

Over 1,800 Comments Directly from Appraisers - From the OREP/WRE Bifurcated Appraisal Survey

Q11. Please include any additional thoughts or commentary you'd like to share:

Open-Ended Response

This appears to be a product designed to benefit the AMC's and lenders and not the borrower or appraiser.

Until you are physically at a property, you cannot tell what condition it is in. Some properties have horrible odors either pet or smoke and how can an Appraiser perform a credible report if such conditions exist? It is not possible.

This is just plain idiotic. Typical meddling in a profession with the aim of attempting to rid itself or our value to the appraisal process. I will not accept that type assignment and all appraisers should not participate in downgrading our profession by participation in such a program.

While the buf appraisal products appear good on the outside, once you go through the process the seasoned (experienced prudent) Appraiser will realize the liability concerns and take the necessary steps to make sure they cover their end of the process. This can reduce the liability of the appraiser who does the actual report write up, but not eliminate it. An appraisal is only as good as the data used to develop it. If that data is flawed or lacking, the end result "the appraisal report", is flawed or lacking credibility. I have been on both ends of the bu-ap process as data collector and appraiser analyst and have reservations about completing both ends of the process.

This product has the ability to cause great harm to the appraisal profession. Not only the credibility but also dependability of the Certified Appraiser. Our profession depends on public trust.

BiF (F is always "F'ed") appraisals should not be called appraisals. I can see the FDIC putting an end to this... after an avalanche of foreclosures. Remember the last time fast and lose ruled. The new bunch of clowns did not learn from the last bunch of fools, most of old guys h have retired or are driving a truck.

This survey only points out artificial benefits to the lenders. Mis Management by Fannie mae led to the collapse of the housing market 12 years ago. now they are back doing it again. Question 10, do you believe that the hybrid process will speed turn times. Damn right it will, will they produce a credible report , hell no. No one mentions Public Trust. The purpose of an appraisal is to instill public trust in the real estate transaction process. The public already sees the banking and quasi governmental Fannie Mae as corrupt, especially after the banks were bailed out. Again this practice will not instill public trust.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This whole process does not make any sense to me. Question #5 asked if I would be willing to act as the appraiser-analyst if the PDC was done by a licensed appraiser/trainee. Why would you send a licensed appraiser out to inspect a property and then have a different licensed appraiser who did not see the property complete the report? This is going to lead to mis-valued homes and also compromise the credibility of the appraiser. The only scenario I could see this somewhat working is in a new tract home subdivision with cookie cutter houses. I do not see how this would work in any other scenario. I also think this will increase turn times due to bifurcated appraisals involving two separate parties.

I am open to change, but I don't agree with farming out appraisal responsibilities to third parties.

The AMC's will take most of the fees. The appraiser will not get adequate compensation. The AMC's are the main reason for current slow turn times due to shopping the appraisal for the lowest fee. The AMC's should only be paid a set fee of say \$50 to \$100 for placing the order not what they can make by under paying an appraiser. The bifurcated appraisals I have reviewed did not have adequate property condition information and descriptions just a lot of photos.. The process is flawed and will result in poor quality appraisals. The whole AMC process should be changed.

Liability of using a data collector instead self data collection. Q-9 there are many ways to know what is happening in neighborhoods other than driving though Also would that not be included in the data collectors responsibilities. My company is looking at of using this system and I am looking forward to having it implemented.

Bifurcated appraisals may speed time, but may loose credible results.

I cannot see how hiring two would be better than hiring one, especially in terms of turnaround time. I have yet to understand why anyone thought this was a good idea. So much of the appraisal process by the appraiser has been questioned in the past that making the process open to semi-professionals for the all-important data collection phase is mind boggling. And to think that my state board considers these "valuation models" NOT liable under USPAP is also mind boggling. We have always had it hammered into our head at the USPAP classes that if we are giving a value we are doing an appraisal. So we'd better have our facts straight and our research done, or else. I will not be participating in this system and I hope all other appraisers turn the work down as well. I am not interested in damaging our industry any further than bad appraisals already have.

When the appraiser does not physically inspect the property, it is nearly impossible to create a valid defendable opinion of value.

I hope this new fangled idea goes by the wayside. It will not increase accuracy, fees or turn times, so why even consider it an option for consumers??? What the industry needs to do is figure out a way to get young people to become appraisers! Mentorship programs, revamping the education requirements, etc.

There is no substitute for your own boots on the ground.

no comment



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I believe that we will see another 2008 if the bifurcated appraisals are widely used.
This is simply another attempt by Fannie Mae and the lending sector to reduce fees, get quick turnaround times, and, I do believe, limit the appraisers potential to "kill a deal."
Over time I can see a higher REO's if this process is done. You can't ask a 2nd party to do what appraisers do and to expect the appraiser to take full liability on this type of work.
having someone who is not an appraiser do onsite inspection and or measure houses is a bad idea. This statement is based upon seeing hundreds of inspections for hybrid appraisals. Many times gross living area is not even close to being correct.
This process will only delay assignments and create more inadequate appraisal reports.
There is no way to make an appraisal, you have the right professional that this is a complex profession with a lot of liability. There is education requirements as well as continuing education every two years. With software, MLS fees, insurance, and all of the other expenses, this is a slap in the face for the appraisers that take their career seriously. Computers will never be able to do what an appraiser does. That is a fact.
Just a bad idea.
Huge liability when appraiser has not physically inspected the home. Some lenders require 3+ years appraisal experience, but any trainee can do the inspection...makes no sense!
The notion that a bifurcated appraisal is either efficient or credible is absurd allowing lenders and FNMA to control the valuation process. This type of appraisal is highly sensitive to manipulation, fraud and they know it.
Fail. Back to the drawing board for FHFA and Fannie. Or maybe just leave it alone - the appraisal process is fine right now. And why would these entities be concerned with an appraiser's turn-time when professionals in this industry know there is no cure-all method that will speed up the process. We haven't asked for one, either. What we want is to be better compensated for the fact that every single case is unique, and requires experienced interpretation. For this, the only thing appraisers have been asking for is a bigger portion of the appraisal fee.
This latest appraisal incarnation is as bad as the ill-fated CU and hopefully goes the way of the dodo.
The appraiser performing the analysis gains a great deal of knowledge, perspective, and market understanding by actually visiting and inspecting the property. To lose that will further diminish the accuracy and quality of real estate appraisals.
None
I am very cautious and restricted in excepting these assignments. I must be intimately familiar with the neighborhood, there has to be adequate recent MLS or detailed county data available and any one unique attribute disqualifies my willingness to assignments for certain properties.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

As the owner of my appraisal business I spend a great deal of time and money on E&O, CE, MLS, License to stay current with Real Estate sales and trends. I have years of experience. Why would people who have none of the above be allowed to do this type of work. The customer will suffer from people who have no idea what they are doing.
None
None at this time.
If anything turn over time will be longer and there will be surplus of miscommunication!!
Sacrificing speed for accuracy. Demeaning the appraisal process.
None
Data Collection AND Analysis go hand-in-hand. I don't quite understand how one can separate the two. There are many other ways to reduce the cost of appraisals = AMC elimination.
The fees are to low. Thus the product causing appraisers to produce an inferior product.
if lenders do not trust appraisal after they get licensed then just say yes or no to the loan. But who will the lenders blame when it goes South on them.
Making loans based on data collected and reported in this manner, bifurcated/hybrid appraisals, is going to result in another housing market bubble burst like 80s.
Even if it appears that the turn time will be faster, it offers no benefit to the client, borrower or seller of the property.
My professional insurance rates may go up to cover the lawsuit costs of poorly performed appraisal assignments completed by multiple parties.
Since the Dodd-Frank bill the lending industry has back themselves into a corner with appraisers not willing to "play the game" any longer since they are the ones with all the liability and the ones being thrown under the bus. The have realized they need another way to get the appraisal values they need and bypass the appraiser not willing to play the game like pre-2008. Bifurcated appraisals is it, or so they hope.
This is an insult to ALL APPRAISERS.
These ideas will not survive the next crash in the housing market.
AMC's cause most of the appraisal delays with requesting bids from local appraisers and waiting days or weeks before assigning a report. The delays are NOT normally due to the Appraiser.
Pay peanuts, get monkeys.
none
Adding a second person to the professional responsibilities of the appraiser does not reduce turnaround time, or cost, but instead raises my costs, turnaround time, and complicates the process. Might be okay for big companies; will kill the little guy, who happens to be the ones who keep people honest.
Replacing personal appraiser inspection will compromise quality of data collection and harm buyers and lenders.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The costs for each independent appraiser to have their own office with their own MLS, software, computer, car, time to drive, licensing, continuing education, errors and omissions insurance, requires us to have enough paying orders to stay in business. Appraisal waivers are desstimating the appraisal profession. They are not retiring due to age, its duevto lack of orders for acceptable fees.

