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Appraisal Subcommittee

Federal Financial Institutions Examination Council

November 17, 2003

Sydney W. Beckett, Acting Assistant Director
Department of Licensing
P.O. Box 9015
Olympia, WA 98507-9015

Dear Mr. Beckett:

Thank you for your September 26, 2003 letter responding to our September 8th follow-up field review letter.

We appreciate your assurance that the Department of Licensing (“Department”) will not administratively close a complaint that might indicate potential fraud simply because the appraisal report is more than five years old. You are correct that the Uniform Standards of Professional Appraisal Practice requires an appraiser to retain the work file for five years, in most cases. However, we understand that many appraisers retain documentation indefinitely. Also, complainants often provide adequate documentation to investigate potential fraud situations without the need to rely on appraiser work files.

We agree that your Notice of Correction, as explained in your letter, could be used to conform to Policy Statement 10. Based on your explanation, a Notice of Correction would function much the same as what many States call a “warning letter.” Proper use of such a notification would meet Policy Statement 10’s guidance.

We will continue to monitor your progress in reducing the backlog of outstanding complaints. Please provide a quarterly complaint log listing all complaints, including the complaint status. The log can be submitted in electronic format.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director

cc: Fred Stephens, Director, Department of Licensing