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INDEPENDENT REGULATORY REVIEW COMMISSION
333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

February 22, 2001

David J. King, Chairman
State Board of Certified Real Estate Appraisers
116 Pine Street
Harrisburg, PA 17105

Re: Regulation #16A-7011 (IRRC #2153)
State Board of Certified Real Estate Appraisers
Fees For Board Services

Dear Chairman King:

Enclosed are our Comments. They are also available on our website at www.irrc.state.pa.us.

Our Comments list objections and suggestions for consideration when you prepare the final version of this regulation. We have also specified the regulatory criteria which have not been met. These Comments are not a formal approval or disapproval of the proposed version of this regulation.

If you would like to discuss these Comments, please contact my office at 783-5417.

Sincerely,

Robert E. Nyce
Executive Director
wbg
Enclosure

cc: Honorable Mario J. Civera, Jr., Majority Chairman, House Professional Licensure Committee
Honorable William W. Rieger, Democratic Chairman, House Professional Licensure Committee
Honorable Clarence D. Bell, Chairman, Senate Consumer Protection & Professional Licensure Committee
Honorable Lisa M. Boscola, Minority Chairman, Senate Consumer Protection & Professional Licensure Committee
Honorable Kim Pizzingrilli, Secretary of the Commonwealth
Albert H. Masland, Commissioner, Bureau of Professional and Occupational Affairs, Department of State
Steven Wennberg, Esq., Counsel, State Board of Certified Real Estate Appraisers
Joyce McKeever Esq., Deputy Chief Counsel, Department of State

Comments of the Independent Regulatory Review Commission

on

State Board of Certified Real Estate Appraisers Regulation No. 16A-7011

Fees for Board Services

February 22, 2001

We submit for your consideration the following objections and recommendations regarding this regulation. Each objection or recommendation includes a reference to the criteria in the Regulatory Review Act (71 P.S. § 745.5a(h) and (i)) which have not been met. The State Board of Certified Real Estate Appraisers (Board) must respond to these Comments when it submits the final-form regulation. If the final-form regulation is not delivered by November 13, 2002, the regulation will be deemed withdrawn.

1. General. – Clarity.

Fee Report form

The fee report form and the preamble both state that the new fee for “Application for Approval as Continuing Education Provider” will be \$85 while the fee in the proposed regulation is \$55. The fee in the regulation should be changed from \$55 to \$85 to reflect the correct fee.

2. Section 36.6. – Fees. – Reasonableness; Clarity.

Application by examination

Application by reciprocity

The House Professional Licensure Committee has suggested, and we agree, that the fee categories of “application by examination” and “application by reciprocity” could give the impression that there are two different exam fees. To alleviate this confusion, the fee categories should be changed to “licensure application fee” and “licensure by reciprocity.”

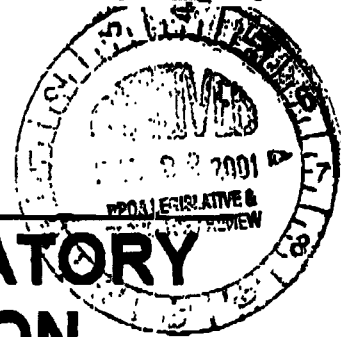
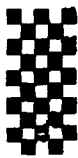
Application for certification as appraiser by examination

Application for certification as certified Pennsylvania evaluator

The application fees for certification as a real estate appraiser and as a Pennsylvania evaluator have increased by more than 200%. By what percentage has the Board’s operating costs increased? The Board should explain the reason for the substantial increase of the fees for these two applications.

Continuing education provider

The category of “continuing education provider” should be plural to be consistent with the other listed categories.



INDEPENDENT REGULATORY REVIEW COMMISSION

To: Suzanne Hoy
Agency: Department of State
Licensing Boards and Commissions
Phone: 7-2628
Fax: 7-0251

From: Kristine M. Shomper
Administrative Officer
Company: Independent Regulatory Review
Commission
Phone: (717) 783-5419 or (717) 783-5417
Fax: (717) 783-2664

Date: February 22, 2001
of Pages: 3

Comments: We are submitting the Independent Regulatory Review Commission's comments on the State Board of Certified Real Estate Appraisers' regulation #16A-7011 (#2153). Upon receipt, please sign below and return to me immediately at our fax number 783-2664. We have sent the original through interdepartmental mail. You should expect delivery in a few days. Thank you.

Accepted by:

Suzanne Hoy

Date:

2/22/01

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