



<b>Public Health -</b>	<b>Public Welfare - 13</b>	<b>Public Safety - 2</b>	<b>None of these- 9</b>	<b>All or combination - 3</b>
<b>Scope of Practice:</b>	<b>Too Narrow - 3</b>	<b>Too Broad - 8</b>		<b>Just Right - 17</b>
<p><b>Problems with own or other professions' scope of practice - No = 29</b>  -- <b>Comment regarding too broad a scope:</b> -- 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.  -- <b>Comments regarding too narrow a scope:</b> -- They are limited in responses to professional members and their questions. One employee actually goes on witch hunts within the profession.  -- <b>Comments regarding just right scope:</b> -- 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.</p>				
<p><b>What laws/regulations have caused the most problems? None =</b>  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 compensation paid by the AMC to the Appraiser be included in every appraisal report to alert the Lender the AMC may not be paying a Customary and Reasonable Fee. A requirement [is needed] that before removing an appraiser from the AMC's panel they must cite reasonable evidence.</p>				
<b>Consumer complaint filed?</b>	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.			
<b>Nonlicensee comments</b>	Saying Board of Real Estate Appraisers: Necessary for Public Health - 118 , Public Safety - 105, Public Welfare - 95 Some respondents marked all or a combination.			