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Evaluation of the Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors

Maryland Department of Labor



UNIVERSITY OF
BALTIMORE

Schaefer Center for
Public Policy

**Evaluation of the Commission of Real Estate Appraisers,
Appraisal Management Companies, and Home Inspectors**

Maryland Department of Labor

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Maryland Department of Labor

Evaluation of the Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors

EXECUTIVE SUMMARY

The Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors (the Commission) is responsible for licensing and regulating real estate appraisers, appraisal management companies and home inspectors in Maryland. During its 2023 session, the Maryland General Assembly passed Senate Bill 827/CH 526, “State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors – Sunset Extension.”¹ Among other provisions, it mandated that an independent evaluation of the Commission be performed. The purpose of the evaluation is to verify the Commission’s compliance with statutory requirements, ensure its duties are being appropriately carried out, and address legislative concerns regarding racial bias in home appraisals. MDOL contracted with the Schaefer Center for Public Policy (Schaefer Center) at The University of Baltimore (UBalt) to conduct the evaluation.

The Schaefer Center employed a mixed methods approach to evaluate the Commission. The evaluation included the following activities:

- Examination of an external review of the Commission, internal licensee audits, and analysis of complaints;
- Interviews with Commission members to gather qualitative insights; and
- A survey of licensed professionals, including appraisers, appraisal management companies (AMCs), and home inspectors.

FINDINGS

Findings Regarding Racial Bias and Discrimination

With respect to the concerns about racial bias and discrimination in the appraisal process, this review did not find evidence of systemic racial bias in the Commission’s operations. Policy changes were implemented in 2020, 2023, 2024, and 2025 to address racial bias in the appraisal process and, as of April 2024, all complaints of racial bias in appraisals are investigated by a third party – the Maryland Commission on Civil Rights (MCCR).

¹ The text of this bill is available in Appendix A: Establishing Legislation.

Specific findings are listed below.

- This review found no evidence of systemic racial bias in the operation of the Commission of Real Estate Appraisers, specifically in its oversight of the appraisers and appraisal management companies.
- The biennial independent compliance review (2024) conducted by the Appraisal Subcommittee (ASC) of the Federal Financial Institutions Examination found the Maryland Appraiser Regulatory Program and the Maryland Appraisal Management Company Regulatory Program to be “In Compliance” with regard Title XI Enforcement requirements related regulations during the 2022-2024 review period. (More information about these reviews is included in Findings Regarding Commission Operations later in this summary and in the body of the report.)
- This review found that the Commission and the General Assembly have taken proactive steps to eliminate racial bias in the real estate appraisal process. Specific actions include:
 1. Eliminating the four-year degree requirement for becoming a licensed appraiser. In 2020 the Commission eliminated the four-year requirement via a regulatory change in COMAR. This change was codified by HB1021 which takes effect on October 1, 2025. Additionally, in 2023, the Commission adopted Practical Applications of Real Estate Appraisal (PAREA) as an alternative path to existing appraisal licensing. These changes are expected to diversify the pool of appraisers by reducing barriers to entry.
 2. Mandating continuing education on racial bias. As of November 1, 2023, licensed appraisers must complete three hours of continuing education on racial discrimination and implicit bias every three years as a condition of license renewal.²³
 3. Establishing a Memorandum of Understanding (MOU) with MCCR. In April 2024, the Commission entered into an MOU with MCCR whereby MCCR agreed to investigate all claims of racial bias in appraisals submitted to the Commission. Under this MOU appraisers can face actions from both MCCR and the Commission.

² “Education - Real Estate Appraisers, Appraisal Management Companies and Home Inspectors.” (n.d.). Maryland Department of Labor. <https://www.labor.maryland.gov/license/reahi/reahieduc.shtml>. Accessed 07/23/2025. The Commission voted to approve this change in April 2023, and the change was effective in November.

³ C.O.M.A.R. 09.19.02.04

- With respect to the concerns about racial bias and discrimination in the appraisal process, the data suggest that there are instances of such bias or discrimination affecting appraisals, but this problem was reported in a small number of the complaints made to the Commission. Slightly larger shares of complaints regarding racial bias or discrimination were dismissed than the shares of all complaints. In addition, the number of hours of remedial CE required for complaints for racial bias or discrimination was lower than for all complaints, but the average fine for complaints for racial bias or discrimination was higher.
- Commission members did agree that racial bias and discrimination are a concern and supported the inclusion of continuing education requirements specific to racial discrimination and bias. Survey respondents (licensees), on the other hand, were more likely to report that racial bias and discrimination were not an issue in appraisals. The appraisers and representatives from AMCs said they were familiar with federal and state laws regarding discrimination in the appraisal process and were confident in their ability to comply with anti-discrimination laws.

Findings Regarding Commission Operations

Generally, the Commission was determined to be operating well as evidenced by external compliance reviews, interviews with Commission members, and a survey of licensees. Minor issues with record keeping were identified by external reviewers and were corrected by the Commission before the review reports were finalized. Specific findings are listed below.

- The biennial independent compliance review (2024) conducted by the Appraisal Subcommittee (ASC) of the Federal Financial Institutions Examination gave the Maryland Appraiser Regulatory Program a finding of “Needs Improvement” and the Appraisal Management Company Regulatory Program a finding of “Good.”
- Both programs were determined to be “In Compliance” with regard Title XI Enforcement requirements-related regulations during the 2022-2024 period. Additionally, the Appraisal Management Company Regulatory Program was also found to be in compliance with applicable statutes, regulations, policies, and procedures.
- The ASC review also determined that the Commission’s Appraisal Regulatory Program was “Not in Compliance” in three other areas – none of which related to enforcement efforts. The Commission reported to ASC that corrective actions were taken to resolve the identified issues.

The review also identified one “Area of Concern” related to maintaining documentation to support determinations that applicants met requirements for licensure. This finding pertained to two applications. In both instances, the Commission was able to locate the missing documentation before the ASC report was finalized.

- The ASC review of the Commission’s *Appraisal Management Company Regulatory Program* identified one “Area of Concern” related to one unpaid Appraiser Registry invoice that was outstanding for more than 45 days.
- Commission members all thought the Commission’s performance overall – as well as the licensing and complaint processes – as very good or outstanding. On a scale of 1 to 5, with 5 being the highest rating, no interviewee rated any area below a 4.
- Survey respondents (licensees) reported that the Commission’s licensing or certification process was adequate for their work. They expressed satisfaction with the various aspects of the process and affirmed the Commission met their expectations with respect to licensing.

RECOMMENDATIONS

The primary recommendation from this report is that the Commission continue requiring appraisers to complete continuing education (CE) on racial bias and discrimination. Research has shown the presence of such bias in the Baltimore regional housing market,⁴ and the review of complaints received by the Commission and the outcomes of those complaints also show that racial bias or discrimination is occurring although it is not one of the foremost concerns.

Other recommendations include:

- Exploring the divide between Commission members and licensed appraisers and AMCs with respect to both racial bias and discrimination and Commission processes in general.
- Consider including more hands-on opportunities to practice and explore how to perform as an appraiser or home inspector.
- Providing or supporting learning opportunities for potential or current homeowners, so they understand the roles of appraisers and home inspectors and how they operate.

⁴ Goldstein, I. with Kim, A. (2025). Evidence of Racial Bias in Home Appraisals in the Baltimore Metropolitan Area. Abell Foundation. https://abell.org/wp-content/uploads/2025/03/2025_Abell-Foundation_Appraisal-Bias_vf-digital.pdf.

- Adopting a secure relational database system to standardize the collection of complaints, disciplinary actions, and outcomes.

CHAPTER 1: PROJECT OVERVIEW

The Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors (the Commission) is responsible for licensing and regulating real estate appraisers, appraisal management companies (AMCs), and home inspectors in Maryland. There are 15 members of the Commission, and these individuals represent the regulated entities as well as consumers. The Commission is located in the Maryland Department of Labor (MDOL). As part of the Commission’s work, it also investigates complaints from the public about services provided by the real estate appraisers, AMCs, and home inspectors in Maryland. During the 2022-2024 review period, there were 2,183 licensed appraisers on the appraiser registry for Maryland.⁵

ACTIONS TO ADDRESS RACIAL BIAS AND DISCRIMINATION

In response to concerns about racial bias and discrimination in the appraisal process, the Commission now requires currently licensed appraisers, certified appraisers, and appraiser trainees to have completed at least three hours of appraisal education on racial discrimination and implicit bias when applying for licensure or renewal.⁶ This requirement was effective in November 2023 and in response to amendments to COMAR 09.19.02.04.

In addition, in April 2024, the Commission entered into a Memorandum of Understanding (MOU) with the Maryland Commission on Civil Rights (MCCR) to share data and complaints with respect to racial bias and discrimination by appraisers against potential home buyers.⁷ Moreover, the Commission removed the requirement for a four-year college degree for appraisal licensing in 2020⁸ and adopted Practical Applications of Real Estate Appraisal (PAREA) as an alternative path to existing appraisal licensing.⁹ Both of these actions were expected to open the field to more candidates. In 2025, HB1021 (effective October 1, 2025) codified the removal of the four-year degree requirement for licensed appraisers.¹⁰

⁵ Appraisal Subcommittee FFIEC Website, https://www.asc.gov/sites/default/files/2024-11/2024.10.15%20MD%20Appraiser%20Final%20Compliance%20Review_0.pdf. Accessed 07/23/2025

⁶ “Education - Real Estate Appraisers, Appraisal Management Companies and Home Inspectors.” (n.d.). Maryland Department of Labor. <https://www.labor.maryland.gov/license/reahi/reahieduc.shtml>. Accessed 07/23/2025. The Commission voted to approve this change in April 2023, and the change was effective in November.

⁷ The Commission shared this MOU with the research team along with the notes from the Commission meeting on April 9, 2024, at which the Commission’s director announced the agreement. As of July 2025, four complaints had been sent to MCCR, and all four remained open.

⁸ Maryland Register, Vol. 47, Issue 2. Friday, January 17, 2020.

⁹ The Commission voted to accept PAREA at its meeting in February 2023.

¹⁰ https://mgaleg.maryland.gov/2025RS/Chapters_noln/CH_341_hb1021t.pdf. Accessed 08/27/2025.

CURRENT REQUIREMENT FOR INDEPENDENT EVALUATION OF THE COMMISSION

During its 2023 session, the Maryland General Assembly passed Senate Bill 827/CH 526, “State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors – Sunset Extension.”¹¹ Among other provisions, it mandated that an independent evaluation of the Commission be performed. The purpose of the evaluation is to verify the Commission’s compliance with statutory requirements, ensure its duties are being appropriately carried out, and address legislative concerns regarding racial bias in home appraisals. MDOL contracted with the Schaefer Center for Public Policy (Schaefer Center) at The University of Baltimore (UBalt) to conduct the evaluation.

The Schaefer Center employed a mixed methods approach to evaluate the Commission. The evaluation included the following activities:

- Examination of an external review of the Commission, internal licensee audits, and analysis of complaints;
- Interviews with Commission members to gather qualitative insights; and
- A survey of licensed professionals, including appraisers, AMCs, and home inspectors.

The following three chapters review the findings from each of the evaluation activities above: Chapter 2 discusses the external review, internal licensee audits, and analysis of complaints; Chapter 3 reviews the findings from the interviews conducted with Commission members; and Chapter 4 reviews the findings of the survey of Commission-licensed appraisers, AMCs, and home inspectors. The final chapter presents the conclusions from this analysis. Appendices with the enabling legislation as well as the interview guide and survey instrument used in the data collection are included at the end of the report.

¹¹ The text of this bill is available in Appendix A: Establishing Legislation.

CHAPTER 2: EXAMINATION OF EXTERNAL REVIEWS, INTERNAL AUDITS, AND

As part of its evaluation of the Commission, the Schaefer Center examined one external review of the Commission, data from an internal Commission audit of licensees' self-reported continuing education (CE), and all complaints submitted to the Commission about real estate appraisers in Maryland as well as the outcomes of the Commission's investigation of those complaints.

ASC STATE APPRAISER PROGRAM AND APPRAISAL MANAGEMENT COMPANY

The Commission provided a copy of its most recent Appraisal Subcommittee (ASC) State Appraiser Program Compliance Review Report¹² and the ASC Compliance Review of Maryland's Appraisal Management Company (AMC) Regulatory Program.¹³ The content of these reports was verified by a review of the official reports posted on the ASC website.

The real estate appraisal regulatory framework for federally related transactions is overseen by the Appraisal Subcommittee (ASC) of the Federal Financial Institutions Examination Council (FFIEC), which was established with the enactment of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA).¹⁴ As part of its oversight responsibilities, ASC conducts ASC Compliance Reviews of appraisal regulatory programs to assess programs' compliance with Title XI of FIRREA, as amended.¹⁵ ASC Reviews are usually conducted every two years.

In February 2024, ASC conducted two regularly scheduled, biennial compliance reviews of programs operated by the Commission to assess the programs' compliance with the requirements of Title XI. The first was a review of the *Maryland Appraiser Regulatory Program (Appraiser Program)* and the second was a review of the *Maryland's Appraisal Management Company (AMC) Regulatory Program*. The reviews covered the period from April 2022 to February 2024.

¹² "ASC Compliance Review of Maryland's Appraiser Regulatory Program." (11/15/2024). Appraisal Subcommittee FFIEC Website. https://www.asc.gov/sites/default/files/2024-11/2024.10.15%20MD%20Appraiser%20Final%20Compliance%20Review_0.pdf. Accessed 07/10/2025.

¹³ "ASC Compliance Review of Maryland's Appraisal Management Company (AMC) Regulatory Program." (11/15/2024). Appraisal Subcommittee FFIEC Website. http://www.asc.gov/sites/default/files/2024-11/2024.10.15%20MD%20AMC%20Final%20Compliance%20Review_0.pdf.

¹⁴ "ASC Mission." (n.d.). Appraisal Subcommittee FFIEC Website. <https://www.asc.gov/about#>. Accessed 07/10/2025.

¹⁵ Appraisal Subcommittee of Federal Financial Institutions Examination Council. 12 U.S.C. §§ 3331-3356. (1989).

FINDINGS RELATED TO TITLE IX ENFORCEMENT

In the compliance review reports (one for each review) dated November 15, 2024, ASC determined the Commission was “In Compliance” with regard to applicable Title XI Enforcement requirements related to both the Maryland Appraiser Regulatory program and the Maryland Appraisal Management Company Regulatory program.

