

# DLLR

STATE OF MARYLAND

DEPARTMENT OF LABOR, LICENSING AND REGULATION

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July 1, 2003

Mr. Steven D. Fritts, Chairman  
Appraisal Subcommittee  
2000 K Street, NW #310  
Washington, DC 20006

RE: Subcommittee Report on Field Review of the Maryland Commission of  
Real Estate Appraisers and Home Inspectors

Dear Mr. Fritts:

On behalf of the Maryland Commission of Real Estate Appraisers and Home Inspectors (Commission), I would like to thank you for the opportunity to respond to the above captioned report. The Commission was very pleased that their program, with the exception of two areas, was found to be consistent with the standards established by the Appraisal Subcommittee pursuant to Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989.

In your report, you indicated that the Commission's regulations limit the valid time period of a temporary permit to less than six months after its issuance. Further, the report states that the Commission has no statutes, regulations, or policy that allows for an extension of a permit. You recommended that the Commission amend its regulations and practices to conform to Title XI and ASC Policy Statement 5.

The Commission wishes to thank you for bringing to their attention, their lack of compliance to Title XI and ASC Policy Statement 5. Based on your recommendations, the Commission has approved the promulgation of a regulation that will both provide for a temporary permit to be issued for a full six month period and a provision to allow for an extension of the permit. As a matter of policy, the Commission will continue to provide an opportunity for an individual to receive an extension of a temporary permit.

Also identified in the report was the Finding that the Commission's regulations allow an appraiser to gain work experience credit by teaching appraisals courses. Although the Commission has not awarded any individual such credit, as evidenced in your report, they apologize for neglecting to remove the provision from their regulations. Based on your recommendations, the Commission has approved the promulgation of a regulation to delete the aforementioned obsolete provision from their regulations.

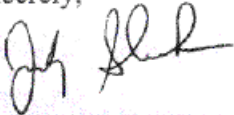


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We wish to thank both you and your staff for the constructive observations and recommendations that were rendered as a result of your review. The Commission assures you that they will continue to develop and maintain appropriate policies and practices consistent with Title XI and those of The Appraisal Subcommittee. Enclosed you will find a copy of the proposed regulations that have been promulgated in response to your *review*.

If you have any questions concerning this matter, feel free to call me at (410) 230-6160.

Sincerely,



Joseph Sliwka  
Executive Director

enclosures

cc: Harry Loleas, Deputy Commissioner  
John Heyn, Chairperson  
Members of the Commission