This is going to turn into 2008 all over again because lenders will be blindly lending money. It's a terrible idea by our government who has a track record of sucking at good ideas.

It shouldn't be about cheap and fast. Cheap and fast equals poor quality. Remove all the middlemen taking a piece of the pie. There isn't any reason an AMC should take half of an appraiser fee. These fees need to be separated on HUD statements and accurate appraiser fees need to be reflected. Having Realtors complete property data collection is biased because anyone that works on commission or potentially commission based is automatically biased even if they are not related to the transcation, they may be related to the company that may have the listing or get a listing etc. People not in the real estate profession may not be educated on what to look for. We may as well go back to the 2055 ext only driveby report forms or 2075 exterior only reports because this would provide a similar result. Maybe create a report form with inspection that is limited in scope but completed entirely by the appraiser. The closing costs are so high because of all the middlemen taking a piece of the pie. Appraiser's are educated and are required to take CE every year/every other year to maintain their level of expertise but others involved in these transctions sometimes don't even speak the common language and are reviewing these reports based off a checklist without any knowledge in the field. Let's get rid of all the middlemen so the fees consumers are paying are going to the educated professionals. This will cut costs. Otherwise, we'll see you in the next recession where not only will appraiser's get sales, refinances but we will also get the foreclosures and everything on both ends again...Involved parties need to

When a competent & well-know data collector/inspector team up with a competent & well-know appraiser analyst, a credible, high-quality appraisal will result. For years, I used a PE, a structural engineer, to do inspections but I or a field assistant would do the market research and comp selection(s).

Nothing good will happen for clients and consumers if the appraiser does not visit the property to which it appraises. Site visit is a huge piece of the appraisal puzzle... scope includes measuring and observing the subject. These two programs are inviting troubling affects on the housing market and beyond. We don't want another 2009. Please consider the consequences of these programs. An appraisal is a valuation service provided by professionally trained individuals, not data analysis programs.

"and the horse they rode in on!"

Fair fees with less bartering. QA people that have experience, and at least read the addenda. TAT of 48 hours after inspection is not hard for the clients that pay well and have good QA staff.

Allowing apprentice appraisers the oppportunity to sign on the left and be reviewed by the sponsor is a better solution long term for increasing speed in the marketplace. Let's not add another layer of confusion with non-appraisers doing inspections. Far too much opportunity for problems vs benifits as I see it.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Speedy delivery times leave room for mistakes. Their reliability are similar to BPOs.

This will be a disservice to the consumer

How will it speed up the process? All I can see is another level of confusion added to the process. Again, I will never do a bifurcated appraisal. Quite frankly, the appraisal process is impossible to fix. If you look at the big picture it's more efficient than government itself. Really, the government should just do what it does best collect licensing fees and waste money. They are good at that.

Another way for the powerful Banking Industry can circumvent a check and balance system, so they can make bad Loans, as they did prior to 2006 in order to cause the Great Recession.

thanks

Poor logic making 2 assignments out of 1 to become more efficient. Untrained, uneducated, non-credentialed, without background checks = poor data, unsafe for public & consumers. Appraiser trainees need expanded roles. Illegal in NC for unsupervised folks to participate in appraisal analysis.

These take longer to complete if an appraiser/appraiser trainee does not complete the inspection. The current advertised fees are an embarrassment to our profession. Only trained state licensed appraisers should complete appraisals and evaluations. It's confusing to the consumer when I have to explain appraiser requirements and USPAP when they had a realtor or AVM conduct their prior report without any of the requirements and they think appraisers are just a pain.

N/A

Too many hands on the report and no one responsible except the appraiser who has the E & O. This is extortion: if you want to work and do these "designer" appraisals then your E & O is on the line. What about the appraiser's reputation? It is on the line also. Thank you for the opportunity to speak.

This is just another attempt to dumb down a profession into a low quality, low compensation job in order to save a few bucks and speed up the process of consumers who are about to make the biggest financial decision of their life.

I can't possibly understand how adding another person, trained or not, can decrease the time required to complete an appraisal. If fees paid are to be "reasonable and competitive", I cannot possibly see how prices will be lowered. There is one more mouth to feed. I cannot possibly see how taking the analyzer out of the field can possibly improve quality. This seems to me to be further complicating a process that is already viewed, at least by some, too complicated.

The Bifurcation process will speed up the process. In my opinion this is promoted by the big banks/lenders to speed up the process, so, they may push to close more loans more money. Greed is the ultimate factor while reducing the quality of work.

There is too much false information floating around to do bifurcated appraisals.

Though the time frames may be accelerated, the reliability of the final value indication will suffer in many cases.

Liability for a value that is based on the reliability of someone else who may or may not be competent.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

In my experience, there are plenty of so called professional appraisers, real estate agents & home inspectors who are willing to "overlook" physical details that are important in developing a "reliable" opinion of value. Whether incompetence, lack of care or detail in their work quality or flat out fraud. Compensation not commensurate with the liability & risk.
I am not opposed to bifurcation. I do think the cost for an appraisal will rise---and should so because in realty, the process will be more complex.
A market share/dominance/control attempt being exercised by Fannie and possibly encouraged by C/L
Bifurcation could easily be done without this program. Just give us permission to break up the appraisal process within our own office.
Bifurcation is a way of lowering costs to appraiser users and destroying the appraisal profession as appraisers are unlikely (as now) to train new appraisers.
I THINK OUR PROFESSION IS BEING TAKEN TO A NEW LOW!
Cheap and irresponsible way of getting around a vital part of the loan process. In order to keep the public's trust we shouldn't cut corners when providing a service on their biggest and most prized investment!
I understand why those in regulation and retail want to cut out the valuation and appraisal processes; for perceived time and cost savings. This demonstrates that form readers do not understand either of these processes. Attempting to boil the process down to check boxes, and cutting out supplemental narrative (analysis) from the document is not good for the credibility of the profession, or for the public good. The appraisal process is the gold standard. We should be working to elevate the level of service provided by production- and volume- driven appraisers and appraisal companies. This would include the use of big-data and tech. Making the distinction between the appraisal form and the process is critical to retain public
If the poor state of MLS Data is a foreshadowing of the quality of the data, this system will lead to higher costs and longer turn times.
Cause further laziness and corruption in the business. Allows for mass work by non appraisers
This disjointed attempt appears to be another route to destroy and dismantle the profession of the appraiser which is the main profession that acts as both a buffer and a reality check on all interested parties in real estate and to start taking more and more away from those who dispassionately and with non bias perform the valuations it appears more and more based on the idea that the one profession that has no bias in the entire process get overseen and dismantled by those who appear to be more concerned about the "clients" of the appraisals (aka banks and lending institutions) then ensuring the real protection of the public



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I have completed a few bifurcated appraisals that were drive bys. Was not comfortable that the person taking the pictures would be seeing what I would see and potentially miss something along with driving through the neighborhood and assessing outside influences. There were also several times that I would receive the assignment and did not receive the exterior photos until a day or two longer than if I had the opportunity to just complete the entire assignment myself. So, selling that it would save time is not true. I have read that those out taking pictures are getting paid about \$10 an hour. So, the true motivation would be money. However, in the long run, the compromise to the validity of the valuation could cost much more than the perceived money savings on the front end. It is a slippery slope. The lower rate of foreclosures has been to the steps taken from 2008 along with lower interest rates. If you stop taking the prescribed medication, the illness will come back.

