
MARYLAND DEPARTMENT OF LABOR LETTER OF INFORMATION ON HB1021.

TO: House Economic Matters
FROM: Todd Blackstone, Executive Director, MREAHI
DATE: February 19, 2025
BILL: HB1021- Real Estate Appraisers - Licensure and Certification -
Qualifications

House Bill 1021 prohibits the State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors from requiring an applicant to hold a bachelor's degree or higher to qualify for certification or licensure as a real estate appraiser. As written, this bill would inadvertently violate federal guidelines.

Educational criteria for appraisal licensure are established by the Appraisal Foundation (AF) that has federal oversight authority over all state appraisal licensing programs. The AF requires that all candidates for the highest level appraisal classification, which is the Certified General classification, must have a bachelor's degree from an accredited college. Consequently, a Maryland law prohibiting the Commission from requiring an applicant to meet such educational mandates will violate the criteria for appraisal licensure established by the AF. Such a departure from established criteria would result in Maryland losing its authority to issue real estate appraisal credentials altogether. If that were to occur, Marylanders, the State's Industry and the State's economy as a whole could see a negative impact. See Md. Ann. Code, Bus. Occ. & Prof. §§ 16-302(d)(3), 16-502(b)(3), 16-3A-02, and 16-3A-03. See *also* COMAR 09.19.02.01.

To provide additional context, a Bachelors or 4 year college degree is only required for the highest appraiser level, Certified General, under the current law. A Bachelor's or 4 year degree is *not* required for a Licensed Appraiser, a Certified Residential Appraiser, or a Home Inspector.



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The Department respectfully requests the House Economic Matters Committee to consider this information on HB1021.

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