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STATE OF IDAHO

BUREAU OF OCCUPATIONAL LICENSES

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November 6, 2012

Lori Schuster
Management and Program Analyst
Appraisal Subcommittee
1401 H Street, NW
Suite 760
Washington, DC 20005

Dear Ms. Schuster:

The Idaho Real Estate Appraiser Board would like to thank you for the opportunity to comment on the Proposed Revisions to the ASC Policy Statements. Proposed Policy Statement 7 currently states the following:

Policy Statement 7 – State Agency Enforcement:

1. States must maintain relevant documentation to enable understanding of the facts and determinations in the matter and the reasons for those determinations.105
2. States must resolve all complaints filed against appraisers within one year (12 months) of the complaint filing date, except for special documented circumstances.106
3. States must ensure that the system for processing and investigating complaints and sanctioning appraisers is administered in an effective, consistent, equitable, and well documented manner.107
4. States must track complaints of alleged appraiser misconduct or wrongdoing using an electronic complaint log.108
5. States must appropriately document enforcement files and include rationale.109
6. States must regulate, supervise and discipline their credentialed appraisers.110
7. Persons analyzing complaints for USPAP compliance must be knowledgeable about appraisal practice and USPAP.111

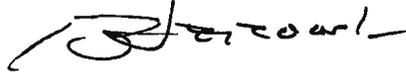
The State of Idaho along with several other jurisdictions has not met the requirement to resolve all complaints filed against appraisers within 12 months. For various reasons, including due process, the Board feels that a 12 month requirement is unreasonable. The Board would recommend that the ASC revise Policy Statement 7.2. to the following: States must resolve all complaints filed against appraisers *within an average of two years (24 months)* of the complaint filing date, except for special documented circumstances.

This change would ensure jurisdictions were not closing cases just to meet a 12 month benchmark, but that a state Board was able to fulfill its mission to help safeguard life, health and

property and to promote the public welfare through the licensure and regulation of those who provide real estate appraisals.

Your consideration of this request is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Janoush", with a stylized flourish at the end.

Brad Janoush, Chair
Idaho Real Estate Appraiser Board

BJ/mb