



VIA EMAIL

May 22, 2023

Amy Hall
Board Director
Indiana Professional Licensing Agency
Real Estate Appraiser Licensure & Certification Board
402 W. Washington St., Rm. W072
Indianapolis, IN 46204

Re: LSA Document #22-295/Economic Impact Statement

Dear Ms. Hall

Pursuant to Indiana Code 4-22, as the Small Business Ombudsman for the state of Indiana, I have reviewed the proposed rule and economic impact analysis for small businesses associated with the rule changes contained in LSA Document #2-295 (proposed rule) proposed by the Indiana Professional Licensing Agency (PLA) and found the following to be true.

Proposed rule LSA #22-295 provides various updates, clarifications, and standardization to 876 IAC 3 related to real estate appraiser licensure and certifications. Examples include updating the minimum education standards to be information based rather than minimum hours logged, standardized criteria found within Real Property Appraiser Qualification Criteria, January 2022 edition, and less burdensome criminal background check requirements. The proposed rule change appears to be done so in the least stringent and most efficient way possible, and will have a minimal, if any, direct impact to small businesses across the state of Indiana. In fact, some of the new requirements appear to remove hurdles to entering the industry and may help small businesses with an expanded potential employee pool.

Based upon this statement and review, the Indiana Small Business Ombudsman supports the proposed rule related to the economic impact to small business if the PLA conclusion reflects the actual result after promulgation. If there are any questions about these comments, please contact me at majaworowski@iedc.in.gov.

Sincerely,

Matt Jaworowski
Small Business Ombudsman
Manager, Interagency Affairs
Indiana Economic Development Corporation