing a process for approving educational courses at its October 19, 2001 meeting.

- **Implementation of Regulations and Statutory Changes**

The Board is in the process of revising the original rules and regulations, which were sent to the Governor last October. As a result of the field review by the Appraisal Subcommittee, several changes need to be made in order to comply with Title XI. Efforts were made by the Chairperson Runyon to lobby a Senator of the 24<sup>th</sup> Legislature to assist in this matter, however, these efforts were unsuccessful. Commissioner Rutnik has since directed the Legal Unit of the Department of Licensing and Consumer Affairs, to address this matter post haste. It is anticipated that all changes to the Regulations and amendments to the Statute will be completed by October 31, 2001.

Should you have any further questions or concerns, please feel free to contact me at (340) 773-2226.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa Davis".

Lisa Davis  
Administrator  
Boards and Commissions

Cc: Commissioner Andrew Rutnik  
Board Members