FINDINGS RELATED TO THE MARYLAND APPRAISER REGULATORY PROGRAM

In its report on the Maryland Appraiser Regulatory Program issued on November 15, 2024, ASC gave the Maryland appraiser program a finding of “Needs Improvement.” Comparing Maryland to the rest of the appraisal regulatory programs across the country, of the 50 states and the District of Columbia, 12 received a review finding of “Excellent,” 29 received a finding of “Good,” 7 received a finding of “Needs Improvement,” and 3 received a finding of “Not Satisfactory.”¹⁶

ASC determined the Commission was “Not in Compliance” with Title XI of FIRREA in four areas: statutes, regulations, policies, and procedures; national registry; application process; and education. For each of the areas of non-compliance, the Commission’s response to the preliminary report of findings indicated the issue was corrected, and the Commission’s policies were updated to prevent a reoccurrence. The findings of the review are summarized below.

The Commission was determined to be “In Compliance” with regard to applicable Title XI Enforcement requirements.

The Commission was determined to be “Not in Compliance” in the following areas:

National Registry: Maryland was found to have one unpaid Appraiser Registry Invoice that was outstanding from more than 45 days.

Application Process: Two applications were identified that did not contain necessary documentation – one did not include documentation that the applicant met requirements for education, experience, and examination, while the other did not meet the requirement for examination. For both applications, the Commission located the applications and necessary documentation to rectify the problem.

¹⁶ “Appraiser Regulatory Program Compliance Review Findings.” (n.d.). Appraisal Subcommittee FFIEC Website. <https://www.asc.gov/states/appraiser-findings#>. Accessed 07/10/2025.

Education: The Commission was found to have “approved qualifying education and continuing education courses beyond the expiration date of the delivery mechanism and course content approval certificates.”¹⁷

The review identified one “Area of Concern”:

Statutes, Regulations, Policies, and Procedures: Maryland’s statute with regard to reciprocity is not in compliance with the requirements under Title XI. The report noted that the Commission’s practice appears to be in compliance.

FINDINGS RELATED TO THE MARYLAND’S APPRAISAL MANAGEMENT COMPANY (AMC) REGULATORY PROGRAM

In its report on the Maryland Appraisal Management Company Regulatory Program issued on November 15, 2024, ASC gave the program a finding of “Good.” Comparing Maryland to the rest of the appraisal management company regulatory programs across the country, of the 50 states and the District of Columbia, 5 received a review finding of “Excellent,” 41 received a finding of “Good,” 4 received a finding of “Needs Improvement,” and 1 received a finding of “Not Satisfactory.”¹⁸

With regard to the Maryland Appraisal Management Company Regulatory Program, the Commission was determined to be “In Compliance” with regard to statutes, regulations, policies and procedures and well as enforcement of applicable Title XI Enforcement requirements.

The Commission received on “Area of Concern”:

National Registry: Maryland was found to have one unpaid Appraiser Registry Invoice that was outstanding from more than 45 days. (This issue was resolved before ASC issued its final determination.)

¹⁷ “ASC Compliance Review of Maryland’s Appraisal Management Company (AMC) Regulatory Program.” (11/15/2024). Appraisal Subcommittee FFIEC Website. http://www.asc.gov/sites/default/files/2024-11/2024.10.15%20MD%20AMC%20Final%20Compliance%20Review_0.pdf.

¹⁸ “Appraiser Regulatory Program Compliance Review Findings.” (n.d.). Appraisal Subcommittee FFIEC Website. <http://www.asc.gov/states/amc-findings#>. Accessed 08/26/2025.

INTERNAL AUDIT OF CONTINUING EDUCATION COMPLETION

As part of its oversight responsibilities, the Commission conducts an internal audit of continuing education (CE) completion by its licensees. For this audit, appraisers and home inspectors who are randomly selected must provide the Commission with proof that they completed the required number and type of CE hours required to maintain their license. Appraisers must complete 42 hours of CE every three years including three hours of training every three years on racial discrimination and implicit bias, while home inspectors must complete 30 hours every two years.¹⁹

The Commission supplied a record of the results and disciplinary determinations of the random CE audits it has conducted of licensees since March 1, 2020.²⁰ The Commission selected 396 licensees for random audits. Selected licensees were required to provide documentation that they completed the required number and type of continuing education during their licensee period. Of the 396 licensees selected for audit, 64 licensees (16%) failed the audit. These failures led to a total of 82 outcomes, as some cases resulted in more than one action (e.g., both a complaint being opened and a license being surrendered). The most common outcomes were:

- Complaints opened: 26
- Disciplinary actions issued: 19
- Precharges filed: 13
- Surrendered licenses: 7
- Fines imposed: 4
- Submission of acceptable CE after failed audit: 7
- Other outcomes included complaints closed (2), license not renewed (1), individual was unlicensed (1), or the business was no longer operational (2).

As of November 1, 2023, licensees are required to complete 3 hours of appraisal education related to racial discrimination and implicit bias every three years.²¹ The CE audit data provided by the Commission documented if the licensee passed or failed the CE audit (including the number and type of continuing education hours) and the outcome of the disciplinary process for those who failed the audit. Data was not provided to specifically identify the number of licensees who did not complete the required racial discrimination and implicit bias continuing education.

¹⁹ COMAR 09.19.02.04.

²⁰ This dataset was not independently verified by the Schaefer Center. Information about three audits conducted in 2025 was included in the data provided but are not included in this analysis.

²¹ COMAR 09.19.02.04.

COMPLAINTS ABOUT APPRAISERS

COMPLAINT PROCESS

Figure 1 outlines the appraisal complaint process followed by the Maryland Real Estate Commission from initial submission to potential hearing.²² Complaints must be submitted in writing along with supporting documentation. Once received, Commission staff screen each complaint to determine jurisdiction and verify that the required documentation is included. If the complaint is determined to be within the Commission’s jurisdiction and completed correctly, the Commission staff send an acknowledgement letter to the complainant and notify the subject appraiser. Appraisers are given 30 days to respond to the complaint in writing. For complaints with missing documentation, complainants are given the opportunity to provide the missing documentation.

As of April 2024, all complaints that allege racial bias are also sent to the Maryland Commission for Civil Rights for investigation of bias. MCCR issues a report to the Commission. If MCCR finds racial bias in the appraisal, MCCR may pursue monetary damages from the appraiser by behalf of the complainant AND the Commission may also take disciplinary action against the appraiser.

For complaints that do not allege racial bias, a panel of Commission members and an Assistant Attorney General evaluate all submitted materials. Based on the evidence, the complaint is either administratively dismissed, recommended for charges, or sent for further investigation. Only Commissioners have the authority to issue charges or dismiss cases.

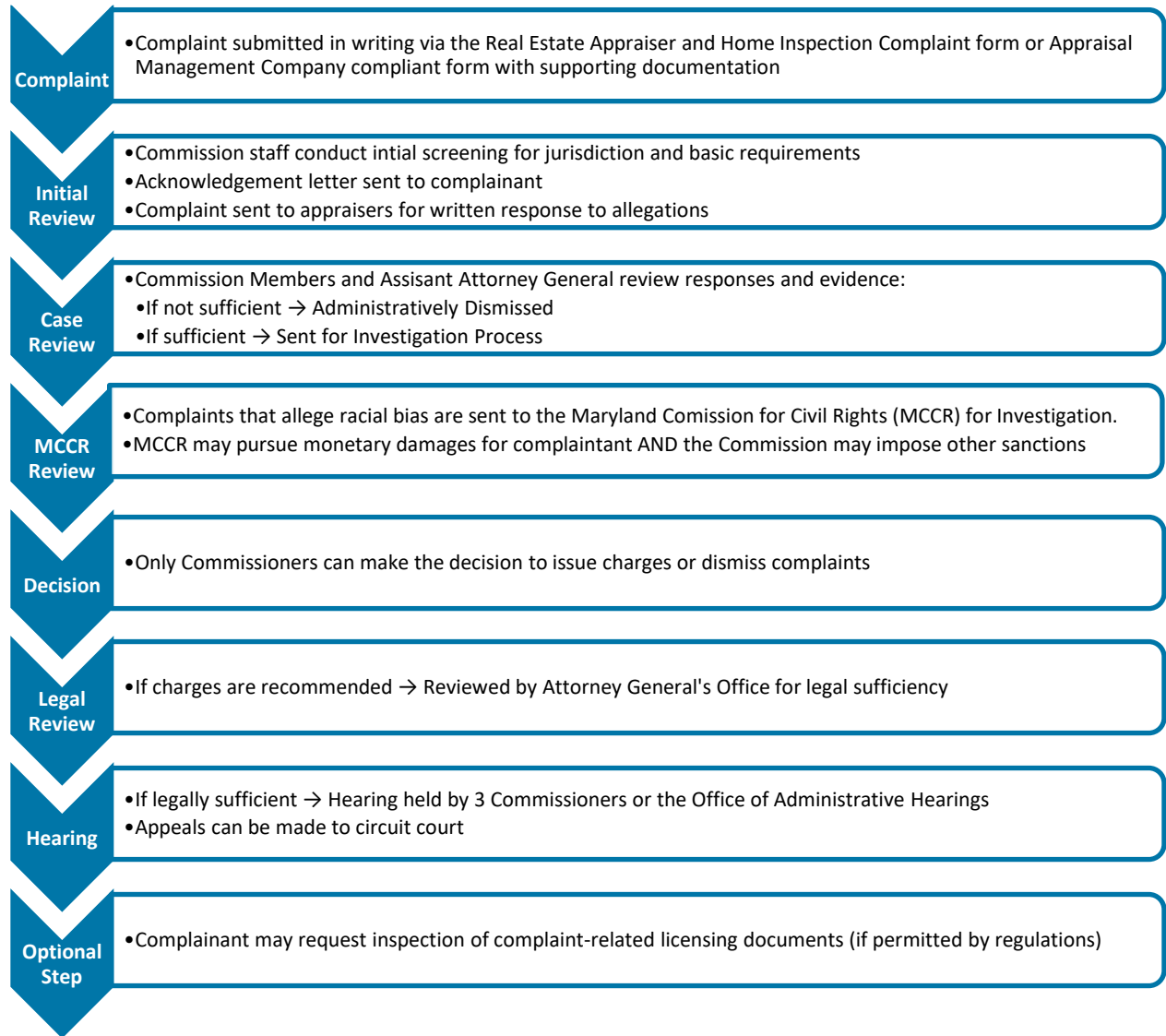
If additional investigation is requested, the Commission panel and the Assistant Attorney General review the additional information and make a determination to dismiss the charges, seek to resolve the issue informally before charges are issues, or recommend charges.

If charges are recommended, the Attorney General’s Office reviews the charge for legal sufficiency. Legally sufficient cases receive a formal hearing by either a Commission hearing board or an administrative law judge. Accused appraisers are afforded procedural protections including the right to an attorney who may present evidence and a right to cross-examine witnesses. At any point, complainants may request to inspect complaint-related documents in the respondent’s licensing file, subject to regulations.

²² “Understanding the Complaint Process - Real Estate Appraisers, Appraisal Management Companies and Home Inspectors.” (n.d.). Maryland Department of Labor.
<https://www.dlrr.state.md.us/license/reahi/reahicomprocess.shtml>. Accessed 08/11/2025.

After the hearing, a written decision is filed. If the appraiser is not satisfied with the results, he or she ordinarily has the right to file exceptions and the right to appeal the final decision in circuit court. The possible outcomes of the hearing include dismissing the complaint and upholding the complaint and imposing sanctions with may include denial of license, reprimand, license suspension or revocation, and/or a fine not to exceed \$5,000.

Figure 1: Complaint Process Overview



Note: Based on information available on the Commission's website

<https://www.dllr.state.md.us/license/reahi/reahicompprocess.shtml><https://labor.maryland.gov/license/mrec/mreccomp.shtml>).

METHODOLOGY

The Commission provided the Schaefer Center with all complaints it received about real estate appraisers in Maryland from 2022 to 2024.²³ The complaints and the outcomes of those complaints were analyzed by the Schaefer Center staff based on the type of complaint and the outcome of the complaint. The codes used for the types of complaints and the definitions of those codes are shown in Table 1. There were 13 possible outcomes for the resolution of complaints:

- Closed,
- Remedial Continuing Education (CE),
- Consent Order,
- Fine,
- Global Fine,
- Suspension,
- Out of Jurisdiction,
- Dismissed,
- Dismissed after Informal,
- Withdrawn by Complainant,
- Reprimand,
- Pending Litigation, and
- Surrendered License.

²³ The Commission also provided the two complaints made in 2025. Because this data collection and analysis were conducted in 2025, there presumably have been more complaints made but not provided to the Schaefer Center. Therefore, this section only examines the complaints made in 2024.

