

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

05/17/2013

Regarding: Senate Bill 617-A

Chair Holvey and
Members of the Consumer Protection and Government Efficiency,

I am Diane Forsberg and a State Certified Residential Appraiser living and working in West Salem. I have been a self-employed, real estate appraiser for a number of years. I am a member of the National Association of Appraisers (NAA), current Board member for the Portland/Rose City Chapter of the National Association of Independent Fee Appraisers and past president of the Oregon Appraisers' Coalition. Today I am here representing myself as a working Oregon appraiser.

Creating an addition and separate 3 – member panel to an already well-functioning agency is redundant, unnecessary and costly. According to the bill, this panel would be the 'front – line' for allegations (complaints) against appraisers and responsible in determining violations of the Uniform Standards of Professional Appraisal Practice (USPAP). USPAP is the 'bible' for federally recognized regulations and guidance for all real estate appraisers. At the beginning of this year, the Appraisers Certification and Licensure Board (ACLB) implemented a 3 – member Enforcement and Oversight Committee. This standing committee is made up of current Board members and chaired by a certified residential appraiser and USPAP instructor, an Appraisal Management Company (AMC) owner and certified residential appraiser, and a public member who is also experienced in state investigative procedures and an attorney. I am at a loss to understand why we would need yet another investigative panel. Further, this bill appears to supersede the Board's regulatory authority provided by ORS 674, by disallowing disciplinary action unless this bill's panel specifically directs it and only on specific allegations. What this does is limit this agency's regulatory authority and prohibits it from working in its full capacity. I find this inefficient and, in some cases, detrimental to the consumer and the public.

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. I believe you see is as Fiscal Impact of Proposed Legislation – Measure: SB 617 – A. Our Board functions solely on fees collected from various licenses, registrations and certifications issued by the Board. If this bill were to pass, projected increases to my biennium renewal fee

could be about \$96. Now I understand that there is a cost to doing business and willing to pay for it. But I am not willing, and strongly object to, paying for superfluous additions to an already efficient and well run system.

I have been actively engaged with the ACLB staff and Board for a number of years on several different matters. I, myself, have had an allegation/complaint (which was dismissed) lodged against me and have some knowledge of this system. Personally, I did not enjoy this process, but I found the ACLB staff professional, and most importantly, fair. And as an appraiser who has gone through this process, I see no reason to add another bureaucratic layer, and additional time, to an already stressful situation.

I ask you to vote no on this bill. Let the Enforcement and Oversight Committee have time to work. This bill is ambiguous at best and places undo financial burden on appraisers for an unnecessary, bureaucratic layer, and does nothing for the protection of the public in general.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Diane Forsberg". The signature is written in dark ink and is positioned above the typed name.

Diane Forsberg, CRGA, MAA