

BUREAU OF REAL ESTATE APPRAISERS

Sunset Review Report 2015

Presented to the Senate Committee on Business, Professions, and Economic Development



Bureau of Real Estate Appraisers

BACKGROUND INFORMATION AND OVERVIEW OF THE CURRENT REGULATORY PROGRAM

As of December 1, 2015

Section 1 –

Background and Description of the Board and Regulated Profession

Provide a short explanation of the history and function of the bureau.¹ Describe the occupations/profession that are licensed and/or regulated by the board (Practice Acts vs. Title Acts).

In 1989, Title XI of the federal Financial Institutions Reform, Recovery and Enforcement Act (FIRREA) was adopted by the United States Congress mandating all states to license and certify real estate appraisers who appraise property for federally related transactions. In response to the federal mandate, the California Legislature enacted the Real Estate Appraisers Licensing and Certification Law in 1990 (AB 527, Chapter 491, Statutes of 1990), which established the Bureau of Real Estate Appraisers (Bureau or BRE), entirely funded by regulatory fees.

The Licensing Division of the Bureau is responsible for applicant compliance with the minimum requirements for licensure in accordance with criteria established by the federally mandated Appraisal Foundation and California law.² The Licensing Division also registers Appraisal Management Companies (AMC) in compliance with California law.

The Enforcement Division of the Bureau investigates the background of applicants, licensees, and AMC registrants to ensure they meet the standards for licensure. The Enforcement Division also investigates complaints filed against licensed appraisers and registered AMCs.

The Bureau is also responsible for the accreditation of educational courses and providers for real estate appraisers and has reviewed and approved more than 1,800 pre-licensing and continuing education courses.

1. Describe the make-up and functions of each of the bureau's committees (cf., Section 12, Attachment B).

The Bureau does not have an advisory committee.

¹ The term "board" in this document refers to a board, bureau, commission, committee, department, division, program, or agency, as applicable. Please change the term "board" throughout this document to appropriately refer to the entity being reviewed.

² The minimum requirements for licensure are established by the Appraisal Qualifications Board of the Appraisal Foundation.

Table 1a. Attendance			
Date Appointed:			
Meeting Type	Meeting Date	Meeting Location	Attended?
Meeting 1			
Meeting 2			
Meeting 3			
Meeting 4			

Table 1b. Bureau/Committee Member Roster					
Member Name (Include Vacancies)	Date First Appointed	Date Re- appointed	Date Term Expires	Appointing Authority	Type (public or professional)

2. In the past four years, was the bureau unable to hold any meetings due to lack of quorum? If so, please describe. Why? When? How did it impact operations?

The Bureau has not been unable to hold meetings due to a lack of quorum because it does not have an advisory committee.

3. Describe any major changes to the bureau since the last Sunset Review, including:

- Internal changes (i.e., reorganization, relocation, change in leadership, strategic planning)

On July 1, 2013, the Office of Real Estate Appraisers became the California Bureau of Real Estate Appraisers, within the Department of Consumer Affairs (Department or DCA), in accordance with Governor Brown's Government Reorganization Plan No. 2.

A new Office Director, James "Jim" Martin, was appointed by Governor Brown on July 31, 2012, and was reappointed to serve as Bureau Chief following the July 1, 2013 effective date of the Governor's Reorganization Plan No. 2.

- All legislation sponsored by the bureau and affecting the bureau since the last sunset review.

The Bureau has not sponsored any legislation since the last Sunset Review; however, the following is a list of recently enacted legislation that affects the Bureau.

AB 2742 (Committee on Banking and Finance, Chapter 64, Statutes of 2014) makes technical corrections and updates cross-references in the Business and Professions Code, Civil Code, Corporations Code and Financial Code. These changes are clean-up amendments related to SB 664 (Committee on Banking and Financial Institutions, Chapter 243, Statutes of 2011) and revised federal regulations.

Governor's Reorganization Plan No. 2 (Governor Brown, effective July 3, 2012) establishes the Office as a Bureau within the Department of Consumer Affairs, operative July 1, 2013.

AB 2519 (Berryhill, Chapter 683, Statutes of 2012) expands the Office's ability to take disciplinary actions against its licensees and makes other technical and conforming changes to the law governing real estate appraisers and appraisal management companies.

SB 706 (Price, Chapter 712, Statutes of 2011) makes numerous enforcement changes to the Department of Real Estate and the Bureau, requiring specified licensing boards to post information about licensees on the Internet.

SB 6 (Calderon, Chapter 716, Statutes of 2011) updates California's Real Estate Law, Appraisal Law, and Civil Code, to reflect recent changes enacted at the federal level, pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act.

- All regulation changes approved by the bureau since the last sunset review. Include the status of each regulatory change approved by the bureau.

In 2015, the Bureau amended California Code of Regulations (CCR) Title 10 section 3528 to comply with new federal minimum requirements for licensure. CCR 3528 was effective April 1, 2015. The Bureau also repealed CCR section 3530 (citizenship requirement) to comply with Business and Professions Code section 135.5. CCR 3530 was approved by the Office of Administrative Law on April 27, 2015 as a section 100 change.

In 2014, the Bureau changed the "Office" to the "Bureau" and made other non-substantive changes as a result of the Governor's Reorganization Plan No. 2.

In 2013, with the approval of the Secretary of State, the Bureau amended Article 15 regarding the Bureau's conflict of interest regulation.

In 2011, the Bureau amended several regulations primarily to interpret and clarify the newly chaptered AMC laws. These amendments included changes to California Code of Regulations Title 10 sections: 3500; 3522-30; 3582; 3681; 3702; 3703; 3721; 3724; 3728; 3721; and 3741. The Bureau also adopted new sections 3575; 3576; and 3577.

The Bureau has begun the internal review process for five regulations including sections: 3543 regarding minimum basic education requirements for licensure; 3568 regarding licensee supervision requirements; 3569 regarding license reciprocity; and 3733 regarding the Bureau's disciplinary guidelines; 3661 and 3668 regarding continuing education examination and law course renewal.

4. Describe any major studies conducted by the bureau (cf. Section 12, Attachment C).

No major studies have been undertaken by the Bureau.

5. List the status of all national associations to which the bureau belongs.

The Bureau is a member of the Association of Appraisal Regulatory Officials (AARO), a national organization of regulatory officials including approximately 48 states and territories.

- Does the bureau's membership include voting privileges?

The Bureau Chief was elected to the Board of Directors of AARO in 2014 and is a voting member.

- List committees, workshops, working groups, task forces, etc., on which bureau participates.

Currently the Bureau is not participating in any committees, workshops or groups. The Bureau Chief was nominated and appointed to the Appraisal Subcommittee (ASC) Advisory Committee in March of 2014 which has recently completed its mission for development of federal regulations which may be prescribed by the ASC concerning: (1) temporary practice; (2) national registries; (3) information sharing; and (4) enforcement. This committee was legislatively mandated pursuant to Section 1106 of Title XI as amended by the Dodd-Frank Act and included seven state regulators, three financial institution representatives, three appraiser members, two Appraisal Management Companies, one consumer advocate and a real estate agent representative.

- How many meetings did bureau representative(s) attend? When and where?

The Bureau Chief attended four ASC advisory committee meetings in Washington DC, April 2014, July 2014, October 2014, and February 2015.

- If the bureau is using a national exam, how is the bureau involved in its development, scoring, analysis, and administration?

The national licensing exam is developed and authorized by the Appraisal Qualifications Board, an independent board of The Appraisal Foundation under the provisions of Title XI of the Financial Institution Reform, Recovery and Enforcement Act of 1989 (FIRREA). The Bureau contracts with an exam provider who administers and scores the national exam. The bureau does not have a role in exam development, scoring, analysis, or administration.

Section 2 – Performance Measures and Customer Satisfaction Surveys

6. Provide each quarterly and annual performance measure report for the bureau as published on the DCA website.

These reports are also available online at:

http://www.dca.ca.gov/about_dca/cpei/quarterly_reports.shtml

7. Provide results for each question in the bureau's customer satisfaction survey broken down by fiscal year. Discuss the results of the customer satisfaction surveys.

The Bureau has a customer survey/feedback option on its website and on correspondence with the public, licensees, respondents, complainants, and educational providers for several years. Each survey response is screened and routed to management staff for appropriate action. Everyone who submits a survey is notified of the outcome within three business days of submittal.

More recently, the Bureau modified and expanded this feedback to follow the DCA customer satisfaction survey model. Of the surveys sent out, the Bureau had an over 10% response rate, receiving around 1,300 responses. See Attachment 3 for survey results.

Section 3 – Fiscal and Staff

Fiscal Issues

8. Describe the bureau's current reserve level, spending, and if a statutory reserve level exists.

A fund condition analysis shows 16.2 months in reserve for 14/15 and 12.0 months for 15/16.

9. Describe if/when a deficit is projected to occur and if/when fee increase or reduction is anticipated. Describe the fee changes (increases or decreases) anticipated by the bureau.

The Bureau's revenue is closely linked to variations in the real estate market, both statewide and nationally. Swings in supply and demand, interest rates, employment, and the availability of capital all affect the market for real estate appraisal services and subsequently the number of licensed appraisers. The bureau closely monitors fund reserves.

Table 2. Fund Condition

(Dollars in Thousands)	FY 2010/11	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16
Beginning Balance	7,075	6,046	4,130	2,886	9,910	7,625
Revenues and Transfers	3,528	2,927	3,662	12,102	3,097	3,822
Total Revenue	\$3,528	\$2,927	\$3,662	\$4,002	\$3,097	\$
Budget Authority	4,827	4,914	4,971	5,422	5,680	5,651
Expenditures*	4,062	4,831	4,981	5,078	5,470	5,661
Loans to General Fund	0	0	0	0	0	0
Accrued Interest, Loans to General Fund	0	0	0	0	0	0
Loans Repaid From General Fund	0			8,100		
Fund Balance	\$6,541	\$4,142	\$2,811	\$9,909	\$7,625	\$5,786
Months in Reserve	16.2	10.0	6.6	21.7	16.2	12.0

The expenditures in the fund condition table are net of reimbursements and includes direct assessments to the fund (FISCAL, 21st Century, et) so they will not tie to the Expenditures by Component.

10. Describe the history of general fund loans. When were the loans made? When have payments been made to the bureau? Has interest been paid? What is the remaining balance?

Loans made from BREA to the GF- \$1M (FY 2003/04), \$2M (FY 2004/05), and \$16.6M (FY 2008/09). Payments made to the bureau- \$5M (FY 2009/10) and \$8.1M (2013/14). The remaining balance is \$6.5M.

11. Describe the amounts and percentages of expenditures by program component. Use *Table 3. Expenditures by Program Component* to provide a breakdown of the expenditures by the bureau in each program area. Expenditures by each component (except for pro rata) should be broken out by personnel expenditures and other expenditures.

Table 3. Expenditures by Program Component (list dollars in thousands)								
(Dollars in Thousands)	FY 2011/12		FY 2012/13		FY 2013/14		FY 2014/15	
	Personnel Services	OE&E	Personnel Services	OE&E	Personnel Services	OE&E	Personnel Services	OE&E
Licensing	483	338	453	293	609	295	643	301
Examination	-	-	-	-	-	-	-	-
Enforcement	1249	1281	1305	1231	1462	1066	1607	987
Administration	927	564	962	586	937	393	1113	462
DCA Pro Rata****	-	-	-	228	-	300	-	361
TOTALS	\$2,659	\$2,183	\$2,720	\$2,338	\$3,008	\$2,053	\$3,363	\$2,111
*Administration includes costs for executive staff, bureau, administrative support, and fiscal services.								

12. Describe license renewal cycles and history of fee changes in the last 10 years. Give the fee authority (Business and Professions Code and California Code of Regulations citation) for each fee charged by the bureau.

The license renewal cycle is two years, with a four year cycle for continuing education. The Bureau's budget grew significantly during the real estate boom from 2003 to 2008 and licensing fees were reduced in 2009. Since that time, the population of licensed appraisers in California has declined by nearly 50% as market activity declined. B&P sections 11400-11409, Title 10 CCR sections 3581-3583 provides authority for fees collected by the Bureau for appraiser licensing and the registration of appraisal management companies.

Table 4. Fee Schedule and Revenue (list revenue dollars in thousands)							
Fee	Current Fee Amount	Statutory Limit	FY 2011/12 Revenue	FY 2012/13 Revenue	FY 2013/14 Revenue	FY 2014/15 Revenue	% of Total Revenue
AT Initial/AL Renewal/Any Reciprocal	\$310-\$355		109	512	408	297	17.23%
AL Initial	\$455*	\$450	18	-	7	14	0.51%
AR/AG Initial/AL Late Renewal	\$435-\$510	\$525	44	62	97	132	5.60%
AT Renewal	\$310*	\$450	39	69	66	55	2.96%
AR/AG Renewals & AT Late Renewal	\$435*	\$525	447	2180	1648	84	42.34%
AR/AG Late Renewal	\$560*		1671	99	82	84	4.06%
Upgrades AT to AL	\$210*		51	12	13	11	0.59%
Upgrades AT to AR & AT to AG	\$285*		-	9	15	7	0.54%
Upgrades AL to AR & AR to AG	\$235*		-	37	48	49	2.37%

Reciprocal Residential	\$355*		-	1	-	-	0.00%
DCSS or Other Reinstatement App	\$140		-	-	1	1	0.05%
Dishonored Check Reinstatements	\$25		-	-	-	-	0.00%
AMC App Review/Registration	\$1,750		255	206	259	184	10.83%
AMC Controlling Person App	\$80 each		24	5	3	3	0.15%
AMC Misc Changes	\$20			3	1	1	0.05%
Temp Practice Permits	\$80			20	22	20	1.03%
Non Taxable Sales Sale of State Registry	\$55		2	-	1	1	0.05%
One Year Subscription - CA Registry Full List	\$600		-	--	1	-	0.02%
Petition for Equivalency	\$45 each		58	3	2	2	0.10%
Misc Changes & Dup Licenses & Lic History	\$20 each		15	24	10	8	0.44%
Course Provider Acc App New/Renew	\$300		64	5	6	6	0.29%
BE Course Accreditation	\$500		3	48	16	14	0.73%
BE USPAP Course Accreditation	\$250		-	-	2	43	1.10%
CE Course Accreditation	\$200		-	-	34	3	0.90%
CE USPAP Course Accreditation	\$100		-	-	4	-	0.10%
Miscellaneous	Variable		1	11	-	-	0.00%
Penalty Assessments (Fines)	Variable		127	236	148	83	5.65%
Penalty Assessments - Cost of Enforcement	Variable		-	110	60	9	1.69%
Penalty Assessments - Monitoring Costs	Variable		-	8	14	12	0.64%

*Inclusive of additional fees, including application review, background fingerprinting, federal, state, and issuance fees.

13. Describe Budget Change Proposals (BCPs) submitted by the bureau in the past four fiscal years.

Table 5. Budget Change Proposals (BCPs)

BCP ID #	Fiscal Year	Description of Purpose of BCP	Personnel Services				OE&E	
			# Staff Requested (include classification)	# Staff Approved (include classification)	\$ Requested	\$ Approved	\$ Requested	\$ Approved
1111-007	FY 14-15	Request to establish 1.0 permanent position for a Senior Programmer Analyst-Specialist(Programmer) to be funded through an internal redirection.	1.0 - Senior Programmer Analyst-Specialist (Programmer)	1.0 - Senior Programmer Analyst-Specialist (Programmer)	-\$66,000	-\$66,000		

Staffing Issues

14. Describe any bureau staffing issues/challenges, i.e., vacancy rates, efforts to reclassify positions, staff turnover, recruitment and retention efforts, succession planning.

The Bureau does not currently have any staffing challenges. Consistent with Goal 4 of the Strategic Plan the Bureau has an organizational-wide succession plan that focuses on recruitment and retention. The Bureau implements promotional opportunities, staff cross training, rotating or expanding of job responsibilities when possible, and takes advantage of DCA SOLID training opportunities.

15. Describe the bureau's staff development efforts and how much is spent annually on staff development (cf., Section 12, Attachment D).

The bureau takes full advantage of the Department's SOLID training opportunities including analytical skills, computer and software skills and supervision.

The Bureau also takes advantage of the specialized investigator training provided and paid for by the Appraisal Subcommittee. Other training funded specifically by the Bureau includes primarily continuing education in support of investigators maintaining current industry knowledge and active licenses which are required to hold the position. Average annual cost for this staff development training is \$7,800.

Section 4 – Licensing Program

16. What are the bureau's performance targets/expectations for its licensing³ program? Is the bureau meeting those expectations? If not, what is the bureau doing to improve performance?

Title 10 California Code of Regulations section 3570 provides a 90-day time limit on processing license applications. This requires the bureau to provide the applicant written notice of whether their application is complete or deficient within 90 days. The law also requires that licenses be issued or denied within 90 days of the bureau's receipt of the Request for Issuance form, which indicates that all requirements for licensure have been met including a background investigation and passage of the licensing examination. The bureau currently meets these processing requirements.

³ The term "license" in this document includes a license certificate or registration.

17. Describe any increase or decrease in the bureau's average time to process applications, administer exams and/or issue licenses. Have pending applications grown at a rate that exceeds completed applications? If so, what has been done by the bureau to address them? What are the performance barriers and what improvement plans are in place? What has the bureau done and what is the bureau going to do to address any performance issues, i.e., process efficiencies, regulations, BCP, legislation.

Federal guidelines require applications be processed within 90 days and the Bureau meets this requirement for all license processing activities including new applications, upgrade applications, renewal applications, educational course provider and course approval, and AMC registration. Online renewals have significantly reduced the turn around time to only a matter of five working days or less in many cases. There are no processing backlogs.

18. How many licenses or registrations does the bureau issue each year? How many renewals does the bureau issue each year?

The Bureau issues approximately 360 new licenses, and approximately 5,800 license renewals annually, across four license types: trainee, residential, certified residential, and certified general. Each license has a limited scope except for the "certified general" license type. If a licensee has a license other than a certified general and meets the requirements for a higher level license, they can upgrade their license with an application. License upgrade applications have averaged 260 annually over the last four years. The Bureau issues approximately 125 new AMC registrations annually and approximately 86 AMC renewals annually.

Table 6. Licensee Population					
		FY 2010/11	FY 2011/12	FY 2012/13	FY 2013/14
TRAINEE LICENSE	Active	1339	864	791	786
	Out-of-State	N/A	N/A	N/A	N/A
	Out-of-Country				
	Delinquent				
RESIDENTIAL LICENSE	Active	2732	2108	1851	1673
	Out-of-State	4	1	9	3
	Out-of-Country				
	Delinquent				
CERTIFIED RESIDENTIAL	Active	6412	6222	6036	6015
	Out-of-State	24	17	50	43
	Out-of-Country				
	Delinquent				
CERTIFIED GENERAL	Active	3439	3374	3290	3264
	Out-of-State	12	9	112	101
	Out-of-Country				
	Delinquent				

Table 7a. Licensing Data by Type

Application Type		Received	Approved	Closed	Issued	Pending Applications			Cycle Times		
						Total (Close of FY)	Outside Bureau control*	Within Bureau control*	Complete Apps	Incomplete Apps	combined, IF unable to separate out
FY 2012/13	(Exam) ⁴	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	(License)	351	299	N/A	221	270	228	42	N/A	N/A	68
	(Renewal)	6321	6613	19	6613	147	65	28	N/A	N/A	31
FY 2013/14	(Exam) ⁵	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	(License)	489	475	39	387	312	282	30	N/A	N/A	51
	(Renewal)	4899	4932	18	4932	22	16	6	N/A	N/A	11
FY 2014/15	(Exam) ⁶	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	(License)	361	349	48	314	273	249	24	N/A	N/A	46
	(Renewal)	5687	5798	2	5798	24	15	9	N/A	N/A	9

* Optional. List if tracked by the bureau.

Table 7b. Total Licensing Data

	FY 2012/13	FY 2013/14	FY 2014/15
Initial Licensing Data:			
Initial License Applications Received	351	489	361
Initial License Applications Approved	299	475	238
Initial License Applications Closed	128	92	39
License Issued	221	387	314
Initial License Pending Application Data:			
Pending Applications (total at close of FY)	N/A ⁷	243	171
Pending Applications (Pending completion of prerequisites)*	N/A ⁸	205	151
Pending Applications (Pending Bureau review)*	N/A ⁹	38	20
Initial License/Initial Exam Cycle Time Data (WEIGHTED AVERAGE):			
Average Days to Application Approval (All - Complete/Incomplete)	48	44	33
Average Days to Application Approval (incomplete applications)*	60	49	50
Average Days to Application Approval (complete applications)*	44	20	17
License Renewal Data:			
License Renewed	6613	4932	5799

* Optional. List if tracked by the bureau.

