



INDIANA OFFICE OF SMALL BUSINESS AND ENTREPRENEURSHIP

Jacob Schpok, Executive Director

September 16, 2014

Jeanette Langford
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 14-304 proposed by the Indiana Real Estate Commission (“Commission”). The proposed rule change will amend 876 IAC 3-3-2 to require that individuals seeking licensure under the current requirements also pass the licensing examination before January 1, 2015; amends 876 IAC 3-3-3.1 to require that appraiser trainees complete a supervisor/trainee course to meet licensure requirements and requires that qualifying education be completed within the five (5) years prior to the date of application; amends 876 IAC 3-3-4.1 to require a bachelor’s degree for licensure as a certified residential appraiser and to allow qualifying education to be obtained through an accredited college or university; amends 876 IAC 3-3-5.1 to require a bachelor’s degree for licensure as a certified general appraiser and to allow qualifying education to be obtained through an accredited college or university; repeals 876 IAC 3-3-5.2; amends 876 IAC 3-6-9 to require certified residential and certified general appraisers to hold an Indiana certification for at least three (3) years before acting as a supervisor, have no disciplinary action taken within the last three (3) years against an appraiser license or certification in any jurisdiction that affects the supervisory appraiser’s legal ability to engage in appraisal practice, and allows a supervisor to supervise up to three (3) trainees at the same time; amends 876 IAC 3-6-10 to require that certified residential and certified general appraisers complete the supervisor/trainee course prior to commencing association with an appraiser trainee and modifies the requirements of the course.

The proposed rule submitted by the Commission total estimates that the economic impact possible on small business is \$29,178. 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.

Regards,

Erik Scheub