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Appraisal Subcommittee

Federal Financial Institutions Examination Council

February 3, 2015

Mr. Craig Cellini, Rules Coordinator
Department of Financial and Professional Regulation
320 West Washington, 3rd Floor
Springfield, IL 62786

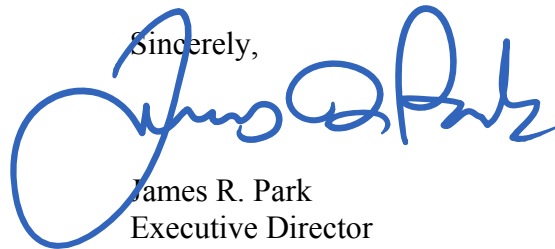
Dear Mr. Cellini:

Thank you for the opportunity to review the proposed rule amendments to Part 1455 Real Estate Appraiser Licensing. We have reviewed the proposed amendments and have the following comments:

- Section 1455.316(a)(2) requires only that the supervisory appraiser be physically present for the first 500 hours of a trainee's experience. AQB Criteria, however, requires that a supervisory appraiser must "[p]ersonally [inspect] each appraised property with the Trainee Appraiser until the Supervisory Appraiser determines the Trainee Appraiser is competent to inspect the property, in accordance with the COMPETENCY RULE of USPAP for the property type." This proposed regulation has established a presumption that 500 hours is enough to satisfy competency. We recommend that the regulation be further amended to comply with the AQB Criteria to reflect the competency requirement.
- The proposed regulations do not appear to require that a supervisory appraiser must take the trainee/supervisory appraiser course before being eligible to act as a supervisory appraiser.

Please contact Kristi Klamet at [REDACTED] if you have any questions.

Sincerely,



James R. Park
Executive Director

cc: Mr. Mike Garvin, ASC Liaison
Mr. Brian Weaver, Program Coordinator