⁴ The Bureau currently is not able to determine the requested examination information. However, the Bureau is working to update its system to add this capability.

⁵ The Bureau currently is not able to determine the requested examination information. However, the Bureau is working to update its system to add this capability.

⁶ The Bureau currently is not able to determine the requested examination information. However, the Bureau is working to update its system to add this capability.

⁷ This information is stored in the Bureau's legacy system and is not available.

⁸ This information is stored in the Bureau's legacy system and is not available.

⁹ This information is stored in the Bureau's legacy system and is not available.

19. How does the bureau verify information provided by the applicant?

- a. What process does the bureau use to check prior criminal history information, prior disciplinary actions, or other unlawful acts of the applicant?

The Bureau conducts criminal background investigations through California Department of Justice and the Federal Bureau of Investigations.

- b. Does the bureau fingerprint all applicants?

The Bureau uses Live Scan to obtain electronic fingerprints or requires submittal of hardcopy fingerprint cards of all applicants.

- c. Have all current licensees been fingerprinted? If not, explain.

All current licensees have been fingerprinted.

- d. Is there a national databank relating to disciplinary actions? Does the bureau check the national databank prior to issuing a license? Renewing a license?

The Appraisal Subcommittee maintains a National Registry of licensed appraisers that the Bureau uses to check for disciplinary actions against all license applicants, and the Bureau checks the National Registry prior to renewing a license. Depending on the discipline stated on the National Registry, the Bureau may institute disciplinary action against the license or deny the license.

- e. Does the bureau require primary source documentation?

Applicants are required to provide certified copies of police reports and/or court documents related to the applicant's record.¹⁰ The Bureau follows up by acquiring an original set of documents directly from the arresting agency or the court of record in cases of significant violations or if incomplete records are submitted by the applicant.

20. Describe the bureau's legal requirement and process for out-of-state and out-of-country applicants to obtain licensure.

Per Title XI, FIRREA (1989) and amended by the Dodd-Frank Act, the Bureau offers reciprocity when an appraiser has a valid home state credential from a compliant state whose credentialing requirements meet or exceed those of California at the time of application. Licenses are issued without additional examination, but the licensing fee is still required. Applicants are required to submit documentation of their current license and a letter of license history. Out-of-country applicants must meet the same initial licensing requirements.

Note: Consistent with Policy Statement 5 issued by the Appraisal Subcommittee on June 1, 2013, the Bureau is in the process of changing this regulation¹¹ to remove the need for agreements between states for reciprocity. This will ensure that appraisers from any other states can receive a California license when qualified.

¹⁰ Required by Business and Professions Code section 11318.

¹¹ California Code of Regulation section 3569

21. Describe the bureau's process, if any, for considering military education, training, and experience for purposes of licensing or credentialing requirements, including college credit equivalency.

- a. Does the bureau identify or track applicants who are veterans? If not, when does the bureau expect to be compliant with BPC § 114.5?

The Bureau is in compliance with BPC § 114.5, and while it does identify military personnel through the application, there is currently no process for tracking those applicants specifically.

- b. How many applicants offered military education, training or experience towards meeting licensing or credentialing requirements, and how many applicants had such education, training or experience accepted by the bureau?

To date, the Bureau has had one applicant offer military education towards meeting the licensing requirements and that education was accepted. Experience and training requirements dictated by the Appraisal Qualifications Board (AQB) are very specific and can only be met through working in the appraisal profession while under the supervision of a state certified appraiser. The AQB, as established by the Appraisal Foundation and mandated by congress through Title XI of the federal Financial Institutions Reform, Recovery and Enforcement Act (FIRREA 1989), sets forth the minimum qualification criteria for state licensing, certification and re-certification of real property appraisers nationally. Title XI mandates that all state certified appraisers must meet the minimum education, experience and examination requirements promulgated by the AQB.

- c. What regulatory changes has the bureau made to bring it into conformance with BPC § 35?

The minimum education requirements for licensure are established by the AQB and implemented by the Bureau. The Bureau has the authority to approve military education within the guidelines set by the AQB. Because the Bureau has only had one request under this section, each application is reviewed on a case-by-case basis to determine how military education, training, and experience may be used to meet the licensure requirements. Therefore, no regulatory changes are needed to comply with BCP § 35.

- d. How many licensees has the bureau waived fees or requirements for pursuant to BPC § 114.3 and what has the impact been on bureau revenues?

To date, the Bureau has not had any requests for waiver pursuant to this code section.

- e. How many applications has the bureau expedited pursuant to BPC § 115.5?

To date, the bureau has not had any applications submitted seeking expedited processing pursuant to this code section.

22. Does the bureau send No Longer Interested notifications to DOJ on a regular and ongoing basis? Is this done electronically? Is there a backlog? If so, describe the extent and efforts to address the backlog.

Currently the Bureau sends No Longer Interested notifications to the Department of Justice (DOJ) when a license is revoked or it expires and the Bureau is notified. This is still a paper process for the Bureau. There is a backlog currently, but the Bureau is in the process of developing an electronic process via its REALE database to identify and process all former licensees outside of their renewal period who may have not received notification during the transition from the legacy IT system. This process should be complete within 6 months and will resolve the current backlog issues.

Examinations

Table 8. Examination Data				
California Examination (include multiple language) if any: All California applicants take national exam				
License Type				
Exam Title				
FY 2010/11	# of 1 st Time Candidates			
	Pass %			
FY 2011/12	# of 1 st Time Candidates			
	Pass %			
FY 2012/13	# of 1 st Time Candidates			
	Pass %			
FY 2013/14	# of 1 st time Candidates			
	Pass %			
Date of Last OA				
Name of OA Developer				
Target OA Date				
National Examination (include multiple language) if any: California Applicants for National Exam				
License Type		Res/Trainee	Cert Residential	Cert General
Exam Title		National Uniform	Licensing & Cert	Examination
FY 2010/11	# of 1 st Time Candidates	198	170	74
	Pass %	55	65	62
FY 2011/12	# of 1 st Time Candidates	229	121	45
	Pass %	65	69	87
FY 2012/13	# of 1 st Time Candidates	278	112	34
	Pass %	34	71	32
FY 2013/14	# of 1 st time Candidates	224	313	61
	Pass %	48	55	67
Date of Last OA		Ongoing	Ongoing	Ongoing
Name of OA Developer		AQB	AQB	AQB
Target OA Date				

23. Describe the examinations required for licensure. Is a national examination used? Is a California specific examination required?

The examination for each license category is a national examination developed by the Appraisal Qualifications Board of the Appraisal Foundation and administered to all license candidates nationwide.

24. What are pass rates for first time vs. retakes in the past 4 fiscal years? (Refer to Table 8: Examination Data)

In general, the pass rates for first time test takers averaged approximately 60% except for 2013 where the pass rate fell to 44%. Retake pass rates averaged just over 40% except for 2013 where the pass rate was only 25%. This trend is generally consistent with the national pass rates, particularly in the lower license levels, where the applicants with the least education and experience are more affected by the ongoing changes in the exam as developed by the AQB. The reason for the drop in the pass rate in 2013 is unclear, but it may have been due to the increased federal requirements for licensure which caused many licensees to try to upgrade their license-type.

25. Is the bureau using computer based testing? If so, for which tests? Describe how it works. Where is it available? How often are tests administered?

Testing for all three licensure categories is computerized; however a pencil-and-paper option is still available. The examinations for all license categories is scheduled and administered at 16 testing sites located throughout the state, at least five times a week.

26. Are there existing statutes that hinder the efficient and effective processing of applications and/or examinations? If so, please describe.

There are currently no statutes that hinder the Bureau's efficient and effective processing of applications or examinations.

School approvals

27. Describe legal requirements regarding school approval. Who approves your schools? What role does BPPE have in approving schools? How does the bureau work with BPPE in the school approval process?

The Bureau does not approve any schools; it accepts coursework completed at an institution accredited by a U.S. Department of Education approved accreditor. The Bureau's regulations state that it will accept coursework from BPPE approved institutions; therefore, if BPPE approved an institution, the Bureau would accept coursework completed at that institution. The Bureau does not work with BPPE in the approval process.

28. How many schools are approved by the bureau? How often are approved schools reviewed? Can the bureau remove its approval of a school?

The Bureau does not approve schools; it accepts coursework completed at accredited or BPPE approved institutions. Specifically, the Bureau accepts accredited courses as long as the content meets AQB minimums, and reviews for content when the course has not been previously approved by the Bureau or AQB.

29. What are the bureau's legal requirements regarding approval of international schools?

The Bureau does not approve schools, international or otherwise. The Bureau will review and approve distance education course credits if they are taken at an accredited or BPPE approved institution, or if they are also approved by the International Distance Education Certification Center or the AQB Course Approval Program. An applicant from another country must meet the same licensure requirements as any other applicant. There is no reciprocity for an appraiser in another country.

Continuing Education/Competency Requirements

30. Describe the bureau's continuing education/competency requirements, if any. Describe any changes made by the bureau since the last review.

The term of a California real estate appraiser's license is two years. All licensed appraisers must meet minimum continuing education requirements before renewing their license. A total of 56 hours of continuing education is required during the four-year continuing education cycle including the following mandatory courses for all license categories.

7-hour National Uniform Standards of Professional Appraisal Practice (USPAP) course-required every two years.

4-hour Bureau approved course entitled "Federal and State Laws and Regulations"- required every four years. This 4-hour course is an addition since the last sunset review. (See BPC section 11360(a).)

In practical terms, this requires a renewal of the 7-hour USPAP course every two years on its own, and a full continuing education (56 hours) renewal every four years. Generally the requirement is a full CE 56 hour renewal every other two year cycle, with a reduced 7 hour CE renewal cycle in between.

Continuing education courses or seminars must cover appraisal related topics including subjects such as land use planning, appraisal computer applications, cost estimating, and green building appraisals.

The requirement to take the 4-hour Bureau approved course entitled "Federal and State Laws and Regulations" became operative on January 1, 2013 after Business and Professions Code section 11360 was amended to require the course.

a. How does the bureau verify CE or other competency requirements?

The Bureau reviews each course completion certificate for compliance with continuing education requirements.

b. Does the bureau conduct CE audits of licensees? Describe the bureau's policy on CE audits.

Bureau staff reviews each completion certificate for course name and approval number, number of hours, method of instruction, completion date, and a penalty of perjury statement with signature of instructor/verifier. As such, subsequent audit of licensee continuing education is not necessary.

c. What are consequences for failing a CE audit?

If continuing education hours cannot be verified upon application a deficiency letter is issued, and the applicant is allowed to supplement the application with additional documentation. If continuing education hours still cannot be verified, continuing education hours are not awarded and the application for license renewal is denied. Applicants continue to have a two year grace period for renewal after expiration during which time a renewal can still be completed after submitting evidence of the required education.

d. How many CE audits were conducted in the past four fiscal years? How many fails? What is the percentage of CE failure? How many fails? What is the percentage of CE failure?

Continuing education audits are not performed because verification of continuing education completion is done for each and every applicant for renewal. Failure to submit required evidence of continuing education results in denial of the application so there are no licensees who failed to complete their continuing education. There are approximately 15 fails a year accounting for less than 1% of renewals.

e. What is the bureau's course approval policy?

Course providers must submit course description including method of instruction, timed course outline, textbooks, proposed advertising and promotional material, and examinations. Course material must cover appraisal-related subjects consistent with Appraisal Qualifications Board requirements.

f. Who approves CE providers? Who approves CE courses? If the bureau approves them, what is the bureau application review process?

The Bureau approves continuing education course providers. The Bureau approves courses or courses may be pre-approved by the Appraisal Qualifications Board. The Bureau reviews course approval applications for compliance with the Bureau's approval policy and consistency with Appraisal Qualifications Board requirements.

g. How many applications for CE providers and CE courses were received? How many were approved?

For fiscal year 2014-2015, 12 new applications for course provider accreditation were received and all were approved.

h. Does the bureau audit CE providers? If so, describe the bureau's policy and process.

Currently, the Bureau does not formally audit CE providers. Continuing education provider accreditation is valid for four years. Continuing education providers must resubmit an entirely new application which is reviewed by the Bureau. During the four-year accreditation period, course providers must notify the Bureau of any material change to the education offering, ownership or operating policies. Bureau staff investigators are also debriefed after attendance at continuing education course offerings to provide the education coordinator feedback on the content and quality of the courses taken for staff licensing requirements. However, as explained in (i) below, the Bureau is working on a survey to develop a formal audit program.

i. Describe the bureau's effort, if any, to review its CE policy for purpose of moving toward performance based assessments of the licensee's continuing competence.

The Bureau is currently developing a licensee survey seeking feedback on their continuing education experience. This information will be used to initiate formal audits or program review of course providers.

Section 5 – Enforcement Program

31. What are the bureau's performance targets/expectations for its enforcement program? Is the bureau meeting those expectations? If not, what is the bureau doing to improve performance?

The primary program goal for enforcement is timely, effective, and consistent processing of complaints in a manner that is equitable and well-documented. Appraisal Subcommittee Policy Statement seven requires resolution of complaints filed against appraisers within one year of the complaint filing date. In the majority of cases, the Bureau is meeting these expectations; however, there are a small number of very complex multiple property cases that do not meet the Bureau's one year timeline. To improve performance, the Bureau is employing multiple measures including, increasing the frequency of, and attendance at settlement conferences, seeking the earliest possible hearing date, and working with investigators to reduce investigation time.

32. Explain trends in enforcement data and the bureau's efforts to address any increase in volume, timeframes, ratio of closure to pending cases, or other challenges. What are the performance barriers? What improvement plans are in place? What has the bureau done and what is the bureau going to do to address these issues, i.e., process efficiencies, regulations, BCP, legislation?

The volume of complaints increases and decreases with significant changes in market trends, lending volumes and property values. These variations in complaint volume are very difficult to quantify due to the many market variations and factors that drive home values up or down, sometimes over a relatively short time period. A surge or reduction in complaints may seem reversed or counter intuitive due to the delay in the timing of the complaint when compared to the actual transaction and the markets ability to recognize the outcome of appraisal reports that may be a few years old. During the real estate boom from 2003 to 2007, complaints were down in volume; but during the downturn from 2008 to 2012, increased by approximately 40%. The Bureau continually works to improve any potential barriers by maintaining an adequate number of qualified enforcement staff, working with the Office of the Attorney General to ensure better understanding of technical appraisal issues, ensure the timely drafting of pleadings and request earliest hearing date, and request settlement conferences on cases not requiring a mandatory conference.

Table 9a. Enforcement Statistics				
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15
COMPLAINT				
Intake				
Received	591	488	347	325
Closed ¹²	15	10	8	2
Referred for investigation	576	478	339	323
Average Time to Close ¹³	28	34	18	33
Pending (close of FY)	ILD	ILD	5	1
Source of Complaint				
Public	34	205	107	113
Licensee/Professional Groups	341	164	151	127
Governmental Agencies	12	14	15	16
Lender/Financial Institutions	204	105	74	69
Conviction / Arrest				
CONV Received	N/A	N/A	N/A	N/A
CONV Closed	N/A	N/A	N/A	N/A
Average Time to Close	N/A	N/A	N/A	N/A
CONV Pending (close of FY)	N/A	N/A	N/A	N/A
LICENSE DENIAL				
License Applications Denied	3	3	8	7
SOIs Filed	ILD	2	2	1
SOIs Withdrawn	ILD	0	0	0
SOIs Dismissed	ILD	0	0	0
SOIs Declined	ILD	0	0	0
Average Days SOI	N/A	N/A	N/A	N/A
ACCUSATION				
Accusations Filed	44	27	5	4
Accusations Withdrawn	0	0	0	0
Accusations Dismissed	0	0	0	0
Accusations Declined	0	0	0	0
Average Days Accusations	0	0	0	0
Pending (close of FY)	ILD	12	3	2

¹² Case closed because the Bureau did not have jurisdiction.

¹³ Average time to close for lack of jurisdiction.

Table 9b. Enforcement Statistics (continued)				
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15
DISCIPLINE				
Disciplinary Actions				
Proposed/Default Decisions	73	89	60	82
Stipulations	30	42	33	31
Average Days to Complete	704	549	584	494
AG Cases Initiated	55	16	11	7
AG Cases Pending (close of FY)	N/A	N/A	N/A	514
Disciplinary Outcomes				
Revocation	4	10	3	5
Voluntary Surrender	10	11	6	5
Suspension	0	0	0	0
Probation with Suspension	1	4	6	2
Probation	29	38	27	29
Probationary License Issued	N/A	N/A	N/A	N/A
Citations	59	68	51	72
PROBATION				
New Probationers	30	42	33	31
Probations Successfully Completed	ILD	38	30	30
Probationers (close of FY)	N/A	N/A	N/A	N/A
Petitions to Revoke Probation	ILD	4	3	1
Probations Revoked	0	2	3	1
Probations Modified	0	0	0	0
Probations Extended	0	0	0	0
Probationers Subject to Drug Testing	0	0	0	8
Drug Tests Ordered	0	0	0	96
Positive Drug Tests	0	0	0	0
Petition for Reinstatement Granted	0	0	0	0
DIVERSION				
New Participants	N/A	N/A	N/A	N/A
Successful Completions	N/A	N/A	N/A	N/A
Participants (close of FY)	N/A	N/A	N/A	N/A
Terminations	N/A	N/A	N/A	N/A
Terminations for Public Threat	N/A	N/A	N/A	N/A
Drug Tests Ordered	N/A	N/A	N/A	N/A
Positive Drug Tests	N/A	N/A	N/A	N/A

¹⁴ The Bureau is working on an enhancement to capture this information at the end of each fiscal year. As of October 2015 the Bureau had 5 respondents with cases at the Attorney General's office

Table 9c. Enforcement Statistics (continued)				
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15
INVESTIGATION				
All Investigations (Use CAS Report EM 095)				
First Assigned	591	488	338	332
Closed	673	518	407	388
Average days to close	275	238	251	281
Pending (close of FY)	330	296	228	174
Desk Investigations (Use CAS Report EM 095)				
Closed	673	518	407	388
Average days to close	275	238	251	281
Pending (close of FY)	330	296	228	174
Non-Sworn Investigation (Use CAS Report EM 095)	N/A	N/A	N/A	N/A
Closed	N/A	N/A	N/A	N/A
Average days to close	N/A	N/A	N/A	N/A
Pending (close of FY)	N/A	N/A	N/A	N/A
Sworn Investigation				
Closed (Use CAS Report EM 095)	N/A	N/A	N/A	N/A
Average days to close	N/A	N/A	N/A	N/A
Pending (close of FY)	N/A	N/A	N/A	N/A
COMPLIANCE ACTION (Use CAS Report 096)				
ISO & TRO Issued	N/A	N/A	N/A	N/A
PC 23 Orders Requested	N/A	N/A	N/A	N/A
Other Suspension Orders	N/A	N/A	N/A	N/A
Public Letter of Reprimand	N/A	N/A	N/A	N/A
Cease & Desist/Warning	N/A	N/A	N/A	N/A
Referred for Diversion	N/A	N/A	N/A	N/A
Compel Examination	N/A	N/A	N/A	N/A
CITATION AND FINE (Use CAS Report EM 10 and 095)				
Citations Issued	44	68	52	71
Average Days to Complete	416	409	500	444
Amount of Fines Assessed	N/A	\$206,500	\$135,500	\$116,250
Reduced, Withdrawn, Dismissed	0	0	0	0
Amount Collected	N/A	\$133,199	\$140,695	\$139,520
CRIMINAL ACTION				
Referred for Criminal Prosecution	0	0	0	0

Table 10. Enforcement Aging						
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15	Cases Closed	Average %
Attorney General Cases (Average %)						
Closed Within:						
1 Year	6	7	1	3	17	11.0
2 Years	9	16	5	2	32	20.8
3 Years	20	20	7	7	54	35.1
4 Years	23	8	2	3	36	23.4
Over 4 Years	8	6	1	0	15	9.7
Total Cases Closed	66	57	16	15	154	100.0%
Investigations (Average %)						
Closed Within:						
90 Days	322	277	225	161	985	49.6
180 Days	71	27	8	25	131	6.6
1 Year	108	60	35	92	295	14.9
2 Years	90	117	118	83	408	20.5
3 Years	37	22	14	17	90	4.5
Over 3 Years	45	15	7	10	77	3.9
Total Cases Closed	673	518	407	388	1986	100.0

33. What do overall statistics show as to increases or decreases in disciplinary action since last review.

The number of complaints and investigations has decreased largely due to the stabilization of the market. The number of actions filed has decreased primarily because of the Bureau's focus on settling cases before an action is filed.