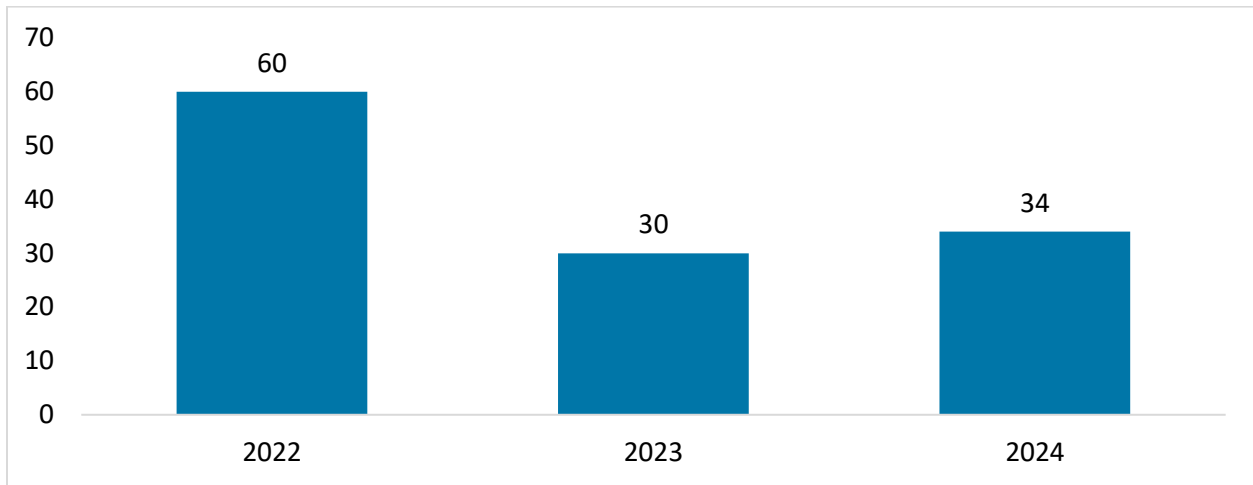
Table 1: Complaint Codes Used in Analysis

Code #	Complaint Code	Definition
1	Incomplete or Non-Compliant Appraisal Report	Appraisal reports that are missing required information (e.g., FHA case number, signatures, or key documentation).
2	Unfair or Excessive Fees	Unjustified or unusually high appraisal fees, including cases where a second fee is charged without additional work.
3	Appraisal Report Reuse or Misrepresentation	Situations where an outdated or previous appraisal is resubmitted without updates, new inspections, or proper disclosure.
4	Outdated or Inaccurate Valuation	Cases where an appraisal is considered unreliable due to market changes or the passage of time.
5	Contract Disruption Due to Appraisal Issues	When appraisal-related issues lead to the cancellation or delay of a real estate transaction.
6	Inflated or Deflated Home Valuation	Cases where the appraised value is significantly higher or lower than fair market value, suggesting possible bias, miscalculation, or fraud.
7	Appraiser Negligence or Professional Misconduct	Includes allegations of gross negligence, failure to adhere to professional standards (e.g., USPAP violations), or unethical behavior.
8	Lack of Geographical Expertise or Inability to Select Comparable Sales	When an appraiser lacks sufficient local market knowledge, leading to errors in comparable sales selection and valuation.
9	Racial bias	Allegations that the appraisal process was influenced by racial discrimination.
10	Other/Miscellaneous	Complaints that do not fit into the predefined categories, including unique, ambiguous, or less common issues related to the appraisal process.
11	False inspection claims	Appraisal report inaccurately states that an appraiser personally inspected a property when, according to the complainant, they did not.
12	Factual Errors in Appraisal Reports	Appraisal report contains incorrect or misleading factual details, such as inaccurate square footage, incorrect measurements, misrepresentation of appliances, or errors in home configuration.
13	Appraiser Retaliation	Appraiser is alleged to have adjusted a valuation in retaliation for a complainant's inquiry, complaint, or other action. This includes intentional deflation or inflation of value as a punitive response.
14	Undue Influence & Bribery	Appraiser is pressured by external parties (e.g., realtors, lenders) to manipulate a property valuation or where bribery is involved to suppress appeals or influence appraisal outcomes.

ANALYSIS OF COMPLAINTS AND OUTCOMES

As shown in Figure 2, there were 124 complaints made during the period covered by this evaluation. The most common type of issue included in a complaint concerned inflated or deflated home valuations (Figure 3). There were 66 complaints that included this issue, which represents over half of the complaints (53%) during these three years.²⁴ A majority of the complaints also included a concern regarding lack of geographical expertise or inability to select comparable sales (63 complaints, 51%).

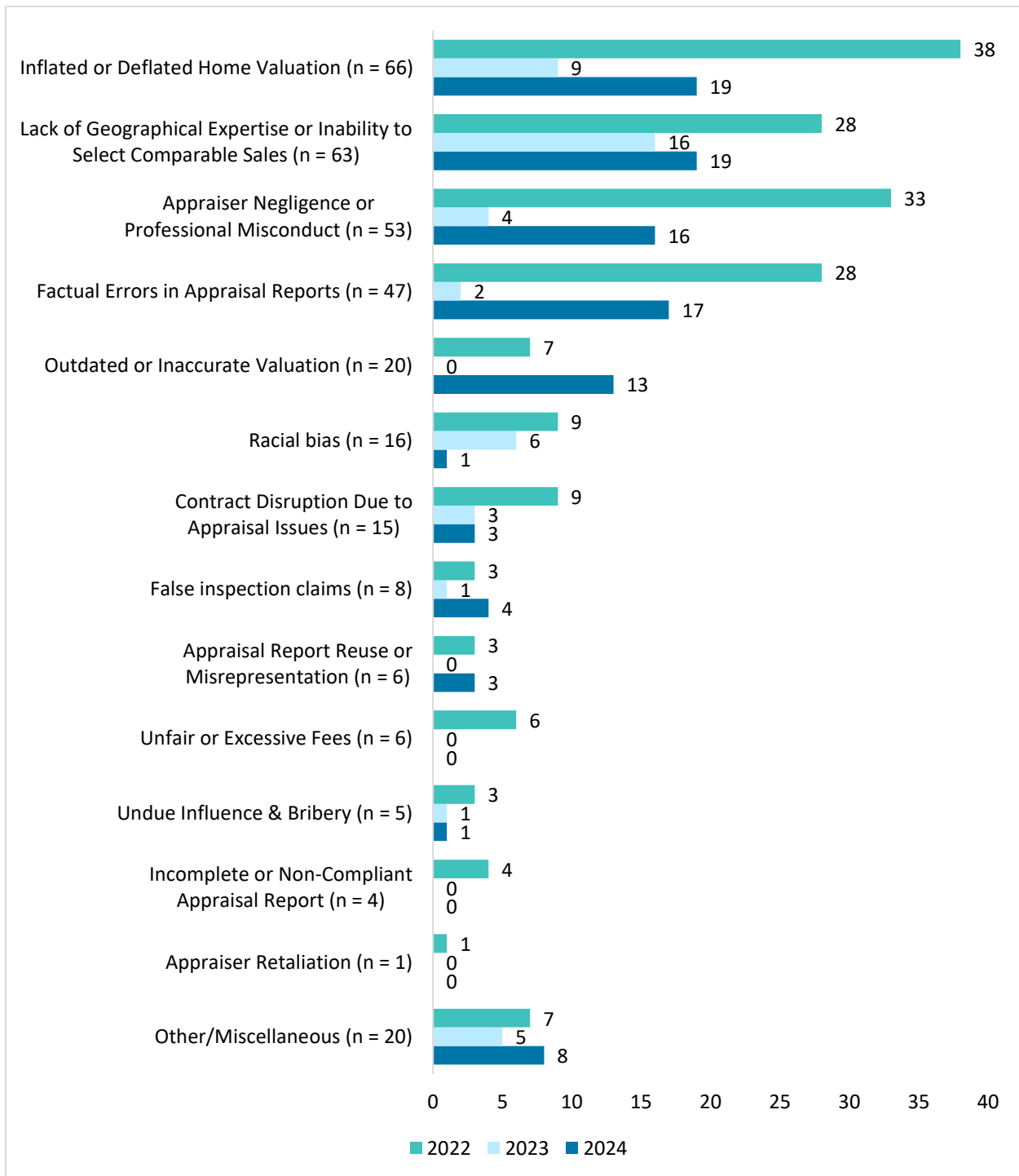
Figure 2: Number of Complaints Made to Commission, 2022-2024



Note: N = 124.

²⁴ Multiple issues could be included in one complaint.

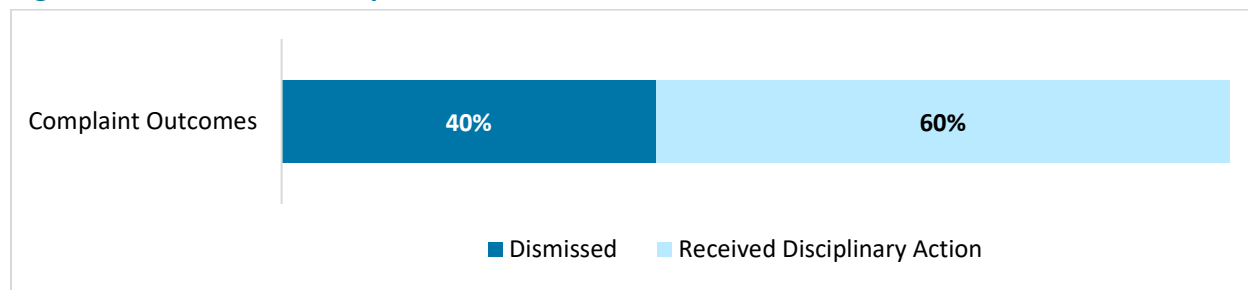
Figure 3: Types of Issues in Complaints About Real Estate Appraisers by Year, 2022-2024



Notes: N = 124 complaints with 350 issues. The total number of issues was larger than the number of complaints since there could be more than one issue in a complaint. Issues are listed in descending order by total number of complaints.

Figure 4 displays the distribution of outcomes for formal complaints filed from 2022 to 2024. The majority of complaints resulted in disciplinary action (60%), while 40% of complaints were dismissed.

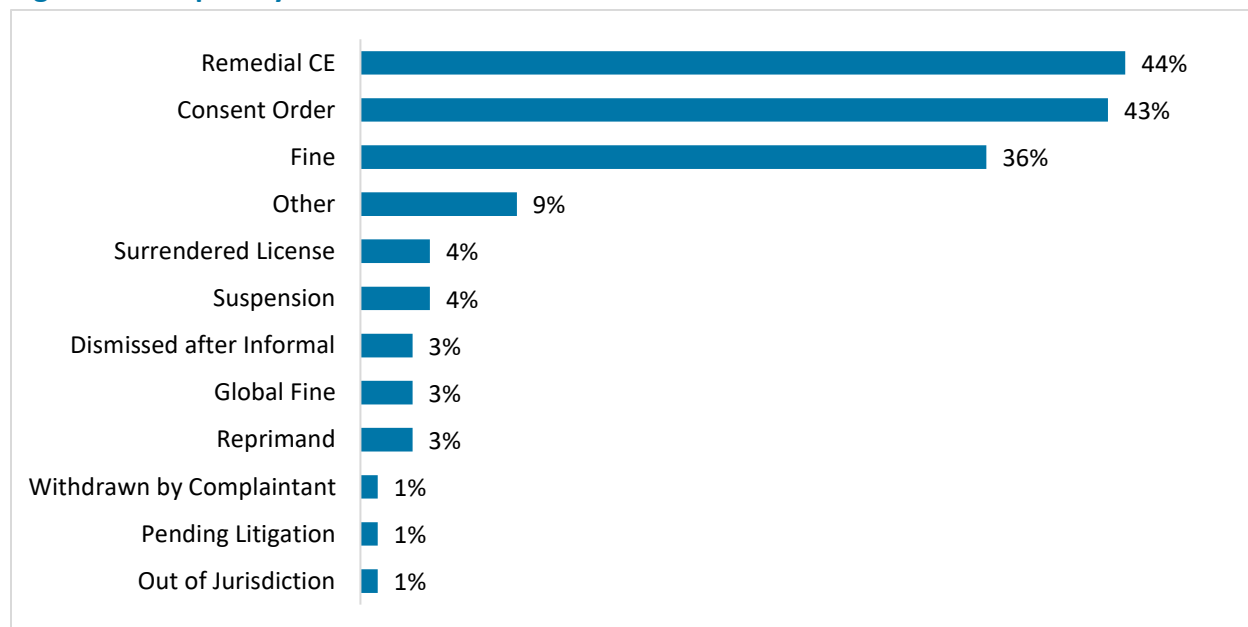
Figure 4: Outcomes of Complaints, 2022-2024



Note: N = 124.

Figure 5 provides a breakdown of the disciplinary actions taken, as most closed cases involved one or more procedural steps before closure. Remedial CE (44%), a consent order (43%), or a fine (36%) were the most common steps before closure.

Figure 5: Disciplinary Action Taken



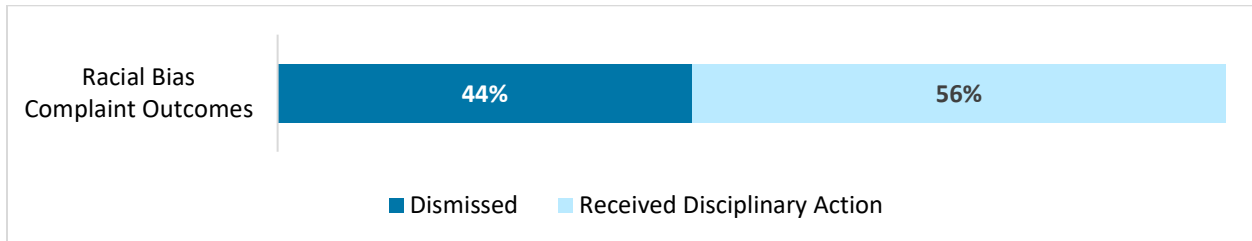
Notes: N = 75. Percentages total more than 100% since there can be more than one outcome for one complaint. Outcomes are listed in descending order. "Other" outcomes include the following: "No trainees for 3 years," "expired license flagged," "deceased," "pre-charge – given to AG office," or "not a complaint – license denial."

Across the 124 complaints, the number of hours required for remedial CE ranged from 7 hours to 75 hours, with an average of 19 hours. Fines ranged from \$500 to \$6,000, with an average fine of \$2,188.

COMPLAINTS ABOUT RACIAL BIAS

As shown in Figure 3, 16 of the 124 complaints received from 2022 to 2024 included concerns about racial bias. This issue is the sixth most common concern and was included in 13% of complaints. Seven (44%) racial bias complaints were dismissed (Figure 6). The remaining 9 complaints (56%) received some form of disciplinary action after being reviewed by the commission.

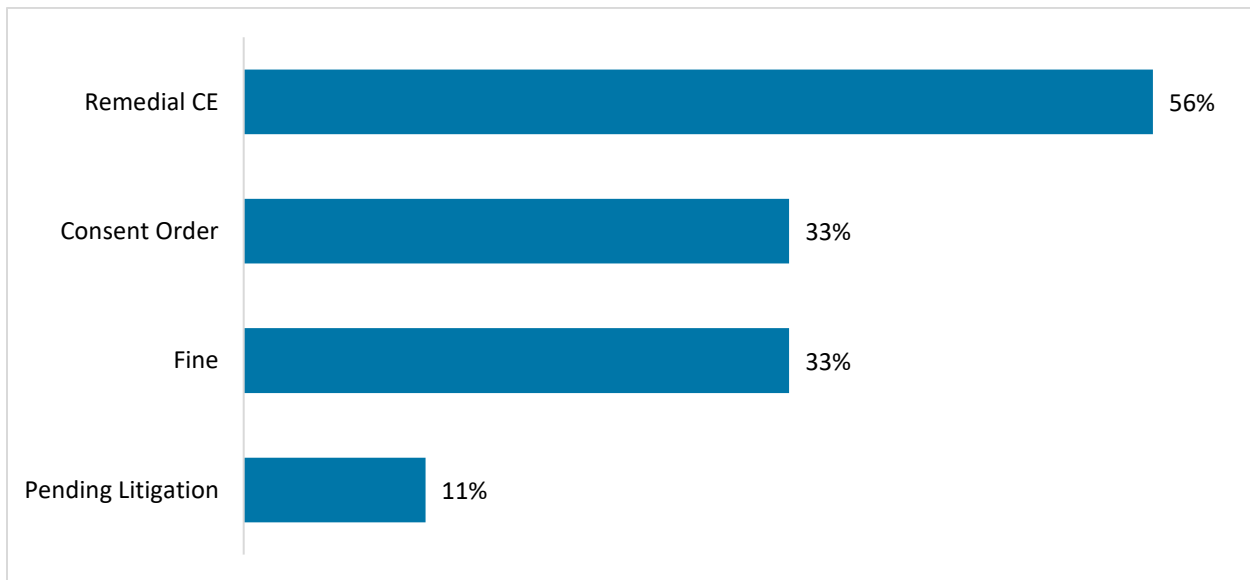
Figure 6: Outcomes of Racial Bias Complaints, 2022-2024



Note: N = 16.

