



February 28, 2013

Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429-9990

National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

Comptroller of the Currency  
U.S. Department of the Treasury  
400 7th St. SW, Washington, DC 20219

**Re: Interagency Appraisal Complaint Form—(OMB Control Number OCC 1557-NEW; FDIC 3064-NEW; NCUA 3133-NEW)**

Dear Concerned Readers:

On behalf of the more than 25,000 members of our respective professional appraisal associations, thank you for the opportunity to comment on the proposed Interagency Appraisal Complaint Form.

It is our understanding that this Form is intended to be used by your agencies when contacted by a range of entities with concerns relating to appraisal issues. This includes concerns ranging from non-payment of appraiser fees to coercion of appraisers to complaints about appraisals. We understand that the Agencies intend to provide a copy of this form to individual complainants, who, in turn, will return to the agency for information-gathering and potential referral. We also understand that the Consumer Financial Protection Bureau is developing a Form of its own that differs from the Interagency Appraisal Complaint Form. We encourage the Agencies to consider developing new/future forms for specific audiences, such as one specifically for appraisers looking to report appraisal independence violations.

Overall, the Form is intending to cover a broad range of issues in one place. We are unsure whether this is the most effective approach, or whether separate forms to receive complaints on subtopics may be more valuable or appropriate. For instance, we understand that the Form was developed in consultation with state appraiser regulatory agencies. As a result, the complaint form may have more applicability with some state appraiser regulatory agencies than real estate commissions and state mortgage licensing agencies.

We offer several specific suggestions to help improve usefulness of the Form, as follows:

1. **The Agencies should not accept complaints regarding “inaccurate” values or disagreements with the value provided by the appraiser.** The intended purpose of the form is to collect *“information about complaints of non-compliance with the appraisal independence standards and the Uniform Standards of Professional Appraisal Practice, including complaints from appraisers, individuals, financial institutions and other entities.”*

Disagreements over value opinions have nothing to do with appraisal independence matters. Further, such differences of opinion do not rise to the level of potential USPAP violations unless specific violations are identified by the complainant. Here, the form already includes a section for potential USPAP violations to be referred. As such, the checkbox option that states, “Appraisal inaccurate or disagree with the value provided in the appraisal” should be removed entirely.

2. **The current section of the form entitled, “Who are you complaining about” is insufficient and should include, at a minimum, options for real estate agents and mortgage brokers.** Surveys of real estate appraisers regularly cite mortgage brokers/loan officers and real estate agents among the most likely to attempt to influence the appraisal process. As such, addition of these two industry classifications would greatly increase the relevance and usability of the form for appraisers and assist with agency safety and soundness, and mortgage fraud-tracking issues.
3. **Only one classification of “Appraiser” is necessary.** The Form categorizes the three most common forms of certification and licensure of appraisers under “Who are you?” where only one broad classification is necessary. Consolidation of the “Certified Residential Appraiser,” “Certified General Appraiser,” and “Licensed Appraiser,” under the catch-all term, “Appraiser,” would save a significant amount of space on the form.

Thank you, in advance, for your consideration. We look forward to working with you to resolve these concerns. Please contact Bill Garber, Director of Government and External Relations of the Appraisal Institute, at 202-298-5586 or [bgarber@appraisalinstitute.org](mailto:bgarber@appraisalinstitute.org) or Brian Rodgers, Manager of Federal Affairs, at 202-298-5597 or [brodgers@appraisalinstitute.org](mailto:brodgers@appraisalinstitute.org) for future industry outreach or questions.

Sincerely,

Appraisal Institute  
American Society of Farm Managers and Rural Appraisers