34. How are cases prioritized? What is the bureau's complaint prioritization policy? Is it different from DCA's *Complaint Prioritization Guidelines for Health Care Agencies* (August 31, 2009)? If so, explain why.

Cases are screened to identify priority. First priority cases are those where the subject of the new complaint is presently the object of another investigation already in progress, pending disposition, or complaints that provide evidence of systematic fraud or other danger to the public.

The Bureau's complaint prioritization policy is based upon the mission of protection of the public. In general, the extent to which a complaint demonstrates a threat to the public, such as fraud and forgery, elevates the priority. Cases are otherwise, investigated in the order received. The Bureau is not a health care agency so the DCA's *Prioritization Guidelines for Health Care Agencies* is not applicable.

35. Are there mandatory reporting requirements? For example, requiring local officials or organizations, or other professionals to report violations, or for civil courts to report to the bureau actions taken against a licensee. Are there problems with the bureau receiving the required reports? If so, what could be done to correct the problems?

There are mandatory reporting requirements; 15 U.S.C.A. Section 1639e(e) requires any mortgage lender, mortgage broker, mortgage banker, real estate broker, appraisal management company or employee thereof, or any other person involved in a real estate transaction involving an appraisal in connection with a consumer credit transaction secured by the principal dwelling of a consumer who has a reasonable basis to believe an appraiser is failing to comply with the Uniform Standards of Professional Appraisal Practice, is violating applicable laws, or is otherwise engaging in unethical or unprofessional conduct, shall refer the matter to the applicable State appraiser certifying and licensing agency. The Bureau has not had issues receiving these reports.

36. Does the bureau operate with a statute of limitations? If so, please describe and provide citation. If so, how many cases have been lost due to statute of limitations? If not, what is the bureau's policy on statute of limitations?

The Bureau does not operate with a statute of limitations. The Bureau monitors the passage of time in a disciplinary matter on a case by case basis. Issues such as the threat posed to the public, the likelihood of success at hearing, and mitigating factors are assessed.

37. Describe the bureau's efforts to address unlicensed activity and the underground economy.

California Business and Professions code section 11320 states in part: "no person shall engage in a federally related real estate appraisal activity governed by this part or assume or use the title of or any title designation or abbreviation as a licensed appraiser in this state without first obtaining a license as defined in Section 11302." Lenders are required by Title XI of FIRREA to ensure that appraisals are performed by licensed appraisers, with the appropriate license level, when the loan is a federally related transaction. In the rare case that a complaint is received regarding unlicensed activity, the case is investigated and may be resolved with a citation, a cease and desist letter, and/or referral to the district attorney's office.

California is not a mandatory licensure state. This means individuals can appraise property without a license as long as the property they appraise is not involved in federally related real estate appraisal activity. Of the subset of appraisers who are required to be licensed, those involved in federally related real estate appraisal activity, there are a couple factors that prevent unlicensed individuals from practicing without a license. Lenders who facilitate federally related real estate appraisal activity ensure the appraisers are licensed in order for the transaction to comply with federal law. Also, practicing without a license subjects an appraiser to criminal action and Bureau citation. As a result, the Bureau receives very few complaints for unlicensed activity. Based on the reasons above, the Bureau does not believe there is an underground economy, as it relates to real estate appraising.

Cite and Fine

38. Discuss the extent to which the bureau has used its cite and fine authority. Discuss any changes from last review and describe the last time regulations were updated and any changes that were made. Has the bureau increased its maximum fines to the \$5,000 statutory limit?

The Bureau routinely uses its cite and fine authority. Business and Professions Code section 11315(e) allows maximum fines of \$10,000 per violation; however citation fines typically range from \$500 to \$3,000. There have been no changes since the last review.

39. How is cite and fine used? What types of violations are the basis for citation and fine?

Cite and fine authority is the most common disciplinary action taken by the Bureau encompassing over 80% of disciplinary outcomes. Citations are typically used for violations that do not involve fraud, gross ethical abuses or significant lack of competency. The most common violations found in citations include misrepresentation of a property characteristic and inappropriate use of sales.

40. How many informal office conferences, Disciplinary Review Committees reviews and/or Administrative Procedure Act appeals of a citation or fine in the last 4 fiscal years?

The Bureau does not usually hold informal conferences outside of investigations, nor does it have a Disciplinary Review Committee. There were five appeals in 2014/15, three appeals in 2013/14, and one appeal in 2012/13.

41. What are the 5 most common violations for which citations are issued?

The most common violations yielding a citation relate to Standard Rule 1 and 2 of the Uniform Standards of Professional Appraisal Practice (USPAP). USPAP is a document that sets forth the minimum standards used in the industry and are imbedded in both federal and state law. The purpose of USPAP is to establish requirements for appraisers that promote a high level of public protection and result in appraisal services that are meaningful and not misleading.

Generally these are minor to moderate competency or ethics violations, including:

1. Failure to implement an adequate scope of work;
2. Not correctly employing recognized methods and techniques;
3. Use of insufficient or inappropriate market data;
4. Failing to report accurate physical or locational characteristics; and,
5. Producing reports with errors or omissions which result in an appraisal report that is not credible or is in some way misleading.

42. What is average fine pre- and post- appeal?

The average fine amount is \$1,000. There is no difference between pre- and post-appeal fine amount.

43. Describe the bureau's use of Franchise Tax Board intercepts to collect outstanding fines.

After the Bureau has received a final order with a fine, the Bureau waits until the amount is due. This is typically upon the effective date of the decision or 30 days thereafter. If the amount is not paid, the Bureau sends a notice of overdue payment to the respondent. The Bureau will send the licensee three notices before referring the matter for collection with the Franchise Tax Board. The Bureau submits the required documents to Department for the Franchise Tax Board request to intercept the fine amount.

Cost Recovery and Restitution

44. Describe the bureau's efforts to obtain cost recovery. Discuss any changes from the last review.

The Bureau includes a request for costs in every accusation and statement of issues. The Bureau has improved investigator declarations needed in order for the court to award cost recovery. These improvements include a more detailed documentation of the investigator's time in order to recover the full amount of time expended bringing a case to hearing. The Bureau also prohibits licensees who owe costs from renewing their licenses until the amount is paid.¹⁵

45. How many and how much is ordered by the bureau for revocations, surrenders and probationers? How much do you believe is uncollectable? Explain.

All cases seeking revocation or probation seek cost recovery. Surrenders are very rare, but when accepted by the Bureau they are usually conditional on payment of cost recovery. Most cases settle, and the Bureau and respondent typically agree to have respondent pay a monetary amount in addition to any probationary terms that may be applicable. Typically, the amount is negotiated as a fine, not cost recovery, because respondents are more willing to accept paying a fine rather than cost recovery. The amount varies from case to case, but it usually is from \$2,000 to \$5,000. Cases that do not settle and go to hearing usually contain an order for partial or full cost recovery. The amount of recovery for cases that go to hearing varies greatly from a few thousand to tens of thousands of dollars depending on the complexity and length of the hearing. The Bureau currently has nine cost awards totaling \$86,000 that have not been paid in the Franchise Tax Board collection process, three of those within the last two years. The Franchise Tax Board collection order runs indefinitely so it is unknown which cost awards are uncollectable.

46. Are there cases for which the bureau does not seek cost recovery? Why?

The Bureau does not seek cost recovery for citations because the respondents are ordered to pay a fine. Citations involve lower level violations that typically do not consume a large amount of investigator time. It is more cost effective to not seek cost recovery because respondents typically want to litigate cost awards. Therefore, removing the litigation trigger allows investigators to move to the next case and not get overburdened with citation hearings.

47. Describe the bureau's use of Franchise Tax Bureau intercepts to collect cost recovery.

After the Bureau has received a final order awarding the Bureau their cost, the Bureau waits until the amount is due. This is typically upon the effective date of the decision or 30 days thereafter. If the amount is not paid, the Bureau sends a notice of overdue payment to the respondent. The Bureau will send the licensee three notices before referring the matter for collection with the FTB. The Bureau submits the required documents to the Department for the FTB request to intercept the amount of cost recovery ordered.

48. Describe the bureau's efforts to obtain restitution for individual consumers, any formal or informal bureau restitution policy, and the types of restitution that the bureau attempts to collect, i.e., monetary, services, etc. Describe the situation in which the bureau may seek restitution from the licensee to a harmed consumer.

The bureau does not have legal authority to seek restitution.

¹⁵ See BPC section 11409(c)(2)

Table 11. Cost Recovery (list dollars in thousands)				
	FY 2010/11	FY 2011/12	FY 2012/13	FY 2013/14
Total Enforcement Expenditures	149,300	391,981	359,176	357,915
Potential Cases for Recovery *	23	24	26	31
Cases Recovery Ordered	21	17	13	11
Amount of Cost Recovery Ordered	33,592	26,590	18,352	30,090
Amount Collected ** Includes all cost recovery	88,022	127,161	353,892	100,077
* "Potential Cases for Recovery" are those cases in which disciplinary action has been taken based on violation of the license practice act. ** Includes, fines, cost enforcement, and monitoring costs recovered.				

Table 12. Restitution (list dollars in thousands)				
	FY 2010/11	FY 2011/12	FY 2012/13	FY 2013/14
Amount Ordered	N/A			
Amount Collected				

Section 6 – Public Information Policies

49. How does the bureau use the internet to keep the public informed of bureau activities? Does the bureau post bureau meeting materials online? When are they posted? How long do they remain on the bureau's website? When are draft meeting minutes posted online? When does the bureau post final meeting minutes? How long do meeting minutes remain available online?

The Bureau uses its newsletter and its Website to communicate with stakeholders. The Bureau does not hold public meetings so there are no meeting materials or minutes to publicly post.

50. Does the bureau webcast its meetings? What is the bureau's plan to webcast future bureau and committee meetings? How long to webcast meetings remain available online?

Not applicable; the Bureau does not hold public meetings.

51. Does the bureau establish an annual meeting calendar, and post it on the bureau's web site?

Not applicable; the Bureau does not hold public meetings.

52. Is the bureau's complaint disclosure policy consistent with DCA's *Recommended Minimum Standards for Consumer Complaint Disclosure*? Does the bureau post accusations and disciplinary actions consistent with DCA's *Web Site Posting of Accusations and Disciplinary Actions* (May 21, 2010)?

The Bureau's complaint disclosure policy is consistent with DCA's *Recommended Minimum Standards for Consumer Complaint Disclosure*. The Bureau posts accusations and disciplinary actions consistent with DCA's *Web Site Posting of Accusations and Disciplinary Actions*.

53. What information does the bureau provide to the public regarding its licensees (i.e., education completed, awards, certificates, certification, specialty areas, disciplinary action, etc.)?

The Bureau provides the ability to perform licensee lookups via its Website. The lookup contains the name, license number, company, phone address, license level, license status, license history, and effective dates of all licensees. In addition, the Bureau provides all publically available documents to the public upon request. The Bureau allows interested parties to subscribe to email notifications with a link located on its website.

54. What methods are used by the bureau to provide consumer outreach and education?

The Bureau maintains a continuously updated webpage with information and links to all consumer and licensee material. The Bureau posts and emails a biannual newsletter containing articles, statistics, and updates, as well as a list of enforcement actions taken during the previous six months.

Section 7 – Online Practice Issues

55. Discuss the prevalence of online practice and whether there are issues with unlicensed activity. How does the bureau regulate online practice? Does the bureau have any plans to regulate internet business practices or believe there is a need to do so?

Transmission of appraisal reports over the internet is normal procedure in the industry, but there is no prevalence of online practice. The appraiser client relationship is well regulated, as is the reporting process, so the use of online services for normal business activities is common, but there is no advantage or opportunity for gain over conventional hard copy reporting, so there is no need to regulate online practice. The Bureau has no plans to regulate internet business at this time.

Section 8 – Workforce Development and Job Creation

56. What actions has the bureau taken in terms of workforce development?

The Bureau is actively working on the development of practicum course criteria which will promote a curriculum-based educational offering to licensed trainee appraisers in California. This training will qualify as experience toward full licensure. The Bureau is collaborating with the Appraisal Qualifications Board, California Community Colleges, and the private sector to advance these training opportunities which, to date, are unavailable anywhere the country.

57. Describe any assessment the bureau has conducted on the impact of licensing delays.

The Bureau does not have licensing delays so no assessment has been completed.

58. Describe the bureau's efforts to work with schools to inform potential licensees of the licensing requirements and licensing process.

As stated earlier, the Bureau is currently working with California Community Colleges to develop practicum course criteria which are designed to better inform students of the requirements they will need to meet to become licensed appraisers. The Bureau also coordinates with approved course providers regarding changes to minimum Appraisal Qualifications Board education requirements. The Bureau website includes a Course Provider Handbook for use by current and potential course providers specifying licensing course requirements for both qualifying and continuing education.

59. Provide any workforce development data collected by the bureau, such as:

a. Workforce shortages.

Changing real estate market conditions dictate the demand for appraisal services. Since the 2008 market downturn the number of licensed appraisers in California has dropped by approximately 50% and is still declining. There are no appraiser workforce shortages in California at this time.

b. Successful training programs.

Since the inception of the appraiser licensing program training requirements have been met through AQB standards dictating from 2,000 to 3,000 hours of experience to be obtained by working as an appraiser trainee in the private sector. Successful training options are only found in private on-the-job training opportunities as the market supports supervising appraiser/trainee affiliations. The Bureau is actively working on the development of practicum course criteria which will promote a curriculum based educational offering to licensed trainee appraisers in California. This training will qualify as experience toward full licensure.

Section 9 – Current Issues

60. What is the status of the bureau's implementation of the Uniform Standards for Substance Abusing Licensees?

The Uniform Standards for Substance Abusing Licensees only apply to health care boards. The Bureau is not a health care board.

61. What is the status of the bureau's implementation of the Consumer Protection Enforcement Initiative (CPEI) regulations?

The Consumer Protection Enforcement Initiative (CPEI) applies to health care boards. The Bureau is not a health care board.

62. Describe how the bureau is participating in development of BreEZe and any other secondary IT issues affecting the bureau.

The Bureau does not participate in the BreEZe program, and instead has a custom built IT business enterprise tool which has been in use for three years. This tool, the Real Estate Appraiser Licensing and Enforcement (REALE) system includes database applications and reporting options that allow for efficient and effective processing and record keeping for all Bureau functions including licensing, enforcement, and education. At this time, there is no plan for the Bureau to participate in BreEZe.

Section 10 – Bureau Action and Response to Prior Sunset Issues

Include the following:

1. Background information concerning the issue as it pertains to the bureau.
2. Short discussion of recommendations made by the Committees/Joint Committee during prior sunset review.

Issue #1- Staff Recommendation: *The OREA should report to the Committee on its progress in updating its Strategic Plan.*

The Bureau completed a new Strategic Plan in July 2014.

Issue #2- Staff Recommendation: *Section 11310.1 should be added to the Business and Professions Code, to provide, “Protection of the public shall be the highest priority for the Office of Real Estate Appraisers in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.”*

Business and Professions Code section 11310.1 was added with SB 706 (Price, Chapter 712, Statutes of 2011) as recommended by the Committee.

Issue #3- Staff Recommendation: *The OREA should detail its efforts to provide a consistent forum for input from the public and from licensees, and OREA should further advise the Committee as to its assessment of whether a state regulatory board would meet the requirements of the federal law mandating the licensing and regulation of real estate appraisers. The Committee should give consideration to establishing OREA as an independent board of Real Estate Appraisers appointed by the Governor and the Legislature, composed of licensed real estate appraisers and members of the public to prevent any influence of the real estate industry and having a public member majority.*

The Bureau continues to make an effort to provide a consistent forum for input from the public and licensees. This input is received from surveys that go with outgoing communications. Those comments are directed to appropriate units within the Bureau and the individual is contacted within three business days if there is a concern that needs to be addressed. The Bureau, including the Chief, also receives telephone and email communications from the public and licensees. Those communications can result in operational changes to make a more user-friendly and efficient operation. Additionally, the Chief and members of the enforcement unit make presentations to various groups and associations to educate and receive comments from the public and licensees. Finally, the Bureau issues a newsletter and updates its website with the latest news and important updates.

As result of the implementation of the Governor's Reorganization Plan 2 in 2013, the Bureau operates under the oversight of the Bureau Chief, who, in consultation with the Director of DCA and the Governor, is responsible for administering the Bureau's licensing, education and enforcement programs. Since its inception in 1989 the program has operated as a non-board entity where the Chief is appointed by the Governor, subject to confirmation by the Senate, with consideration of qualifications that demonstrate knowledge of the appraisal profession.

The Bureau maintains open communication with the public and licensees while maintaining the efficiencies of a bureau. Thus, the Bureau recommends maintaining the bureau structure.

Issue #4- Staff Recommendation: *The Office of Real Estate Appraisers should be consolidated as a part of the DRE. In drafting the consolidation legislation, firewalls should be established to ensure that OREA maintains its independence to issue and revoke licenses. Consideration should be made to creating an independent board of Real Estate Appraisers under DRE to prevent any influence of the real estate industry but allow this board to seek resources from DRE as needed.*

The implementation of the Governor's Reorganization Plan No. 2 resulted in the Office of Real Estate Appraisers becoming the Bureau of Real Estate Appraisers within the DCA. This change provides the efficiencies and administrative support that might have been gained in a consolidation with the former Department of Real Estate while also maintaining the Bureau's independence consistent with the federal mandate. This is no longer considered an issue by the Bureau.

Issue #5- Staff Recommendation: *The OREA should continue its progress of developing a data base processing system similar to and based upon DRE's Enterprise Information System, and report to the Committee on its progress in implementing the new system.*

The Bureau launched the REALE application in the summer of 2012. This business enterprise tool benefits the Bureau by integrating a comprehensive tracking system for license application, payment, education, and enforcement. Web-based reporting/monitoring produces management reports, summaries and metrics on bureau functions. Ongoing implementation and enhancement of the REALE application yielded new efficiencies and services including on-line license renewal and temporary practice permits, automated education verification, and real-time reporting between the California Appraisers License Registry and the federal Appraisal Subcommittee Registry. These improvements significantly reduced license renewal turnaround time and increased consumer protection as California is the only state in the nation offering immediate verification of a California appraiser's credential at the national level.

Issue #6- Staff Recommendation: *The OREA should explain to the Committee the impact of the drop in the number of licensees upon its operations, including the impact upon revenues and licensing staff, and any efforts made by the OREA to redirect staff to other areas of OREA's regulatory programs.*

Changes in market supply and demand, interest rates, employment, and the availability of capital all affect the demand for real estate appraisal services and subsequently the number of licensed appraisers. Since the 2008 market downturn, the number of licensed appraisers in California has dropped by approximately 50% and is still declining. The national population of licensed appraisers has had a similar drop and California still has approximately 12% of all licensed appraisers in the country. As a special fund program the Bureau's revenue is closely linked to variations in the real estate market, both statewide and nationally. In 2009 license fees were reduced due to the significant revenue growth resulting from the population increase from 2003-2007.

The Bureau monitors fund reserves and as a result of the ongoing repayment of the general fund loan (2009), the Bureau has sufficient reserves thru the 2018-19 fiscal year. The Bureau

is also closely monitoring industry and market trends and investigating the potential for a new AMC audit program that would involve reallocation of resources.

Issue #7- Staff Recommendation: *The OREA should relate to the Committee its early observations of the new AMC registration requirement. Are the new rules accomplishing what was intended? What are the challenges that still face OREA in implementing these new requirements?*

The AMC registration requirement provided a good foundation for AMC regulation. However, in June 2015, several federal agencies issued joint regulations on AMCs.¹⁶ Among these changes are new definitions for what an AMC is and what services they provide; a national reporting and fee collection responsibility for states; and requirements for states to monitor AMCs as they meet new requirements such as appraiser competence and independence rules. The Bureau must meet or exceed these new regulations by June 2018. The Bureau is currently evaluating the changes that likely need to be made in order to meet and exceed the new federal regulations.

