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Appraisal Subcommittee

Federal Financial Institutions Examination Council

March 3, 2014

The Honorable Troy Singleton, Assemblyman
New Jersey Legislative District 7
20000 Horizon Way, Suite 190
Mount Laurel, NJ 08054

The Honorable Jay Webber, Assemblyman
New Jersey Legislative District 26
1055 Parsippany Boulevard, Suite 104
Parsippany, NJ 07054

Re: Pending Assembly Bill 2387

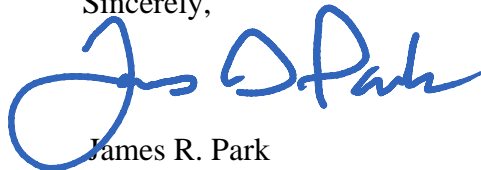
Dear Mr. Singleton and Mr. Webber:

It has come to the attention of the Appraisal Subcommittee (ASC) that pending Assembly Bill 2387, which you sponsored, proposes to abolish the State Real Estate Appraisers Board and transfer regulation of appraisers to the New Jersey Real Estate Commission. Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended (Title XI), authorizes the ASC to oversee State appraiser regulatory programs to determine whether they comply with Title XI. Numerous provisions within the proposed legislation raise significant concerns about compliance with Title XI.

ASC Policy Statement 1, which sets forth guidance to States for compliance with Title XI, provides that States should adopt and maintain an organizational structure for appraiser certification, licensing and supervision that avoids conflicts of interest or the appearance of such conflicts. Ideally, States should maintain totally independent State agencies. Any State with its appraiser regulatory function in a department that regulates realty related activities must ensure that adequate safeguards exist to protect the independence of the appraiser regulatory function. Persons appointing officials to a State agency should not be associated or affiliated with an affected industry, i.e., they should not have a direct or indirect financial interest in realty related activities. The ASC strongly urges that State agency decisions, especially those relating to license or certificate issuance, revocation and disciplinary actions, not be made by State officials who also are responsible for realty related activities.

We invite you to visit our website for more information www.asc.gov. Please contact us if you have any questions.

Sincerely,



James R. Park
Executive Director

cc: Mr. Charles Kirk, Executive Director, Board of Real Estate Appraisers,
Mr. John A. McCann, President, New Jersey State Board of Real Estate Appraisers