Figure 7 provides a breakdown of the disciplinary actions taken in racial bias complaints. Just over half of the complaints regarding racial bias resulted in the disciplinary action of Remedial CE (56%). A smaller portion of these complaints resulted in a consent order (33%), fine (33%), or pending litigation (11%).

Figure 7: Disciplinary Actions Taken in Racial Bias Complaints



Notes: N = 9. Percentages total more than 100% since there can be more than one outcome for one complaint. Outcomes are listed in descending order.

Comparing all outcomes to those for complaints involving racial bias, a slightly larger share of racial bias complaints were dismissed compared to all complaints (44% and 40%, respectively). Larger shares of racial bias complaints, compared to all complaints, resulted in remedial CE. However, these differences should be interpreted with caution due to the relatively small number of racial bias complaints, which may limit the reliability and generalizability of these comparisons.

The number of remedial CE hours required for complaints of racial bias ranged from seven to 30, with an average of 12.4 hours.²⁵ Three appraisers (19%) were required to pay fines. These fines ranged from \$1,000 to \$5,000, with an average fine amount of \$3,000. The average fine for complaints including racial bias was higher than the average fine for all complaints, while the number of hours of remedial CE was lower than for all complaints.

CONCLUSION

While the ASC reviews determined that the Commission’s State Appraiser Regulatory Program “Needs Improvement,” it and the Appraisal Management Company Regulatory Program were found to be “In Compliance” with regard to Enforcement during the 2022-2024 review period. As discussed earlier in this section, the areas of non-compliance did not relate to issues impacting

²⁵ One complaint did not have the number of remedial CE hours required of the appraiser.

the Commission's ability to address racial bias or discrimination. In addition, the concerns about racial bias or discrimination were cited in a relatively small number (16 of 124) of complaints received by the Commission from 2022 to 2024. In comparison, the most common complaints (i.e., inflated or deflated home valuations, lack of geographical expertise or inability to select comparable sales) had approximately four times the number of complaints compared to complaints of racial bias or discrimination. Slightly larger shares of complaints regarding racial bias or discrimination were dismissed than the shares of all complaints. In addition, the number of hours of remedial CE required for complaints for racial bias or discrimination was lower than for all complaints, but the average fine for complaints for racial bias or discrimination was higher.

CHAPTER 3: INTERVIEWS WITH COMMISSION MEMBERS

Interviews were conducted with six of the Commission members to understand the Commission’s overall performance, operations, and requirements for licensing.²⁶ An interview guide for these discussions was written by the Schaefer Center, approved by Commission leadership, and approved by The University of Baltimore’s Institutional Review Board.²⁷ These interviews were conducted virtually from May 30, 2025, to June 26, 2025, and the transcripts were reviewed for key findings. Each of the Commission members interviewed had served on the Commission for at least one year. The interviewees had different roles and responsibilities on the Commission, and not all interviewees were in the appraisal field.

INTERVIEW FINDINGS

Interviewees generally rated the Commission’s overall performance very highly. On a scale from 1 (unacceptable) to 5 (outstanding), all interviewees rated the Commission’s performance a 4 or 5. One interviewee commented that: “The members that attended the meetings that I attended, ... all of them were very engaged. I enjoyed their questions.” When asked how the Commission could improve its performance, interviewees cited the following: improving the website, improving how complaints are handled, or improving training people for their roles.

LICENSING PROCESS

All interviewees were familiar with the Commission’s licensing process, although two of the six were only aware of the process with respect to their role as an appraiser or home inspector. When asked to rate the Commission’s licensing process on the same 1 to 5 scale, those who provided a rating gave the process a 4 or 5. Suggestions for improving the licensing process included more hands-on or experiential training – one interviewee suggested a program for trainees to submit a few appraisals, which would be used to help guide them during the licensing process, and another suggested increasing the requirements for home inspectors and implementing apprenticeships or internships.

All interviewees felt that the licensing process was generally fair, though some raised concerns about accessibility. One interviewee noted specific “barriers to entry for underserved communities,” while another reported hearing complaints that the licensing process should be

²⁶ There were multiple attempts, including both email and telephone, to schedule an interview with four Commission members, but there were no responses. Three Commission members scheduled interviews but did not show up or respond to attempts to reschedule.

²⁷ The interview guide is available in Appendix B: Interview Guide.

more accessible. Others mentioned concerns they had heard related to the limited number of work opportunities available post-licensing or that the licensing requirements should be more rigorous.

CONTINUING EDUCATION

Interviewees were next asked about the Commission’s continuing education (CE) requirements. One interviewee was not familiar with the requirements, and another was only familiar with requirements for their profession. Of those familiar with the requirements, three thought the number of hours was sufficient, one was unsure but felt they were likely sufficient, and another said they were not. The interviewee who said the requirements were not sufficient noted they “lack rigor” and that there needs to be more training and hands-on learning. Those who said they were sufficient noted the similarities to other states’ requirements, that these requirements are more strenuous than licensing, that regulations change quickly, and that CE covers multiple subjects. Suggested improvements for the CE requirements included tailored requirements for specific jobs or adding the subject of professional conduct and how to interact with customers; three interviewees did not suggest other topics for CE to cover.

Interviewees were asked specifically about the CE requirements for appraisers concerning racial discrimination and implicit bias. One respondent said the information was important to have and more hours could be required on the topic, and another said this information was good to include and another thought it was beneficial. Of the other two interviewees, one did not see anything wrong with it but were not sure it should be a requirement, while the other said that racial bias was not a problem in their profession.

COMPLAINT PROCESS

All interviewees said they were familiar with the complaints process, although one was “sort of” familiar. All but one interviewee rated the complaints process as a 5; the other interviewee said it was a 4. Four interviewees said there were no aspects of the complaints process that concerned them, while one mentioned the possibility of altered reports and the continuation of the improper practices, and the other brought up the problem of invalid or unjustified complaints. All interviewees thought the complaints process was fair, although one said it was fair for professionals in the field but less fair for consumers.

RACIAL BIAS IN THE APPRAISAL PROCESS

All interviewees, including those who were not appraisers, were asked about the issue of racial bias in the appraisal process. All interviewees thought such bias exists, although one thought such bias would be minimal. One said that such bias is likely present in appraisals for residential properties but not for commercial properties.

When asked about the patterns of complaints about racial bias in appraisals, three noted such patterns exist. One interviewee said the pattern was around “neighborhoods and ethnicity,” while another said there was a racial dynamic to the complaints, with complaints more common when there is a White appraiser and Black customer. Another said that the patterns concern the property values. Two interviewees were unaware of the Commission’s process for investigating and addressing potential racial bias; the other interviewees noted that investigations are delegated to a committee but the full Commission is made aware of the findings.

Four respondents identified improvements that the Commission could make with respect to the issue of racial bias. These suggestions included:

- Improved enforcement of training policies;
- Providing training or education on fair housing policies;
- Promoting diversity in the profession and reducing barriers to entry; and
- Continuing with the current CE requirements.

SUMMARY REMARKS

At the end of the interview, one interviewee suggested using education instead of reprimands because everyone makes mistakes and those mistakes could be learning opportunities. Another noted that some complaints are dismissed, but further investigation reveals additional information that should be included in the report.

CONCLUSION

Interviewees all thought the Commission’s performance overall – as well as the licensing and complaint processes – as very good or outstanding. On a scale of 1 to 5, with 5 being the highest rating, no interviewee rated any area below a 4. Interviewees thought that the Commission’s CE requirements were sufficient. All interviewees also thought the complaint process was fair to the licensed businesses but one person did say they thought the process was “less fair” to consumers. Suggestions for improvement on the above concerns included recognition of the barriers to entry in these professions and the opportunity for more experiential learning opportunities. Most interviewees supported the inclusion of CE requirements specific to racial discrimination and bias and suggested the pattern of such complaints concerned property values, racial issues, or “neighborhoods and ethnicity.”

CHAPTER 4: SURVEY OF LICENSEES

The third method of data collection for the evaluation of the Commission included a survey of all licensees. This survey was not restricted to only appraisers – appraisal management companies (AMCs) and home inspectors were also asked to respond. The survey included questions about the Commission’s licensing or certification process, complaint process, and discrimination in the appraisal and process.

The survey instrument was developed by the Schaefer Center, reviewed and approved by Commission leadership, and approved by The University of Baltimore’s Institutional Review Board.²⁸ The survey was open May 6, 2025, to May 25, 2025, and was distributed to 3,422 individuals. A total of 419 people responded, resulting in an overall response rate of 12%. Most respondents identified as appraisers or worked for an AMC, while a much smaller portion were home inspectors.

SURVEY FINDINGS

RESPONDENTS’ PROFESSIONS

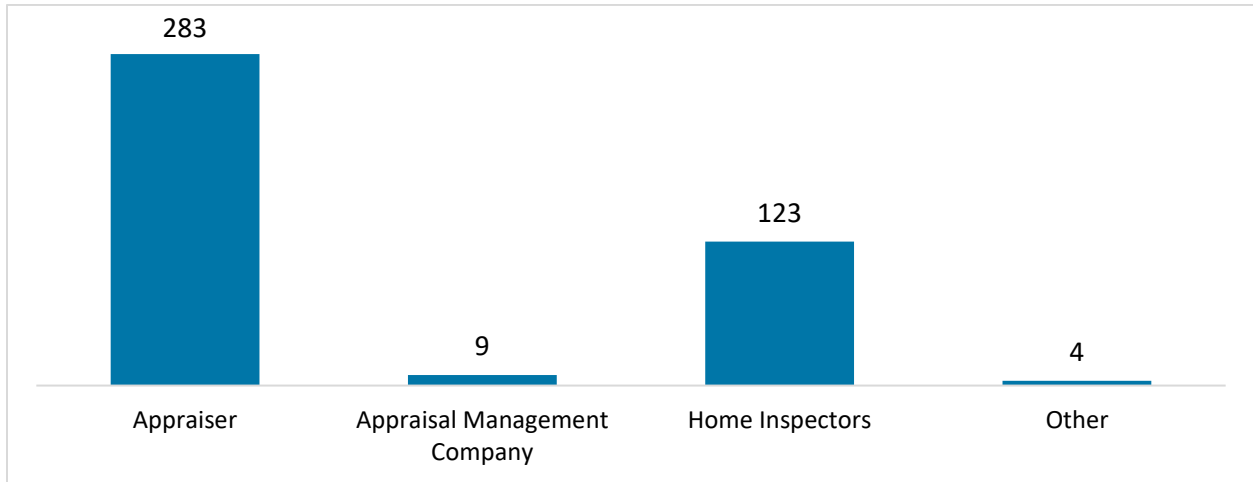
A substantial majority of respondents (283 respondents, 68%) identified as appraisers (Figure 8). The second largest group of respondents were home inspectors (123 respondents, 29%), and 2% of respondents were from an appraisal management company.²⁹ All but one respondent said they were licensed by the Commission, and that respondent said they were an appraisal trainee.³⁰

²⁸ The interview guide is available in Appendix C: Survey Instrument.

²⁹ There was a total of 292 appraisers and AMCs, representing 70% of respondents.

³⁰ Unless otherwise noted, the survey responses discussed here are for all respondents, not just the appraisers.

Figure 8: Survey Respondents' Roles

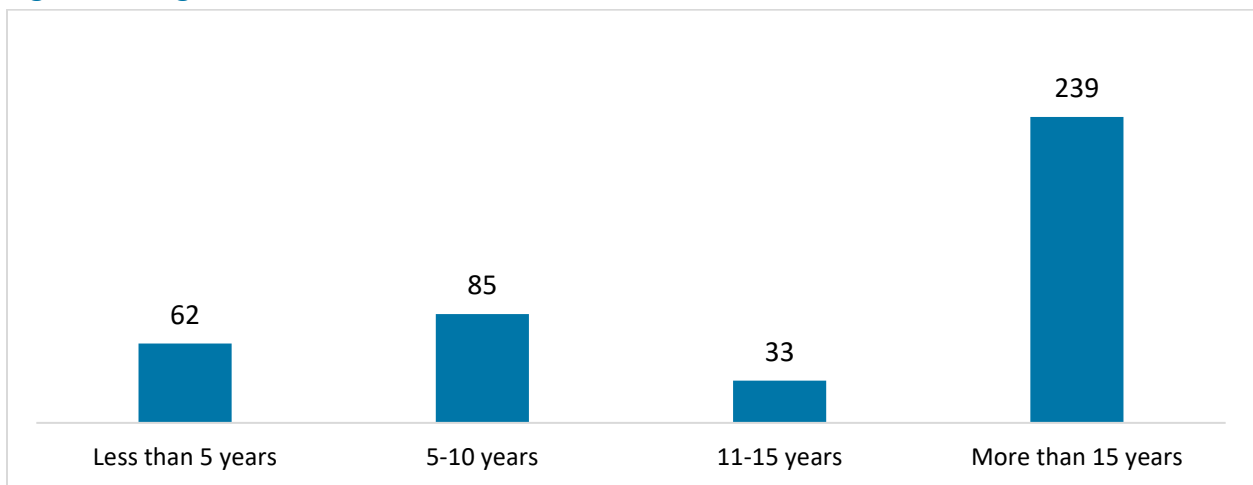


Note: N = 419.