Issue #8- Staff Recommendation: *The OREA should pursue changing its regulations to: (1) require completion of the laws and regulations course every two years; (2) no longer allow licensees to submit a statement that they have read and understand the federal and state law; (3) require licensees to pass an examination as a part of the continuing education process; and, (4) require the California laws and regulations course to be approved every two years.*

SB 706 (Price, Chapter 712, Statutes of 2011) amended Business and Professions Code section 11360 to require completion of a California laws and regulations course every four, not two, years. The Bureau is working on regulations to require licensees to pass an examination as part of this course. Additionally, to keep courses up-to-date, the Bureau proposes a requirement that the California laws and regulations course must be approved by the Bureau every two years.¹⁷

Issue #9- Staff Recommendation: *To give the OREA adequate resources to investigate complaints in a timely manner, the Committee should support OREA efforts to increase staffing resources. OREA should report to the Committee on its progress in reducing complaint resolution timeframes, and any efforts to secure more enforcement staffing resources.*

The Enforcement Division significantly reduced the number of older cases. Since the 2012 ASC review the Bureau has hired two more investigators, took full advantage of the Appraiser Regulatory Agency Investigator Training, and reduced the enforcement case backlog. Additionally, the permanent filling of the Chief of Enforcement position together with devoting more in-house legal resources to enforcement has advanced effectiveness and efficiency in the enforcement program.

In the 2012 ASC review, the Bureau had 259 outstanding complaints, 83 of which were unresolved for more than one year without special documented circumstances. Of those, 72

¹⁶ See 12 CFR Part 34; 12 CFR Parts 208 and 225; 12 CFR Parts 323 and 390; 12 CFR Part 1026; 12 CFR Part 1222.

¹⁷ CCR section 3661 and 3668

were at various stages of the disciplinary process and only 11 were still at the Bureau pending investigation. The 2014 review found 134 outstanding complaints, 16 of which were unresolved for more than one year without special documented circumstances. Of those, 15 were in various stages of the disciplinary process, with only one still at the Bureau pending investigation.

Issue #10- Staff Recommendation: *The OREA should inform the Committee more fully about its disclosure policies for enforcement actions, and should discuss its belief that publishing accusations on the OREA's website, prior to an administrative hearing, is considered a violation of the respondent's due process rights. The OREA should insure that it discloses the status of every license, and any disciplinary action taken against the licensee, including: formal accusations, suspensions, revocations, whether or not the licensee or former licensee is in good standing, or has been subject to discipline by the DRE or by the department of another state or jurisdiction.*

Business and Professions Code section 11317.2 established by SB 706 (Price, Chapter 712, Statutes of 2011), requires the Bureau to publish on the internet the status of every license and registration including accusations, suspensions, and revocations on the internet. The Bureau has complied with this new requirement and has been publishing on the internet all accusations, suspensions, and revocations. Additionally, when reviewing a license online, the Bureau's website displays the name, license number, company, phone address, license level, license status, license history, effective dates of the license and any action that has been taken against that licensee.

Issue #11-Staff Recommendation: The OREA should clarify to the Committee whether it has the authority to recover reasonable costs of probation monitoring for a licensee who is placed on probation, or issued a restricted license by administrative law judge or through a stipulated settlement. If OREA does not have sufficient statutory authority, the law should be amended to authorize OREA to recover reasonable costs of probation monitoring.

The Bureau has begun the internal regulatory review process to establish disciplinary guidelines. These guidelines will provide authority to recover reasonable costs of probation monitoring for a licensee who is placed on probation, or issued a restricted license by administrative law judge or through a stipulated settlement.

Issue #12-Staff Recommendation: The OREA should be authorized to contract with a collection service for the purpose of collecting outstanding fees, fines, or cost recovery amounts.

The Bureau agrees it should be authorized to enter into a contract with a collection agency to recover outstanding fees, fines, or cost recovery amounts. The Bureau has explored entering into such agreements, but has encountered legal issues with sharing social security numbers. While the Bureau cannot work with collection agencies, it does utilize the Franchise Tax Board intercepts discussed earlier in this report, which help recover any outstanding monies.

Issue #13- Staff Recommendation: The OREA should clarify the nature of its current authority to enter into a stipulated settlement, and if necessary, this provision should be amended to authorize OREA to enter into a settlement agreement with a licensee, or applicant, prior to OREA's issuance of an accusation against the licensee or statement of issues against an applicant.

Business and Professions Code 11315.5 states that the Bureau may, at any time the Chief deems it to be in the public interest, enter into a settlement of any administrative allegation of violation upon any terms and conditions as the Chief deems appropriate. This provision allows the Bureau to enter into a stipulated settlement prior to issuance of an accusation or statement of issues against a licensee or applicant.

Issue #14- Staff Recommendation: The law should be changed to provide that the license of a licensee shall be suspended automatically if the licensee is incarcerated after the conviction of a felony, regardless of whether the conviction has been appealed. In such cases, the OREA should be required to notify the licensee of the suspension and of his or her right to a specified (due process) hearing.

Business and Professions Code section 11319.2 was added with SB 706 (Price, Chapter 712, Statutes of 2011), and it expressly provides the Bureau the authority recommended by the Committee.

Issue #15- Staff Recommendation: Statutory changes should be made to prohibit a licensed real estate appraiser or an AMC from including, or permitting to be included, any provision in a civil dispute settlement agreement which would prohibit a person from contacting, cooperating with or filing a complaint with the OREA based on any action arising from the licensee's practice.

AB 2570 (Hill, Chapter 561, Statutes of 2012) added Business and Professions Code Section 143.5 which prohibits a licensee of any board, bureau, or program under the Department of Consumer Affairs from using or allowing the use of confidentiality agreements, or "gag clauses," in settlement agreements.

Issue #16- Staff Recommendation: The law should be changed to declare that it is unprofessional conduct for a real estate appraiser or a registered AMC to fail to cooperate with an OREA investigation. The provision should also specify that failure by a licensee or registrant to furnish information in a timely manner to the OREA, or cooperate in any disciplinary investigation, constitutes unprofessional conduct.

Currently, if a licensee or registrant fails to provide documents to the Bureau as required by Business and Professions Code sections 11328 or 11328.1, the licensee/registrant is subject to discipline pursuant to Title 10 California Code of Regulations section 3721(a)(7) for violating the Business and Professions Code. Thus, there is no need to change the law to declare it is unprofessional conduct for a licensee/registrant to not cooperate with an investigation because it is already a violation of the law and results in discipline.

Issue #17- Staff Recommendation: Real estate appraisers should be required to submit a written report to the OREA for the following reasons: (1) the bringing of an indictment or information charging a felony against the licensee; (2) arrest of the licensee; (3) conviction of the licensee of any felony or misdemeanor; and, (4) any disciplinary action taken by another regulatory agency of this state or of another state or an agency of the federal government.

In 2011, SB 706 (Price, Chapter 712, Statutes of 2011) amended Business and Professions Code section 11318 to require the information recommended by the Committee. However, as identified in section 11 of this report, the Bureau is considering two options to ensure licensees are reporting arrests and cooperating with investigations.

The first option is to amend Business and Professions Code section 11318 to require licensees to provide the Bureau documents related to an arrest within 30 days of an arrest. Currently, licensees are only required to notify the Bureau of felony charges or any conviction. However, the criminal process can be slow and these notification markers can be months or even years from the act that caused an arrest. Furthermore, the Bureau is notified of all arrests via subsequent arrest notifications and then requests the licensee provide information related to the arrest. However, there is no obligation for a licensee to respond to the Bureau's letter. Therefore, the Bureau proposes to require licensees provide notification within 30 days of an arrest.

The second option is to add a new section specifying that, similar to provisions of other programs under the Department of Consumer Affairs, the failure of, or refusal by, a licensee to respond to a written request from a representative of the Bureau, is grounds for enforcement action. Currently, the Bureau does not have authority to discipline a licensee for failure to respond to a request for information and this puts the public at risk, particularly when it concerns the investigation of criminal action. By providing the Bureau with this authority, the public will be provided with enhanced protections when the Bureau takes enforcement action against licensees who refuse to cooperate.

Issue #18- Staff Recommendation: The OREA should give input to the Committee about whether it should be authorized to hire a certain number of investigators with the authority and status of peace officers.

As a result of the Governor's Reorganization Plan No. 2 implemented in 2013 the Bureau is now within the DCA. Support services provided by the Department include access to the Division of Investigation. These services include law enforcement expertise and sworn investigators. Any change addressing this issue is no longer necessary.

Issue #19- Staff Recommendation: The law should be amended to require that the clerk of the court provide notice to OREA, if there is a judgment for a crime committed in excess of \$30,000, for which the licensee is responsible due to negligence, error or omission in practice, or his or her rendering unauthorized professional services. The law should further be amended to require the clerk of the court to report any filings of charges of a felony against a real estate appraiser to the OREA.

The Bureau does not have a position on this proposal.

Issue #20- Staff Recommendation: The OREA should advise the Committee as to what extent it has used the authority to obtain an interim suspension order under CCR § 3730 or B&P Code § 494.

The Bureau has not utilized its authority to issue interim suspension orders (ISOs) since the last sunset report. The Bureau has a process to evaluate all complaints to determine which, if any, qualify for an ISO.

Issue #21- Staff Recommendation: OREA should tell the Committee whether there is any reason that it is unable to take action under Penal Code Section 23, and if there is no reason why it cannot take the action under this section, it should immediately take steps to begin utilizing these provisions.

The Bureau has established a screening procedure to determine what, if any, arrests warrant a Penal Code section 23 action. Subsequent arrest notifications are reviewed daily to determine if any arrest demonstrates a threat to the public. Arrests for fraud or other deceitful conduct, violent crimes, and all felony arrests are brought to the Chief of Enforcement and she determines whether to bring a Penal Code section 23 action.

Issue #22- Staff Recommendation: Since the ASC performs Compliance Reviews of OREA each year; staff is not recommending at this time that a separate enforcement monitor be appointed.

Given the ASC oversight and audit authority, the Bureau agrees that additional enforcement monitoring is not necessary.

Issue #23- Staff Recommendation: OREA should move quickly to begin accepting complaints online. OREA should further report its progress to the Committee by January 1, 2012.

The Bureau accepts complaints online via a webpage link entitled "File a Complaint Online". The law allows a complaint to be filed by anyone, and this service is available online to any member of the public, homeowner, lender, borrower, investor, appraiser, or other stakeholder.

Issue#24- Staff Recommendation: The OREA should discuss its fund projections, and whether it will have sufficient funds to cover its administrative, licensing and enforcement costs and to provide for adequate staffing levels for critical program areas into the foreseeable future.

The Bureau has a healthy reserve of 16.2 months projected for Fiscal Year 14/15 and 12.0 months for Fiscal Year 15/16.

Issue#25- Staff Recommendation: The OREA should identify for the Committee the resource challenges that it faces, and advise the Committee of what staffing levels it believes are necessary to fully implement its mandates.

The addition of two investigators and the implementation of REALE have improved the balance of workload to resources at the Bureau. The implementation of the new federal requirements for AMCs is the next project and given current workload trends the Bureau expects this new AMC project to be absorbable.

3. What action the bureau took in response to the recommendation or findings made under prior sunset review.

The actions were identified in question two above.

4. Any recommendations the bureau has for dealing with the issue, if appropriate.

The recommendations were identified in question two above.

Section 11 – New Issues

This is the opportunity for the bureau to inform the Committees of solutions to issues identified by the bureau and by the Committees. Provide a short discussion of each of the outstanding issues, and the bureau's recommendation for action that could be taken by the bureau, by DCA or by the Legislature to resolve these issues (i.e., policy direction, budget changes, legislative changes) for each of the following:

1. Issues that were raised under prior Sunset Review that have not been addressed.

None.

2. New issues that are identified by the bureau in this report.

None.

3. New issues not previously discussed in this report.

In preparation for this review, the Bureau and Department note that the Real Estate Appraisers' Licensing and Certification Law contains a provision in Business and Professions Code section 11411, requiring the establishment of a separate account called a recovery account. Business and Professions Code section 11411 also directs the former Office to direct 5% of licensing fees and for the fund to be continuously appropriated beginning January 1, 2003. The Director of the former office was also tasked, in statute, with the responsibility of determining whether or not a recovery account was necessary by January 1, 2002, and to establish regulations creating such an account by January 1, 2004. The fund was never established and licensing fees were never directed to a separate account. According to records, only one potential claimant has ever contacted the Bureau in the intervening years regarding this account, and that potential claimant never sought payment. As a comparison, the Bureau of Real Estate has a statutorily mandated recovery account called the Consumer Recovery Account, established in 1964. In Fiscal Year 2014-2015 alone, the Bureau of Real Estate processed over 154 claims against its recovery account, with 119 of those qualifying for a payable claim. When comparing the two, while an account for the Bureau of Real Estate clearly has a big consumer protection element, the same does not seem to hold true for the Bureau of Real Estate Appraisers.

4. New issues raised by the Committees.

The Bureau is aware of no new issues.

Section 12 – Attachments

Please provide the following attachments:

- A. Bureau's administrative manual.

[See attachment #1](#)

- B. Current organizational chart showing relationship of committees to the bureau and membership of each committee (cf., Section 1, Question 1).

[The Bureau does not sponsor, participate, or have membership in any committees.](#)

- C. Major studies, if any (cf., Section 1, Question 4).

[The Bureau has not conducted any studies.](#)

- D. Year-end organization charts for last four fiscal years. Each chart should include number of staff by classifications assigned to each major program area (licensing, enforcement, administration, etc.) (cf., Section 3, Question 15).

[See attachment #2](#)

Section 13 – Bureau Specific Issues

THIS SECTION ONLY APPLIES TO SPECIFIC BUREAUS, AS INDICATED BELOW.

Diversion

Discuss the bureau's diversion program, the extent to which it is used, the outcomes of those who participate, the overall costs of the program compared with its successes

Diversion Evaluation Committees (DEC) (for BRN, Dental, Osteo and VET only)

1. DCA contracts with a vendor to perform probation monitoring services for licensees with substance abuse problems, why does the bureau use DEC? What is the value of a DEC?
2. What is the membership/makeup composition?
3. Did the bureau have any difficulties with scheduling DEC meetings? If so, describe why and how the difficulties were addressed.
4. Does the DEC comply with the Open Meetings Act?
5. How many meetings held in each of the last three fiscal years?
6. Who appoints the members?
7. How many cases (average) at each meeting?
8. How many pending? Are there backlogs?
9. What is the cost per meeting? Annual cost?

10. How is DEC used? What types of cases are seen by the DEC's?
11. How many DEC recommendations have been rejected by the bureau in the past four fiscal years (broken down by year)?

Disciplinary Review Committees (Bureau of Barbering and Cosmetology and BSIS only)

1. What is a DRC and how is a DRC used? What types of cases are seen by the DRC's?
2. What is the membership/makeup composition?
3. Does the DRC comply with the Open Meetings Act?
4. How many meeting held in last three fiscal years?
5. Did the bureau have any difficulties with scheduling DRC meetings? If so, describe why and how the difficulties were addressed.
6. Who appoints the members?
7. How many cases (average) at each meeting?
8. How many pending? Are there backlogs?
9. What is the cost per meeting? Annual cost?
10. Provide statistics on DRC actions/outcomes.

Attachment# 1

Administrative Manuel



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Licensing Division Administrative Manual

Revised 2015

The Licensing Division of the Bureau is responsible for applicant compliance with the minimum requirements for licensure in accordance with criteria established by the federally mandated Appraisal Foundation and California law. The Licensing Division also registers Appraisal Management Companies (AMC) in compliance with California law.

Application Processing

- (a) *Background*. Below is a list of license applications and the Bureau's review process. In addition to the review process below, all applicants will undergo and pass a background investigation before the license or registration can be issued. See the Enforcement Division's administrative manual for a description of the process.
- (b) *Military Service*. If an applicant checks either military related boxes on the top of any application, the military service must be validated and then the application must be expedited.
- (c) *Initial Trainee (AT)*. The trainee license is the entry level license and thus does not require the experience requirement of other applications. The following information must be verified by the Bureau.¹
 - (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - (2) The education documented meets the education requirement to obtain a trainee license. If the applicant does not have sufficient education, a deficiency letter is issued.
 - (3) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the examination admittance letter is issued.
 - (4) If the applicant passes the examination and timely submits a request for issuance, the license is ready to be issued pending background approval.
- (d) *Initial Residential (AL), Certified Residential (AR) & Certified General (AG)*. The AL, AR, and AG licenses will require the same process as above plus an additional experience review that is conducted by the Enforcement Division. The following information must be verified by the Bureau.
 - (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - (2) The education documented meets the education requirement to obtain a license. If the applicant does not have sufficient education, a deficiency letter is issued.
 - (3) Verify with the Enforcement Division the experience requirement has been satisfied. If the applicant does not have sufficient experience, a deficiency letter is issued.
 - (4) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the examination admittance letter is issued.

¹ For abnormal cases, refer to Article 3-5 in BREA's regulations or a manager.

- (5) If the applicant passes the examination and timely submits a request for issuance, the license is ready to be issued pending background approval.

(e) *Reciprocal Licenses*. Reciprocal licenses are granted to appraisers licensed in good standing by another state. Per federal guidelines the Bureau accepts the appraiser's education, experience, and examination results as long as the appraiser satisfied these requirements in a home state with requirements which meet or exceed those of California. The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) An out-of-state license is active and in good standing confirmed by a letter of license history and the National Appraisal Registry.
- (3) If there are no deficiencies or if the deficiencies have been remedied and the applicant has an active out-of-state license in good standing, the license is ready to be issued pending background approval.

(f) *Temporary Practice Permits (Paper and Online)*. These permits do not constitute a license. Per federal guidelines out-of-state appraisers in good standing must be allowed to complete a single appraisal assignment in another state by obtaining a temporary permit. The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) An out-of-state license is active and in good standing confirmed by letter of license history and National Appraisal Registry.
- (3) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion and the applicant has an active out-of-state license in good standing, the permit is issued.

(g) *Renewal – Paper*. The following information must be verified by the Bureau.

- (1) All forms are completed correctly.² If the forms are not completed correctly, a deficiency letter is issued.
- (2) Correct amount of continuing education is documented. If the applicant did not document the correct amount of continuing education, a deficiency letter is issued.
- (3) The licensee has paid all fines and completed all ordered education if the licensee was subject to past discipline. The license cannot be renewed until the ordered education is complete and fines are paid.
- (4) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the renewal license is issued.

(h) *Renewal – Online*. Online renewals are only available to licensees who reside in California, have no criminal history or subsequent arrest reports during last license term, have no outstanding dishonored payments to the Bureau and are in full

² Late renewals are subject to the requirements and limitations of CCR section 3682 and a \$125 late renewal fee.

compliance with any current child support order. The following information must be verified by the Bureau.

- (1) Correct amount of continuing education is documented. If the applicant did not document the correct amount of continuing education, a deficiency letter is issued.
- (2) The licensee has paid all fines and completed all ordered education if the license was subject to discipline. The license cannot be renewed until the ordered education is complete and fines are paid.
- (3) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the renewal license is issued.

(i) *License Upgrade.* The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) The education documented meets the education requirement to obtain a license. If the applicant did not have document sufficient education, a deficiency letter is issued.
- (3) The Enforcement Division experience requirement has been satisfied. If the applicant does not have sufficient experience, a deficiency letter is issued.
- (4) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the examination admittance letter is issued.
- (5) If the applicant passes the examination and timely submits a request for issuance, the license is ready to be issued pending background approval.

(j) *Initial AMC Registration and Renewal.* The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the registration is ready to be issued pending background approval.

Education Approval Process

(a) *Education Approval Process.* The Bureau accredits both Course Providers and the individual courses offered. Initial and upgrading applicants must complete accredited basic education and renewing applicants must complete accredited continuing education.

- (1) *Course Provider Accreditation Process.* Acceptable course provider documentation is required before the Bureau can issue a course provider approval number. The following information must be verified by the Bureau.

- a. All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - b. The Course Provider policies comply with the Bureau's requirements: attendance; grading; instructor hiring; refund and re-examination; final examination; record management and retention; and subcontracting.
 - c. The sample course completion certificates are in compliance with Bureau requirements.
 - d. If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the accreditation is ready to be issued.
- (2) *Course Accreditation Process.* Once the course provider has been accredited to provide courses, the Bureau reviews the courses to determine if the courses meet the following requirements. (Online-IDECA required)
- a. All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - b. The course textbooks, proposed advertising, syllabus, final examinations, and reading assignment listings are in compliance with Bureau standards.
 - c. If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the accreditation is ready to be issued.