No sense commenting. The idiots in charge will do what they want and then just look to place the blame for problems on the appraiser.

Too easy for them to come back and bite you

I have performed these types of reports for about 10 years for some major clients. No issues so far...

AMC's slow down the process most shop until the price is more than 50% in their favor.

The financial market crash was largely a result of the loans made on real estate where equity was much less than the amount of money lenders were lending on the properties. The appraiser's were considered one of the main offenders resulting in much higher requirements for us to obtain an appraisal license. It no longer allows us to communicate with our clients...what other industry does that, now we have to split our fees with a third party that controls the amount of work we get. Any thing else that lowers our fee per assignment and I'm DONE!!!

They're not a true Appraisal I doubt I'll ever do one. I've had several requests

Totally sucks. Again, faster and cheaper

I think having a better process for new appraisers to enter the field is a better solution.

The production of an appraisal with this bifurcated process adds complexity to an already complex system. I have performed a few of these assignments and after these assignments conclude that it does not reduce my production time due primarily to "reviewing" the information sent by the data collector with all other available information sources, initiating additional requests for pertinent data, correcting assumptions by the data collector (e.g., assumption of condition, costs to repair). If the data were to be collected in a manner that is driven by the appraiser (real-time connection between the two parts of the process), I believe it could be an additional tool available to our industry for producing credible assignment results. The assignments I have completed this split-process on were complex assignments (REO) which involve two opinions of value and client-specific requirements regarding condition and repairs. In my opinion, these assignments were too complex to be as reliable than a single source for the entire assignment. On non-complex assignments in areas with adequate data, the conclusions may be as

Change is not always good



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

DUE TO THE HARD WORK, SACRIFICE AND MONETARY INVESTMENT I HAVE MADE IN THE LONG TERM TO TRAIN AND DEVELOP MY PRACTICE, PROFESSION AND KNOWLEDGE BASE, I WILL NOT LET ANYONE WALK IN THIS PROFESSION AND PRACTICE WHO HAVE NOT PAID NECESSARY PRICE AND DUES IN TERMS OF HARD WORK, EDUCATIONAL STUDY AND MONETARY CONTRIBUTION AND COMMITMENT.

There is little difference between the bifurcated and a desktop. USPAP does not require an actual inspection if you believe your data sources are reliable. In the end, it is the responsibility of the appraiser to VERIFY information, no matter the source in order to create that credible report. If the form is not sufficient, add verbiage until you cover all necessary bases. It really isn't as complicated as many wish to make it because like, the rest of humanity, appraisers dislike CHANGE. But this is HERE and will stay. Bet that.

I do not think this is at all good for the profession!! Writing a report where I have not visited the property is not something I'm interested in. I don't even complete exterior appraisals.

Personal subject inspections give an appraiser the best information and feel for the subject. The one bifurcated appraisal I completed I found the property inspector omitted a roof leak that later MLS photos showed when it sold.

Eyes and feet on the streets are necessary for credible reports as well as interior observation of properties. Does a lender really want to use unverified second hand data to lend money on a property? I would never use 2nd hand info and data collected on an appraisal with my signature. So lenders want to short cut and use robo data, yet as an appraiser, I am the one signing the report. I will never rely on second hand info as if the loan defaults ..we all know the licensed certified appraiser is the first one to be thrown under the bus. Bad Idea. If lenders insist....there should be legislation in place stating they agree to the short cuts and will be liable if inaccurate.

Bifurcated appraisals are another example of the lending industry showing contempt for appraisers, and the ignoring benefit of the appraiser's knowledge, in exchange for saving a few days in the process, and few hundred dollars on loans where they make many thousands. They continue to scapegoat the appraisal profession as the impediment to the lending process, instead of acknowledging the importance of the appraiser's role in the approval process.

It appears that the lender is always looking for ways to cut appraiser's fee-how about cutting where the real money is!! The loan and LO and RE fees!!

This is Just another way for Lenders and Amc's to cut cost and Sacrifice Quality and Credibility

It's not only bad for the Appraisal profession it's bad for the public it may produce bad loans

Just Fannie trying to cut out the appraisers so they can make marginal loans easier



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

two parts and/or have them performed by two separate parties. We would have to 100% trust the other party who we are relying on and without knowing who that person is, there is no way that appraisers want to put their reputation and livelihood on the line and also take all of that extra responsibility insurance-wise (I would assume E&O rates would go up because of this extra liability or they might not even cover this type of appraisal). The way to save money in this industry for the borrowers would be to go back to the time when appraiser were allowed to compete and make their own clients/businesses, cut out the AMCs and let professional appraisers go back to doing what they are trained to do and get paid appropriately. This would eliminate the problem with the lack of appraisers as we would be open to training and more people would want to get into our industry as there would be an actual cost benefit to any supervisory appraisers and potential

They should be outlawed

Bifurcation is not a NEW concept, it is how many appraisers were trained prior to the Home Valuation Code of Conduct and Dodd Frank Legislation. Appraisers were then told not to have trainees perform appraisal inspections without the supervisor present. Why is it ok to use property data compiled by someone hired by an AMC to complete an appraisal while it is not acceptable to use the same data collection by an appraiser trainee under the appraiser's direct supervision and employment?

If I didn't inspect the property and neighborhood, I am not going to rely on a 3rd party's analysis of that property or neighborhood.

FU

I have done desktops with 3rd party inspections, it is a dangerous prop

I have already performed Form 2000 reviews on these garbage reports and if they start doing it again I have a plan. I have teamed with an experienced trial lawyer and WE will be going after your E&O in Illinois. The goal? I get rich and make sure that no E&O provider will cover these types of products. So... go ahead, try and ruin my business... make my day.

Too much deception out there already. Having someone other than the appraiser doing the inspection is a liability. Homeowners and inspectors both have "incentives" to overlook issues

If Lenders and AMCs would order the Appraisal and review them in a more timely manner then the Appraiser would have the time they need to produce a well researched and credible product. If fees weren't so ridiculously low Appraisers wouldn't have to overlap orders to make a living.

#10; I do not know if bifurcation process will speed appraisal turn times. I checked 'No' because one of them had to be checked to complete this survey.

This is a very dangerous idea. It will discredit or profession and make it more difficult to defend our work.

it's always the appraisers who get short cutted, and were the ones that get blamed.

Again, trying to find a cheaper appraisal. Horrible idea

The chance of inaccurate valuation will compound over time as lesser direct valuation and the increasing use of computer models continues.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I think FANNIE MAE greatly underestimates how many items/condition issue are not implicitly spelled out in the report but adjusted for in the report to avoid underwriting issues. I'm willing to take the kickback, but the clog in the process is underwriting.
Train wreck waiting to happen!
None
Back to watering down the process for monetary reasons...the make the deal mentality because tax payers will take the heat again
I have done a couple and honestly believe its a terrible valuation. It does not speed up time to get a completed report,terrible payand bad results. guessing what is in the property amenities..I would leave the profession if it would all go to these types of reports.
AMCs are the real problem
Raise fees
AMC's were added in order to improve the appraisals and process and save money. Adding a second person to make a living off 1 appraisal made them more expensive and I am sure no saving's in time either. Adding a third person making money off 1 appraisal can not possibly save time or money. I don't want to spend my entire life in front of a computer. Yuk! I want to be the inspector. They won't have to do anything but ride around and let others take all the responsibility. sounds good to me.
As a profession, we need to learn to adapt to the times. If not, our profession will cease to exist. For some reason, there is far too much resistance to hybrid appraisals. Instead, appraisers should see this as an opportunity to adapt to the newest technology and remain relevant.
Being in the appraisal profession for more than 30 years and observing how many appraisers and Realtors rush through the process of measuring a home with incorrect measurements and basic vanilla neighborhood observation, I do not want to be part of a process. I want to do it by myself from start to finish, not rely on others for doing part of it, on others who may not even be appraisers or licensed.
These assignments would only be good for non complex properties where there are a good supply of comparable.
Licensed property inspectors preform at higher levels than ever before. Come out of your caves and review some reports. Engage with current professional, educated men and women that can tailor the information for your specific requirements.
If there still has to be the time taken to do the site inspection, the research and the report, not to mention an inspection of the neighborhood, then it might as well be the same person. This will result in the highest level of a credible report and opinion of value.
It time for me to retire.
None
Another loss of protection for the public and only benefits the lending community



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

How can an appraiser set a value for a property solely relying on another person's data who may not have the appraisal mindset or skills to accurately notice pertinent value related features or lacking amenities in which value is attributed. I see a lot of 'missed' adjustments in this valuation model, thereby skewing the value significantly, similar to that of automated valuation and/or valuation without all of the pertinent facts for a given property such as valuations done by Zillow or Trulia. Completely inaccurate values, for the most part by these companies in which the public heavily relies upon. The appraiser, and only the appraiser is the valuation expert in the field and in the analysis of a particular property. Trying to change this model does not make any sense for anyone.

