## Appraisal Subcommittee

Federal Financial Institutions Examination Council

July 22, 2013

## Via Email

Ms. Carol Leighton, Administrator Board of Real Estate Appraisers 35 State House Station Augusta, ME 04333-0035 carol.j.leighton@maine.gov

## Dear Ms. Leighton:

Thank you for the opportunity to review and comment on the proposed legislative amendments to amend Maine's real estate appraiser licensing law. We support your prompt adoption of these proposed revisions.

In addition, Maine's Board of Real Estate Appraisers should take the opportunity to have its statute reflect new requirements for reciprocity. The current provision, 32 M.R.S.A. §14024, should be amended to remove language referencing reciprocal agreements with other jurisdictions. Effective July 1, 2013, in order for a State's appraisers to be eligible to perform appraisals for federally related transactions, the State must have a reciprocity policy in place for issuing a reciprocal credential to an appraiser from another State under the conditions specified in Title XI. States may be more lenient in the issuance of reciprocal credentials by implementing a more open door policy; however, States may not impose additional impediments to issuance of reciprocal credentials. Attached is a copy of the ASC Policy Statements (Revised). Please refer to Policy Statement 6 regarding reciprocity.

Please contact your Policy Manager, Jenny Tidwell, with any questions or concerns.

Sincerely,

James R. Park
Executive Director

<sup>&</sup>lt;sup>1</sup> Title XI § 1122 (b), 12 U.S.C. 3351.