Future Of The Appraisal Industry An Update Collateral Risk Network New Orleans, LA April 14, 2016

GREG STEPHENS, SRA, MNAA, CDEI CHIEF APPRAISER, SVP COMPLIANCE, METRO-WEST APPRAISAL COMPANY

## Talking Points

- Current Regulatory Requirements and Impact
- Current Lender Requirements and Impact
- Trainee Survey of State Appraiser Regulatory Agencies
- Examination of AQB Alternative Experience Criterion
  - > 4 Year College Degree Requirement
  - > 2,500 Hours of Experience
  - > 24 Month Minimum Time Period
- Lender Barriers
- Call To Action

 No Trainee statistics available from TAF
 No Trainee statistics available from ASC
 Survey Conducted in March 2016
 46 Of 50 State Agencies Have Trainee Credentialing Programs
 34 States Responded

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The title relating to Appraiser Trainee credential is also referred to by the various states as: Provisional Appraiser; Associate; Limited; Appraiser Intern; Apprentice; Appraiser Apprentice State Licensed Real Estate Assistant; Appraiser Assistant.

For the purposes of this study, we will use the term Appraiser Trainee.

None of the five Territories – Guam, American Samoa, Mariana Islands, Puerto Rico, Virgin Island, have or provided data on Appraiser Trainee Credential programs.

Of the 50 states surveyed, 46 have some form of credentialing program for Appraiser Trainees.

Of the 46 states surveyed, 34 responded.

Missouri began credentialing trainees in 2014

Wyoming began credentialing Trainees in 2015.

Due to the recent nature of their programs limited data was available from those two states.

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- 20 states reported they are experiencing declines in the number of credentialed trainees.
- 4 states reported they are experiencing an increase in the number of credentialed trainees
- 8 states responded indicating they had no appraiser trainee trending data.

I state reported a 26% swing in the rise and decline resulting in the same number of credentialed trainees between 2010 and 2015

 $\succ$  1 state is still gathering the information.

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Below is the list of states reporting declining numbers of appraiser trainee credentials or applications, the time period of the survey and the rate of decline over that time period.

State	Time Period	Trend Results	Rate of Decline
Alaska	2005-2015	14 / 1	-93%
California	2011-2015	450 / 294	-35%
Connecticut	2006-2016	588 / 112	-81%
Florida	2011-2015	903 / 486	-46%
Illinois	2005-2015	1231 / 55	-95%

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State	Time Period	<b>Trend Results</b>	<b>Rate of Decline</b>
Kansas	2010-2013	25 / 11	-56%
Kentucky	2013-2016	222 / 188	-15%
Louisiana	2009-2015	487 / 169	-65%
Maine	2008-2016	59 / 25	-58%
Minnesota	2011-2015	389 / 231	-40%
New Mexico	2012-2015	10 / 6	-40%
North Carolina	2010-2016	469 / 346	-26%
North Dakota	2012-2016	46 / 35	-24%

State Ohio Oklahoma Oregon Pennsylvania South Carolina Utah Washington State 2010-2016

**Time Period** Trend Results Rate of Decline 2011-2016 279 / 266 -05% 2010-2015 136 / 82 -39% 2011-2015 69 / 68 -01% 2010-2015 72 / 52 -28% 2008-2015 600 / 150 -75% -77% 2008-2016 592 / 72 -57% 435 / 188

The survey results received from the state regulatory agencies confirm the concerns the

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Collateral Risk Network,
 National Appraisal Congress
 National Association of Appraisers

have been expressing relating to the potential appraiser shortage that will be facing the industry unless significant and immediate changes occur within the regulatory requirements governing entry into the profession and lender acceptance. The survey reveals the rate of decline in the number of trainee credentials is significantly outpacing the continued decline in the number of appraiser credentials.

We can also expect to see an accelerated increase in the number of active appraisers leaving the industry due to a number of factors. Appraiser Shortage – Fact or Myth?
 How Many Boots on the Ground Appraisers?

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 ASC National Registry
 Provides Visibility Into Number of Credentials
 No Visibility into "Practicing" Credentials
 Exceptions: Executives, Management, Staff Reviewers
 Many Credentialed in Multiple States

**AQB** Real Property Appraiser Criteria Concept Paper July 2015 ▶ Public Meeting in D.C. October 2015 Public Meeting in Phoenix April 2016 Alternative Paths for Experience Credit Question whether 2,500 Hours is excessive Survey of state regulators - AARO 2013 Range was Six weeks to Six Months Training

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#### Survey of Appraisal Industry Leaders

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# Metro-West, Forsythe, William Fall, GES&A 700+ Trainees over 30+ Years 4 to 6 Months = Avg. Time to Independent Appraising

#### **Economic Plight of Licensed Appraisers**

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#### FHA Certification Requirement

Lenders excluding Licensed Appraisers – Not just for FHA but also for Conventional Loans

Licensed Appraisers no longer capable of sustaining a living doing mortgage lending work.

State data indicating Licensure Renewals declining at accelerating rate Disincentive By-Product of Requirements
 No Economic Incentive to Attain Licensure

Trainees Path Now By-Passing Licensure
 From 12 Month Minimum to 24 Month Minimum
 From 2,000 Hours to 2,500 Hours

Disincentive to Trainee as well as Supervisory Appraiser having to directly supervise a Trainee for a minimum of 2 Years

Four Year College Degree Requirement Unintended Consequences Licensed Appraisers Texas Appraiser Already had Associate Degree Stopped appraising Attended College Full Time ► Will get degree in 2016 Estimates it will have cost \$85,000 **Currently No Alternative** 

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## **Appraiser Surveys**



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- Working Real Estate Magazine 4/13/16
  - ► 3,500 Appraisers Responded
  - ►22% Believe There is a Shortage in Their Market
  - ►82% Support Alternative Path to Certification for Appraisers in Good Standing
  - ►76% Believe Trainee Can Inspect Properties Independently if properly Trained
  - ►60% Plan to Retire within 10 Years
  - ►34% Plan to Retire within 5 Years

#### **Lender Barriers**

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Misconceptions Regarding Use of Trainees
 Dodd-Frank Act

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Interagency Appraisal and Evaluation Guidelines
 AMC Final Rule – allows the use of Trainees

Lenders/AMCs Requiring 3-5 Years Experience

Lenders Not Using Licensed Appraisers

## CRN Call To Action

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AQB Exposure Draft Responses
 Written Comments
 Public Meetings

CRN Outreach to Lenders
 Supervisor/Trainee Score Card Data Reveals:

 Faster Turn Times from Request to Completion
 Fewer Revision Requests
 Higher Quality Scores

#### CRN Call To Action

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Collaboration with Other Advocacy Groups
 National Appraisal Congress
 National Association of Appraisers
 State Appraiser Coalitions
 National Association of Realtors - Appraisal

Resolve Dispute Between AI and TAF



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