



Appraisers With a Complaint Don't Know the Half of It

An appraiser with a bullet-proof defense against allegations can still get in trouble when a complaint is filed.

When a notice of a complaint is sent to an appraiser from the state board, the appraiser is given a certain number of days to submit a response. This response should contain the at-issue appraisal report, the report's workfile, and an explanation of the appraiser's side of things.

Typical complaint: *The appraiser measured my home inaccurately and my sale fell through!*

Typical response: *I used ANSI Standards for measuring the subject dwelling. The GLA was XXX sq. ft. while MLS and tax records showed it as YYY sq. ft. I disclosed this disparity in the Comment Addendum of my report; stating that I was going to use my measurement.*

End of complaint, right? Oh, if only that was so! In fact, the Appraisal Subcommittee (ASC), which is responsible for oversight of state appraisal boards has a policy statement regarding enforcement which states, in part:

States must analyze each complaint to determine whether additional violations, especially those relating to USPAP, should be added to the complaint.¹

Many appraisers fall into the vast hole of USPAP non-compliance without knowing it existed until the complaint. APC can help you avoid this. If you already have a complaint, we can help you too.

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¹ Policy Statement 7, Appraisal Subcommittee Federal Financial Institutions Examination Council Policy Statements (Revised), June 1 2013