LICENSING OR CERTIFICATION PROCESS

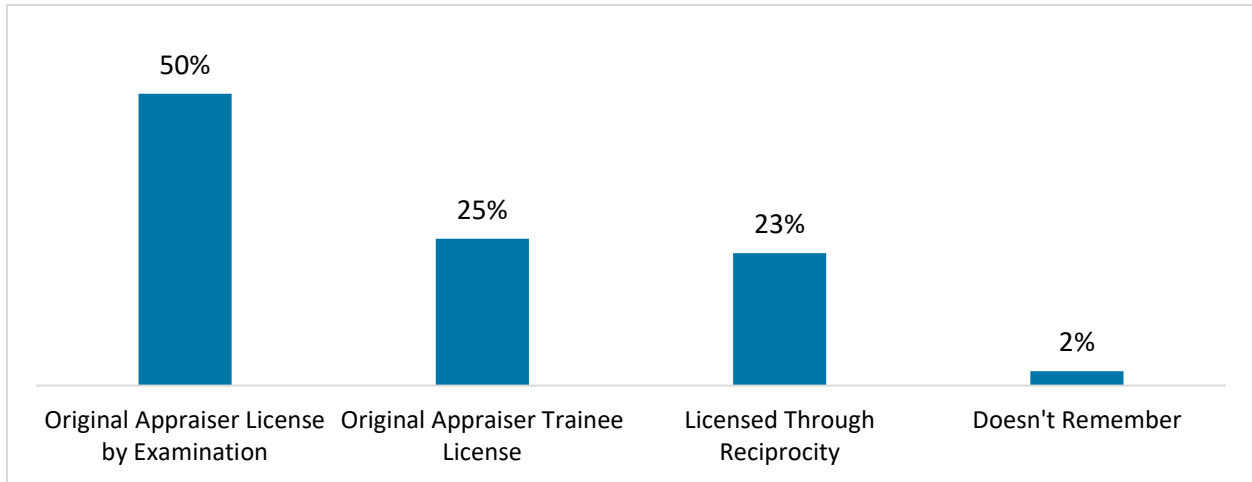
As shown in Figure 9, over half of respondents have been licensed by the Commission for 15 years or more – 239 respondents (57%) said they have been licensed that long. The second largest group of respondents by tenure were those who have been licensed for 5-10 years (85 respondents, 20%). The majority of respondents received their initial license by examination (141 respondents, 50%), while approximately one-quarter received an Appraiser Trainee License and another quarter were licensed via reciprocity (Figure 10).

Figure 9: Length of Licenses



Note: N = 419.

Figure 10: Initial Licensing Process Used – Appraisers Only

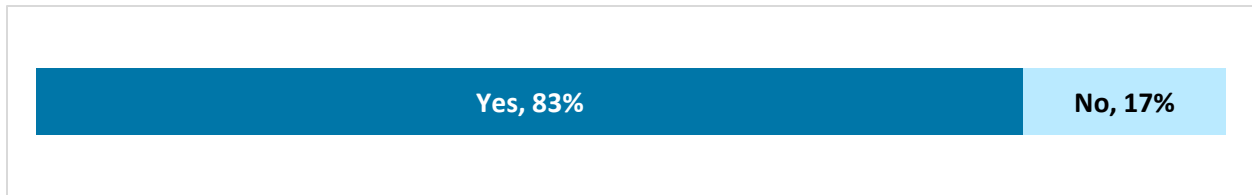


Notes: N = 283. No respondents said they were licensed through the Practical Applications of Real Estate (PAREA) program.

Respondents generally responded positively to questions about the licensure process:

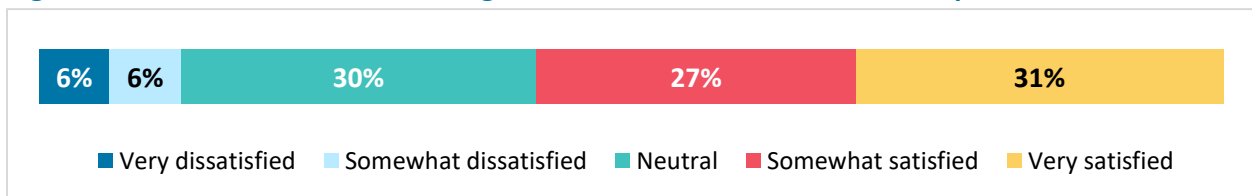
- Most respondents (83%) said the preparation before the licensing exam was adequate for their work (Figure 11).
- Over half of the respondents (58%) were satisfied with the education and exam requirements for licensing (Figure 12).
- Over half of respondents (59%) were satisfied with the licensing process overall (Figure 13).

Figure 11: Preparation Before Licensing Exam Was Adequate for Work



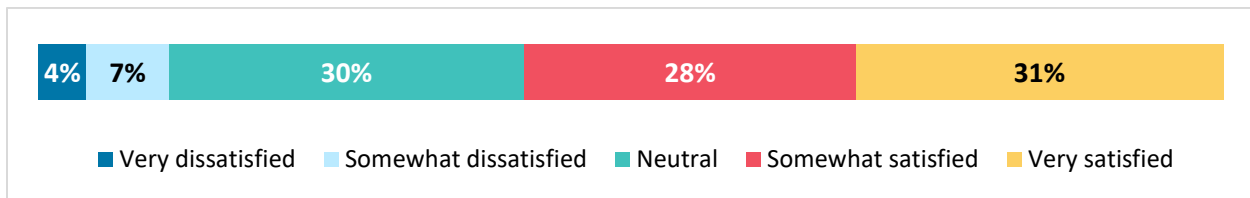
Note: N = 413.

Figure 12: Satisfaction with Licensing Process – Education and Exam Requirements



Note: N = 386.

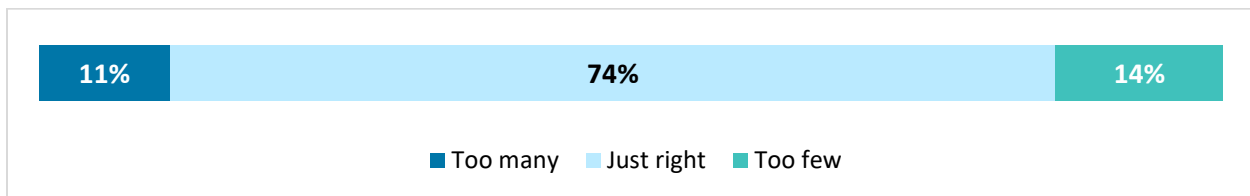
Figure 13: Satisfaction with Licensing Process – Licensure Process Overall



Note: N = 385.

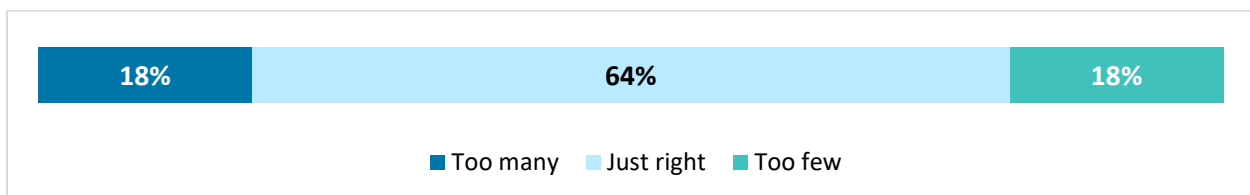
Most respondents said the required number of course hours (74%; Figure 14) and work experience hours to sit for the licensing exam (64%; Figure 15) were just right. A majority also said the current length of the license before renewal was appropriate (61%), although over one-third of respondents (37%) thought licenses should be valid for longer period (Figure 16).

Figure 14: Satisfaction with Required Number of Course Hours to Sit for Licensing Exam



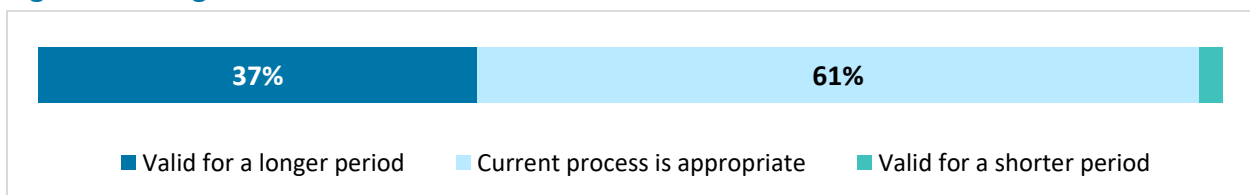
Note: N = 387.

Figure 15: Satisfaction with Required Number of Work Experience Hours to Sit for Licensing Exam



Note: N = 382.

Figure 16: Length of License Renewal Period

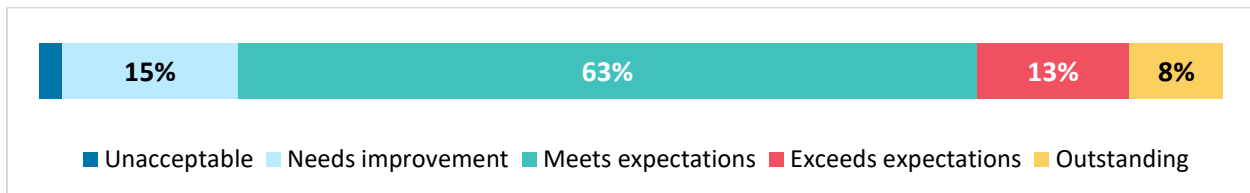


Notes: N = 408. The percentage for the final response option was 2% and is not shown in the figure for ease of reading.

Almost two-thirds of respondents (258 individuals, 63%) said the Commission meets their expectations with respect to licensing (Figure 17). When asked if there was additional training or content that should be covered in the licensing exam, 40 respondents (66%) said there should be

field work, hands-on work, or experiential training. One respondent noted that “I spent the first 15 years being trained or training someone else.” Another said, “The exam is adequate, but no substitute for one-on-one training and in-the-field experience.” Twenty respondents (33%) suggested other training topics, including technical knowledge and information about the forms licensees are required to complete, or methods, such as mentoring and peer review.

Figure 17: Rating for Commission’s Performance on Licensing

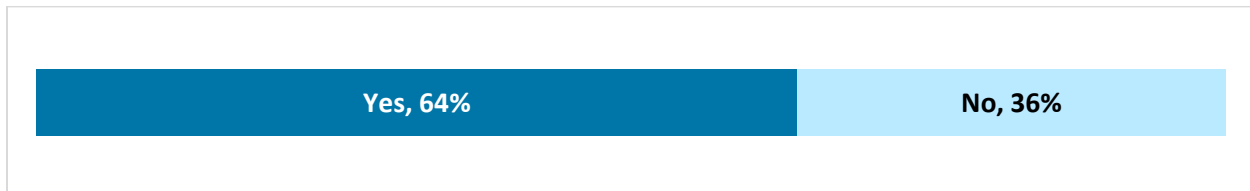


Note: N = 412. The percentage for the first response option was 2% and is not shown in the figure for ease of reading.

COMPLAINT PROCESS

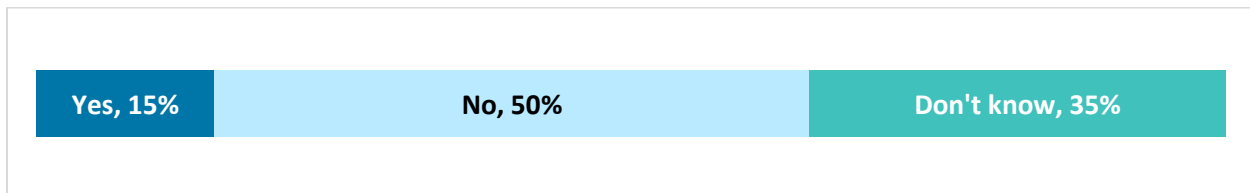
Most respondents (64%) were familiar with the Commission’s complaint process (Figure 18), but half of respondents who were familiar with the process thought most complaints were not made in good faith, which was defined as complaints concerning generally valid issues that needed to be resolved (Figure 19). Only 15% of respondents said most complaints were made in good faith.

Figure 18: Familiarity with Commission’s Complaint Process



Note: N = 415.

Figure 19: Respondent Believes Most Complaints Made in Good Faith

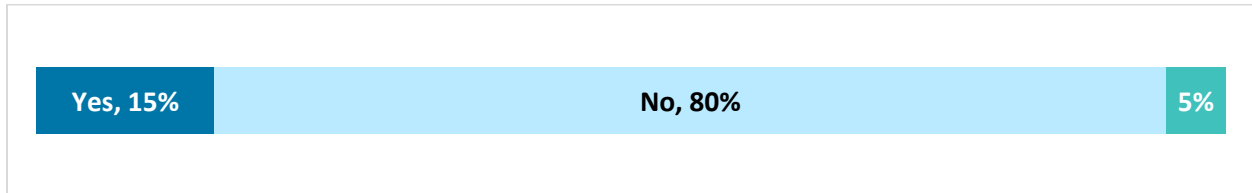


Note: N = 268.

Most respondents never had a complaint filed against them (Figure 20). For those who said they did have a complaint filed against them, most (61%) chose the “other” response option regarding the subject of the complaint (Table 2), and half of those individuals (21 respondents) said the complaint regarded a difference in value. Only 11 respondents (22%) said that they had to

complete remedial education or training requirements or pay a fine as a consequence of the complaint, and, of the 42 individuals who chose the “other” option, almost all respondents (34 respondents) said it was dismissed, there was no action taken against them or there were no consequences (Table 3).

Figure 20: Respondent Has Had Complaint Filed Against Them



Notes: N = 417. The last response option was “Don’t know;” the label is not shown in figure for ease of reading.

Table 2: Subject of Most Recent Complaint Against Respondent

Subject of Complaint	Number of Respondents Selecting	Percentage of Respondents
Engaging in conduct that demonstrates bad faith, incompetency, negligence or untrustworthiness, or that constitutes dishonest, fraudulent, or improper dealings	7	10%
Dishonest or fraudulent acts in providing real estate appraisal or home inspection services	5	7%
Racial bias or discrimination	4	6%
Violating Commission regulations, including ethical standards and practices	3	4%
Failing a continuing education audit	1	1%
Other	42	61%
Don’t remember	7	10%
Total	69	100%

Notes: Respondents could select more than one subject. No respondents said the subject of the most recent complaint against them involved fraudulently or deceptively using a license.

