

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, October 18, 2018 8:07:27 AM

-----Original Message-----

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, October 17, 2018 8:33 PM
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS APPRAISER LICENSING AND CERTIFICATION BOARD

First Name: Brad

Last Name: Hess

Title: Digital Marketer

Organization you are affiliated with: Various Independent Appraisers

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

The staff report regarding the TALCB is inadequate in its suggestions and doesn't fully address the many failings of this bloated, useless agency. For one, the agency provides ZERO support to appraisers who are being wrongly accused of any number of violations. This leads to a situation where appraisers are being blackmailed by their clients to deliver specific results. Case in point, if you provide an appraisal to a private client (i.e. a client going through a divorce, need property value for settlement), and they are unhappy with the value, they can file a frivolous complaint with TALCB. It seems that TALCB doesn't care about the "cause" of the complaint, only slapping fines and penalties on appraisers. How can an appraiser operate independently and without bias when he/she must constantly fear being reported and then taxed and harassed by TALCB?

The attorneys within the TALCB are unethical and operate with impunity. An Austin appraiser I work with was "questioned" regarding our business relationship. This was done under a false accusation of "possible fraud". TALCB claimed that the appraiser had only logged "private" appraisal assignments for over a year and that "there weren't that many private assignments to be performed in the area". So TALCB was claiming that an independent appraiser couldn't perform 30-40 private assignments a month across a metro area covering more than 1.5 million people. Either they are incredibly ignorant to the needs of the public or they were lying. When this appraiser hired an attorney and pressed the issue, TALCB admitted they just wanted details on the business arrangement he had with me - so why the lies to try and scare, intimidate and harass this appraiser? Attorneys Mark Lee and Troy Beaulieu have been accused of similar harassment tactics against numerous appraisers and are both being reported to the Texas BAR for their actions.

TALCB has too much power and there is no "higher-authority" to appeal to without moving into district court, a cost most cannot bear. If you're falsely accused of ANYTHING via public complaint to TALCB, you can bet there's a 90% chance you're not getting out of it with a fine and penalty. Tax and harass seems to be their motto.

TALCB fails to properly educate appraisers. Ask any appraiser if the appraisal exams have much practical use and most will tell you they do not.

You learn a bunch of ethics, rules, math, and basic real estate principles, but you learn absolutely nothing about practical application of appraisal practice. Perhaps that is why they require 2000 hours of apprenticeship under a supervisor appraiser (something that is near impossible to find) instead of approaching things the way TREC does with home inspectors - x amount of hours on sight with an inspector.

And while we're talking about the sponsorship debacle, TALCB regulations and requirements for obtaining a license/certification have led to a severe shortage of competent appraisers across Texas. Even worse, by placing emphasis on useless college classes and course material, instead of practical appraisal knowledge, many appraisers are entering the industry with severe incompetency. I can't count the number of appraisal reports I've seen from "Certified" and Certified General" appraisers that are absolute garbage.

TALCB does nothing to support appraisers. I realize the agency is responsible for protecting the public, but should they provide some protection to appraisers as well? After all, what are all those fees being paid going towards?

Any Alternative or New Recommendations on This Agency: Abolish the TALCB as soon as possible and place all of its authority and responsibilities under the purview of TREC, where it rightfully belongs. TREC is better suited to handle not only the licensing and management of appraisers, but public complaints/disputes as well.

My Comment Will Be Made Public: I agree