Licensing Suspension

(a) *Licensing Suspension.* The licensing manager will suspend a license or registration for the following reasons:

- (1) A license or registration will be automatically suspended if payment of any fees is dishonored by the issuing institution for any reason.³
- (2) Licensees not in compliance with a child support order are subject to suspension and denial of renewal.⁴

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³ California Code of Regulations section 3582(c)

⁴ Family Code section 17520



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Enforcement Division

Administrative Manual

Revised 2015

The Enforcement Division investigates the background of applicants, licensees, and AMC registrants to ensure they meet the standards for licensure as established by Title XI of FIRREA and California Law. The Enforcement Division also investigates complaints of violations of California law and national appraisal standards filed against licensed appraisers and registered AMCs. In addition, the Enforcement Division handles public inquiry calls not related to administrative application or credential processing questions.

Background Investigation

(a) Criminal Background Investigations.

- (1) *Initial Applications.* All initial applicants undergo a criminal background investigation with a fingerprint check and must answer background questions on the application. The Bureau evaluates any criminal convictions to determine if a license should be granted or denied.
- (2) *Subsequent Arrest Notification.* The Bureau also receives subsequent arrest notifications from the Department of Justice for all licensees who reside in California. This notification system alerts the Bureau if any licensee is arrested. Depending on the arrest or any subsequent conviction, the Bureau may take disciplinary action against the licensee.

(b) Experience Verification.

- (1) *Initial and Upgrade Applications.* Initial and upgrade applications must meet mandatory experience requirements.¹ An investigator must review an applicant's appraisal work log to determine if the applicant meets the experience requirement. This review includes verifying that the work completed includes the appropriate certifications and conforms to the minimum professional standards as dictated by the Appraisal Subcommittee (ASC).

Complaint Investigation

- (a) *Complaint Intake.* The Bureau may receive complaints from anyone, but generally complaints are received from the public (homeowners/borrowers), lenders, appraisers, and appraisal management companies. All complaints must be signed and verified by the complainant.² A verified complaint is opened as a case and the case is assigned to a Bureau investigator (Certified Appraiser trained as an investigator). The complainant is sent an acknowledgement letter within ten working days after the Bureau receives the verified complaint.³
- (b) *Jurisdictional Determination.* Each complaint is reviewed to determine if the Bureau has jurisdiction. If so, the case continues, if not the case is closed and referred to the appropriate entity, if any.

¹ Trainee applications do not require experience.

² California Code of Regulations section 3726(a)(3)

³ California Code of Regulations section 3726(b)

(c) *Complaint Prioritization.* Once it is determined the Bureau has jurisdiction a case is prioritized based upon the following:

- (1) Priority 1 complaints are those where the public may be at risk of serious harm or the complaint is regarding a licensee or registrant currently under investigation due to another open case;
- (2) Priority 2 complaints involve a licensee or registrant who has a prior history of discipline; and
- (3) Priority 3 complaints are all others, prioritized in the order in which they were received.

(d) *Complaint Processing*

- (1) Each case results in a confidential investigative report showing a summary of the acts and/or omissions alleged, and a summary of the supporting evidence together with a recommendation to division management for appropriate enforcement action, if any.
- (2) When the confidential investigation report shows: a) allegations are supported by credible evidence that a violation of law or regulations was committed by a licensed appraiser, registrant, or person or entity acting in a capacity requiring a license or certificate of registration; and b) that the violation is substantially related to the qualifications, duties, or functions of an appraiser, the Bureau shall take appropriate action as defined below.
- (3) Where the confidential investigative report shows that the allegations, even if true, do not constitute a violation of the law or regulations, that the allegations are not supported by sufficient credible evidence, or that the facts show a complete defense or legal justification, the investigation is closed.⁴

(e) *Appropriate Action.* Depending on the seriousness of the violation, the division may recommend either a: verbal advisory; written advisory; cease and desist letter (unlicensed or unregistered only); private reproof, public reproof, citation; or accusation.⁵ The Bureau evaluates each case individually to determine what action is appropriate. The complainant is notified of final action taken on the complaint.⁶

(f) *Monitoring.* Depending on the outcome of the case the process may include follow up monitoring of any disciplinary action or probation requiring education, payment of a fine or ongoing review of work.

Public Inquiry Calls

(a) *Public Inquiry Calls.* Most calls directed to the Enforcement Division originate with licensees, registrants, homeowners, or real estate agents/brokers and are

⁴ California Code of Regulations section 3728

⁵ California Code of Regulations section 3721

⁶ California Code of Regulations section 3726(b)

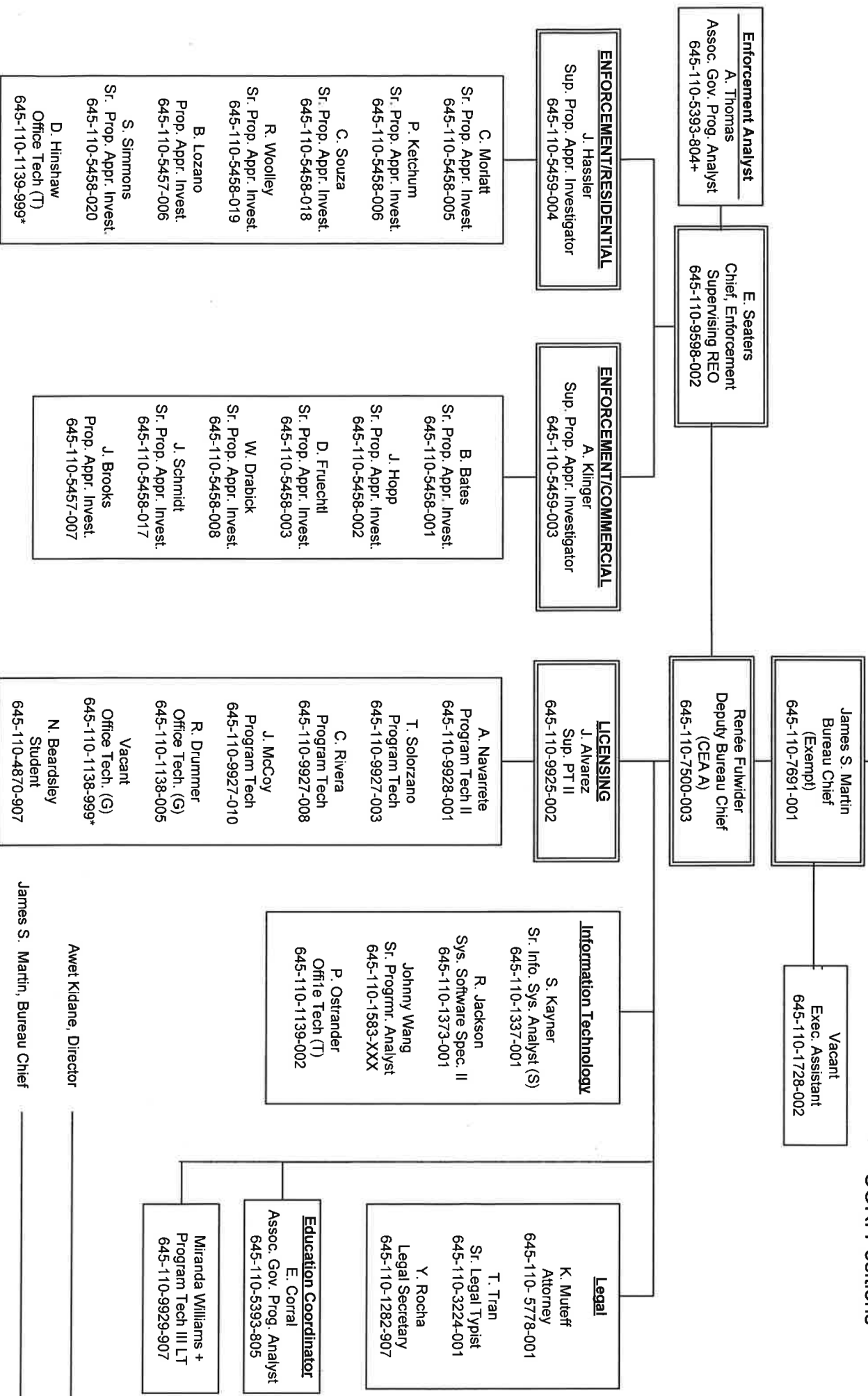
handled by a staff investigator. Depending upon the call the investigator may direct callers to the BREa website or an appropriate federal agency for more information. Other calls may pertain to appraisal methodology, compliance with the Uniform Standards of Professional Appraisal Practice or federal rules relating to the practice of appraisal. The investigator will generally direct the caller to additional reference material for further guidance. In some cases the investigator may recommend the caller file a complaint so the Bureau can investigate the matter.

Attachment# 2

Organizational Chart

BUREAU OF REAL ESTATE APPRAISERS

CURRENT
FY 2014-15
Authorized Positions: 32
* BL 12-03 (999 blanket): 2
Blanket Positions: 3
+ = CORI Positions



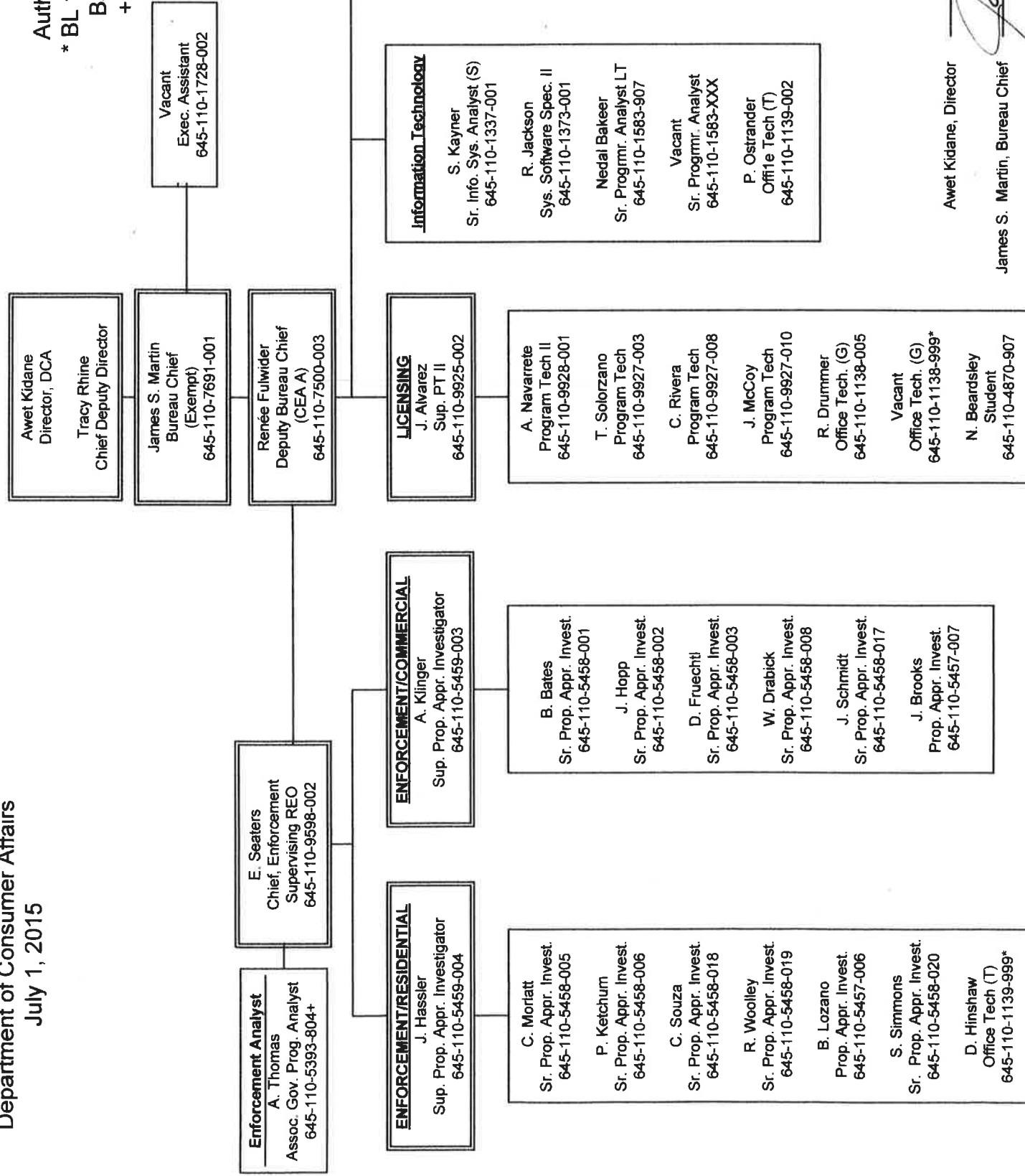
Awet Kidane, Director
James S. Martin, Bureau Chief
Dannielle Carrillo, C&P Analyst

BUREAU OF REAL ESTATE APPRAISERS

CURRENT
FY 2014-15

Authorized Positions: 32
* BL 12-03 (999 blanket): 2
Blanket Positions: 4
+ = CORI Positions

Department of Consumer Affairs
July 1, 2015



Awet Kidane, Director

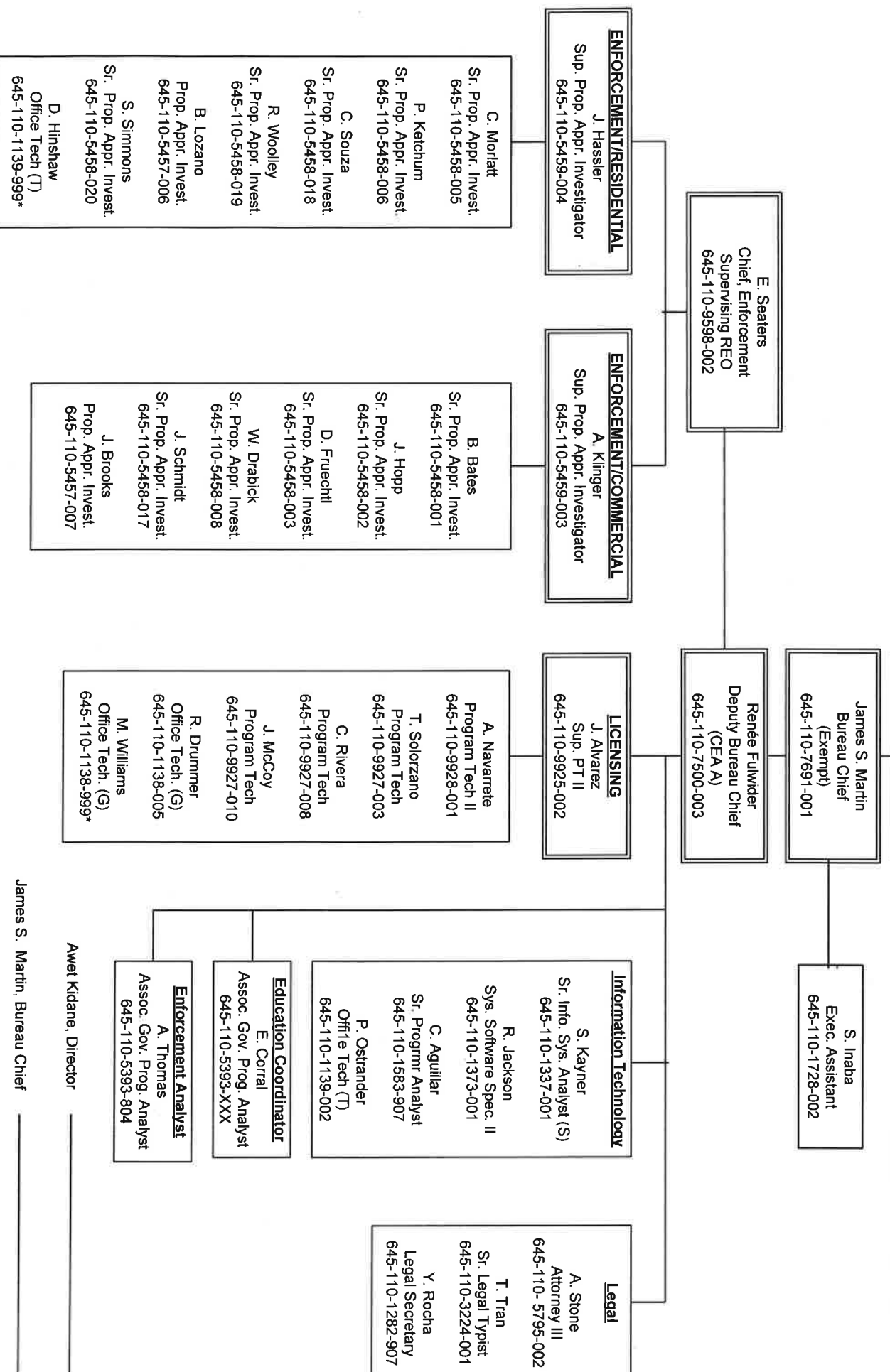
James S. Martin, Bureau Chief

Dannielle Carrillo, C&P Analyst

BUREAU OF REAL ESTATE APPRAISERS

CURRENT
FY 2014-15

Authorized Positions: 31
* BL 12-03 (999 blanket): 2
Blanket Positions: 2



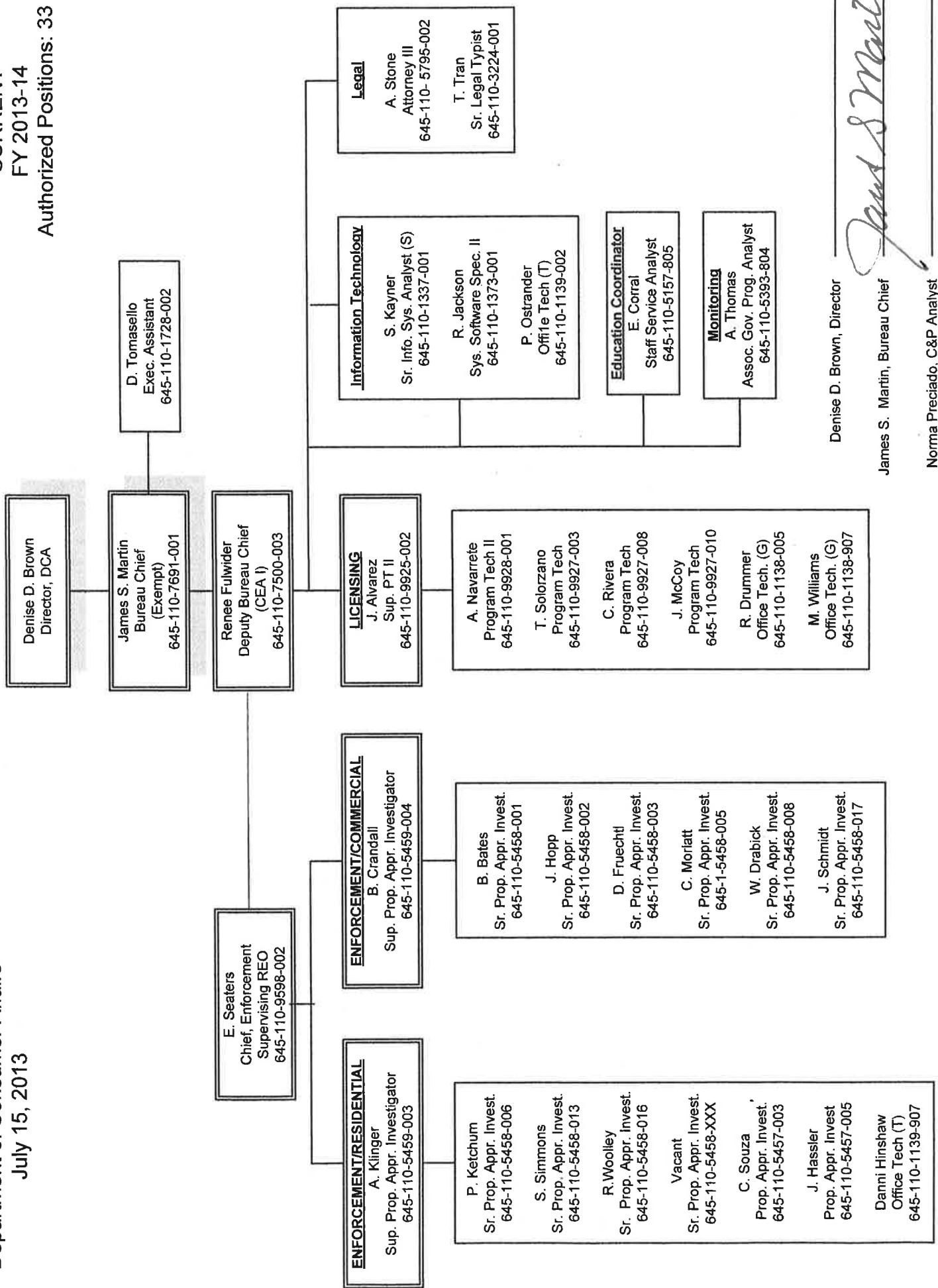
Awet Kidane, Director

James S. Martin, Bureau Chief

Dannielle Carrillo, C&P Analyst

BUREAU OF REAL ESTATE APPRAISERS

CURRENT
FY 2013-14
Authorized Positions: 33



James S. Martin

PY 31.0
FY 2012/13
9/1/12

Office of Real Estate Appraisers

Director
Jim Martin
417-100-7691-001

D. Tomasello Exec. Assistant
417-100-1728-002

Information Technology Unit

S. Kayner Sr. Info. Systems Analyst (Sp)
417-100-1337-001
R. Jackson Systems Software Specialist II
417-100-1373-001
P. Ostrander Office Tech (T)
417-100-1139-002