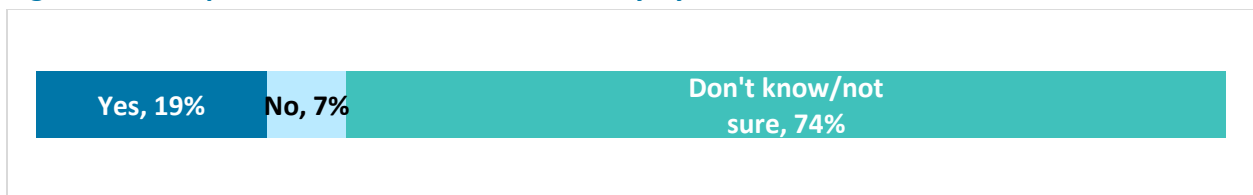
Table 3: Consequences of Most Recent Complaint Against Respondent

Consequence	Number of Respondents Selecting	Percentage of Respondents
Remedial education or training requirements	7	13%
Fine	4	7%
Case is ongoing	1	2%
Other remedial actions	42	76%
Don't remember	1	2%
Total	55	100%

Notes: Respondents could select more than one subject. No respondents said the consequence of the complaint was permanent loss of a license, a suspended license, or a reprimand by the Commission.

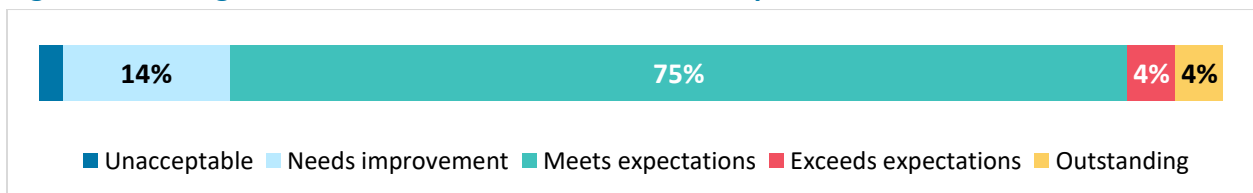
Overall, when asked if the complaint process is conducted fairly by the Commission, a majority of respondents were not sure (74%), while 19% thought it was, and 7% thought it was not (Figure 21). In contrast, of those who had a complaint filed against them, almost two-thirds (63%) of respondents thought the complaint process was conducted fairly, and 20% said it was not fair. Most respondents (75%) said the Commission’s performance on the complaint process met their expectations, while 16% said the process was unacceptable or needed improvement (Figure 22). Twenty-five respondents suggested ways that the complaint process could be made fairer. Most (19 respondents, 76%) provided suggestions related to reporting or disciplinary procedures, such as providing education rather than fines and providing more information on how decisions with respect to complaints are made. There were also comments about structural improvements to the process, such as hiring more reviewers to review complaints regarding valuations.

Figure 21: Complaint Process is Conducted Fairly by Commission



Note: N = 418.

Figure 22: Rating for Commission’s Performance on Complaint Process

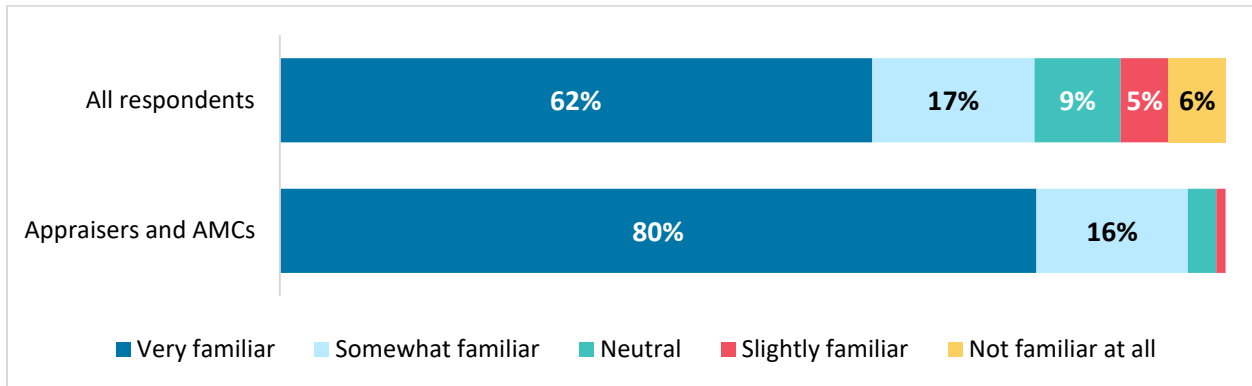


Note: N = 366. The percentage for the first response option was 2% and is not shown in the figure for ease of reading.

DISCRIMINATION IN APPRAISAL PROCESS

Most respondents (62%) said they were very familiar with federal and state laws regarding discrimination in the appraisal process, and 80% of the respondents who were appraisers said they were very familiar with these laws (Figure 23).

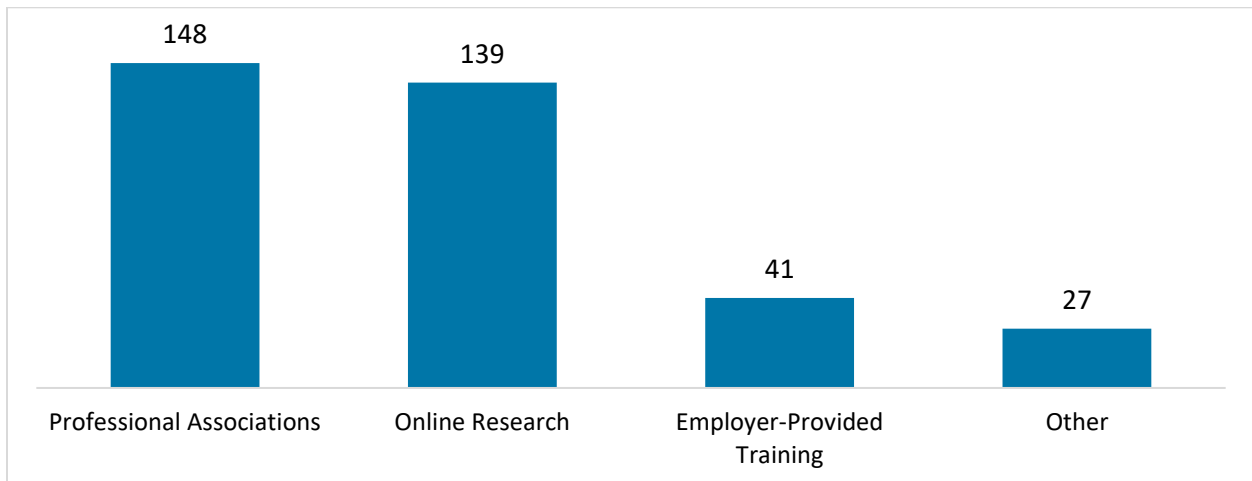
Figure 23: Familiarity with Federal and State Laws Regarding Discrimination in the Appraisal Process



Note: N = 405 for all respondents and 289 for appraisers and appraisal management companies.

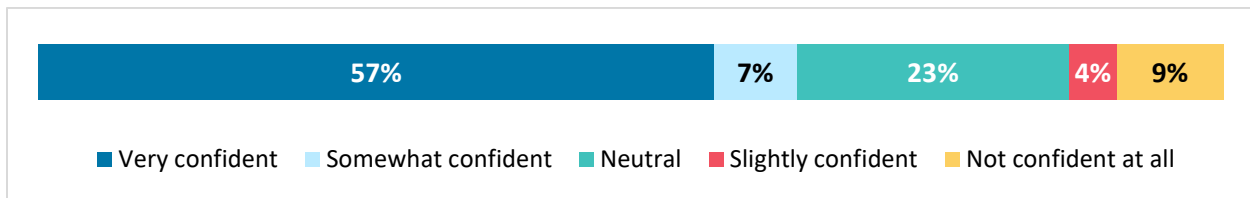
The most common source of information about appraisal-related anti-discrimination laws for appraisers and AMCs was professional associations (148 respondents) followed by online research (139 respondents; Figure 24). Of note, none of the responding appraisers and appraisal management companies said they obtained this information through required CE courses. Most of the appraisers and appraisal management companies (57%) said they were very confident in their ability to comply with anti-discrimination laws in the appraisal process (Figure 25).

Figure 24: Sources of Information About Appraisal-Related Anti-Discrimination Laws



Notes: N = 292. Only responses from appraisers and appraisal management companies are shown. Respondents could select more than one source of information.

Figure 25: Confidence in Ability to Comply with Anti-Discrimination Laws in Appraisal Process



Note: N = 112. Only responses from appraisers and appraisal management companies are shown.

ADDITIONAL COMMENTS PROVIDED BY RESPONDENTS

At the end of the survey, respondents were offered the opportunity to provide comments or insights about the Commission or its policies or procedures. There were 164 responses to this question, although 58 of these comments were a variation of “no comment.” There were 49 comments concerning structural changes with respect to licensing (e.g., length of licenses, reciprocity), complaints (e.g., length of time to resolution, notification of complaints, power to enforce sanctions), CE (e.g., online versus virtual CE programs), or other Commission functions (e.g., oversight of AMCs, communication about standard operating procedures, the Commission’s budget, the Commission’s website). There were also comments about the CE requirement generally, state versus national standards and licensing, and the issue of racial bias and discrimination that was the focus of the survey.

It should be noted that, with respect to many of the topics listed here, there were both positive and negative comments. For example, there was a comment that the Commission’s website is “‘elegant’ in its content and navigation” and a comment that Commission should “improve the website.” Similarly, there were both positive and negative comments about the Commission as a whole, such as “I think the Commission is doing a great job” and “The Commission has become too punitive and lacking in accountability.”

DEMOGRAPHICS

Most respondents (73%) had their primary business location in Maryland (Figure 26). Seventy-seven respondents said their primary business location was in a neighboring state such as Delaware, Pennsylvania, Virginia, West Virginia, and Washington, DC, and 25 respondents said their business location was in a state outside the mid-Atlantic region.

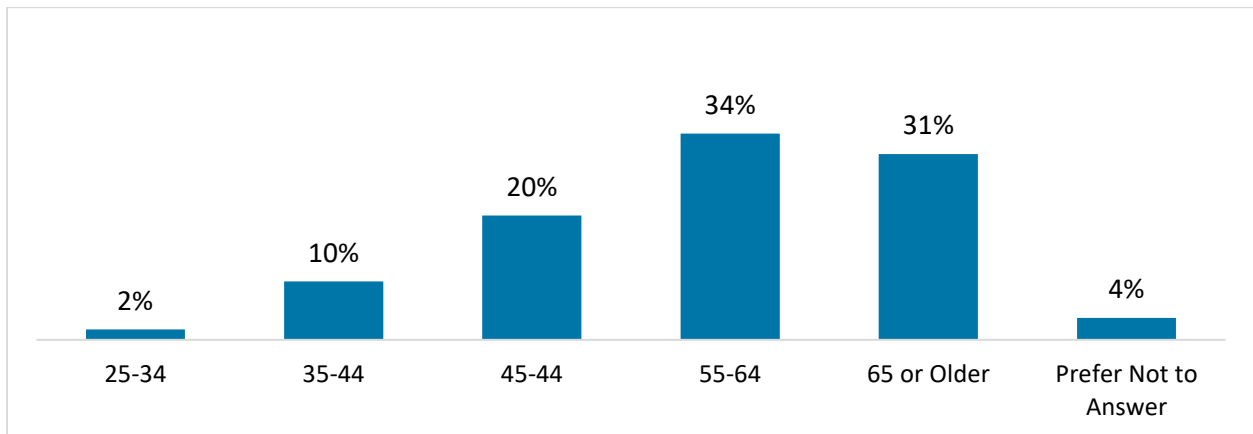
Figure 26: Respondents' Primary Business Location Is in Maryland



Note: N = 413. "Other" responses included Delaware (12 respondents), Virginia (34 respondents), Washington, DC (9 respondents), West Virginia (8 respondents), and other locations (48 respondents).

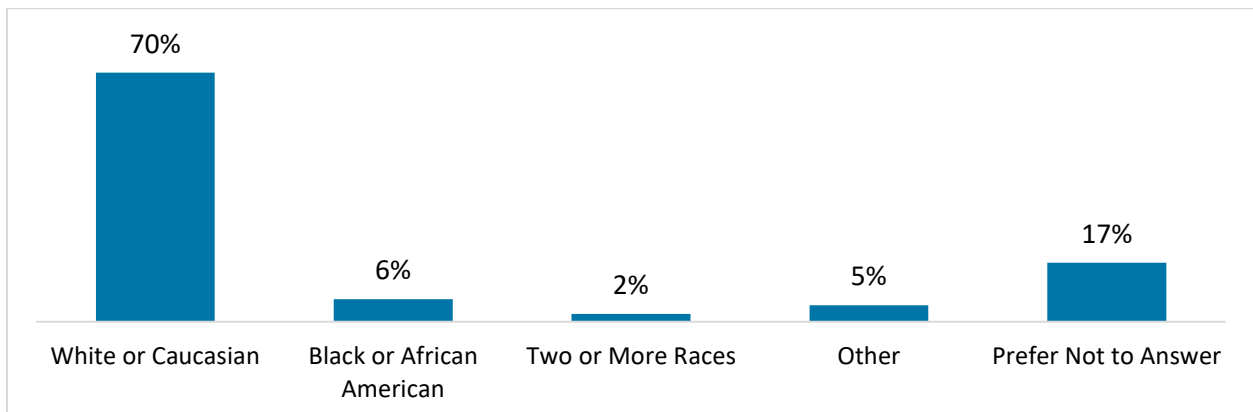
Almost 65% of respondents were aged 55-64 (34%) or 65 or older (31%; Figure 27). Most respondents were White (70%; Figure 28), not of Hispanic or Latino origin (79%; Figure 29), and men (67%; Figure 30). Most respondents had a college degree (56%; Figure 31).

Figure 27: Respondents' Ages



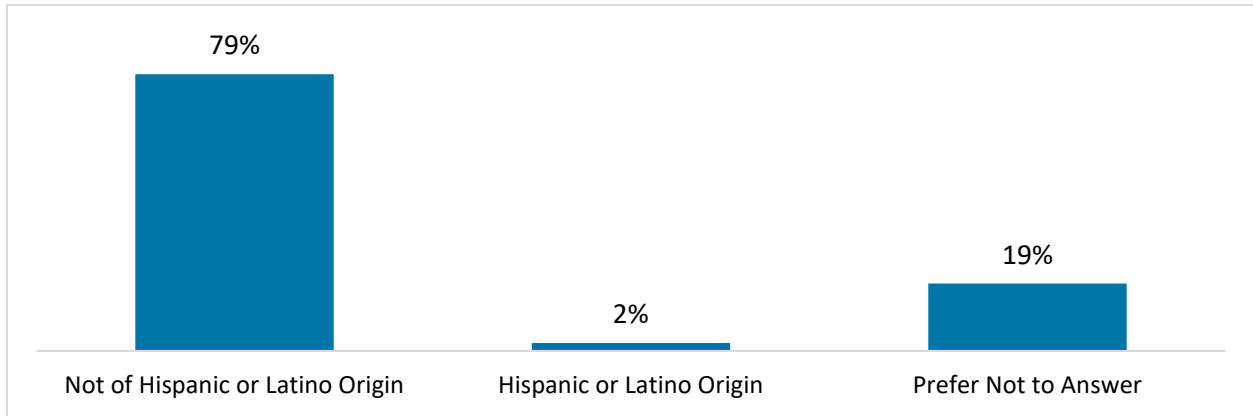
Notes: N = 415. There were no respondents under 25 years old.

