



## TEXAS APPRAISER LICENSING AND CERTIFICATION BOARD

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Larry D. Kokel December 14, 2007  
Chair

Appraiser Member  
Georgetown

Clinton P. Sayers  
Vice-Chair  
Appraiser Member  
Austin

Ms. Virginia Gibbs  
Chairperson  
Appraisal Subcommittee  
2000 K Street, Suite 310  
Washington, DC 20006

Malcolm J. Deason  
Secretary  
Public Member  
Diboll

RE: Response to August 13, 2007 Appraisal Subcommittee letter regarding  
revisions to ASC Policy Statement 10: Enforcement.

Elroy Carson  
Public Member  
Lubbock

Dear Ms. Gibbs:

Wm. A. (Rusty) Faulk, Jr.  
Public Member  
Brownsville

The Texas Appraiser Licensing and Certification Board (TALCB) has reviewed the changes to Statement 10 and specifically Statement 10.G which was adopted August 9, 2007. The TALCB commented on the proposed changes in a letter sent May 24, 2007. For convenience, this letter is attached along with the original Proposed Amendments exposed by the Appraisal Subcommittee (ASC) on March 28, 2007.

Paul E. Moore  
Ex-officio Member  
Executive Secretary  
Veterans Land Board  
Austin  
(Mark A. McAnally  
Designee)

Upon review of the adopted Statement 10.G by the TALCB, it is noted that Item 10.G.3 of the adopted version varies from the exposed version. The exposed version of Item 3 gave no direct requirement that "when awarding a certified general credential, States need to review both residential and commercial work product," as stated in the adopted Statement 10.G.3. This interpretation was also discussed at the AARO Conference in Washington, D.C. which was held September 29 to October 2, 2007. The TALCB questions whether this will be feasible for all appraiser trainees since it is very conceivable for a commercial appraisal trainee working within a specific field to have 30 months of qualified experience but not have conducted residential appraisals. It is the TALCB's position that the "Competency Rule" of the *Uniform Standards of Professional Appraisal Practice* (USPAP) would cover the concern of a State Certified General appraiser conducting residential appraisals without experience since a "Certified General" appraiser is not authorized to conduct all appraisals but must demonstrate prior experience for a specific property or disclose the steps taken to gain adequate competency. The Texas Appraiser Licensing and Certification Board requests reconsideration of this interpretation as adopted in Statement 10.G.3.

James B. Ratliff  
Appraiser Member  
Garland

Dona S. Scurry  
Public Member  
El Paso

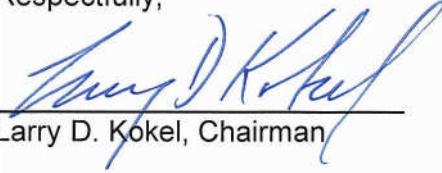
Shirley Ward  
Appraiser Member  
Alpine

Tim Irvine  
Commissioner  
512-465-3900

The TALCB also restates its concern related to 100% review of trainee experience, as previously stated in our May 24, 2007 letter. During our Appraisal Subcommittee review, Denise Graves indicated Texas will be given time to seek changes in our current legislation and acquire additional funding to meet the increased time required as a result of the revised interpretation of the experience review process adopted by the Appraisal Subcommittee.

Our Board appreciates the opportunity to offer input and will continue to work in concert with the ASC in meeting the goals and objectives of the licensing and certification of appraisers.

Respectfully,



Larry D. Kokel, Chairman

Attachments: 2

CC: Marc Weinberg  
Acting Executive Director and General Council  
Appraisal Subcommittee  
Via E-mail: [marc@asc.gov](mailto:marc@asc.gov)