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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

January 17, 2001

Mike Brown, Director  
Real Estate Appraisal Administration Division  
Office of Banks and Real Estate  
310 South Michigan, Suite 2130  
Chicago, IL 60604-4278

Dear Mr. Brown:

This letter responds to your December 21, 2000 letter to Dennis Greene regarding temporary practice enforcement issues. You questioned the responsibility of the host and home States concerning enforcement complaints filed against appraisers practicing under temporary practice permits. In particular, you asked about Illinois' responsibility when Illinois credentialed appraisers practicing in other States under temporary practice permits have complaints filed against them in those host States.

*Policy Statement 5: Temporary Practice* has three specific provisions addressing these issues. The first two provisions address responsibilities of the host State:

- The host State is required to take regulatory responsibility for a visiting appraiser's unethical, incompetent, or fraudulent practices performed while within the State; and
- After taking disciplinary action against a visiting appraiser, the host State is required to forward copies of available evidence and final disciplinary orders to the appraiser's home State agency.

The last provision addresses the home State's responsibility. The home State (in your case, Illinois) must take appropriate disciplinary action when one of its certified or licensed appraisers is disciplined by another State agency for ethical, incompetent, or fraudulent practices while practicing under a temporary practice permit.

Therefore, if a host State investigates a complaint against an Illinois appraiser practicing in the host State under a temporary practice permit, takes disciplinary action against the appraiser, and notifies Illinois, Illinois must take appropriate disciplinary action against the appraiser.

If you have any questions, please call us.

Sincerely,

Ben Henson  
Executive Director

cc: Patrick Brady, Deputy Commissioner  
Joe Mildice, Chairperson