

From: Don Clark <crsappraisers@gmail.com>
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To: jim@asc.gov
Subject: Shortage of appraisers

<https://www.ASC.gov/Temporary-Waiver-Requests/TWAP.aspx>

In reference to the above:

It is my sincere belief that there is not currently a shortage of appraiser in most if not all jurisdictions. There is a shortage of appraisers willing to work with some AMC's that some lenders have hired to manage their appraisal request. the reasons are many but here are a few:

1. Low fee below C&R.
2. Adding stipulations or scope of work requirements that neither make for a better appraisal or opinion of value. Some additional scope of work requirements are over 100 pages long.
3. Lack of communication by lenders AMC & appraisers by knowledgeable AMC staff.
4. Lenders and AMC's who send request to appraisers that may not have geographical competence. I have received request for appraisals over 100 miles from my market.
5. Blasting request and accepting the lowest bid based on \$\$\$\$ and not competence.
6. Unreasonable stipulations after the reports are complete.

And, to not let the Appraisal Foundation off the hook:

Uncertainty as to actual qualifications and ever changing qualifications for residential appraisers.

Deciding what to call a report. It should be A Appraisal report and let the scope of work decide how comprehensive or detailed, or restricted it should be.

But, what do I know? I have only been doing this for 42 years.

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