

# **Labor\_FAV\_SB117**

Uploaded by: Robinson, Tiffany

Position: FAV

January 10, 2020

The Honorable Delores G. Kelley

3 East Miller Senate Office Building

11 Bladen Street

Annapolis, MD 21401

Dear Senator Kelley:

As chairman of the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors, I am writing in support of Senate Bill 117 Real Estate Appraisers and Real Estate Appraiser Trainees - Licenses and Certificates - Experience, Renewal, and Reinstatement Requirements.

The legislation makes changes related to the experience, renewal, and reinstatement requirements for real estate appraisers. It removes the number of experience hours from statute and allows the commission to set the number of hours by regulation. This will allow the commission to be responsive to changes made by the Appraisal Foundation that regulates the program, as well as to the needs of the industry.

It also extends the reinstatement period for appraisers and specifies what the commission's role is when an appraiser applies for reinstatement beyond the proposed three year time period. The commission feels that two years is too short of a time period and is comfortable extending the reinstatement period by one year which also equals the existing three year renewal cycle.

Lastly, the bill allows appraiser trainees to renew an unlimited amount of times. The commission feels the current law is too restrictive and forces people out of the profession unnecessarily.

The Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors encourages the committee to support SB 117.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anatol Polillo".

Anatol Polillo

Chairman

**DeptofLabor\_FWA\_SB117**

Uploaded by: Robinson, Tiffany

Position: FWA

---

Date: January 20, 2020  
Committee: Senate Finance  
Bill: Senate Bill 117  
RE: Amendments to Senate Bill 117

---

The Department seeks to amend Senate Bill 117 to reduce the required work experience hours for two professions, licensed appraisers and certified residential appraisers, in statute.

Over the past 10 years, the number of licensed appraisers has decreased 80%, from 1,200 to 236. In the same period, the number of certified residential appraisers has decreased from 1,235 to 1,035, a 16% decrease. In sum, the total number of combined licensed appraisers and certified residential appraisers has been cut in half over the past 10 years.

Maryland law currently requires a minimum 2,000 hours of qualifying experience under the supervision of a certified appraiser. On February 1, 2018, after two (2) years of discussion, public comments, and meetings with stakeholders, the Appraiser Qualifications Board (AQB), a national organization representing appraisers, chose to modify recommended requirements for work experience for licenses appraisers and certified residential appraisers. The AQB now sets the recommended number of hours of work experience for licensed appraisers at 1,000 hours, and for certified residential appraisers at 1,500 hours.

An average appraisal takes five (5) hours to complete. Should the law change to reflect AQB standards, licensed appraisers would be required to complete approximately 200 appraisals, and certified residential appraisers would be required to complete approximately 300 appraisals. In *addition* to the work experience requirements, licensed appraisers would be required to complete 150 hours of classroom training and pass an examination, and certified residential appraisers would be required to complete 200 hours of classroom training and pass an examination.

Reciprocity is another important reason to amend the required number of hours of work experience to meet AQB standards. Under current Maryland law, the Department may waive examination requirements for out-of-state licensees if an applicant is licensed or certified in another state after meeting, in that state, requirements that are substantially equivalent to or exceed the requirements in Maryland. Pennsylvania, Delaware, Washington D.C., West Virginia, and Virginia have adopted lower work experience requirements to reflect AQB standards.

Should Maryland choose *not* to adopt the federal standards, the Department may be unable to continue to grant reciprocal licenses to applicants licensed in other states. For this reason, the Department seeks to reduce the required work experience hours for licensed appraisers and certified residential appraisers.