Deputy Director, Licensing & Administrative Services

Vacant CEA I
417-100-7500-003

Chief, Licensing & Enforcement
E. Seaters Supervising REO
417-100-9598-001

Legal

K. Chovan Attorney III
417-100-5795-002
Y. Rocha Legal Secretary
417-100-1282-001

Enforcement / Residential

A. Klinger Sup. Prop. Appr. Investigator
417-100-5459-003

Enforcement / Commercial

B. Crandall Sup. Prop. Appr. Investigator
417-100-5459-004

Licensing Unit

J. Alvarez Sup PT II
417-100-9925-002

Education Coordinator

E. Corral Assc Govtl Prg Analyst
417-100-5393-705

Monitoring

A. Thomas Staff Service Analyst (G)
417-100-5157-704

A. Navarete Program Tech II
417-100-9928-001

C. Rivera Program Tech
417-100-9927-008

J. McCoy Program Tech
417-100-9927-010

T. Solorzano Program Tech
417-100-9927-003

R. Drummer Office Asst. (G)
417-100-1441-002

J. Hopp Sr. Prop. Appr. Invest.
417-100-5458-002

D. Friecht Sr. Prop. Appr. Invest.
417-100-5458-003

W. Drabick Sr. Prop. Appr. Invest.
417-100-5458-008

J. Schmidt Sr. Prop. Appr. Invest.
417-100-5458-017

* Vacant Sr. Prop. Appr. Invest.
417-100-5458-013

C. Moratt Prop. Appr. Invest.
417-100-5457-004

Enforcement / Residential

A. Klinger Sup. Prop. Appr. Investigator
417-100-5459-003

R. Mackay Sr. Prop. Appr. Invest.
417-100-5458-001

S. Simmons Sr. Prop. Appr. Invest.
417-100-5458-005

P. Ketchum Sr. Prop. Appr. Invest.
417-100-5458-006

R. Woolley Sr. Prop. Appr. Invest.
417-100-5458-016

C. Souza Prop. Appr. Invest.
417-100-5457-003

J. Hassler Prop. Appr. Invest.
417-100-5457-005

Danni Hinshaw Office Tech (T)
417-100-1139-901*

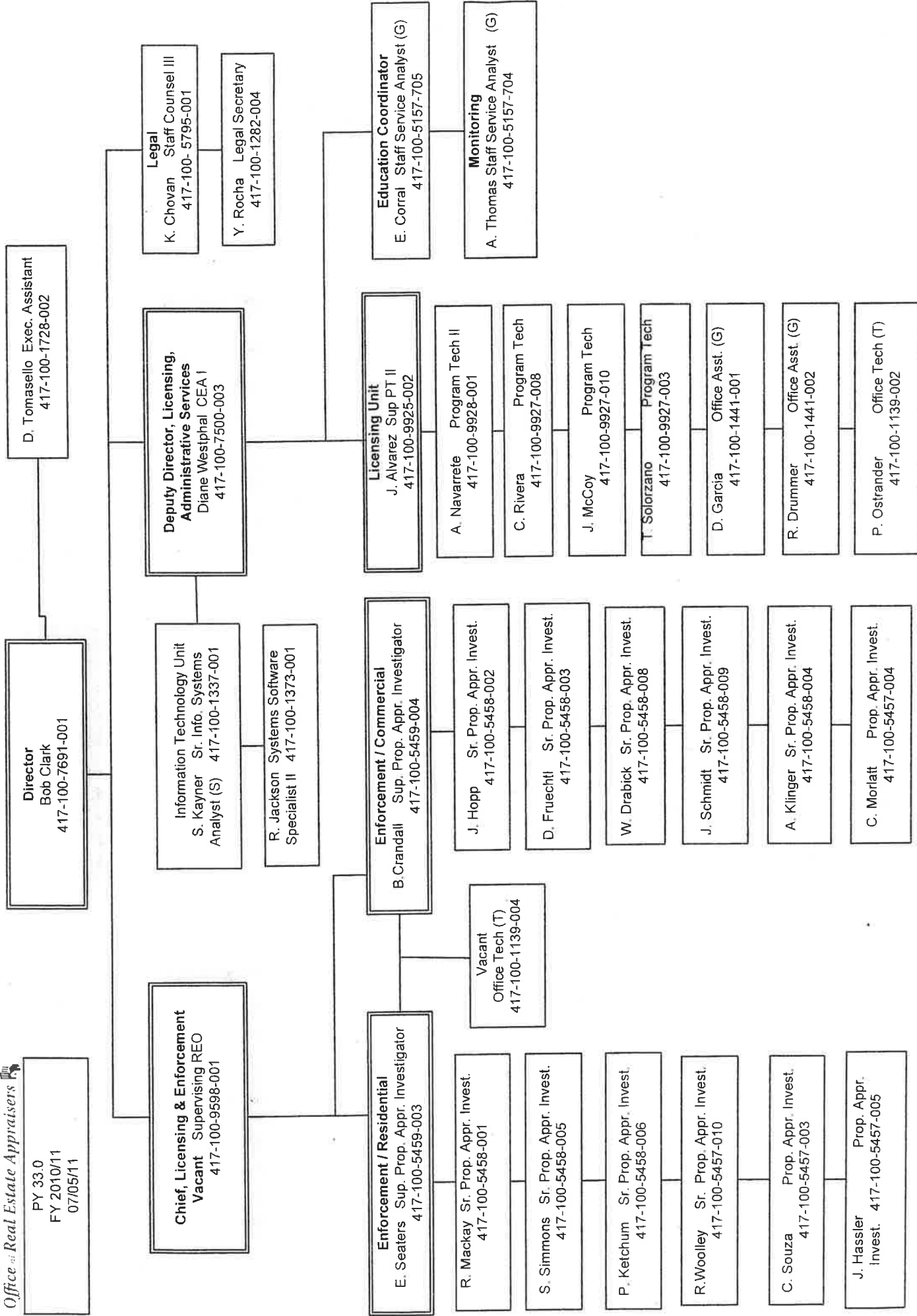
* = blanket position

Approved

Date

PY 33.0
FY 2010/11
07/05/11

Office of Real Estate Appraisers



Bob Clark

Approved

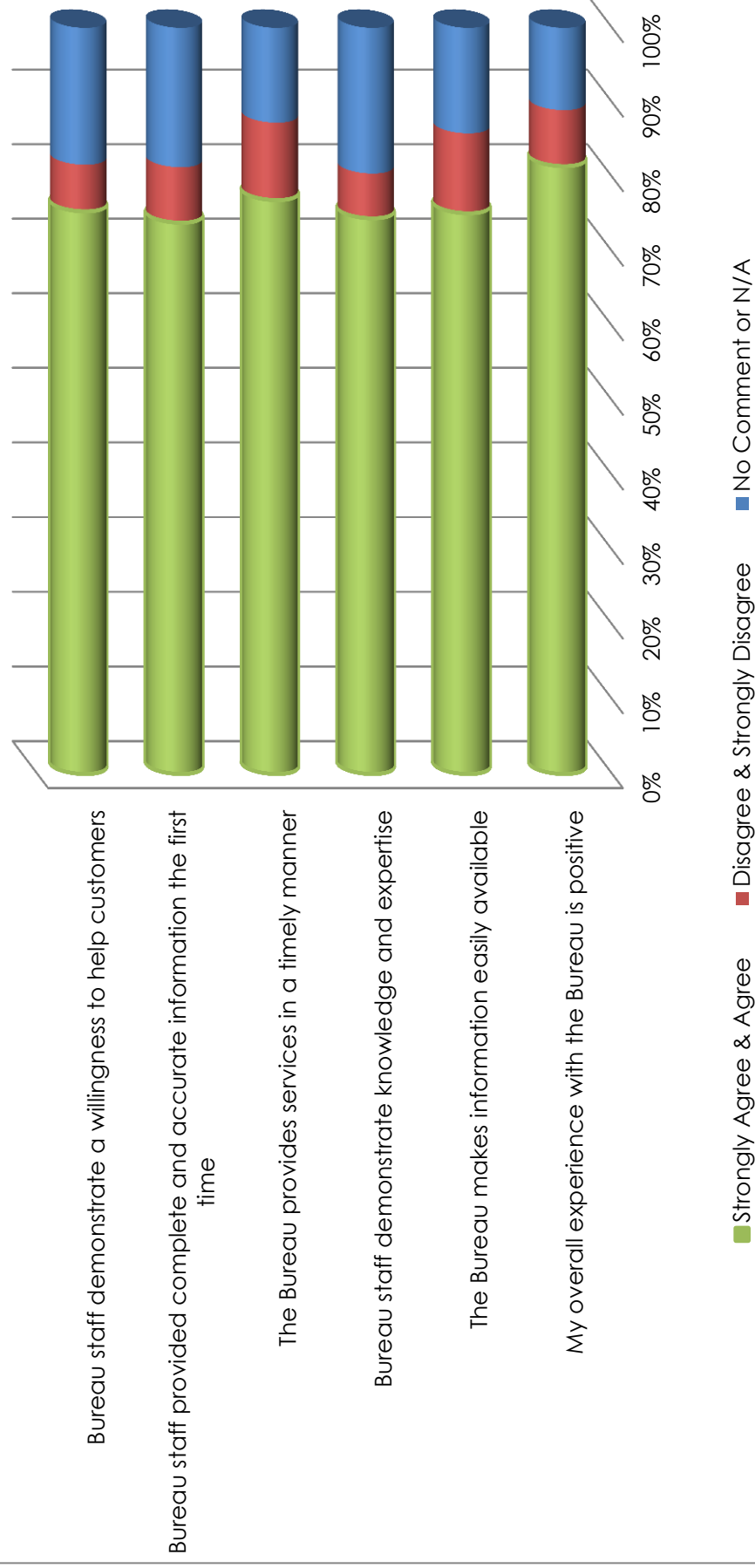
Date

7/5/11

Attachment# 3

Customer Satisfaction Survey Charts

BREA 2015 Customer Satisfaction Survey Results



BREA 2015 Customer Satisfaction Survey Results					Strongly Agree	Agree	Disagree	Strongly Disagree	No Comment or N/A
Bureau staff demonstrate a willingness to help customers					37%	38%	4%	2%	18%
Bureau staff provided complete and accurate information the first time					36%	37%	4%	4%	19%
The Bureau provides services in a timely manner					39%	37%	6%	5%	13%
Bureau staff demonstrate knowledge and expertise					37%	37%	3%	3%	20%
The Bureau makes information easily available					36%	39%	7%	3%	14%
My overall experience with the Bureau is positive					41%	41%	4%	4%	11%



Bureau of Real Estate Appraisers
1102 Q Street, Suite 4100
Sacramento, CA 95811

Phone: (916) 552-9000

Website: www.brea.ca.gov

Bureau of Real Estate Appraisers



2014-2018 Strategic Plan

MESSAGE FROM THE CHIEF

James S. Martin, Bureau Chief



The Bureau of Real Estate Appraisers (BREA) 2014-2018 Strategic Plan is the result of participation by a broad range of stakeholders including, consumers, licensees, registrants, and education providers. Survey results were insightful on both the current position of BREA and the state of the environment in which we operate. BREA staff contributions were instrumental in identifying opportunities relating to day-to-day operations and mission critical objectives.

With this input, and guidance from the Department of Consumer Affairs (DCA), SOLID staff, BREA executive team developed a strategic plan that is both responsive and actionable. The plan will allow for the organization to respond to change while remaining faithful to our mission.

Services provided by the appraisal profession are integral in business and the everyday life of consumers. California, with the largest number of licensees in the nation, plays a critical role in partnering with the federal government to implement requirements supporting a high level of public trust in the appraisal industry.

BREA must respond not only to a changing regulatory climate but also to real estate market conditions and trends which impact program processes and workload. This plan positions the Bureau to be flexible and excel in a leadership role protecting the public and consumers of appraisal services in California and nationwide.

I am proud of the work and contributions of my executive team and staff, and grateful to the survey participants for their vital input. With that I offer this road map to guide our vision of real estate appraisal excellence in California.

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ABOUT THE BUREAU OF REAL ESTATE APPRAISERS.....	2
SIGNIFICANT ACCOMPLISHMENTS	4
VISION, MISSION, AND VALUES	6
STRATEGIC GOALS AND OBJECTIVES.....	7

OVERVIEW OF STRATEGIC PLANNING

SOLID began the strategic planning process by conducting a preliminary meeting with the Bureau Chief and Bureau management to learn about the background of the Bureau of Real Estate Appraisers, identify key areas of focus, define roles and responsibilities, and establish a customized strategic planning schedule.

To understand the environment in which the Bureau operates and identify factors that could impact the Bureau's success, SOLID conducted an environmental scan and analysis of the internal and external environments by collecting information through the following methods:

- An online survey sent to 5,000 Bureau stakeholders, consisting of professional licensees, Appraisal Management Companies, continuing education providers, real estate appraisal professional associations, and others who expressed interest in the strategic direction of the Bureau. Over 1,500 stakeholders responded to the survey.
- Telephone interviews with seven Bureau management members, including the Chief, conducted during the months of April and May 2014.
- Two focus group discussions on April 14 and 17, 2014, with Bureau staff to identify the strengths and weaknesses of the Bureau from an internal perspective.

The most significant themes and trends identified from the environmental scan were discussed by the executive team during a strategic planning session facilitated by SOLID. This information guided the team in developing its vision, mission, and values, and directed the strategic goals and objectives outlined in this strategic plan for the Bureau to accomplish over the next five years 2014–2018.

ABOUT THE BUREAU OF REAL ESTATE APPRAISERS

In 1989, Title XI of the federal Financial Institutions Reform, Recovery and Enforcement Act was adopted by congress mandating states to license and certify real estate appraisers who appraise property for federally related transactions. The federal law was enacted as a result of the savings and loan crisis.

In response to the federal mandate, the California Legislature enacted the Real Estate Appraisers Licensing and Certification Law in 1990 (AB 527, Chapter 491 of 1990). The Office of Real Estate Appraisers (OREA) was established within the Business, Transportation and Housing Agency, and charged with developing and implementing a real estate appraiser licensing and certification program compliant with the federal mandate. In 2012, Governor Brown submitted a reorganization plan to the Legislature. As a result, on July 1, 2013, OREA became the Bureau of Real Estate Appraisers (BREA) within the Department of Consumer Affairs.

BREA, which is entirely funded by licensing fees, is a single program comprised of two core components, licensing and enforcement.

The Licensing Division implements the minimum requirements for licensure, according to criteria established by the federal government and California law, to ensure that only qualified persons are licensed to conduct appraisals in federally related real estate transactions. Applicants must meet minimum education and experience requirements and successfully complete a nationally approved examination. The Licensing Division also registers Appraisal Management Companies (AMC) in compliance with California law.

The Enforcement Division investigates the background of applicants, licensees, and AMC registrants to ensure they meet the standards for licensure. The Enforcement Division also investigates complaints of violations of California law and national appraisal standards filed against licensed appraisers and registered AMCs.

BREA is responsible for the accreditation of educational courses and providers for real estate appraisers. BREA has reviewed and approved over 1,800 pre-licensing and continuing education courses. In addition to the real estate appraisal related

courses offered by California's community colleges and universities, over 70 proprietary schools provide appraisal education.

FEDERAL OVERSIGHT

The following entities are not part of the Bureau, but they have influence over the Bureau and its operations at the federal level.

Appraisal Subcommittee

The Appraisal Subcommittee (ASC) was created in 1989 pursuant to Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989. The ASC's role as an independent federal institution is to generally oversee the real estate appraisal process as it relates to federally regulated transactions. More specifically, the ASC reviews each state's compliance with federal requirements for licensed appraisers and appraisal management companies and can take action in the case of non-compliance; maintains a national registry of approved appraisers; and oversees the Appraisal Foundation.

Appraisal Foundation

The Appraisal Foundation (Foundation) is a non-profit organization that works to advance professionalism for appraisers through the promulgation of standards, appraiser qualifications, and guidance regarding appraisal methods and techniques. The Appraisal Standards Board within the Foundation determines and maintains the Uniform Standards of Professional Appraisal Practice which all states must enforce to be compliant with federal requirements and allow state licensed appraisers to participate in federally regulated transactions. The Appraisal Qualifications Board within the Foundation establishes the minimum education and experience requirements as well as the examination requirements. The Appraisal Practices Board within the Foundation is charged with providing guidance and issuing opinions on recognized valuation methods and techniques.

SIGNIFICANT ACCOMPLISHMENTS

Over the last 10 years the Bureau's program has undergone significant change due to the influence of unstable market conditions and changes in federal regulatory mandates. The following are significant Bureau accomplishments during this period.

1. Tremendous growth in real estate market activity and the changes increasing the qualifying education and experience requirements mandated by the Appraisal Qualifications Board in 2008 triggered a large volume of appraisal license applications. The Bureau's licensee population grew from approximately 12,000 in 2003 to over 20,000 in 2007.
2. Beginning in 2009, as a result of the national real estate market downturn, the Bureau responded to increasing complaint volume by implementing policies, processes and procedures designed to reduce enforcement case turnaround time and improve overall operational efficiencies.
 - In July 2009 Enforcement Division staff implemented a "Fast Track" complaint triage and case resolution process allowing for the efficient processing and closing of complaints for minor violations. The process has since been modeled and adopted by other states.
 - In 2010 Enforcement staff increased the scope and detail of the work sample review process on initial and upgrade applications. Monitoring appraisal reports submitted to meet the experience requirement for licensure has become a proactive tool to assure only qualified applicants are licensed.
 - In 2010 and 2012 the Bureau implemented two legislative initiatives. SB 237 requiring the registration and oversight of Appraisal Management Companies and SB 706 requiring the web posting of formal accusations.
 - Beginning in 2012 the Bureau significantly increased the monitoring and communication in its caseload management process with the Office of the Attorney General. The Bureau also worked with the Office of the Attorney General to develop new disciplinary guidelines improving the consistency

and conformity of administrative disciplinary actions. Internal legal resources within the Bureau were redirected to further enhance enforcement efficiency.

3. In 2009 Bureau staff subject matter experts and a dedicated information technology team began development of a customized web based Enterprise Information System known as the Real Estate Appraiser Licensing and Enforcement (REALE) system. This comprehensive application includes powerful tools and reports improving the efficiency and effectiveness of the Bureau's regulatory activities.
4. In 2012-2013 further implementation and enhancement of the REALE database yielded new efficiencies and services including on-line license renewal and temporary practice permits, automated education verification, and real-time reporting between the California Appraisers License Registry and the federal Appraisal Subcommittee Registry. These improvements significantly reduced license renewal turnaround time and increased consumer protection as California is the only state in the nation offering immediate verification of their credential holders at the national level.
5. In April 2014 Bureau staff attended and made presentations at the Association of Appraiser Regulatory Officials (AARO) conference in San Francisco. This conference included attendance by state appraiser regulatory officials from across the country and Appraisal Subcommittee (ASC) staff. Also, the Bureau Chief was appointed to the ASC Advisory Committee to participate in making recommendations to the ASC on the upcoming rule making process as mandated by the Dodd-Frank legislation. These activities illustrate the influence and leadership role that California plays in appraiser regulatory matters at the national level.
6. In the spring of 2014 the Bureau reintroduced The California Appraiser newsletter and completed the redesign of the Bureau website, including user friendly mobile access. Both of these tools now allow for increased communication and access to information by Bureau stakeholders.

OUR VISION

Empowering real estate appraisal excellence.

OUR MISSION

Safeguard public trust by promoting professionalism in the real estate appraisal industry through licensing, education, and enforcement.

