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Appraisal Subcommittee

Federal Financial Institutions Examination Council

December 7, 2001

Sherry Bren, Administrator
Department of Commerce and Regulation
118 W. Capitol Avenue, First Floor
Pierre, South Dakota 57501-2000

Dear Ms. Bren:

Thank you for providing for our review a copy of proposed changes to §§20:14:04, 20:14:06, 20:14:09, and 20:14:10 of the South Dakota Administrative Rules regarding real estate appraisers. We reviewed the changes and have one comment.

We understand these amendments, in part, clarify the State's intention to grant State Licensed and State Certified Residential appraisers the authority to appraise noncomplex, non-residential properties with a transaction value of less than \$250,000. Please note that generally accepted Federal guidance suggests State Licensed and State Certified Residential appraisers may also appraise **complex**, non-residential properties with a transaction value of less than \$250,000. The State, however, is under no obligation to adopt this more liberal scope of practice description to remain consistent with Title XI of the Financial Institutions, Reform, Recovery, and Enforcement Act, of 1989, as amended.

Again, we appreciated the opportunity to review the proposal.

Sincerely,

Ben Henson
Executive Director