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## **Stuff is happening that affects appraisers - by Cohen and Sousa**

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There's no doubt that the appraisal profession, as small as it is, remains on the radar of federal and state lawmakers and regulators. The size of the profession, coupled with the fact so few appraisers belong to any association that stands up for them, makes challenging adverse changes very difficult. This is why the MBREA is proud to collaborate on a national level with several other appraisal organizations.

If you truly value your profession, and your livelihood, shouldn't you join an organization that stands up for appraisers? The MBREA is one organization that could use you as a member. Join today.

The MBREA recently joined with other appraisal organizations in submitting joint letters to the National Credit Union Administration and the Consumer Finance Protection Bureau.

The NCUA recently proposed increasing the residential threshold for appraisals from \$250,000 to \$400,000, an action we oppose. Once again, we have an instance where regulators ignore the past and weaken safeguards for consumers and taxpayers for the benefit of financial institutions.

The CFPB issued a notice seeking feedback about TILA/RESPA Integrated Disclosures (TRID). We took the opportunity to address the fact appraisal fees should not be included in the "zero" tolerance bucket. If the appraisal fee changes while the loan is in process, under TRID's zero tolerance policy, the lender has to go through a significant redisclosure process that may create new liability for them.

The MBREA, the American Society of Appraisers, the American Society of Farm Managers and Rural Appraisers, and the Appraisal Institute, work collaboratively to represent the interests of all appraisers.

The Massachusetts Board of Registration of Real Estate Appraisers recently took a big step forward towards the adoption of new criteria for obtaining an appraisal license.

A hearing on January 16, 2020, was held at the state Board's office at which the MBREA appeared and testified in support of the proposed amendments which, when finalized, bring MA into alignment with the criteria implemented by the Appraiser Qualifications Board in 2018. Our testimony asked the Board to clarify one section to avoid duplication of requirements and to anticipate transitional questions by preparing an advisory notice.

In addition to the MBREA, one trainee attended the hearing and spoke in favor of adopting the amended regulations.

A new manner of counting hours for experience credit is included in the proposed regulatory changes that were subject to a hearing on the 16th. Rather than assigning the actual number of hours worked on each assignment, a Trainee will use a standard number of hours.

The regulations will contain a table of "Credited Hours" for many types of assignments. For example, a Trainee will list 8 hours for a one-unit residential property with a full interior inspection. Multi-family and commercial properties are also included; for example, a trainee will report 60 hours for a multi-tenant industrial assignment.

At the MBREA's suggestion, the state Board will be preparing transitional guidance for trainees.

Now that the public hearing is completed, the state Board will take a final vote on the changes at its

next meeting after which they will be published in the Massachusetts Register. Once published, the regulations become effective.

The state Board of Registration of Real Estate Appraisers is busy drafting more regulations, this time to fully implement the appraisal management company licensing law that went into effect last August. The MBREA will analyze the draft when available and provide comments to the Board during the hearing process.

We are constantly on the lookout for the next initiative that will affect the appraisal profession and we will remain vigilant in our efforts to protect and enhance it.

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