OUR VALUES

Accountability – We take ownership and responsibility for our performance.

Fairness – We treat everyone equally and make impartial, unbiased decisions.

Excellence – We strive for quality, innovation and continuous improvement of our programs, services, and processes.

Integrity – We are honest, dependable, respectful, and ethical.

OUR STRATEGIC GOALS

1 LICENSING AND REGISTRATION

The Bureau promotes licensing standards for licensees and registration standards for Appraisal Management Companies to protect consumers and allow reasonable access to the profession.

2 ENFORCEMENT

The Bureau protects the safety of consumers through the enforcement of the laws and regulations governing the practice of licensed Real Estate Appraisers and registered Appraisal Management Companies.

3 LAWS AND REGULATIONS

The Bureau pursues statutes, regulations, policies, and procedures to strengthen and support the Bureau's mandate and mission.

4 ORGANIZATIONAL EFFECTIVENESS

The Bureau standard is to build an excellent organization through proper Bureau governance, effective leadership, and responsible management, with a focus on retention and succession planning.

5 COMMUNICATION, CUSTOMER SERVICE, OUTREACH

The Bureau informs consumers, licensees, and stakeholders about the practice and regulation of the profession, while ensuring responsive customer service.

GOAL 1: LICENSING AND REGISTRATION

- ▶ *The Bureau promotes licensing standards for licensees and registration standards for Appraisal Management Companies to protect consumers and allow reasonable access to the profession.*

- 1.1 Establish the process and add database capability to address supervisor-trainee regulation change as per new federal requirements effective January 1, 2015.
- 1.2 Explore the feasibility of expanding pathways for licensure by developing a process to allow the use of practicum experience to meet licensing requirement.
- 1.3 Measure application timeframes and evaluate the process and implement improvements for efficiencies if needed.
- 1.4 Review and analyze the practicality of changing continuing education schedule for licensing renewals to simplify the process if appropriate.
- 1.5 Conduct a licensing fee study and make necessary changes in regulations to align with current and projected licensee population.

GOAL 2: ENFORCEMENT

- ▶ *The Bureau protects the safety of consumers through the enforcement of the laws and regulations governing the practice of licensed real estate appraisers and registered appraisal management companies.*

- 2.1 Continue to reduce disciplinary case resolution time by implementing the contingent dismissal process and increasing the frequency and attendance at settlement conferences.
- 2.2 Improve the Office of the Attorney General's basic understanding of the Uniform Standards of Professional Appraisal Practice to better facilitate the representation of BREa on technical appraisal issues.
- 2.3 Increase enforcement activities over Appraisal Management Companies by implementing new federal and State standards and increasing BREa auditing.

GOAL 3: LAWS AND REGULATIONS

- ▶ *The Bureau pursues statutes, regulations, policies, and procedures to strengthen and support the Bureau's mandate and mission.*

- 3.1 Review and revise state regulations, including forms, to enhance clarity, increase enforceability, and remain compliant with federal law.
- 3.2 Seek regulatory authority to require a basic California Laws and Regulations course as an initial licensure requirement.
- 3.3 Review and revise regulations regarding appraisal management companies for parity with federal laws and to support program objectives.
- 3.4 Review and revise regulations regarding supervisor-trainee definitions and requirements to provide clarity and remain consistent with federal law.

GOAL 4: ORGANIZATIONAL EFFECTIVENESS

- ▶ *The Bureau standard is to build an excellent organization through proper Bureau governance, effective leadership, and responsible management, with a focus on retention and succession planning.*

- 4.1 Develop an organization-wide succession plan that includes recruitment, retention and appropriate classification adjustments, if needed.
- 4.2 Develop and implement a staff recognition program to acknowledge achievements.
- 4.3 Update internal policy and procedure manuals to reflect changing processes and maintain consistency.
- 4.4 Explore feasibility of a paperless records management application and implement if possible.
- 4.5 Increase learning opportunities for staff to diversify work functionality and provide backup for essential functions.

GOAL 5: COMMUNICATION, CUSTOMER SERVICE, AND OUTREACH

- ▶ *The Bureau informs consumers, licensees, and stakeholders about the practice and regulation of the profession, while ensuring responsive customer service.*

- 5.1 At a minimum, develop and deliver a biannual newsletter and provide timely email notification to stakeholders to increase the Bureau's outreach.
- 5.2 Utilize various outlets of social media to distribute relevant program information to stakeholders and increase public awareness about the Bureau.
- 5.3 Improve the internal call referral process to better identify subject matter experts to respond to technical questions.
- 5.4 Create a process to better inform staff of changes in policy, laws and regulations, and licensing requirements, in a timely manner.
- 5.5 Explore options for expansion of online services for stakeholders to improve customer service and increase program efficiency.

Bureau of Real Estate Appraisers
1102 Q Street, Suite 4100
Sacramento, CA 95811
(916) 552-9000



This strategic plan is based on stakeholder information and discussions facilitated by SOLID for the California Bureau of Real Estate Appraisers from April 2014 to June 2014. Subsequent amendments may have been made after Bureau approval of this plan.



Prepared by
SOLID Planning Solutions
California Department of
Consumer Affairs



BUREAU OF REAL ESTATE APPRAISERS
1102 Q STREET, SUITE 4100, SACRAMENTO, CA 95811
P 916.552.9000 F 916.552.9007 / www.orea.ca.gov



Enforcement Division

Administrative Manual

Revised 2015

The Enforcement Division investigates the background of applicants, licensees, and AMC registrants to ensure they meet the standards for licensure as established by Title XI of FIRREA and California Law. The Enforcement Division also investigates complaints of violations of California law and national appraisal standards filed against licensed appraisers and registered AMCs. In addition, the Enforcement Division handles public inquiry calls not related to administrative application or credential processing questions.

Background Investigation

(a) Criminal Background Investigations.

- (1) *Initial Applications.* All initial applicants undergo a criminal background investigation with a fingerprint check and must answer background questions on the application. The Bureau evaluates any criminal convictions to determine if a license should be granted or denied.
- (2) *Subsequent Arrest Notification.* The Bureau also receives subsequent arrest notifications from the Department of Justice for all licensees who reside in California. This notification system alerts the Bureau if any licensee is arrested. Depending on the arrest or any subsequent conviction, the Bureau may take disciplinary action against the licensee.

(b) Experience Verification.

- (1) *Initial and Upgrade Applications.* Initial and upgrade applications must meet mandatory experience requirements.¹ An investigator must review an applicant's appraisal work log to determine if the applicant meets the experience requirement. This review includes verifying that the work completed includes the appropriate certifications and conforms to the minimum professional standards as dictated by the Appraisal Subcommittee (ASC).

Complaint Investigation

- (a) *Complaint Intake.* The Bureau may receive complaints from anyone, but generally complaints are received from the public (homeowners/borrowers), lenders, appraisers, and appraisal management companies. All complaints must be signed and verified by the complainant.² A verified complaint is opened as a case and the case is assigned to a Bureau investigator (Certified Appraiser trained as an investigator). The complainant is sent an acknowledgement letter within ten working days after the Bureau receives the verified complaint.³
- (b) *Jurisdictional Determination.* Each complaint is reviewed to determine if the Bureau has jurisdiction. If so, the case continues, if not the case is closed and referred to the appropriate entity, if any.

¹ Trainee applications do not require experience.

² California Code of Regulations section 3726(a)(3)

³ California Code of Regulations section 3726(b)

(c) *Complaint Prioritization.* Once it is determined the Bureau has jurisdiction a case is prioritized based upon the following:

- (1) Priority 1 complaints are those where the public may be at risk of serious harm or the complaint is regarding a licensee or registrant currently under investigation due to another open case;
- (2) Priority 2 complaints involve a licensee or registrant who has a prior history of discipline; and
- (3) Priority 3 complaints are all others, prioritized in the order in which they were received.

(d) *Complaint Processing*

- (1) Each case results in a confidential investigative report showing a summary of the acts and/or omissions alleged, and a summary of the supporting evidence together with a recommendation to division management for appropriate enforcement action, if any.
- (2) When the confidential investigation report shows: a) allegations are supported by credible evidence that a violation of law or regulations was committed by a licensed appraiser, registrant, or person or entity acting in a capacity requiring a license or certificate of registration; and b) that the violation is substantially related to the qualifications, duties, or functions of an appraiser, the Bureau shall take appropriate action as defined below.
- (3) Where the confidential investigative report shows that the allegations, even if true, do not constitute a violation of the law or regulations, that the allegations are not supported by sufficient credible evidence, or that the facts show a complete defense or legal justification, the investigation is closed.⁴

(e) *Appropriate Action.* Depending on the seriousness of the violation, the division may recommend either a: verbal advisory; written advisory; cease and desist letter (unlicensed or unregistered only); private reproof, public reproof, citation; or accusation.⁵ The Bureau evaluates each case individually to determine what action is appropriate. The complainant is notified of final action taken on the complaint.⁶

(f) *Monitoring.* Depending on the outcome of the case the process may include follow up monitoring of any disciplinary action or probation requiring education, payment of a fine or ongoing review of work.

Public Inquiry Calls

(a) *Public Inquiry Calls.* Most calls directed to the Enforcement Division originate with licensees, registrants, homeowners, or real estate agents/brokers and are

⁴ California Code of Regulations section 3728

⁵ California Code of Regulations section 3721

⁶ California Code of Regulations section 3726(b)

handled by a staff investigator. Depending upon the call the investigator may direct callers to the BREa website or an appropriate federal agency for more information. Other calls may pertain to appraisal methodology, compliance with the Uniform Standards of Professional Appraisal Practice or federal rules relating to the practice of appraisal. The investigator will generally direct the caller to additional reference material for further guidance. In some cases the investigator may recommend the caller file a complaint so the Bureau can investigate the matter.



BUREAU OF REAL ESTATE APPRAISERS

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Licensing Division Administrative Manual

Revised 2015

The Licensing Division of the Bureau is responsible for applicant compliance with the minimum requirements for licensure in accordance with criteria established by the federally mandated Appraisal Foundation and California law. The Licensing Division also registers Appraisal Management Companies (AMC) in compliance with California law.

Application Processing

- (a) *Background*. Below is a list of license applications and the Bureau's review process. In addition to the review process below, all applicants will undergo and pass a background investigation before the license or registration can be issued. See the Enforcement Division's administrative manual for a description of the process.
- (b) *Military Service*. If an applicant checks either military related boxes on the top of any application, the military service must be validated and then the application must be expedited.
- (c) *Initial Trainee (AT)*. The trainee license is the entry level license and thus does not require the experience requirement of other applications. The following information must be verified by the Bureau.¹
 - (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - (2) The education documented meets the education requirement to obtain a trainee license. If the applicant does not have sufficient education, a deficiency letter is issued.
 - (3) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the examination admittance letter is issued.
 - (4) If the applicant passes the examination and timely submits a request for issuance, the license is ready to be issued pending background approval.
- (d) *Initial Residential (AL), Certified Residential (AR) & Certified General (AG)*. The AL, AR, and AG licenses will require the same process as above plus an additional experience review that is conducted by the Enforcement Division. The following information must be verified by the Bureau.
 - (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - (2) The education documented meets the education requirement to obtain a license. If the applicant does not have sufficient education, a deficiency letter is issued.
 - (3) Verify with the Enforcement Division the experience requirement has been satisfied. If the applicant does not have sufficient experience, a deficiency letter is issued.
 - (4) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the examination admittance letter is issued.

¹ For abnormal cases, refer to Article 3-5 in BREA's regulations or a manager.

- (5) If the applicant passes the examination and timely submits a request for issuance, the license is ready to be issued pending background approval.

(e) *Reciprocal Licenses.* Reciprocal licenses are granted to appraisers licensed in good standing by another state. Per federal guidelines the Bureau accepts the appraiser's education, experience, and examination results as long as the appraiser satisfied these requirements in a home state with requirements which meet or exceed those of California. The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) An out-of-state license is active and in good standing confirmed by a letter of license history and the National Appraisal Registry.
- (3) If there are no deficiencies or if the deficiencies have been remedied and the applicant has an active out-of-state license in good standing, the license is ready to be issued pending background approval.

(f) *Temporary Practice Permits (Paper and Online).* These permits do not constitute a license. Per federal guidelines out-of-state appraisers in good standing must be allowed to complete a single appraisal assignment in another state by obtaining a temporary permit. The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) An out-of-state license is active and in good standing confirmed by letter of license history and National Appraisal Registry.
- (3) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion and the applicant has an active out-of-state license in good standing, the permit is issued.

(g) *Renewal – Paper.* The following information must be verified by the Bureau.

- (1) All forms are completed correctly.² If the forms are not completed correctly, a deficiency letter is issued.
- (2) Correct amount of continuing education is documented. If the applicant did not document the correct amount of continuing education, a deficiency letter is issued.
- (3) The licensee has paid all fines and completed all ordered education if the licensee was subject to past discipline. The license cannot be renewed until the ordered education is complete and fines are paid.
- (4) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the renewal license is issued.

(h) *Renewal – Online.* Online renewals are only available to licensees who reside in California, have no criminal history or subsequent arrest reports during last license term, have no outstanding dishonored payments to the Bureau and are in full

² Late renewals are subject to the requirements and limitations of CCR section 3682 and a \$125 late renewal fee.

compliance with any current child support order. The following information must be verified by the Bureau.

- (1) Correct amount of continuing education is documented. If the applicant did not document the correct amount of continuing education, a deficiency letter is issued.
- (2) The licensee has paid all fines and completed all ordered education if the license was subject to discipline. The license cannot be renewed until the ordered education is complete and fines are paid.
- (3) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the renewal license is issued.

(i) *License Upgrade.* The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) The education documented meets the education requirement to obtain a license. If the applicant did not have document sufficient education, a deficiency letter is issued.
- (3) The Enforcement Division experience requirement has been satisfied. If the applicant does not have sufficient experience, a deficiency letter is issued.
- (4) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the examination admittance letter is issued.
- (5) If the applicant passes the examination and timely submits a request for issuance, the license is ready to be issued pending background approval.

(j) *Initial AMC Registration and Renewal.* The following information must be verified by the Bureau.

- (1) All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
- (2) If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the registration is ready to be issued pending background approval.

Education Approval Process

(a) *Education Approval Process.* The Bureau accredits both Course Providers and the individual courses offered. Initial and upgrading applicants must complete accredited basic education and renewing applicants must complete accredited continuing education.

- (1) *Course Provider Accreditation Process.* Acceptable course provider documentation is required before the Bureau can issue a course provider approval number. The following information must be verified by the Bureau.

- a. All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - b. The Course Provider policies comply with the Bureau's requirements: attendance; grading; instructor hiring; refund and re-examination; final examination; record management and retention; and subcontracting.
 - c. The sample course completion certificates are in compliance with Bureau requirements.
 - d. If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the accreditation is ready to be issued.
- (2) *Course Accreditation Process.* Once the course provider has been accredited to provide courses, the Bureau reviews the courses to determine if the courses meet the following requirements. (Online-IDECA required)
- a. All forms are completed correctly. If the forms are not completed correctly, a deficiency letter is issued.
 - b. The course textbooks, proposed advertising, syllabus, final examinations, and reading assignment listings are in compliance with Bureau standards.
 - c. If there are no deficiencies or if the deficiencies have been remedied in a timely fashion, the accreditation is ready to be issued.

Licensing Suspension

(a) *Licensing Suspension.* The licensing manager will suspend a license or registration for the following reasons:

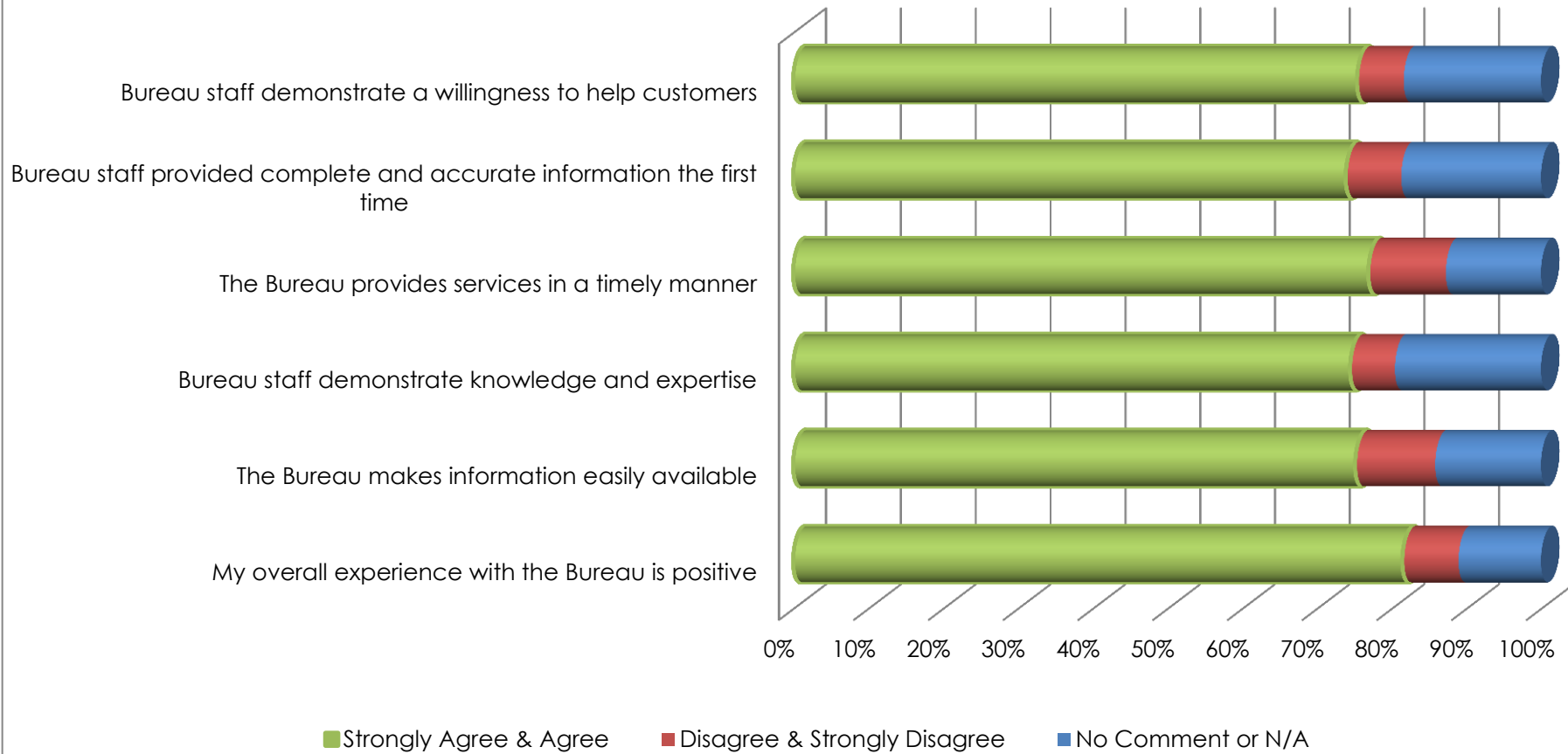
- (1) A license or registration will be automatically suspended if payment of any fees is dishonored by the issuing institution for any reason.³
- (2) Licensees not in compliance with a child support order are subject to suspension and denial of renewal.⁴

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³ California Code of Regulations section 3582(c)