Figure 28: Respondents' Races



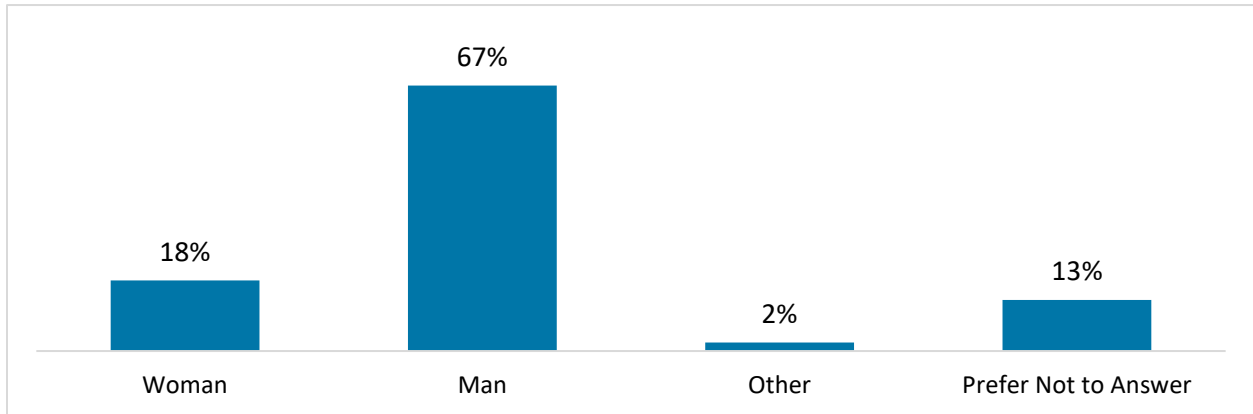
Notes: N = 409. "Other" includes individuals who identified as American Indian or Alaska Native, Asian, or Native Hawaiian or another Pacific Islander or selected "Other" as the category.

Figure 29: Respondents' Ethnicity



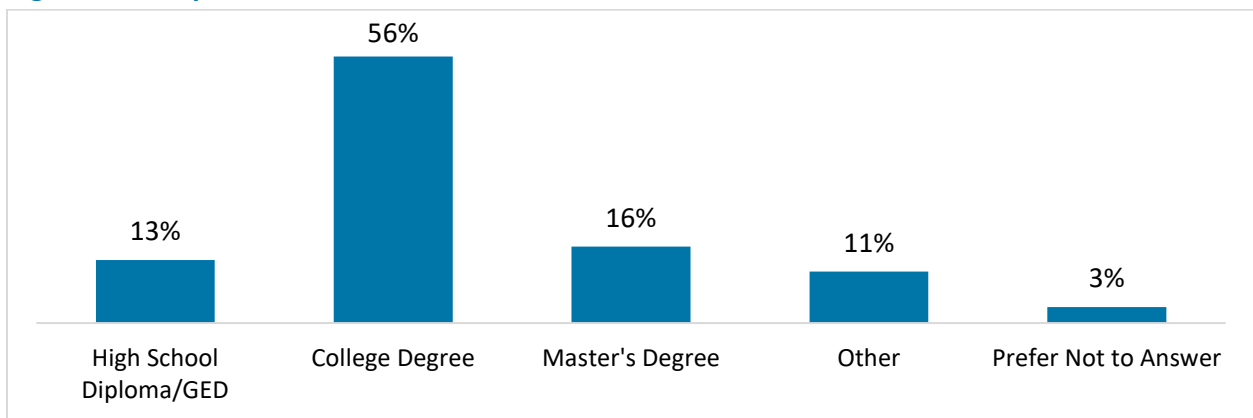
Note: N = 407.

Figure 30: Respondents' Gender



Notes: N = 410. "Other" includes individuals who identified as Trans woman; Trans man; or Genderqueer, gender non-binary, or gender non-conforming; or preferred to self-describe.

Figure 31: Respondents' Educational Attainment



Notes: N = 414. "Other" includes individuals who held a doctoral/professional degree or selected "Other" in response to the question. There were no respondents who said they had "some high school."

CONCLUSION

Respondents to the survey of appraisers, appraisal management companies, and home inspectors licensed by the Commission suggested that the Commission's licensing or certification process was adequate for their work, that respondents were satisfied with the various aspects of the process, and that the Commission met respondents' expectations with respect to licensing. Most were familiar with the Commission's complaints process, but half of those respondents did not think that most complaints are made in good faith. Of the minority of respondents who had a complaint filed against them, the biggest issue of those complaints concerned property valuations. Most respondents, including home inspectors, said they were familiar with federal and state laws regarding discrimination in the appraisal process, and respondents who were appraisers or with AMCs were confident about their ability to comply with anti-discrimination laws. However, there were multiple comments that racial discrimination is not a problem in the appraisal industry and that common sense or being a professional were the only things needed to limit discrimination.

CHAPTER 5: CONCLUSIONS AND RECOMMENDATIONS

In response to legislation issued by the Maryland General Assembly that mandated that the Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors (Commission) have an independent evaluation, the Commission contracted with the Schaefer Center for Public Policy (Schaefer Center) at the University of Baltimore to conduct the evaluation. The Schaefer Center's research staff reviewed primary and secondary information provided by the Commission (specifically, an external review of the Commission, internal CE compliance audits, and the complaints made by consumers to the Commission) and collected additional information from Commission stakeholders (specifically, members of the Commission and individuals licensed by the Commission).

Analysis of this data suggests that both the Commission members and those licensed by the Commission believe the Commission is performing its functions well and, at a minimum, meeting their expectations of the Commission with respect to licensing, complaints, and continuing education opportunities. One of the most common suggestions from both the interviews and the survey was to provide for more experiential or hands-on learning opportunities as part of the licensing process. There were also suggestions to provide mentorship to newly licensed appraisers or home inspectors.

However, there was a significant divide between the interviewees and the survey respondents with respect to the motivating issue for the legislation, which is whether there is racial discrimination or bias in the appraisal process. The complaint data that the Commission provided suggests that some consumers complain that there is racial bias or discrimination in the appraisal process, but it is not one of the leading issues in complaints filed. From 2022 to 2024, there were only 16 complaints related to racial bias or discrimination out of a total of 124 complaints. In interviews, the Commission members mostly agreed that such bias exists, and three of the six interviewees cited that the pattern relates to race, ethnicity, neighborhoods, and/or property values.

In contrast, survey respondents were much more likely to think that racial bias and discrimination was not an issue in the appraisal process. This came through in the open-ended responses, in which the most common responses about bias and discrimination said it was not a problem and that it could be handled with common sense and acting professionally. Most respondents said they were aware of federal and state laws with respect to this issue, and most felt confident in their ability to comply with anti-discrimination laws. The difference in positions between the Commission members and the licensed individuals also shows in their view of the complaints, although this difference was less striking – all interviewees gave the Commission's complaint

process high marks, although one did mention concerns about invalid or unjustified complaints, while only 63% of respondents who reported having a complaint filed against them said the complaint process was conducted fairly by the Commission. Further, half of the survey respondents who were aware of the complaint process said that complaints were not made in good faith. The survey respondents were much more likely to say that home valuations and consumers wanting a higher valuation than provided were the primary concerns driving complaints.

RECOMMENDATIONS

The primary recommendation from this report is that the Commission should continue requiring appraisers to complete continuing education (CE) on racial bias and discrimination. Research has shown the presence of such bias in the Baltimore regional housing market,³¹ and the review of complaints received by the Commission and the outcomes of those complaints also show that racial bias or discrimination is occurring although it is not one of the foremost concerns.

It would be useful to explore the divide between the Commission members and the licensed appraisers and AMCs with respect to racial bias and discrimination and Commission processes in general. Open-ended survey responses about how the Commission conducts its work frequently mentioned communication in general, making the reasoning for Commission decisions clearer, and the length of time it takes to receive a decision from the Commission about a complaint. Working to better explain Commission processes could help align the Commission members and licensees on specific concerns and more broadly.

Although not the focus of this study, one other item came through clearly in both the interviews and the survey – there seems to be a substantial demand for more hands-on opportunities to practice and explore how to perform as an appraiser or home inspector. This was mentioned with respect to the licensing process and to CE requirements. Such opportunities could also expose licensees to problems such as implicit bias, which may not be captured well if only theory is covered in licensing or CE, which was also cited as a problem by some survey respondents.

The Commission might also consider offering learning opportunities – or supporting these types of opportunities offered by other parties – to potential or current homeowners, so they understand the roles of appraisers and home inspectors and how they operate. Such training

³¹ Goldstein, I. with Kim, A. (2025). Evidence of Racial Bias in Home Appraisals in the Baltimore Metropolitan Area. Abell Foundation. https://abell.org/wp-content/uploads/2025/03/2025_Abell-Foundation_Appraisal-Bias_vf-digital.pdf.

could help decrease the number of invalid complaints and complaints about how appraisers arrive at the value of a property. This could also help appraisers understand why consumers are contesting the appraisal values and when the complaints are made in good faith.

Finally, to strengthen consistency in the tracking of complaints, disciplinary actions, and related outcomes, it is recommended that the Commission adopt a secure relational database system (e.g., Microsoft Access, MySQL, Airtable etc.). Such a system would provide a standardized approach to data collection, ensure records are protected and not inadvertently lost or erased, and allow for more efficient reporting and analysis. If adopting a database is not feasible at this time, the Commission could also enhance its current spreadsheet system by incorporating columns with structured dropdown menus to indicate the stage of each case (e.g., initial review, case review, MCCR review, legal review, hearing, dismissed, closed, etc.) along with a separate column for case notes. Additionally, Excel's protection features can be applied to lock certain fields after entry to prevent accidental deletion or overwriting. Together, these recommendations would support long-term data integrity and improve case status-tracking.

APPENDIX A: ESTABLISHING LEGISLATION

WES MOORE, Governor

Ch. 526

Chapter 526

(Senate Bill 827)

AN ACT concerning

State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors – Sunset Extension

FOR the purpose of continuing the State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors in accordance with the provisions of the Maryland Program Evaluation Act (sunset law) by extending to a certain date the termination provisions relating to the statutory and regulatory authority of the Commission; requiring an independent evaluation of the Commission; and generally relating to the State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors.

BY repealing and reenacting, with amendments,
Article – Business Occupations and Professions
Section 16–802
Annotated Code of Maryland
(2018 Replacement Volume and 2022 Supplement)

SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND,
That the Laws of Maryland read as follows:

Article – Business Occupations and Professions

16–802.

Subject to the evaluation and reestablishment provisions of the Maryland Program Evaluation Act, this title and all regulations adopted under this title shall terminate and be of no effect after July 1, [2023] 2026.

SECTION 2. AND BE IT FURTHER ENACTED, That:

- (a) In this section, “Department” means the Maryland Department of Labor.
- (b) The Department, subject to subsection (c) of this section, shall hire a consultant to conduct an independent evaluation of the State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors, to determine if the Commission is adhering to the most recent Uniform Standards of Professional Appraisal Practice’s diversity, equity, and inclusion guidelines in its regulation of real estate appraisers and appraisal management companies in the State.
- (c) ~~↔~~ The independent evaluation of the Commission required under subsection (b) of this section shall be conducted ~~under the supervision of~~ in consultation

– 1 –

with the Office of Program Evaluation and Government Accountability in the Department of Legislative Services, ~~which, in consultation with the Department, may~~

- ~~(i) write the proposal for the hiring of the consultant;~~
- ~~(ii) select the consultant; and~~
- ~~(iii) distribute the evaluation to the committees of jurisdiction, in accordance with the Maryland Program Evaluation Act.~~

~~(9) (i) The Department shall pay the costs of the independent evaluation required under this section.~~

~~(ii) The Department may use funds from the State Commission of Real Estate Appraisers, Appraisal Management Companies, and Home Inspectors Fund to cover the cost of the independent evaluation.~~

(d) The independent evaluation required under this section shall be:

(1) completed for consideration by the committees of jurisdiction during the 2024 legislative session; and

(2) submitted by the Department to the Office of Program Evaluation and Government Accountability and to the Senate Finance Committee and the House Economic Matters Committee, in accordance with § 2-1257 of the State Government Article, on or before January 1, 2024.

SECTION 3. AND BE IT FURTHER ENACTED, That this Act shall take effect June 1, 2023.

Approved by the Governor, May 8, 2023.

APPENDIX B: INTERVIEW GUIDE

<u>Audience:</u>	Maryland Real Estate Commission members and other stakeholders.
<u>Recruitment:</u>	Emails and follow-up telephone calls using Commission-provided email addresses and telephone numbers.
<u>Frequency:</u>	Once.

CONSENT

Thank you for agreeing to speak with us today. I am _____, from the Schaefer Center for Public Policy at The University of Baltimore, and joining me is _____, a _____ from the Schaefer Center. This interview is to understand the Commission’s overall performance, operations, and requirements for licensing.

The interview should take about an hour to complete. We will take notes during the interview, and we will make every effort to protect your confidentiality. However, due to the small number of individuals being interviewed for this project, we cannot guarantee complete confidentiality. Our interview is being recorded to make sure we capture the entire interview and the discussion so that we can write our report. Your individual responses will not be shared outside of the Schaefer Center.

In the transcript and report on this project, your name will not be associated with your responses. Your participation is voluntary, there is no penalty if you choose not to participate, and you may discontinue participation at any time.

We may use your responses as short, direct quotes in our report. However, we will not be identifying interviewees by name in the report.

If you have questions about this interview, please contact Dr. Sarah Ficenec, Assistant Director for Research of the Schaefer Center, at 410-837-6188 or sficenec@ubalt.edu. If you have questions about your rights as a participant in this interview, please contact The University of Baltimore Institutional Review Board (IRB) Coordinator at 410-837-4057 or IRB@ubalt.edu. Thank you for your time.

Do you agree to continue with the interview and be recorded?

If yes, begin recording now.