The fees are much too low for me to complete these types of assignments.

Another attempt to eliminate appraisers. Who will they blame when these loans fail?

Why should I put the future on my career into the hands of someone else?

I think turn times and low fees should not take precedence to quality appraisal work

This is crazy. So they want to split the assignment into two segments, one an inspection and the other the valuation. Currently we have one appraiser doing both jobs for one fee and now they want to have two people do one job for two different fees. This is how stupid the government is. The old saying "how many people does it take to change a lightbulb"?

Not a good idea

This survey is attempting to spin/solicit a negative view of Bifurcated appraisals. Very dishonest.

The idea is valid. The borrower has great credit, dti, etc and is taking out a line of credit on a home that is paid for. Or some similar scenerio. What isn't right is trying to push the appraiser out of the inspection process and expect to pay half or less of a regular appraisal fee. First of all only appraisers should be completing the inspections. Go ahead and break it up into 2 parts. Let the appraiser inspect and turn in that report. If they don't need a full pay the appraiser a reasonable fee. Hypothetically if my normal fee is \$450 for a full appraisal I will do the inspection part for \$200. If you need a full after that I will complete the desktop portion for \$250. The fee is still \$450. They are still getting an appraisal. They save money when the full is not needed. Keep the appraiser in the entire process. And Secondly, get with the program and let appraiser trainees inspect! To not do so but insist on less trained inspectors without mentors be able to inspect alone demonstrates an entirely different agenda than helping consumers. Thank you.

Do not want anything to do with these type appraisals

Too much chance for error or misunderstanding between the parties involved resulting in poor or misleading values and reports. Too much responsibility on the appraiser's part.

I would stress that some property is ok with this process. Complex, rural, limited data or atypical property requires more analysis, time and hence higher fees

I just am not interested in doing "part" of an appraisal. I will retire before this gets sorted out.

I agin' it.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I think it is a step to get rid of appraisals and to lower appraisal fees.
times are changing.
Terrible idea.
A reliable appraisal is one where the appraiser collects the data as he relies on his "own" data that he knows is accurate.
The product is not faster. Drives down fees for appraisers. Pushes appraisers out of the profession. Unreliable.
There is no easy softer way. At the end of the day the computer cannot analyze the Human Factor. In other words, what caused the buyer and seller to come to a meeting of the minds.
I love bifurcated appraisals.
After 50 years in the business, it is a shame to see the short cuts and risk and industry is making.
This profession will loose may good appraisers if this is the direction Fannie Mae is heading
I won't write an appraisal someone outside my team has inspected. I dont trust others
Penny wise, pound foolish. Appraisals are not the only factor that may "delay" closing on a loan. Haste makes waste. And cliches hold kernels of truth.
no
They are ridiculous and eventually will cause the Lenders greatly.
The entire premise is just ludicrous. Just go look on Zillow if this is how 'accurate' you want an appraisal to be and be done with it.
Like I said - BS appraisal
The inspection is the most important part about the process. Not having and expert inspect the property is bad for all parties involved
This is another way of killing our profession. There is also a potential for law suit because the appraiser does not know what the actual condition of the property is. For instance, two appraier will look at the same house and give different ratings for that same house. This is not fair to the consumers at large. Thank you.
The only benefit would be to those lenders and AMCs who's concern is for making money rather than serving the public a credible value of the subject property.
Will an additional party will be willing and capable of documenting all necessary and pertinent information for appropriate analysis for a low fee? It will have to be a low fee to be worth doing "Bifurcudated". If so, how cheap can they find appraisers willing to complete the latter portion? Better be cheap or it still won't be lower cost to be bifurcated. How many other professions are there that are constantly being told "your labor and expertise is too high" meanwhile licensing requirements increase? Doctors and lawyers seemingly earn appropriate wages for their expertise. Maybe another economy crisis is required before appraisers are reconsidered as worth their expense. Wait, we just had one...
This is a Data Grab by Fannie. Appraisers will get paid less and assume more liability on each assignment.
ALWAYS NEED EYES/HANDS ON



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Very bad for the mortgage lending business in general. Risky and if used will be blamed for next down turn in the market.
i saw in a recent interview where a Fannie representative was asked if appraisers would have to drive by the comps and he answered no, that there is sufficient online info and mapping for appraisers to determine the neighborhood and comparable characteristics. I would like someone to ask them why then do appraisers have to drive by comps now? If I could rely on MLS interior/exterior photos and online info and mapping it would cut down considerably on my turn time, my work load per report, and help everyone. They want to make our work as hard as possible but make it as easy as possible to for others to take our work.
I performed one of these in a neighborhood I was very familiar with. I was uncomfortable with the data collector's ranking of the subject property. They had ranked it a C3 when I felt it was a C4 as it was in basically original condition. This is a major problem - relying on someone else's opinion in order to develop an opinion of value.
Very concerned about liability & USPAP violations
The lender won't accept financial and personal data pertaining to the borrower that isn't received directly from a credible source, so, why would they want to hand out money based on a pieced together, bifurcated appraisal that has no substance behind it? All they want is our signature so they can blame us later.
We will lose our skills appraising if you take us out of the homes. This is not a great process. The difficulty with appraisals right now are the AMCs offering low fees and taking weeks to rate 'shop' appraisers looking for the lowest fee. We don't have a shortage of appraisers, we have a shortage of good AMCs that don't drag their feet trying to get a low fee and asking for quotes several times on the same home over the span of weeks.
Lenders and FNMA want quick turn times. The 2055 was suppose give quicker turn times and end up being as much work as a 1004.
Fast turn times do not equal good appraisals.
A lot of work for lower fees!
If they need more appraisers they should pay more. Imagine questions from the lender going back and forth between the appraiser and field person and the time involved.
It's a Bad, Bad idea !!!!! God luck ,it's going to come back and Bite everyone involved in the process!!!!
I will never sign my name to one of these!!!
A complete about face from our training as responsible valuation professionals It simply takes money out of pockets. It cheapens the valuation process. You reap what you sow. The banks simply want the path of least resistance. Quality appraising doesn't matter anymore.
At this point, I will certainly consider these. If I am uncomfortable with a property to begin with, I will not do it



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Does the property data collector know enough? Such as safety, soundness, marketability or structural integrity issues? How about UAD definitions or building/zoning codes? FHA issues to look for? I doubt it. They will probably try and get a less qualified person that has less education to the inspect property (such as \$75 fee to agent). I have full respect for agents, but their education requirements are generally significantly less and they often do not know what to look for (I'm not talking about appraisers whom are also agents). Now if they used a licensed property inspector that was familiar with UAD, FNMA and FHA, USDA and VA guidelines, then maybe it could be reliable data, but I bet such a person would charge more and I doubt if FNMA would want the results of a property inspector.

I think it is crap

The onus is on the appraiser.....he has to physically inspect subject property and its neighborhoods in order to properly describe physical conditions and neighborhoods characteristics. You can't rely on a 3rd party to do your inspections.

Bad idea for the consumer!

