



**INDIANA OFFICE OF SMALL BUSINESS AND ENTREPRENEURSHIP**

*Jacob Schpok, Executive Director*

April 21, 2014

Jeanette Langford  
Director  
Indiana Professional Licensing Agency  
402 W. Washington Street, Room W072  
Indianapolis, IN 46204

Dear Ms. Langford,

Pursuant to IC 4-22-2-28, the Indiana Office of Small Business and Entrepreneurship (“OSBE”) has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document #14-60 proposed by the Indiana Real Estate Commission (“Commission”). The proposed rule amends 876 IAC 3-3-19 to comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 regarding licensing requirements for individuals licensed in another state. It will also amend 876 IAC 3-5-1 to comply with the Dodd-Frank Act regarding continuing education requirements for trainee appraisers. It also amends 876 IAC 3-5-2 regarding the board's authority to approve real estate appraiser continuing education courses.

The economic impact statement prepared by the Commission indicates each small business will incur the requirement of seeking approval from the Indiana Real Estate Appraiser Licensure and Certification Board (“Board”) for a course over seven (7) hours in length. The economic impact to these small businesses will lessen due to the allowance of gaining approval of the course through the Board versus the current requirement that it be approved by the Appraisal Subcommittee. This requirement is actually one that provides the course provider more flexibility in choosing who to gain course approval through. The current rule requires that a course over 7 hours in length be approved only by the AQB where the new rule allows the course provider to choose between the AQB and the Board. OSBE does not object to the economic impact to small business associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232.5679 or [ombudsman@osbe.in.gov](mailto:ombudsman@osbe.in.gov).

Regards,

Jacob Schpok