



Appraiser Certification Program

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November 2, 2014

Roberta Ouellette, Chair
Appraisal Subcommittee Advisory Committee
1401 H Street NW, Suite 760
Washington, DC 20005

Dear Roberta:

On behalf of the Department of Labor and Regulation, Appraiser Certification Program, I express my sincere appreciation for the opportunity to attend the Appraisal Subcommittee (ASC) Advisory Committee meeting October 15 and 16, 2014 in Washington, DC. I observed first-hand the members of the Advisory Committee, all having diverse industry views yet charged with the daunting responsibility of developing proposed regulations for specific areas of enforcement by the ASC, apply cooperation and professionalism every step of the way in their discussions and actions during this meeting.

As an observer at the meeting, and a State Regulator charged with certifying and licensing appraisers in accordance with Title XI, I encourage the Advisory Committee to amend the proposed sanction grids discussed at the October meeting. Specifically, the following sanctions, which are contained in all four sanction grids:

- a) Interim suspension of credential [May be an individual credential or group of credentials within a State], and
- b) Revocation of credential – individual appraiser [May be an individual credential or group of credentials within a State].

The above language included in the sanction grids implies that the ASC can impose suspension or revocation of an appraiser's credential, whether an individual or group. I do not believe this to be the intent of the Advisory Committee members. I suggest that these two proposed sanction options available to the ASC be removed.

The above stated sanctions clearly overreach the authority of the ASC and as I observed, really does not seem to reflect the actual intent of the Advisory Committee. I do not believe any member of the Advisory Committee would support the revocation or suspension of an appraiser's credential by the ASC without complete due process of law which is applied and upheld solely by the jurisdictions in accordance with each jurisdiction's applicable Administrative Procedures Act.

Ms. Ouellette
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Thank you for your Committee's thoughtful consideration of the above suggested amendment. If you have any questions, please feel free to contact me.

Sincerely,


Sherry Bren, Executive Director
Appraiser Certification Program

CC: Alice Ritter, General Counsel
Appraisal Subcommittee