

Przybylo, Kerry (LARA)

From: Marks, Dena (LARA)
Sent: Thursday, June 6, 2024 12:17 PM
To: Przybylo, Kerry (LARA)
Subject: FW: Real Estate Appraisers - General Rules (MOAHR 2023-032 LR)

Last one. Thank you!

From: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Sent: Tuesday, June 4, 2024 4:30 PM
To: Marks, Dena (LARA) <MarksD1@michigan.gov>
Subject: FW: Real Estate Appraisers - General Rules (MOAHR 2023-032 LR)

From: Beth Graham <bgappraise@gmail.com>
Sent: Tuesday, June 4, 2024 10:32 AM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Subject: Real Estate Appraisers - General Rules (MOAHR 2023-032 LR)

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Comments on the following rules changes/updates:

First Concern:

No where in the AQB guidelines does it say that a State Licensed or Certified Residential Appraiser can perform "nonresidential properties for federally related transactions (c) And I don't see any reference for \$500,000 in the AQB rules.

Where did \$500,000 come from? I believe (c) is an old rule that was never removed in the past. From what I read only a CG can do nonresidential.

Instead of (c) use the AQB wording:

Page 21 C. For non-federally relational transaction appraisals, transactions value shall mean market value.

1. The classification includes the appraisal of vacant or unimproved land that is utilized for one to four residential units or for which the highest and best use is for one to four residential units.

2. The classification does not include the appraisal of subdivisions for which a development analysis/appraisal is necessary.

R 339.23403 State-licensed real estate appraiser; certified residential real estate appraiser; certified general real estate appraiser; allowed functions.

Rule 403. (1) If a state-licensed real estate appraiser is properly qualified to undertake an assignment, a state-licensed real estate appraiser may perform any of the following appraisal services:

(a) Appraise properties that are not federally related transactions.

(b) Appraise **noncomplex** 1 to 4-family residential properties **having a**, ~~unless the transaction value less than is \$1,000,000.00 or more or the property is complex and must be appraised by a certified residential or certified general real estate appraiser.~~ **and complex 1 to 4-family residential properties having a transaction value of less than \$400,000.00.**

(c) Appraise **nonresidential properties for federally related transactions and real estate related financial transactions where the transaction value is less than** ~~does not exceed \$250,000.00~~ **\$500,000.00.**

And on page 19 -

(c) Appraise nonresidential properties for federally related transactions and real estate related financial transactions where the transaction value is ~~less than~~ **does not exceed \$250,000.00** **\$500,000.00.**

Second concern:

The AQB limits a supervisor to supervising only 3 trainees; why did Michigan increase the number to 6? To follow the guidelines of the AQB and fully complete the requirements for training, how can one supervisor fully train 6 people. I know this rule was passed for State Employees, if this is necessary, please include wording that 6 is only for government employees. This can lead to unsupervised licensees or carelessness in our profession, where the general public is relying on good quality reports. I encourage you to follow the standards that have been fully vetted by the AQB and Appraisal Foundation.

Thank you,

-

Beth L. Graham, RAA PMN ePRO C2EX PSA AHWD

Certified Residential Appraiser #1204000601

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beth@bgappraise.com

Przybylo, Kerry (LARA)

From: Marks, Dena (LARA)
Sent: Thursday, June 6, 2024 12:17 PM
To: Przybylo, Kerry (LARA)
Subject: FW: Comments on Real Estate Appraisers Rules MOAHR 2023-032 LR

From: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Sent: Monday, June 3, 2024 1:15 PM
To: Marks, Dena (LARA) <MarksD1@michigan.gov>
Subject: FW: Comments on Real Estate Appraisers Rules MOAHR 2023-032 LR

From: Martha O'Connor <marthaoconnor411@gmail.com>
Sent: Saturday, June 1, 2024 10:58 AM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Subject: Comments on Real Estate Appraisers Rules MOAHR 2023-032 LR

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Dear BPL,

I would recommend edits to the following rules.

R 339.23203a Supervisory certified appraiser.

My recommendation is to edit subrule 5(a) to require that the licensee request authorization to supervise additional real estate appraiser trainees utilizing a form provided by the department. The reason for this change is to simplify the process by having the AQB requirements on a form and easy for the licensee to understand and complete what is necessary.

The suggested revision is highlighted below:

~~(4)~~(5) The department may authorize a supervisory certified appraiser to exceed the maximum number of trainees allowed to be supervised under subrule (34) of this rule, provided all of the following are complied with:

(a) The applicant **requests authorization to supervise more than 3 real estate appraiser trainees by submitting a form provided by the department contacts the department by email to request permission to supervise more than 3 real estate appraiser trainees.** ~~submits an application on a form provided by the department and approved by the board to the department.~~

R 339.23309 Prelicensure course sponsor; instructor duties.

My recommendation is to edit subrule 5 to require instructors to provide proof of completion of the most up to date AQB instructor certification program required by the AQB criteria. The reasoning behind this request would be to meet the AQB criteria which states in pertinent part “At least one of the course instructors must be an AQB Certified USPAP Instructor who is also a state certified appraiser in good standing”. The changes are highlighted below.

(5) Instructors of USPAP shall ~~comply with~~ **provide proof of completion of the most recent** the AQB instructor certification program as required by the ~~real-property~~ AQB criteria.

Sincerely,

Martha O'Connor