

March 9th, 2026

The Honorable William C. Smith, Jr.
Chair, Senate Judicial Proceedings Committee
2 East Miller Senate Office Building
Annapolis, Maryland 21401

RE: MBIA Letter of Opposition SB 817 Real Property - Residential Sales - Communications During Appraisal Process

Dear Chair Smith,

The Maryland Building Industry Association, representing 100,000 employees of the building industry across the State of Maryland, appreciates the opportunity to participate in the discussion surrounding **SB 817 Real Property - Residential Sales - Communications During Appraisal Process**.

This bill requires appraisers to notify the point of contact and interested parties when a residential property may appraise below the contract price or estimated value and allows interested parties to submit additional market data for the appraiser to consider before the appraisal is finalized. MBIA is concerned that this bill will bring unintended consequences and add unnecessary steps to real estate transactions.

Appraisers are already required under federal standards and the Uniform Standards of Professional Appraisal Practice (USPAP) to consider relevant market data when appraising a property and forming an opinion of value. Requiring appraisers to review and document all submitted information in a mandated addendum is a duplicative process that will increase compliance costs.

The bill also establishes a two-day window for the submission of additional comparable sales data and requires it to be presented in a format similar to the comparable sales grid used in a uniform residential appraisal report. This timeframe is too narrow and will be difficult for smaller builders who do not have immediate access to professionally formatted market data to deliver the data in time. This process will create an advantage for larger builders who can easily access the market data and procedural hurdles for smaller builders.

Although the bill states that the communication process may not be used to “pressure, influence or coerce” an appraiser, the structure of the process will inadvertently encourage additional attempts to challenge or influence valuation conclusions before they are finalized. It is important for our state to maintain appraiser independence.

For these reasons, MBIA respectfully requests the Committee give this measure an unfavorable report. Thank you for your consideration.

For more information about this position, please contact Lori Graf at 410-800-7327 or lgraf@marylandbuilders.org.

cc: Members of the Senate Judicial Proceedings Committee