

# Abacus Valuation & Appraising, LLC

P.O.B. 2018  
Salem, OR 97308-2018  
Office: 503-385-8499  
#CR00259

## ***Certified Residential Appraiser \* FHA Approved \* Certified Green Appraiser***

03/30/2013

Regarding: Senate Bill 618

Chair Beyer and  
Members of the Senate Committee on Business and Transportation,

I am Diane Forsberg and a State Certified Residential Appraiser living and working in West Salem. I started in the appraisal business in 1998, licensed in 2004 and certified in 2006. I have ran my own appraisal business the full time. I am an active member of this appraisal community, a member of the National Association of Appraisers (NAA), and a member of the local Portland/Rose City Chapter of the National Association of Independent Fee Appraisers (NAIFA) and serve on that (NAIFA) local board. This letter is my own opinions and concerns and I do not represent NAIFA in any of this letters comments. I am also past president of the Oregon Appraisers' Coalition. As a concerned local appraiser I ask you not to move this bill out of committee.

This bill adds to the requirements on disciplinary hearings conducted by the Appraisers Certification and Licensure Board (ACLB). As a concerned, working appraiser in Oregon, I see several things wrong with this bill. They are as follows:

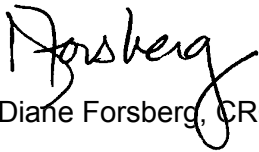
- Section 4 would require the ACLB to reimburse any appraiser who contests allegations at a disciplinary hearing by the Board, and wins, to be reimbursed for reasonable costs incurred for their defense. This would require the ACLB to project a cost that is really a moving target with no historical data for confirmation. As a concerned appraiser I have made public requests for information surrounding this bill, including the Agency Fiscal Impact Statement Form and all supporting documentation. (The information provided me was the 03/26/2013 Draft and not yet vetted.) This form goes into detail about the fiscal impact to this agency. Our Board functions solely on fees collected from Oregon appraisers. In this very extensive report and projected costs would add about \$100 to my renewal fee.
- My objections to this bill two-fold:
  - a. I have never heard of a similar agency as the ACLB reimbursing defendants for complaints or allegations whether they win or lose. Why should an appraiser expect anything different?
  - b. Within this fiscal report the Board must plan for the worst case scenario. This report estimates the costs could be upwards of \$100,000 for a particularly complex appraisal report. Now it strikes me that the cases that are actually pursued by the Board and taken to litigation are typically authored by Certified General appraisers. This certificate allows an appraiser

broad latitude to appraise not only residential properties, but commercial real estate, equipment, it's business income, etc. and can be highly complicated. Along with this certification also comes a greater responsibility and liability that is a choice and accepted by the appraiser wishing to do this kind of work. In other words they understand, or should understand the what they are getting into. The money can be great but so is the liability. According to the Board's website, [www.oregonaclb.org](http://www.oregonaclb.org), 39% of the registered, active appraisers in Oregon are Certified General, 61% or the majority, are licensed to appraise residential properties only. So does that mean that residential appraisers must shoulder an additional responsibility by fee increases for something they do not participate in or reap the financial rewards? I say no, it is not fair and I strenuously object.

I am not here to pit General Appraiser against Residential Appraiser, but this bill has the potential and unintended consequence for such a situation. This bill creates more problems and financial hardship than any perceived problem it is attempting to solve. If my fees go up, I pass it along to my clients and they pass it along to the consumer. And how does that help the consumer?

I ask you to vote no on this bill.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Diane Forsberg". The signature is written in a cursive, flowing style with a large initial "D".

Diane Forsberg, CRGA, MAA