I tried it with a company and did 3 assignments. Each was a disaster and I will never do it again. It is a bad idea, takes longer, costs more, and is frustrating to the homeowner (from my experience). We are good at what we do and I will not put my reliance in someone else's observations (re: view, traffic, condition, etc.). A comment I got from a homeowner that called me directly was, "you didn't even see my view... it is superior to all the comps you used". How can one argue if one hasn't inspected the property or driven the comps. NEVER, NEVER, NEVER AGAIN!!!!

Not professional.

The system is broken. Our fee structure is broken. Our independence as been damaged even by appraisers who take three comps and run for the lesser fee. 2008 will repeat again if dodd rank is not revised. AMC'S only care about speed, turn time and the lowest possible fee.

Let the appraisers do the job that they alone are qualified to do.

Just another way to try to screw appraisers and lower their fees. The appraisal is the most important piece in the mortgage process and yet they want to lower our fees and treat us like dogs. Stand up fellow appraisers!

Who has E&O insurance?

Same old story. Too much money chasing deals which leads to shortcuts, which leads to real estate delinquencies and foreclosures, which leads to new regs to prevent it from happening again. As they say, "you can't make this s--t up.

Why have two people do one job when one person has been completed in the same job for several decades. Splitting the process makes no sense

I will not complete any product which relies on questionable data simply for the purpose of reducing appraisal fees.

It may work in a cookie-cutter tract home neighborhood but you need someone that knows what they are doing to prepare a credible analysis in a diverse market.

Another way for the lenders to rip the appraisers off.

A large step in the wrong direction.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I feel it will not speed up the process because we will still have to spend more time regarding the market and area
Appraisers rely on accurate information and years of experience in real estate appraisal. To rely on factual data only is not reliable enough. I have been appraising for over 45 years.
Why would anyone enter this profession with the education and training requirements for fairly low fees, constant liability and lack of control of your clients and business. Oh, they haven't in the past 10 years. End of this year, you will loose another with 30yrs experience. I'm done.
The real estate and banking industries have tried to reduce or eliminate the appraiser's role in the appraisal process for years. The industry does not like us because we do not always support the value real estate associates and loan officers need to complete a deal that they get paid commission on. In addition, as much money as is involved in a mortgage transaction, I do not believe it is a good idea to not give the analysis and development of an appraisal and appraisal report an adequate amount of time necessary to produce credible and reliable results. Has the industry not learned for prior mistakes what damage they can do to the housing market and economy?
I would refer those who advocate for this bifurcation scheme to the recent history of Savings and Loans and Fannie Mae. "Those who cannot remember the past are condemned to repeat it."
With such low fees being forced on appraisers, how will they be able to keep up expenses - education, license, data collection services and other services involved in staying in business!?
Further data data-mining a d unlicensed people being involved in the public trust is never a good idea
There are too many factors that could go unnoticed if the actual appraiser is not doing the inspection. Relying on someone else visual inspection when you have no clue how reliable that individual or their data is!
I will never work under these conditions.
Bifurcated might be plausible in a Trainer Trainee situation only. All aspects should be done by well trained and well qualified individual students. Responsibility and Accountability for actions and results are to remain paramount.
Can't put my thoughts down here
n
Too easy to "cherry-pick" inappropriate sales comparables and prepare an innapropriate value conclusion.
I would want to be sure that USPAP is complied with, and gives us the freedom to do this without Liability
Stupid program! They want appraisers to validate the work involved in an appraisal but NOT PAY AN ADEQUATE FEE to the appraiser. Leave the business alone as it stands! The quality of appraisals will suffer from the bifurcation process! Also, more quality appraisers will not enter the appraisal field if not fairly compensated for their work.
There will be TOO MUCH missing information to produce a "CREDILBLE" report.
Appraisers that agree to such work are just doing a disservice to their profession.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

liability concerns. completed many appraisals where the puffery of Realtors overstated conditions and missed deferred maintenance or external influences.
If Lenders and GSE's wish to kill the appraisal industry, then do it already and pass the risk onto the American taxpayer once the next crash happens. I'm going to go study for my course on VCR Repair Profession.
Fannie Mae has too much control over the appraisal process, they would eliminate appraisers and do AVMs if they could.
If these became predominant I would have to change my business model or leave the industry, because the fees are low.
No Comment you would not to hear what I think of them.
The profession is dying - milkman - newspaper delivery - shoe shine - no one really cared when they were gone - they were just gone. Same things happening here. I've tried before for years and lots of my own \$ to develop something that might have worked to preserve work for the appraisers but that was argued into the ground - everybody had a better idea - and while that happened a # of new players emerged - perfecting their technology - and the appraiser continues to wither away...
Education, experience, and knowledge are what appraisers have to sell to make a living or to justify the cost of doing business.
You get what you pay for and speeding up the process makes for sloppy due diligence.
As far as I am concerned these types of valuation products are not USPAP compliant
It appears that speed (and cost?) are the only objectives of the lending industry. Does accuracy have a place in the process? I never liked "drive by" appraisals because I know from experience that many houses are not what they seem from the exterior.
I cannot trust people I do not know to gather data. In rural areas, where there is no zoning and no online information available, there is no way to produce a credible report in that manner.
Times are changing and must change accordingly
fees i have been exposed to area far too low
This is a bad idea! Can't wait for attorneys to get involved with this!
Love that 70% will not, means more work for me as my mobility declines.
n/a
get rid of it.
People do not typically purchase their homes without seeing them, walking through them, etc. Why in the world would such practice be allowed to determine if a lender should make a loan on the property? The only professions to benefit will be the banks and brokers/agents.
Would your doctor want to make a diagnosis from another doctors exam. NO! This doesn't work!
to speed delivery of appraisals,just stop requiring comp photos and MC forms. they take too much time and do not contribute anything to the report.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Fannie Mae will let the Bad Genie out of the bottle & there will not be enough appraisers left in the profession to put it back in. This is going to cause huge problems industry wide. Fannie mae was so worried about data collection being done correctly by appraisers and now is willing to let anyone complete this type of work. What are they thinking ??? Someone should take a step back. The financial institutions will not and cannot regulate themselves. They unfortunately are greed driven and this is exactly what they are trying to do. Eradicate a professional & HONEST profession. Good luck !!!!!

These assignments would not speed up time. For example, field review work always take me more time than actually doing the original appraisal myself.

The appraisal industry has been modified and compromised by FNMA, et. al. solely in the interest of those entities, not necessarily in the best interest of appraisal professionalism.

No individual, including appraisers, should be dumb enough to become a data collector, cause it pays a lot less than doing a complete appraisal or a home inspection. I remember in one of your previous articles, FANM was comparing a data collector to individuals who collect similar data for Insurance companies, not mentioning that the individual working for insurance companies are employees with salary, benefits, and paid cars/transportation/gas and expenses, where a data collector would be an independent contractor with all the expenses in the world making few hundred bucks a day. If I were going to do data collection, I would get a job at insurance company. The idea behind Bifurcated Appraisal is to eliminate the need for appraisals period, which would be an oxymoron to all the laws and guidelines and reforms in the 80s, 90s, 2000s, just to make sure we wouldn't have another real estate crises.

It's pure BS. Fannie/Freddie will just blame us anyway when this "goes south".

Higher fees are important.

Funny, how they wouldn't let appraiser trainees do inspections and now this is going to be okay for anyone to do them. Another blow to our profession.

The issues with this process are straight forward. 1) The liability does not simply extend to the appraiser, but also to the client. The client will not understand the position they have been placed in taking the assignment results to be credible. Using these assignment results to package and sell billions in loans. If/when a percentage of these go sideways the focus will be on the process and the appraiser now in the crosshairs. 2nd This process is suppose to make things cheaper and faster but instead of having one person conduct the research, the onsite work, the analysis ad the writeup... now each process will be written and process by several individuals which will increase the time and money required. The liability will follow the ony person that is licensed and expected to sign the certification (i.e. the appraiser).

I have first hand experience in a bifurcated appraisal. Due to incompetent data collector data the owner came back and was very upset. Even after disclaimer that I did not view the property personally and assumed the data collected was accurate. The owner now wants to turn me over to the state board. These are bad all the way around for our profession.