QUESTIONS

BACKGROUND

1. What is your position on the Commission (e.g., chair, sub-committee chair etc.)?
2. Do you belong to any of the sub-committees?
 - a. *(If yes)*, which sub-committees?
3. How long have you been on the Commission?

COMMISSION OVERALL PERFORMANCE

4. Overall, how would you rate the Commission's performance on a scale of 1-5, with 1 being unacceptable and 5 being outstanding?
 - a. Can you explain your rating?
 - b. *(For all responses except 5)* What do you think the Commission could do to improve that performance?

LICENSING PROCESS

(More information about licensing process is available at <https://www.labor.maryland.gov/license/reahi/reahireq.shtml>).

5. Are you familiar with the Commission's licensure process for appraisers, appraisal management companies, and home inspectors?
 - a. If yes, continue to Q6-8.
 - b. If no, skip to "Continuing Education Requirements" Section.
6. How would you rate the Commission's licensure process for appraisers, appraisal management companies, and home inspectors on a scale of 1-5, with 1 being unacceptable and 5 being outstanding? If necessary, you can provide separate answers for each.
 - a. Can you explain your rating?
 - b. What do you think the Commission could do to improve its licensing process in general?
7. Have you heard complaints about the licensure process?
 - a. *(If so)* Can you provide more information on those complaints?
 - b. *(If so)* Were the complaints handled satisfactorily, in your opinion?

8. Do you think the licensing process is fair?
 - a. *(If yes)* Can you tell me more about that?
 - b. *(If not)* What could the Commission do to improve the fairness of the process?

CONTINUING EDUCATION REQUIREMENTS

9. Appraisers must take at least 42 hours of continuing education (CE) courses to renew their license. Do you think this number of hours is sufficient?
 - a. Can you explain your answer?

10. Appraisers in Maryland must complete two specific types of CE:
 - National USPAP Update Course, each time it's updated (which is a national requirement), and
 - 3 hours of training related to racial discrimination and implicit bias.
 - a. The training concerning racial discrimination and implicit bias was effective on November 1, 2023. What are your views on this requirement?
 - i. If necessary, probe for sufficient/insufficient number of hours; if this topic should be a requirement or optional.
 - b. Are there other topics you feel should be mandatory for licensure or renewal of licenses?
 - i. *(If so)* Which topics? Why?

11. Do you feel there are sufficient options for CE courses?
 - a. Can you explain your answer?
 - b. Are there other topics that should be discussed?

COMPLAINTS PROCESS

(More information the complaints process is available at

<https://www.labor.maryland.gov/license/reahi/reahicompprocess.shtml>.)

12. Are you familiar with the Commission's complaint process for appraisers, appraisal management companies, and home inspectors?
 - a. If yes, continue to Q13-16.
 - b. If no, skip to "Racial Bias in the Appraisal Process" Section.

13. How would you rate the Commission's complaints process for appraisers, appraisal management companies, and home inspectors on a scale of 1-5, with 1 being unacceptable and 5 being outstanding? If necessary, you can provide separate answers for each.
- Can you explain your rating?
14. Are there any aspects of the complaint process that concern you?
- (If so)* Why does that concern you?
 - (If so)* How could the Commission improve the complaints process in your opinion?
15. Have you heard feedback about the complaints process?
- (If so)* Please provide more information on that feedback.
 - If necessary, probe for racial discrimination and implicit bias.
 - (If so)* Were the complaints handled satisfactorily in your opinion?
 - (If not)* How could the Commission have better resolved the complaints?
16. Do you think the complaints process is fair for both consumers and the licensed individual/business? If necessary, you can provide separate answers for each.
- (If yes)* Can you tell me more about that?
 - (If not)* What could the Commission do to improve the fairness of the process?

RACIAL BIAS IN THE APPRAISAL PROCESS

17. In your experience, how prevalent do you believe racial bias is in the appraisal process?
- Can you explain your answer?
18. What patterns, if any, have you observed in complaints related to racial bias in appraisals?
19. How does the Commission investigate and address potential racial bias in appraisal complaints?
- Are you aware of any disciplinary action taken against appraisers due to racial bias?
20. What steps could be taken to improve education and awareness of racial bias among appraisers?

CLOSING

21. Are there any additional comments or insights you would like to share about the Commission or any of its policies or procedures?
22. Can we contact you if we have any additional questions or need further clarification?

Thank you for speaking with us today. You have provided important information for us to consider. We appreciate your time.

APPENDIX C: SURVEY INSTRUMENT

Audience:	Individuals licensed by the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors.
Recruitment:	Emails using Commission-provided email addresses.
Frequency:	Once.

The Schaefer Center for Public Policy at the University of Baltimore is conducting a survey to gather feedback from certified appraisers, appraisal management companies, and home inspectors about their experiences with the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors.

The survey will take about 5-10 minutes.

Please click to the next screen to read the required disclosure from the University of Baltimore.

-----Page Break-----

The University of Baltimore requires us to share details of the survey process and inform you of your rights for participating in this survey.

TITLE OF STUDY: Evaluation of Maryland Real Estate Commission

PRINCIPAL INVESTIGATOR: Dr. Ann Cotten, Executive Director, Schaefer Center for Public Policy

STUDY PURPOSE:

The Schaefer Center for Public Policy at the University of Baltimore is conducting a survey of certified appraisers, appraisal management companies, and home inspectors about their experiences with the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors. The survey will serve to gather feedback on the licensing/certification process, the complaint process, as well as general satisfaction and areas of improvement concerning the Commission's processes.

PROCEDURES

Data will be collected through a web survey. The survey will take about 5 to 10 minutes to complete.

CONFIDENTIALITY

Your participation in this survey is confidential. You may choose not to answer any question you don't want to answer or stop at any time without any disciplinary action or penalty. Your answers will be kept separate from your contact information. Only the researchers directly working on the project will have access to the shared folders where the data is stored on the Schaefer Center's secure network.

POTENTIAL BENEFITS

You will not benefit directly from completing this survey. However, by sharing your insights, you will contribute valuable information that can help improve the processes used by the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors.

POTENTIAL RISKS AND DISCOMFORTS

There are no known risks or discomforts in participating in this survey.

COMPENSATION

There is no compensation for participating.

VOLUNTARY PARTICIPATION

Your participation is completely voluntary. You can withdraw from the survey at any time. You do not have to answer any questions that you do not want to answer. If you choose not to participate, there will be no penalty or loss of any benefits for not participating.

WHO TO CONTACT WITH QUESTIONS

If you have any questions about this study, you can contact Dr. Sarah Ficenec, the Assistant Director for Research at the Schaefer Center, at sficenec@ubalt.edu or 410-837-6188.

If you have any questions regarding your rights as a research subject participating in this survey, please contact the Institutional Review Board (IRB) at irb@ubalt.edu or 410-837-4057.

SUMMARY

I understand the information that was presented and that:

- My participation is voluntary.
- I can refuse to participate without disciplinary action or penalty.
- I can skip questions or stop the survey at any time without disciplinary action or penalty.

Q1_ Consent Please select below if you agree to participate in this survey.

- Yes, I am 18 or older and want to take the survey.
- No, I do not wish to take the survey.

Display Closing if Q1= "No"

Q2_BackgroundInformation Please indicate your role:

- Appraiser
- Appraisal Management Company
- Home Inspector
- Other (please specify)

Q3_BackgroundInformation Please confirm that you are licensed as a (piped text: *appraiser, appraisal management company, home inspector*) by the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors.

- Yes
- No

Q4_BackgroundInformation Are you licensed by the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors?

- Yes
- No

Display Q4 only if Q3= "No"; Display Closing if Q4= "No"

Q5_BackgroundInformation What license do you hold with the Commission?

Open-ended response

Display Q5 only if Q3= "Yes"

Q6_LicensingCertificationProcess How long have you been licensed by the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors?

- Less than 5 years
- 5-10 years
- 11-15 years
- More than 15 years

Q7_LicensingCertificationProcess Which licensing process did you use initially?

- Original Appraiser License by Examination
- Original Appraiser Trainee License
- Practical Applications of Real Estate (PAREA) program
- Licensed through reciprocity
- I don't remember

Display Q7 only if Q2= "Appraiser"

Q8_LicensingCertificationProcess Did the preparation required before your licensing exam adequately equip you for your work as a licensed (*piped text: appraiser, appraisal management company, home inspector*)?

- Yes
- No

Q9_LicensingCertificationProcess What additional training or content, if any, should be covered in the licensing exam to better prepare individuals for this work?

Open-ended response

Display Q9 only if Q8= "No"

Q10_LicensingCertificationProcess Please rate your satisfaction with each of the following in regards to obtaining a real estate appraisal license:

Rate each on a scale from 1 = Very Dissatisfied, 2 = Somewhat dissatisfied, 3 = Neutral, 4 = Somewhat satisfied, 5 = Very satisfied

- Education or exam requirements
- Licensure process overall

Q11_LicensingCertificationProcess Do you think the required hours for each of the following are too many, too few, or just about right?

Rate each on a scale from 1 = Too many, 2 = Too few, 3 = Just about right

- Required education course hours to sit for licensing exam
- Required work experience hours to sit for licensing exam

Q12_LicensingCertificationProcess What changes or improvements would you suggest for the licensing process?

Open-ended response

Q13_LicensingCertificationProcess Licenses must be renewed every three years. Which of the following best reflects your opinions on this renewal period?

- Licenses should be valid for a longer period.
- Renewing every three years is appropriate.
- Licenses should be valid for a shorter period.

Q14_LicensingCertificationProcess Overall, how would you rate the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors' performance regarding licensing?

- Unacceptable
- Needs improvement
- Meets expectation
- Exceeds expectations
- Outstanding

Q15_LicensingCertificationProcess Do you have any other comments or feedback about the licensing process? _____

Open-ended response

Complaint Process: For reference, the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors' complaint process is available at <https://www.labor.maryland.gov/license/reahi/reahicompprocess.shtml>

Q16_ComplaintProcess Are you familiar with the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors' process for handling consumer complaints about licensed (piped text: appraiser, appraisal management company, home inspector)?

- Yes
- No

Q17_ComplaintProcess Do you think most consumer complaints are made in good faith, meaning they generally reflect valid issues that need to be resolved?

- Yes
- No
- I don't know

Display Q17 only if Q16= "No"

Q18_ ComplaintProcess Have you ever had a complaint filed against you with the Commission?

- Yes
- No
- I don't know

Q19_ ComplaintProcess What was the subject of the most recent complaint filed against you?
Please select all that apply.

- Dishonest or fraudulent acts in providing real estate appraisal or home inspection services.
- Racial bias or discrimination.
- Fraudulently or deceptively using a license.
- Engaging in conduct that demonstrates bad faith, incompetency, negligence or untrustworthiness, or that constitutes dishonest, fraudulent, or improper dealings.
- Violating Commission regulations, including ethical standards and practices.
- Failing a continuing education audit.
- Other (please specify) _____
- I don't remember

Display Q19 only if Q18= "Yes"

Q20_ ComplaintProcess Were any of the following consequences imposed on you in response to the complaint. Please select all that apply.

- Case is ongoing
- Permanent loss of license (by revocation or surrender)
- Suspended license
- Reprimand by Commission
- Fine (monetary penalty)
- Remedial education or training requirements
- Other remedial actions (please specify) _____
- I don't remember

Display Q20 only if Q18= "Yes"

Q21_ ComplaintProcess Do you feel that the complaint process is conducted fairly by Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors staff?

- Yes
- No
- Not sure/Don't know

Q22_ComplaintProcess How could the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors staff make the complaint process fairer?

Open-ended response

Display Q22 only if Q21= "No"

Q23_ComplaintProcess Overall, how would you rate the Maryland Commission of Real Estate Appraisers, Appraisal Management Companies and Home Inspectors' performance regarding their complaint process?

- Unacceptable
- Needs improvement
- Meets expectation
- Exceeds expectations
- Outstanding

Q24_DiscriminationAppraisalProcess How familiar are you with federal and state laws, such as the Uniform Standards of Professional Appraisal Practice standards or Fair Housing Act, regarding discrimination in the appraisal process?

- Very familiar
- Somewhat familiar
- Neutral
- Slightly familiar
- Not familiar at all

Q25_DiscriminationAppraisalProcess Where do you obtain information about appraisal-related anti-discrimination laws? Please select all that apply.

- Required education courses
- Professional associations
- Employer-provided training
- Online research
- Other (please specify) _____

Q26_DiscriminationAppraisalProcess How confident are you in your ability to comply with anti-discrimination laws in the appraisal process?

- Very confident
- Somewhat confident
- Neutral
- Slightly confident
- Not confident at all

Q27_DiscriminationAppraisalProcess What challenges, if any, do you face in ensuring compliance with anti-discrimination laws in your appraisal work?

Open-ended response

Q28_DiscriminationAppraisalProcess What additional resources or training would help you feel more confident in complying with these laws?

Open-ended response

Q29_Demographics Is your business's primary location in Maryland?

- Yes
- No

Q30_Demographics What is the zip code of your business's primary location? _____

Open-ended response

Display Q30 only if Q29= "Yes"

Q31_Demographics Where is your business's primary location?

- Delaware
- Virginia
- Washington, DC
- West Virginia
- Other (please specify) _____

Display Q31 only if Q29= "No"

Q32_Demographics Please select the option that reflects your age range.

- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65 or older
- Prefer not to answer

Q33_Demographics Please select the option that best describes your race.

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or other Pacific Islander
- White or Caucasian
- Two or more races
- Other (please specify) _____
- Prefer not to answer

Q34_Demographics Are you of Hispanic, Latino, or Spanish Origin?

- No, not of Hispanic, Latino, or Spanish origin
- Yes, I am of Hispanic, Latino, or Spanish origin
- Prefer not to answer

Q35_Demographics Please select the gender with which you most identify.

- Woman
- Man
- Trans Woman
- Trans Man
- Genderqueer, gender non-binary, or gender non-conforming
- Prefer to self-describe _____
- Prefer not to answer

Q36_Demographics Please select your highest completed level of education.

- Some high school
- High school diploma/GED
- Some college
- College degree
- Master's degree (such as M.A. or M.S.)
- Doctoral/Professional degree (such as Ph.D., J.D., M.D., or Psy.D.)
- Other (specify) _____
- Prefer not to answer

Q37_Demographics Are there any additional comments or insights you would like to share about the Commission or any of its policies or procedures? _____

Open-ended response

Closing

We thank you for your time spent taking this survey. You have provided important information for us to consider. We appreciate your time.

Your response has been recorded.