



When to File a Complaint with TALCB

When I was an investigator with TALCB, the appraisers I knew or met seemed to fall into three categories with respect to filing a complaint against other appraisers:

1. The ones who think it's snitching on their colleagues;
2. The ones who thought they'd get a Boy Scout merit badge if they reported a certain number; and
3. The other 90% who seldom, if ever, were confronted with the questionable work of other appraisers

My response to the first two were along the lines of:

- I'm sorry to hear you think fraudulent bums are your colleagues; and
- Have a cup of decaf and stop filing on every guy who forgets to check a box in the *Site* section of the URAR

Fortunately, TALCB has come out with a very clear explanation of when you must report another appraiser in the *TREC Advisor* that was emailed to all of us on or about March 11. If you've already deleted that missive, I've attached a link to the *Articles* page of my website, where you found this PDF.

To quote the federal regulation*, one must report an appraiser if he or she:

reasonably believes an appraiser has not complied with USPAP or ethical or professional requirements, and it is likely to significantly affect the value assigned to the consumer's principal dwelling.

The article goes on to say that TALCB encourages the reporting of "misconduct by an appraiser even if mandatory reporting is not required."

*If you can't resist the urge to look it up, it's *12 CFR § 1026.42(g)(1)*

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