I do not think the appraisal will result in a good product for the client.

Typical BS government oversight



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The Government can diminish the appraisal process by changing the process, but it will come back to bite both the Government and the appraiser. The appraiser loses, the home owner/purchaser loses, the tax payer loses. The AMC wins as I'm sure there will be no loss there.
Some things many have failed to consider. It will be more difficult for a borrower to appeal an opinion of value that they don't agree with. Also, opinions of value will be more conservative as the Appraiser will be less confident in the data.
As the managing principal of my firm, I would only accept PDC work by a COMPETENT certified residential appraiser or certified general appraiser, IF I was very familiar with the current market trends of the market and submarket, e.g. designation as a historic district or proposed new roads or rapid transit.
The people that created this I believe have no respect for the appraisal field.
Those who do not study history are bound to repeat its mistakes...
Lack of adequate market and property analysis.
We are headed for 2008 fiasco again. This is just another avenue for same.
Turn times won't be increased due to the amount of time they take to "shop" appraisers and finally find someone to do it. If they would simply pay customary and reasonable fees and stop shopping for three days (which impacts turn times) the so-called "appraiser shortage" would be solved. The problem isn't a lack of appraisers, it's too much time taken up by the middle-man (AMC).
Again, it's still a full appraisal, and the SOW is determined by the appraiser per USPAP. It will not speed up anything, if anything it will slow down process trying to do a full appraisal inside of the parameters the client wants, while still adhering to USPAP standards
"GOD SAVE THE APPRAISAL INDUSTRY"
This will be a good reason to retire.
It seems these products are to solve a problem that does not exist. If the property is inspected and a report is prepared, why not have an appraiser do their job. It makes no sense, but I'll take their money till they figure that out.
I will not sign a certification on data collection that I was not involved in.
THIS IS SEEMS TO BE A WAY THE LENDERS ARE TRYING AGAIN TO USE IN AN EFFORT TO PROVIDE FALSE VALUES TO INVESTORS, IN ORDER TO MAKE HIGHER SHORT TERM PROFITS.
It ridiculous that lenders are basically trying to destroy the appraisal industry, when their corrupt and incompetent actions led to the most recent bank failures!! Proper underwriting requires a real appraisal completed by a trained and competent appraiser, not the cheapest "appraiser" (in quotes as there are too many people licensed as appraisers who are totally inept) who will provide the value conclusion they desire.
Sacrificing reliable valuations will result in expensive consequences!
why not just eliminate the appraiser all together and let a computer do it...sarcasm
If your looking for a super tedious and nit-picky desk job then these assignments are for you.
If this is about cost savings on the lender or on borrower side taking more of the appraiser fee is not the answer. The appraiser is the lowest paid in the transaction.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Cutting corners is what appears to be the plan with Fannie Mae because what matters is money, not that protect the public. They rapidly forgot the crash in 2008.

I believe that the only appraisers that will agree to accept bifurcated appraisal assignments will be appraiser that are recently licensed and new to the business that have not established a reputation and credibility for their work and agree to accept the assignments simply because any income is better than none. Therefore, the lenders will be accepting reports from inexperienced appraisers and inexperienced people sent out to gather the data and take photos of the properties. As an appraiser with 20 years experience in completing appraisal assignments I will probably quit and retire (I am currently 61 years of age) if my profession is reduced to completing these bifurcated appraisal assignments. I don't actually like to complete 2055 exterior-only assignments due to not considering that a property can be properly appraised by an exterior-only inspection.

Just like it takes time for an appraiser to learn the competency of their apprentice it would take time to learn the "inspectors" methods and degree of knowledge before knowing how they think. This bifurcation process is trying to automate a process that involves human decision making about how a place "looks and feels" just like a buyer does so it's a losing battle. Appraisers are the eyes and ears (and noses) for the bank to protect their investments so diving the process is defeating the purpose

Not a good idea.

Not USPAP compliant. Lenders are just trying to cut fees again.

i do what i'm told as it presents itself. i just know i am making the same money i did 40 years ago and am fighting being always and constantly broke, especially as mls fees, port fees, etc keep growing well beyond my modest means

I believe that with the sheer volume of data available on the internet and collected from the GSE database, this is the direction that valuation will take. The industry is trying to save money for themselves and for the client. The thing I don't understand is that the industry has no problem paying a realtor or mortgage professional thousands of dollars for a single transaction but is trying to nickel and dime the appraiser out of business.

If I can work anywhere and still earn \$100+/- hr, I'm all for it.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This is the dumbest idea I have ever heard. We, as appraisers, are completely self reliant, are heavily regulated both on the State & Federal Level and assume all liability. Even if you work for a large firm the License is held in your name & they do not pay anyone enough to go outside the personal realm of responsibility. We have to pay "portal" fees, AMC fees, etc - all the while everyone else is getting a larger & larger share of the pie while the people actually doing the work get miniscule in relation to the liability & amount of work that has to be done. I have been in the field for over 30 years & every day that goes by I am astounded by the laziness of individuals in all professions - especially the people entering the work force in the last 10 years or so. The buck is always passed to someone else & you are out hanging on a limb trying to finish a report at 11:50PM that is "electronically due" at 11:59PM & if you dont finish it they dock you for performance when all the while it is someone else that didnt supply a vital part of the process. Absolutely not. No Never. This cheapest & quickest nonsense has to stop. Its gotten to the point that the AMC's are starting to throw everything out for bid work & now not only do you have to be the cheapest & quickest you have to be the quickest to respond with your cheapest & quickest fee. This is just another cheapest & quickest scam.

This is obviously generated by someone other than an appraiser

The risk for reward for this type of assignment is not logical for most experienced RE appraiser. I can see that this type of assignment being completed by inexperienced appraisers at low fees.

In my opinion it is in the public's best interest that Licensed, insured and competent appraisers complete the entire report. Bringing in non licensed insured participants opens the door wide open for fraud. I believe this idea is misguided and is an effort to get rid of the only independent unbiased players I n the RE profession.

Its the next step toward eliminating real estate appraisal as a profession and it needs to be stopped. Say no.

if the lender is willing to lender on properties without appraisals being done that's their business i as an appraiser will not consider writing a report that i haven't personally inspected and done the required research on

Why is the emphasis on speed rather than quality?

This is clear violation of USPAP.

Absolutely goes against everything I've learned as to credible work.

Just plain Dangerous!!!

No need for this type of pridu

Whole problem could be solved by allowing certified appraisers to use their own trainee appraisers for inspections like we used to before AMCs changed the entire outlook on the profession. Trainee appraisers kept my costs and turn around times down. Why have a property data collector who isn't in direct communication with the certified appraisers? Makes no sense.

I will never perform a bifurcated appraisal product of any sort as my specialty is court litigation appraisals and I see huge liability in relying on someone else to perform a portion of the work that should be completed by one individual.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

So far these order have taken more time in the long run, even for the shortened desktops, the inspector get a week to do there part, we end up with only hours before the report is due and have a hard time getting extensions. So far there has been no way to get clarification from the inspector on an inadequate report. Over time you would definitely loose your ability to produce a credible report. neighborhoods,markets, desirability change greatly over time.

I would only consider if the licensed trainee were under my direct supervision. I believe this product will only prolong turn times with a 2 prong approach. I would only believe my trained eyes or someone I trust to perform to my standards. Truly, there are no shortcuts in appraising. California is not homogenous and many factors influence value. There is also danger of polluting the data set with bad data. I don't like it. Expand on the good work we do and the approach tried and tested. Quit trying to water it down. That's dangerous. Its a big investment. The standard form could be updated, maybe by an actual appraiser. I believe that possibly bifurcation is a way of training \$20.00 hour staff appraisers for AMC's.

This is a bad idea. Our profession spends hours on CE, collecting data that may or may not be during the process of performing an appraisal. Studying market statics, knowing what the market is doing in your service area. What if the data collector comes from Atlanta, GA to Jesup, GA, way two different markets, way different median incomes, price ranges, etc. This could be driven by Real Estates agents who might want it to lien in their favor. The purpose of performing an appraisal is to determine the value of the subject, this is to protect both the buyer and the lender. Let us not forget the USPAP Preamble An appraiser must act competently and in a manner that is independent, impartial, and objective. How can we do this if we do not inspect the property, neighborhood and comparable sales.

