Responses to Survey - Board of Real Estate AppraisersTotal responses: 29 (of which 1 out-of-state)

Highest Compliment	Ability to monitor on behalf of licensees - 7 Ability to keep profession from criticism because of bad actors - 2 None - 11 Other: - A highly competent board investigator keeps appraisal standards uniform and high.
Biggest Complaint	Licensing fees too high - 15 Lack of Information - 9 Board's response to unlicensed practice - 5 Licensing renewal timelines too strict - Regulations too strict - 2 None - 3 Other: The lack of resources available to complete investigations and review complaints results in lengthy time frames from the first issuance of a complaint until resolution. Also the lack of interaction with licensees. A quarterly newsletter would be beneficial to keep licensees up to date with board actions Continuing education. Also, real estate institutions should be regulating the industry as Real Estate Appraisal is not a matter of Public Heath or Safety. The paid employees that check your work feel they must find errors to justify their job When they implement something new, all of the appraisers in MT should be informed and not kept in the dark. Advertising. I believe they should be sending all of us the appraisal management companies that are registered to do work in MT (& their approved registration #) as well the names of those that have been suspended by the Board. Not "USER" friendly. Don't ask us for any input Board feels they are not responsible to address licensee concerns. They work to protect the public - will not advise. Spending money for no return - example of bureaucracy at its best When someone complaints against appraisers is designed to persecute me instead. (The accuser is always right.) The board's procedures to process complaints against appraisers is designed to persecute instead of support licensees. Much time and money is wasted in pursuit of finding mistakes or errors they feel are USPAP violations. Punishment is harsh considering that an appraiser expresses an opinion and the public's health, safety and welfare is not threatened. Appraisers provide a very specific skill that represents a cog in a large wheel. Further regulation, increased costs in complying with regulations (education and license fees, insurance etc) threatens to limit the number of eligible members in our profession. The

Other reasons the board is important: -- State boards are tasked with protecting the public. They should be funded adequately to complete the required job. With one attorney serving three or four boards at a time, none of the boards are getting adequate representation. Complaints are requiring over a year to be resolved, and in many cases that I am aware of, they are just settled rather than brought into court. There are appraisers in this state that have had numerous serious complaints but due to the lack of resources by the state board, they continue to practice. And that, in my opinion, is not protecting the citizens of the state. -- The board should be concerned with the public as well as the professional's interest. -- The board needs to determine if a person qualifies for the license. The problem with this board is they want you to only do things their way. We have too many super egos on our board. -- Federally required board, bad actors have given the profession a bad name and are responsible in part for the real estate crash. Board should be proactive to the members not just reactive to bad members. -- To ensure quality appraisals, part of the new duties of the licensing board now include the very necessary licensing of appraisal management companies. The Board is going to find its regulation duties will become more and more centered on protecting the appraiser from AMC abuse of power that came about due to the strength of banking lobby. The influence of the financial services/banking industry lobby caused the shift of nearly all lending appraisal administrative costs directly to the appraiser with the advent of appraisal management companies, many of which are owned by banks. The disbursement of appraisal orders by the AMC is now entirely according to which appraiser is willing to accept the lowest fee with the fastest completion time. Obviously, subjecting appraisers to forces of pure cost competition is not conducive to accurate valuations as was recognized in the original version of the Frank-Dodd Bill before the Federal Reserve Bank issued its interpretation, which the AMC gladly adopted. The complexity and reporting requirements have increased while fees to the appraiser have gone down. Clearly, the appraisal industry will be attracting fewer and less qualified individuals. Exactly the opposite effect needed to assure a more secure financial system. The appraisal board will undoubtedly be under more stress than ever before. - Act as a collective advocate for the industry. Appraisers are typically one-person businesses.

Public Health -	Public Welfare - 13	Public Safety - 2	None of these- 9	All or combination - 3
Scope of Practice:	Too Narrow - 3	Too Broad - 8		Just Right - 17

Problems with own or other professions' scope of practice - No = 29

- -- Comment regarding too broad a scope: -- They tend to adopt every new change in USPAP, instead of asking the appraisers what they might think or getting any input from us. My biggest problem is with active appraisers sitting on the board... . As they are actively in business, they are my competition. I think it is a huge conflict of interest. When a board member's own trainee cannot get his sample reports approved by the board for licensure, I see a problem with that. I think when it comes to review of other appraisers' work, it should be done by a state employee under board-generated standards. Appraisers in Montana are subject to their competitors submitting complaints against them as a means to stifle valid competition in any given community. Anonymous complaints should not be allowed or considered valid because they do not allow us to address our accuser under the law. We are guilty until proven innocent and tried without due process. They have the power to control basically every aspect of your practice.
- -- Comments regarding too narrow a scope: -- They are limited in responses to professional members and their questions. One employee actually goes on witch hunts within the profession.
- -- Comments regarding just right scope: -- The scope of practice for appraisers is promulgated by the federally mandated Appraisals Standards Board. I believe this national oversight is appropriate for appraisers, so that there is an equitable and fair appraisal process nationwide. -- It follows most federal rules and seems to be fair. Without many exceptions, the scope of practice is set by Federal Mandate. The Board has narrow discretion to vary from standards set on a Federal Level. Where the State of Montana has departed from Federal Standards, Montana has created a scope of work that is superior and often emulated by other states. Montana, for instance, required that those training other persons in the profession enter an approval process. This is widely recognized as improving the profession. With the addition of the monitoring of AMCs, hopefully the appraisers and the public will be better protected from unethical practices.

What laws/regulations have caused the most problems? None =

The recently adopted rules for oversight of Appraisal Management Companies (AMCs). The Board of Appraisers does not have adequate resources to oversee the licensing and complaint investigation processes at present. Complaints often take over a year to bring to resolution. Until these important processes are taken care of, additional oversight of AMCs should be taken care of by another entity. [12/2012 comment]. -- Continuing to increase costs while not providing ANY service to members. The board is fine however the employees are typical bureaucrats. -- State Boards tend to be too punitive and less educational. -- The Board of Real Estate Appraisers interprets USPAP as if it is a "black and white" legally binding rule when it is a broadly written document that contains statements open for interpretation. The Board needs to re-evaluate its mission and prosecute any appraisers who are committing fraud. USPAP "violations" should be addressed by educating the industry, not punishing people who are trying hard to keep up with regulations. An appraiser provides an opinion. Just because someone else may have a different opinion does not make the appraiser wrong or negligent. USPAP is a document that provides guidelines, guidance and instructions on the preparation and reporting of an appraisal assignment. It does not provide precise written verbiage nor does it dictate what is a right or wrong opinion. -- AMCs need more regulation. Appraiser selection by the AMC should not be determined solely by profit margin. -- Board members need to have a greater understanding of USPAP or less latitude to decide if potential USPAP violations have taken place. Instead of the Board deciding which cases should be submitted to their Investigator to determine possible USPAP violations, the Board's Investigator should be there from the beginning of the process. More competent regulation is needed, not less!! There is the potential to increase AMC adherence to Customary and Reasonable Fee provisions. A requirement [is needed] that the com

Consumer complaint filed?	No = 11 Yes = 4 Board was effective = 1. Board was not effective = 3 Dropped the matter (2) #3 - Complaint from 12 people against a Board member to governor's office after complainant's case dismissed "due to either favoritism or incompetence". Results pending.
Nonlicensee comments	Saying Board of Real Estate Appraisers: Necessary for Public Health - 118, Public Safety - 105, Public Welfare - 95 Some respondents marked all or a combination.