⁴ Family Code section 17520

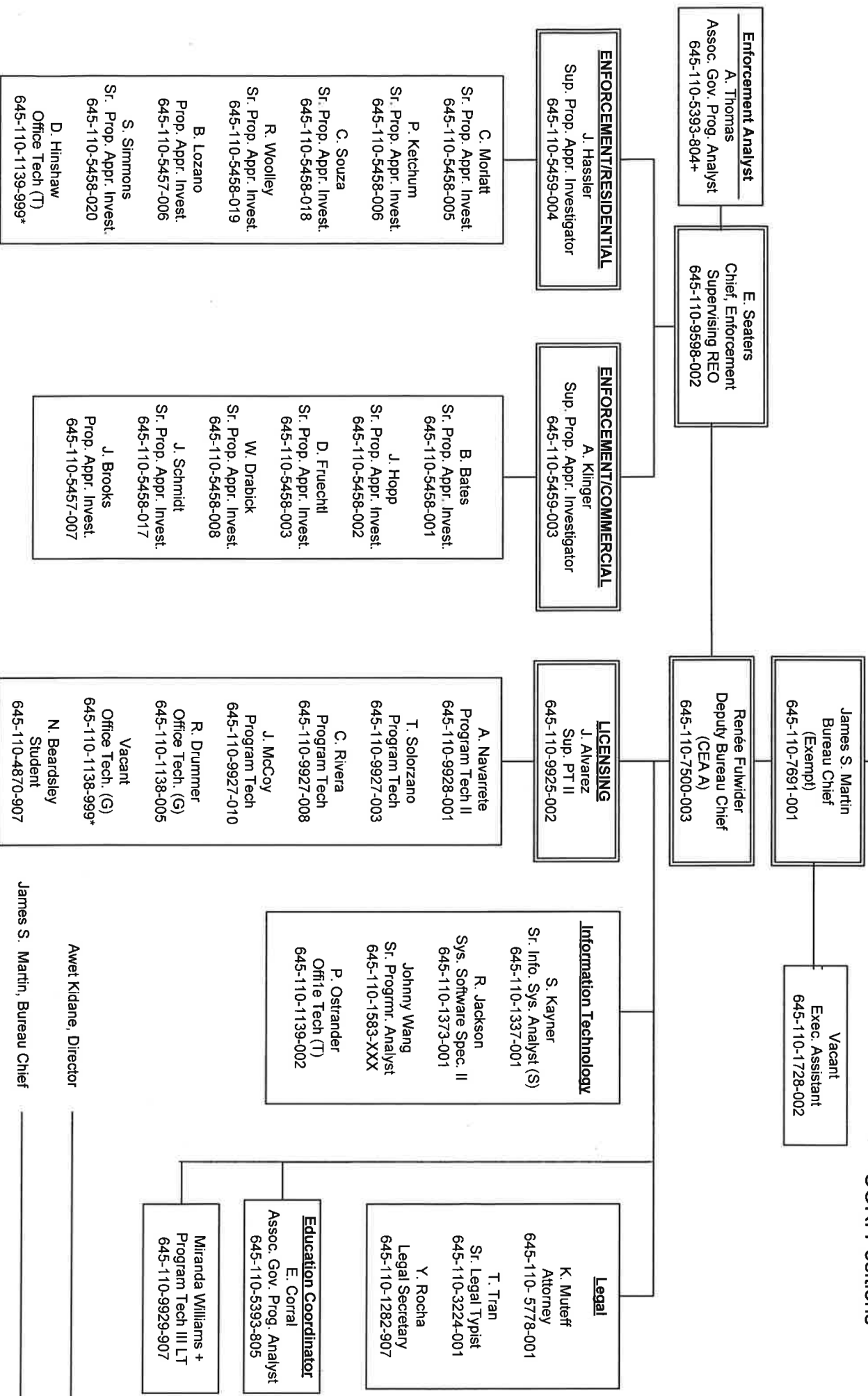
BREA 2015 Customer Satisfaction Survey Results



BREA 2015 Customer Satisfaction Survey Results	Strongly Agree	Agree	Disagree	Strongly Disagree	No Comment or N/A
Bureau staff demonstrate a willingness to help customers	37%	38%	4%	2%	18%
Bureau staff provided complete and accurate information the first time	36%	37%	4%	4%	19%
The Bureau provides services in a timely manner	39%	37%	6%	5%	13%
Bureau staff demonstrate knowledge and expertise	37%	37%	3%	3%	20%
The Bureau makes information easily available	36%	39%	7%	3%	14%
My overall experience with the Bureau is positive	41%	41%	4%	4%	11%

BUREAU OF REAL ESTATE APPRAISERS

CURRENT
FY 2014-15
Authorized Positions: 32
* BL 12-03 (999 blanket): 2
Blanket Positions: 3
+ = CORI Positions



Awet Kidane, Director

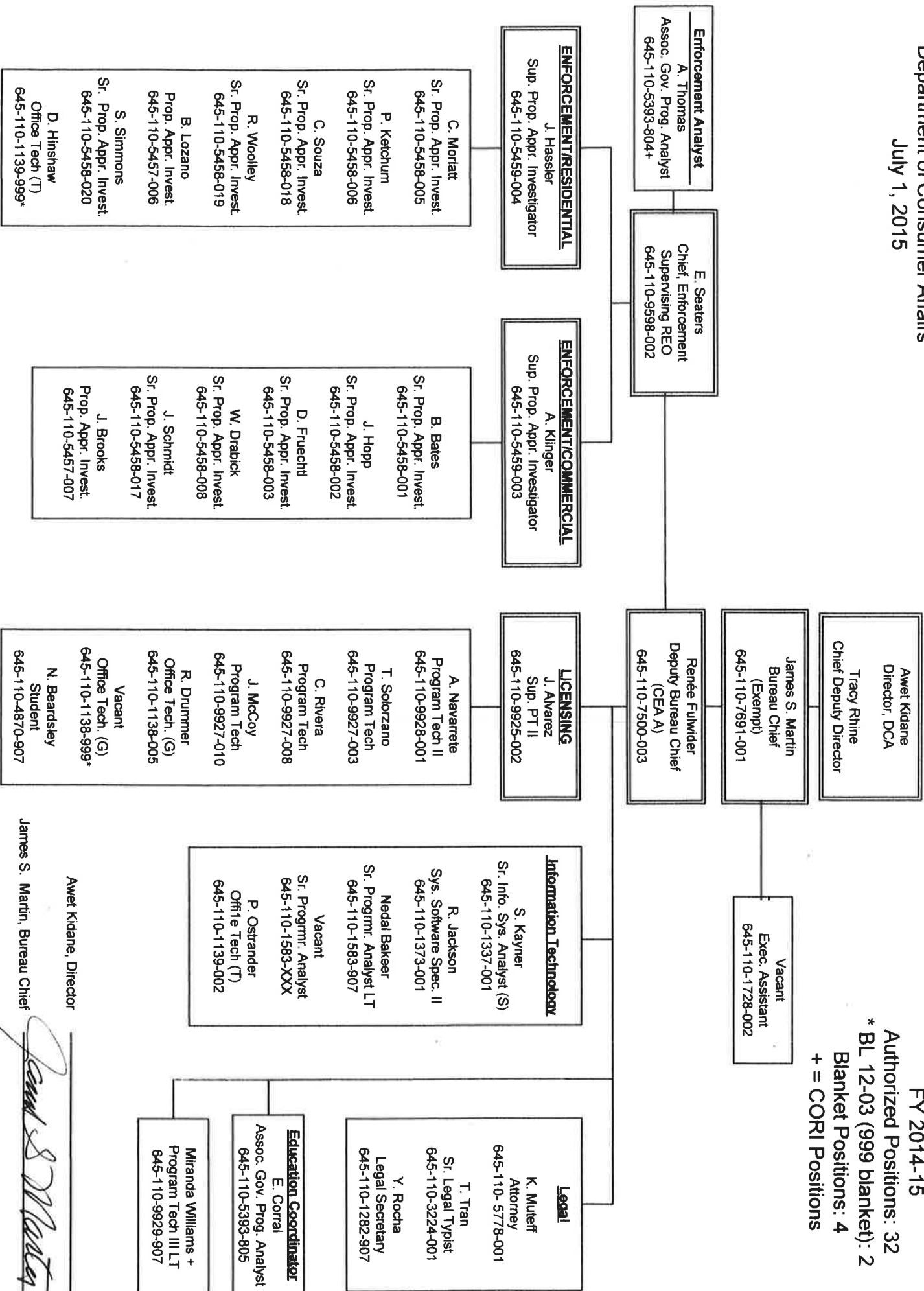
James S. Martin, Bureau Chief

Dannielle Carrillo, C&P Analyst

BUREAU OF REAL ESTATE APPRAISERS

**CURRENT
FY 2014-15**

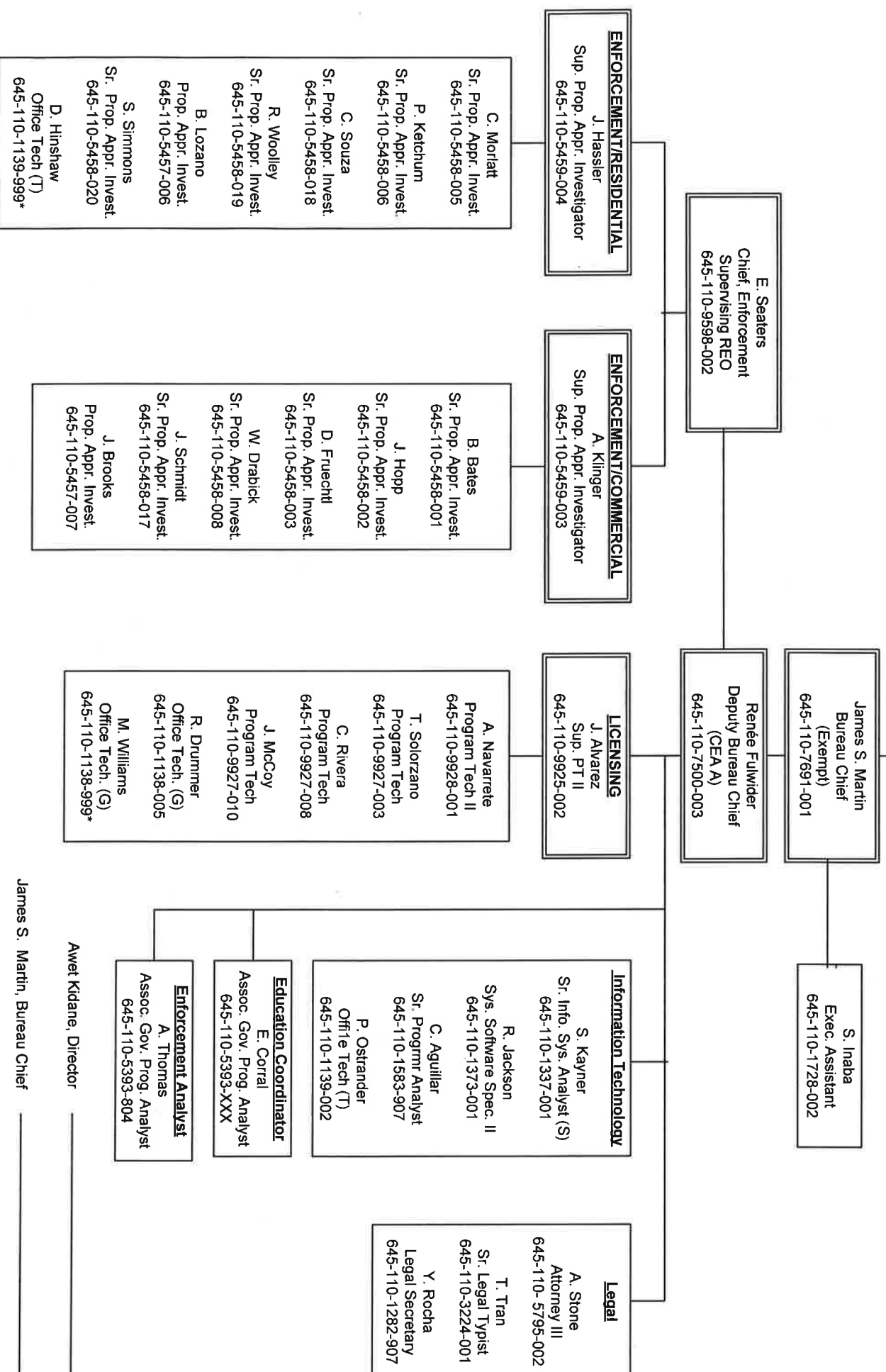
Authorized Positions: 32
* BL 12-03 (999 blanket): 2
Blanket Positions: 4
+ = CORI Positions



BUREAU OF REAL ESTATE APPRAISERS

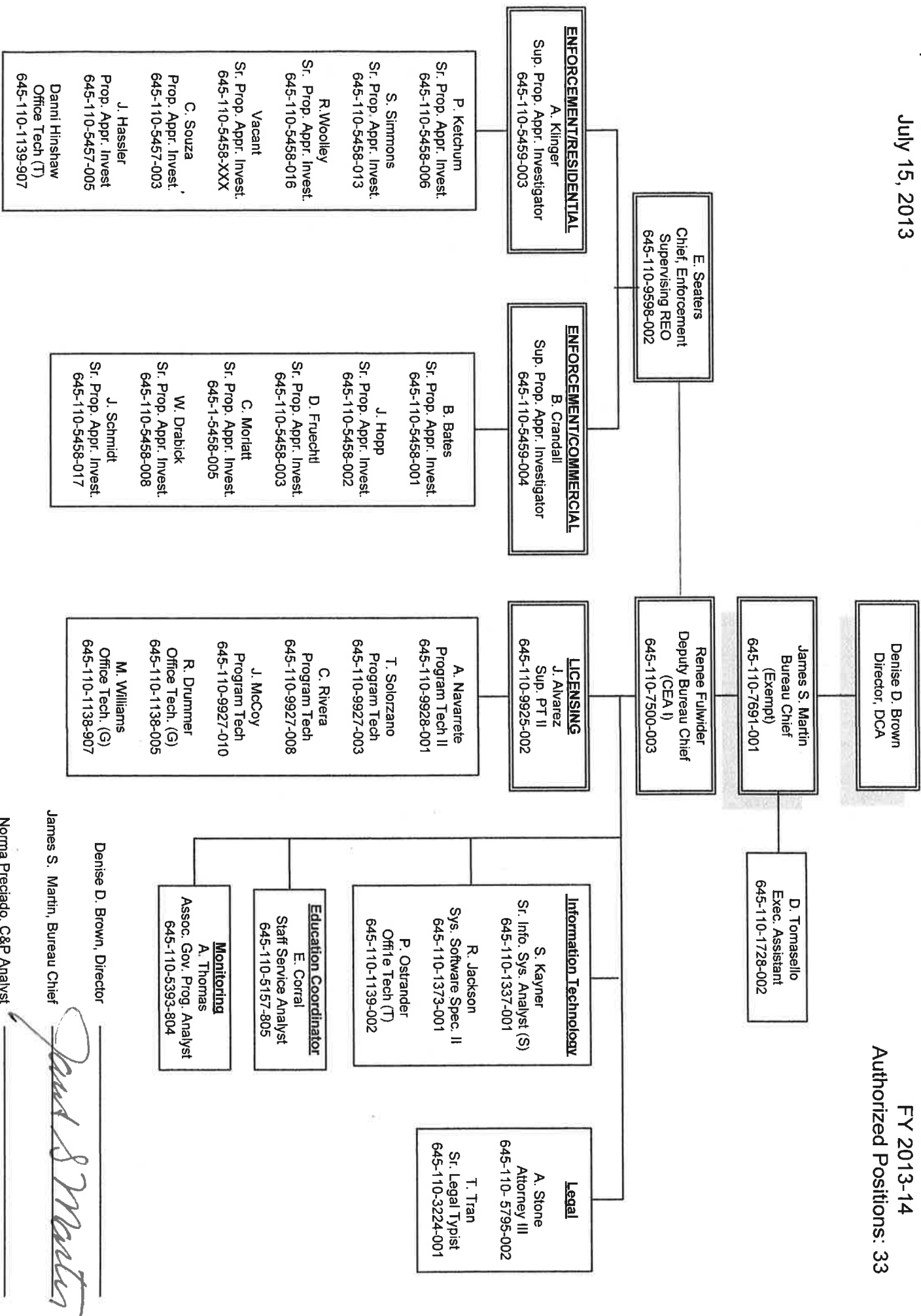
**CURRENT
FY 2014-15**

Authorized Positions: 31
* BL 12-03 (999 blanket): 2
Blanket Positions: 2



BUREAU OF REAL ESTATE APPRAISERS

CURRENT
FY 2013-14
Authorized Positions: 33



PY 31.0
FY 2012/13
9/1/12

Office of Real Estate Appraisers

Director
Jim Martin
417-100-7691-001

D. Tomasello Exec. Assistant
417-100-1728-002

Information Technology Unit

S. Kayner Sr. Info. Systems Analyst (Sp)
417-100-1337-001
R. Jackson Systems Software Specialist II
417-100-1373-001
P. Ostrander Office Tech (T)
417-100-1139-002

Deputy Director, Licensing & Administrative Services

Vacant CEA I
417-100-7500-003

Chief, Licensing & Enforcement
E. Seaters Supervising REO
417-100-9598-001

Legal

K. Chovan Attorney III
417-100-5795-002
Y. Rocha Legal Secretary
417-100-1282-001

Enforcement / Residential

A. Klinger Sup. Prop. Appr. Investigator
417-100-5459-003

Enforcement / Commercial

B. Crandall Sup. Prop. Appr. Investigator
417-100-5459-004

Licensing Unit

J. Alvarez Sup PT II
417-100-9925-002

Education Coordinator

E. Corral Assc Govtl Prg Analyst
417-100-5393-705

A. Navarete Program Tech II
417-100-9928-001

C. Rivera Program Tech
417-100-9927-008

J. McCoy Program Tech
417-100-9927-010

T. Solorzano Program Tech
417-100-9927-003

R. Drummer Office Asst. (G)
417-100-1441-002

Monitoring

A. Thomas Staff Service Analyst (G)
417-100-5157-704

J. Hopp Sr. Prop. Appr. Invest.
417-100-5458-002

D. Friuchtl Sr. Prop. Appr. Invest.
417-100-5458-003

W. Drabick Sr. Prop. Appr. Invest.
417-100-5458-008

J. Schmidt Sr. Prop. Appr. Invest.
417-100-5458-017

* Vacant Sr. Prop. Appr. Invest.
417-100-5458-013

C. Morant Prop. Appr. Invest.
417-100-5457-004

R. Mackay Sr. Prop. Appr. Invest.
417-100-5458-001

S. Simmons Sr. Prop. Appr. Invest.
417-100-5458-005

P. Ketchum Sr. Prop. Appr. Invest.
417-100-5458-006

R. Woolley Sr. Prop. Appr. Invest.
417-100-5458-016

C. Souza Prop. Appr. Invest.
417-100-5457-003

J. Hassler Prop. Appr. Invest.
417-100-5457-005

Danni Hinshaw Office Tech (T)
417-100-1139-901*

* = blanket position

Approved

Date

Office of Real Estate Appraisers

PY 33.0
FY 2010/11
07/05/11

Director
Bob Clark
417-100-7691-001

D. Tomasello Exec. Assistant
417-100-1728-002

Chief, Licensing & Enforcement
Vacant Supervising REO
417-100-9598-001

Information Technology Unit
S. Kayner Sr. Info. Systems
Analyst (S) 417-100-1337-001

R. Jackson Systems Software
Specialist II 417-100-1373-001

**Deputy Director, Licensing,
Administrative Services**
Diane Westphal CEAI
417-100-7500-003

Legal
K. Chovan Staff Counsel III
417-100-5795-001

Y. Rocha Legal Secretary
417-100-1282-004

Enforcement / Residential
E. Seaters Sup. Prop. Appr. Investigator
417-100-5459-003

R. Mackay Sr. Prop. Appr. Invest.
417-100-5458-001

S. Simmons Sr. Prop. Appr. Invest.
417-100-5458-005

P. Ketchum Sr. Prop. Appr. Invest.
417-100-5458-006

R. Woolley Sr. Prop. Appr. Invest.
417-100-5457-010

C. Souza Prop. Appr. Invest.
417-100-5457-003

J. Hassler Prop. Appr.
Invest. 417-100-5457-005

Enforcement / Commercial
B. Crandall Sup. Prop. Appr. Investigator
417-100-5459-004

Vacant
Office Tech (T)
417-100-1139-004

J. Hopp Sr. Prop. Appr. Invest.
417-100-5458-002

D. Friuecht Sr. Prop. Appr. Invest.
417-100-5458-003

W. Drabick Sr. Prop. Appr. Invest.
417-100-5458-008

J. Schmidt Sr. Prop. Appr. Invest.
417-100-5458-009

A. Klinger Sr. Prop. Appr. Invest.
417-100-5458-004

C. Morlatt Prop. Appr. Invest.
417-100-5457-004

Licensing Unit
J. Alvarez Sup PT II
417-100-9925-002

A. Navarete Program Tech II
417-100-9928-001

C. Rivera Program Tech
417-100-9927-008

J. McCoy Program Tech
417-100-9927-010

T. Solorzano Program Tech
417-100-9927-003

D. Garcia Office Asst. (G)
417-100-1441-001

R. Drummer Office Asst. (G)
417-100-1441-002

P. Ostrander Office Tech (T)
417-100-1139-002

Education Coordinator
E. Corral Staff Service Analyst (G)
417-100-5157-705

Monitoring
A. Thomas Staff Service Analyst (G)
417-100-5157-704

Approved

Date

Bob Clark

7/5/11