Insane

I spend hours upon hours making sure that I have accurate data for the living area. I have to sift through and analyse why MLS data includes sunrooms in living area and various other ridiculous things I should not have to waste my time doing. If real estate agents are to be counted on for measuring a property or anything else substantial, it is death to anything straight and trustworthy. It appears this is where the industry is headed. Count me out.

None. Expediting appraisals makes little sense. The main issue lies in fees. Every other person in the transaction (lender, title, realtor) are all paid out of the closing. So their fees are never considered. If appraisal cost we're rolled in, at a higher fee, the profession would then be able to grow again. I will always repeat, the problem the appraisal industry is having is low fees. Even \$500-\$600 is hard to split with trainee. Roll appraisal cost into the loan with everyone else's fee, then appraisers get higher fees and there will be plenty of people then wanting to get into the appraisal business.

Bifurcated Appraisals should be allowed. There are analyst that are good with appraisal skills but not so good in the inspection process, and vice versa.

see above....consultations on hourly basis. Will usually lead to higher costs



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The govt. entities and banking industry is just trying to cut corners maybe to save an insignificant amount of time & cost. There are many reasons to have a qualified professional appraiser with years of experience develop the entire process.
Can't do a credible appraisal without inspecting. May cost the client more went they have to order another credible appraisal. Not willing to put my license on the line for something I didn't inspect.
None
We have worked hard to make a living for nominal fees. I would never analyze a property I did not inspect. Might as well do a drive-by.
Bad idea
Great idea let's do more
Thank You.
There are several factors that contribute to a property-smell is one of those factors. Thanks, Amy
GOVERNMENT AND BIG BUSINESS IS KILLING OUR PROFESSION
Again, another way for the lenders to go around the appraisal process and therefor shifting the liability to the tax payers when we have to bail them out, once again, for corrupt lending practices. Perhaps if the appraisal was ordered at the time of the loan process, things would not always be rushed and the excuse of a shortage of appraisers would no longer exist.
The industry should pay an appraisal fee directly to the appraiser that will encourage people to enter the business and keep appraisers from leaving the business.
None
Since when do real estate brokers, property inspectors from other professions, soccer moms, etc. work cheaper than appraisers ? The appraisers are the lowest paid on the totem pole; are the lenders kidding or what ??
Allow non-professionals to provide 'inspections' or anything doesn't IMPROVE the valuation accuracy. ONLY an inspections allows an appraiser to view the property as a 'market participant' would in the appraiser geographic proficiency area.
None
I take pride in my work from start to finish and I believe that completing an appraisal based on information that I did not gather weakens the final result.
Just bad for the profession. We are heavily regulated to protect clients and the public and this does the exact opposite to which appraisers will take the blame.
Its all about saving lenders and other parties money and time. BUT AT WHAT EXPENSE?
I think these products could be a liability for both the inspection & the analyst. I dont think it will speed up the process, in fact, I believe it will take longer trying to coordinate two separate entities.
Lenders are going about the wrong way to improve the appraisal process. I have seen so many issues with the hybrids that I have done.
Another excuse to do away with appraisers.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The liability to the collector is still an open question. Doing a desk top appraisal, the appraiser is not influenced by outside parties. Relying on questionable input from and outside party (the collector) may adversely affect the analysis.

From what I've heard. I'd have to do 900 of these types of appraisals/year for me to make the same money I'm making now. I don't see me getting 900 assignments in a year.

Bad for the profession

The financial compensation hardly works now for appraisers. What they do not understand doing these types of appraisals are not possible for an appraiser to make a living wage. It is not possible to maintain the job as a profession. We are just paper pushers. We will have to get other jobs in fast foods or as greeters at WalMart. This "profession" is not worth the hassle.

Save money? Some markets may be better suited for this. My market is not.

Bad for public trust

In our market they only want to pay \$100 for data collect and \$100 to type a report. Why would I do the work of a full report for less than half of what I get for a fee now?? Also, I do reviews. I will not trust someone else to be my eyes in the field on a property. This is based upon reviews I've done where the original appraiser left out some major items that made a BIG difference in comp selection and final opinion of value. This is not a good idea at all. The Government making value decisions? Yea that won't go bad will it????

I am totally against this movement. After 45 years experience, I believe this will lead to a financial crisis.

Have already been turning them down.

The report will be only as good as the weakest data

Why do they exist at all? Data collectors do not inspect the subject, and they just add more cooks to the kitchen. Just order a 2055 if subject data is available, or order a full 1004 for the most reliable result. The users of hybrid products clearly are not interested in accuracy, simply cost savings. It's absurd.

stop taking short cuts on property valuations, this is the collateral for your loan. banks are looking for more trouble by taking shortcuts.

Unless appraiser change we will be replaced

all you have to do is look up the definition of appraiser and Appraisal as well as read and understand USPAP.

Manage the risk.

Appraisers already have the ability to have assistants and data-entry persons. Bifurcated appraisal discussions are really just smoke and mirrors that erode the credibility of the profession.

• An appraiser must comply with the ETHICS RULE in all aspects of appraisal practice. • An appraiser must maintain the data, information and analysis necessary to support his or her opinions for appraisal and appraisal review assignments in accordance with the RECORD KEEPING RULE. • An appraiser must comply with the COMPETENCY RULE and the JURISDICTIONAL EXCEPTION RULE for all assignments. Source:2018/19 USPAP Just a few examples from USPAP - And to all Appraisers this is what it means - UNIFORM STANDARDS OF PROFESSIONAL APPRAISAL PRACTICE. Additionally to those 30% of appraisers that would take the work find a different career!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This whole idea of bifurcated work product is a complete joke which has no root in common sense. It will not work and will lead to increased credit risk if lenders start using it. This does not promote public trust in the appraisal profession or banking industry.
This process will only benefit the lender. The end user or consumer will be left holding the bag again.....
None
I cannot believe a financial institution would lend on this type of appraisal.
Appraiser are the only independent person for the buyers and banks to rely upon during the process.
a better use of lender time would be to start revamping their process to INCLUDE and EXPECT the appraisal fee and to treat it as they would the CLOSING fee they pay to attorneys....would they like to do without the Attorney? I'm sure they would. Will they ? No way. They know that the Attorney PROTECTS their (ASS)ETS....and so it is with the Appraiser. The Lenders have forgotten WHO the appraiser protects....THEM!! and yet they don't want this protection...they want a quick , easy loan...and damn the torpedos. Who cares if the loan goes into default and they get stuck with a home worth 75% of its perceived value? Who cares if they have a bunch of assets on their books that are worth far less than they project? Who cares right? We've been here before people....and it didn't end well....
The appraisal industry plays a major role in the asset risk management for our lending institutes. Our industry needs to provide wonderful service, competent individuals and diversification of the industry.
GET RID OF AMC'S IF YOU WANT TO SPEED AND IMPROVE THE QUALITY OF THE APPRAISAL PROCESS!!!
If the bifurcated process is being applied solely on loans that the lenders would not call for an appraisal for anyway, then there may not be a negative impact on the profession. However, it would seem that they will most likely start to apply the process to a greater number of loans and widely broaden the deminimus and other parameters, thereby exposing the market and the profession to lower standards and higher liability as well as lower volume of standard appraisals in the long run. It will most likely not be beneficial.
This is just another ploy to put the appraiser out of business!
L
I am not interested in supporting this type of work. A full appraisal is better for the lender and the property owner.
N/A
I will never consider bifurcated appraisals, doing an appraisal where the appraiser does not physically inspect the subject is insane and terrible for industry
Bifurcation may or may not speed up turn times. If questions/answers/clarifications are needed from the inspector it may cause delays. The risk for error would be high for both parties even if it does speed up turn times on some loans.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I am not against AVMs if range of value exceeds loan amount and other credit/borrower/property criteria is solid. someone wanting a 50% LTV and is a good credit risk can probably suffice (and lender) if AVM lowest confidential value is much higher than 50% of the estimated value. I, as an experienced appraiser, believe that anything other than a solid AVM should have an appraiser view the property, comps and do the analysis. Much of the value, condition, marketability, etc is gained by visiting the property. We also have extremely high ethical standards, as each assignment is very important to do correctly, as to not hamper our ability to continue in this career. Someone who is not trained or lacks the ability to report things correctly, measure homes correctly and/or ignore problems will be a large issue in my opinion. For such a small fee, relative to the transaction amounts, i would think the lender, taxpayer, borrower and overall economy should consider the appraisal fee as a necessity.

