

Appraisal Subcommittee Advisory Committee Meeting July 22, 2014

Comments from Frank O'Neill, Jr, SRA, DataQuick

Thank you for the opportunity to address the Advisory Committee. I am Frank O'Neill, the Chief Appraiser for DataQuick, an AMC that is national in scope.

One of the topics that has become a major topic of concern is Background Checks. The first thing to know that it is not the AMCs that are requiring the Background Checks. It is really the Lender/Clients that are making the requirement because they are concerned about who the individuals are that they are sending into their customer's homes. Those lender clients typically require a background check already for their employees, and require that their AMCs perform background checks for employees of that AMC. That has been in place for a long time. Now those Lender Clients have become aware of and sensitive to the reputational risk and risk to their customers if an appraiser with a criminal background might be dispatched to the home of their customers. The ideal situation would be to find a platform where an appraiser might get one background check and receive a card or credential, like a "Global Travel Card" that would be acceptable proof to States and Clients that the appraiser has an acceptable background. But really, anything that could be done to simplify the system to reduce the burden on the appraisers, the regulators, the clients and the AMCs while at the same time protecting the public should be explored and pursued.

Regarding the Registry, we would like to encourage any steps that would make the Registry of Appraisers more comprehensive, more consistent in its content state by state, and more timely updating. It would be very helpful if there was access to information about true Disciplinary Actions, not just to the states but to the industry as well. The definitions regarding disciplinary actions should be made clear and be consistently applied. The AMCs need a reliable, up to date and efficient method to confirm proper licensing and license history. Such a system might take the place of the current "Letter of good standing". We applaud the initiative to create a unique identifier for each appraiser. The whole industry will benefit from such enhancements.

We have concerns about the suggestion that an appraiser be allowed to opt out of the listing in the Registry. Such an approach would have the effect of removing the comprehensive nature of the Registry list of appraisers. Without counter balancing considerations, that could weaken the system and its effectiveness.

As to the Registry and how it might be applied for AMCs, we suggest that the audience for the information be considered as the decisions are made regarding what information is presented. Who will be expected to access the site, and what information will they be looking for. As to contact information, recognized that because of the different requirements from state to state, the individual identified for one state may be different than who is listed in another state. So the approach taken for the overall listing may need to reach out to that organization to inquire as to the correct person to list on the Registry.

The list of topics suggested for AMC Registry listings includes Bonding requirements by state. It is suggested that those requirements might be better listed in an enhanced section in the ASC website that provides a more comprehensive summary of the different AMC requirements state by state.

There is concern over the coming Registry Fees that will be assessed on AMCs, and the collection of those fees by individual states to then be passed on to the ASC. If it was possible to have the ASC administer that system directly there would be significant benefits for the states, for the AMCs and for the ASC.

Thank you for your time. If there are questions or if I can be of any assistance, I can be reached at foneill@dataquick.com or 302-433-8940.