

January 25, 2021

Erin Seeley
Chief Executive Officer
Real Estate Council of British Columbia
900 – 750 West Pender Street
Vancouver, BC V6C 2T8
Submitted by email: eseeley@recbc.ca

Dear Ms. Seeley,

RE: Licensing Fee Changes

Thank you for the opportunity to provide feedback on your consultation on proposed changes to licensing fees. The British Columbia Real Estate Association (BCREA) urges the Real Estate Council of British Columbia (RECBC) to be thorough in considering potential impacts licensing fee increases could have on the livelihoods of those affected, weighing those trade-offs against the potential for increased services.

We heard concern from REALTORS® and real estate boards that the consultation was not well communicated to licensees and that the time period was inadequate, taking place over the winter holiday break. We recognize the challenges of timing posed by the provincial election in October, but extending the deadline for all submissions until January 30 would have allowed for more effective information sharing from BCREA and boards to Realtors, and ultimately more constructive feedback from a greater number of licensees.

If licensing fees are increased, we believe Realtors will appreciate the following enhancements to RECBC's current services:

- reduce the number of days needed to complete a complaint investigation to enhance compliance. RECBC's Service Plan forecasted that a complaint investigation would take an average of 245 days to complete. Licensees and real estate consumers deserve more timely decisions,
- reduce the inventory of compliance files,

- reduce callback wait times for consumers and licensees. We would like to see a performance measure published in future Service Plans to quantify improvements to callback wait times,
- provide ongoing engagement with licensees and real estate stakeholders. RECBC's Service Plan outlines the objective of working with The Office of the Superintendent of Real Estate and the BC Financial Services Authority, but does not mention or discuss consulting licensees. Understanding licensees' on-the-ground experience through meaningful consultation is vital to develop effective compliance resources and test policy and practice ideas,
- improve the search function of RECBC's website to help licensees easily and quickly find the guidance they need,
- provide standardized reporting and auditing procedures, and

Additional services not currently offered by RECBC that we would like to see introduced include:

- implement biannual customer service surveys of licensees and members of the public who access RECBC's services. Consumer satisfaction surveys could help RECBC understand where improvements to services and resources can be made most effectively,
- develop more effective resources for managing brokers, including:
 - professional advisors dedicated to providing concrete, consistent advice to managing brokers, and
 - more targeted re-licensing education for managing brokers on a sustained, continuous basis, in consultation with BCREA, member boards and managing brokers.

We look forward to learning the outcomes of the feedback you receive and working with you to ensure licensee professionalism and consumer protection. If you would like to discuss further, please contact me directly (dhyde@bcrea.bc.ca; 604.742.2787).

As you know, BCREA is the professional association for about 23,000 Realtors in BC, focusing on provincial issues that impact real estate. Working with the province's ten real estate boards, BCREA provides continuing professional education, advocacy, economic research and standard forms to help Realtors provide value for their clients.

Sincerely,



Erin Seeley
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Darlene K. Hyde
Chief Executive Officer

Copies: Blair Morrison, BC Financial Services Authority (blair.morrison@ficombc.ca)
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