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## Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

October 1, 2015

Mr. Thomas Stevens, Chairperson  
Board of Real Estate Appraisers  
301 South Park Avenue  
P O Box 200513  
Helena, MT 59620-0513

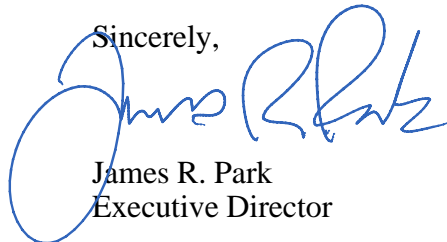
Dear Mr. Stevens:

Thank you for the opportunity to review the proposed amendments to the Montana Administrative Rules of the Board of Real Estate Appraisers. We have reviewed the proposed amendments and have the following comments:

- 24.207.401 fees (c) and (d) sets the fee amount for a temporary practice permit at \$250.00 with a renewal fee of \$50.00. Appraisal Subcommittee (ASC) Policy Statement (PS) 2.B. 2.c. prohibits a State from charging a temporary practice permit fee exceeding \$250, including one extension fee.
- 24.207.502 application requirements (4) (a) provides that reciprocal applicants have a current and unencumbered license in a jurisdiction where the appraisers are approved by the ASC as eligible to perform appraisals for federally related transactions or a jurisdiction that strictly abides by the ASC standards. The ASC does not approve individual appraisers and the term "strictly abides" may be implemented in a way that creates a higher standard than that of ASC PS 5. A. Therefore, it would be more accurate to provide that reciprocal applicants have a current and unencumbered license in a jurisdiction that is "in compliance" with Title XI as determined by the ASC.
- 24.207.509 qualifying experience (e) provides that the Board will select work product from the experience log that is commensurate with the level of credential sought. ASC PS 4. D. 2. a. provides that States must analyze a representative sample of the applicant's work product. A representative sample may include work that is not commensurate with the credential level sought.

Please contact Neal Fenochietti at (202) 834-0485 if you have any questions.

Sincerely,



James R. Park  
Executive Director

cc: Ms. Sharon Peterson, Executive Officer