What part of No is unclear?

I think this is a way to minimize the profession of an appraiser.

It is hypocritical to criticize appraisers for differing opinions on such UAD qualifiers as condition and quality in URAR reports, and then expect them to rely on UNLICENSED individuals to communicate that same inf on the subject on a hybrid or abbreviated appraisal form.

1. Fees have not yet recovered from the effects of HVCC and Dodd-Frank. 2. The process will over time reduce competence. I can be an analyst because I've been appraising my area for over 30 years. What happens when people like me are gone? 3. I'm really tired of regulators trying to reduce costs on the backs of appraisers. What about everyone else who makes a lot more money in every other aspect of the mortgage business. But pay me and I'll roll with the punches.

This process is developed by the banks to make more money faster. It will give loans to people based on the cheapest fastest product.

None

There is no substitute for the Boots on the Ground Appraiser who knows the market, has the professional contacts to confirm otherwise less then credible data.

It's about time we move forward.

As long as inspectors are trained properly. Maybe pass a test?

Too many moving parts and variables when one person does the inspection and another writes the report. The fees offered for both appear minimal and it appears to be a watered down product. Much talk is about "speeding up the process" but 3-5 business days is standard return time on an appraisal in most non rural markets. If the lenders did not wait until a week before closing and ordered appraisals earlier in the process "speed" wouldn't be such a hot button for some. For lenders willing to loan hundreds of thousands of dollars on an assett (home) a legitimate, fair fee to an unbiased professional seems like a fair trade.

We cannot stop technology from changing how we do things.

None



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Seems like a way for big lenders to save money and risk another mortgage meltdown. Why did the requirements get more difficult just to lessen them a few years down the road. This industry is becoming a joke due to the inability for this industry to lobby for ourselves.

Did we learn NOTHING during the recession?!?!?!?

The VA just rejected a Report for inadequate Verification / Source - why then is not visiting the SUBJECT & surroundings (especially in Rural areas) considered OK? We are getting mixed messages

There are other professionals who I would consider even more qualified than appraiser for PDC. Home inspectors. They are state licenced, in my experience provide a superior inspection, and often have more extensive construction experience than most appraisers. They lack exactly one element, which is home measurement. This is not a particularly difficult skill for most properties. The lack of neighborhood inspection is a bit of a red herring. This can be required, there is no reason not to include a drive by of the subject and comparables if this concern manifests, it would still save a great deal of time for appraisers. Cost of course would be an issue.

Clients expect the appraiser to have knowledge of the subject property that only inspecting the property would allow. They want the full appraisal at a reduced cost to them.

How will I know whether house has an odor from a cat, smoke, or other noxious substances, if I don't go in the house? Odors have a significant impact on value when selling a house.

None

BAD IDEA

There is not a shortage of appraisers... there is a shortage of appraisers that will work for minimum wage.

As an SRA and a state certified appraiser, I cannot not accept an inspector's work without on site inspection of the property. The potential liability is too high.

Speed and cost advantages for clients will necessarily come with a detriment to the credibility of the appraisal. It is not, in my view, possible to accurately determine where a subject's value falls within a range of value in a market area if the appraiser is not personally familiar with not only the market area, but also the subject being evaluated.

Fannie Mae updated their policy on allowing trainees and unlicensed individuals to inspect a property unsupervised prior to launching this program. This took place almost immediately prior to a large appraisal conference I attended. Many appraisers there voiced their direction and intent to hire trainees based on this news. It could have changed the profession tremendously for the better. An appraiser can train and guide an apprentice and then let them inspect some on their own. But no lender allows it. Fannie Mae knew this. They wanted a way to control the whole "unlicensed" individual scenario. They only updated their policy to usher in the pilot program. Appraisers with vision can speed turn times by adequately training apprentices without having to wait until they are certified level for them to inspect on their own. This is the solution, not more garbage from and organization that failed and was bailed out.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

These are crap. Slow appraisers won't be sped up by having some idiot do inspections for them, obviously.

It is my understanding that lenders collect the upfront fees for value determinations and credit reports. If so and the loan becomes a bifurcated valuation do the lenders refund (credit) the over collection or NOT? It has been my experience that once they have the fee they justify with any reason to keep it all. Since the bifurcated reports will typically be of lesser costs as the ones I have heard about this is a situation to be mishandled in the favor of the lender and not the consumer. Paying for what is not an appraisal yet charged for one constitutes unfair practice on the public. Though that is nothing new with the process.

Appraisers should always be consulted before attempting to change or improve the way appraisals are done. If the suggestion doesn't improve an appraisers profession or particularly the end users (borrower/buyer) do not benefit, then the idea should be set aside.

Bifurcated appraisals stemmed from the claims of an appraisal shortage which lead to claims of increased appraisal turn times. There are plenty of appraisers they just won't work for the insufficient fees that are provided by most lenders, especially via an AMC. Bifurcated appraisals are being pushed so lenders can reduce their overhead and manipulate the valuation to their advantage. Moreover, the majority of the automation of the appraisal process will allow lenders to manipulate, hide and control the market cycle. These types of products are not reliable and the majority of borrowers do not understand this. If borrowers were made aware of the limited scope and reliability of these products and their affect on the market they would likely be just fine with paying the extra fee for a real valuation. Who is to say lenders won't charge the same fee for a traditional appraisal, pay appraisers the reduced fee for a bifurcated "appraisal" and pocket the difference as they have been doing via AMC's. This is a scam, it is setting the stage for another crash and everyone knows it.

So today 11/13/2019 my trainee is considered not credible or competent enough to help produce an appraisal report when they inspect solely by themselves. Someone who has a 4 year degree, passed the state test, has the many specialized hours of appraisal education and is at 1400 hours of logged work experience and the report would not be accepted yet in a year or two, 3rd party person I don't even know, doesn't have to have any qualifications and can inspect for the lender and I have to rely on that in my analysis and reporting? That is crazy and the turn around process from order to report submission will take longer. It is upside down.

Appraisers have the tech tools - some may not want to spend the money or learn the new techniques. But plenty of Appraisers will spend the money and embrace the technology - if they didn't constantly feel threatened by lenders who constantly come up with plans the replace or limit the appraiser in the process.

I think the follow-up process to the inspector will double the turn time. I.E. what was the quality of the dock, how deep was the pool, the aerial looks like a busy street, etc, etc.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I believe appraisals are necessary to get the true market value of a subject property. These types of reports may also be in violation of USPAP. I was approached by a company to collect the property data of a subject for \$25.00, which means the appraiser will be running to numerous properties in one day and will not be able to be thorough in the data collect.

This process will only extend turn times, costs and diminish credibility of reporting

There is no substitute for first hand familiarity with the subject property. The appraisal process should be completed by one person from beginning to end of the process. Lenders have constantly complained about the cost of appraisals while having no idea of the work required to complete an appraisal. I perform almost no work for lenders and my appraisal fees are twice what they are compared to those doing lender work.

Asking an appraiser for an opinion of value while relying on another's inspection forcing the use of extraordinary assumptions and to be held accountable for five years for the opinion rendered is only for idiots. If the origination companies would order appraisals in the beginning of the mortgage process and not waiting to the last minute to order, speed would not have to be a factor and then quality would become a factor. I have completed numerous field and retrospective reviews of appraisals with speed with a good portion of the appraisals not worth the paper they were printed on. Asking for speed for a cheap fee will only result in misleading reports. No appraiser in their right mind would extract grid adjustments through paired sales analysis for the fees being offered for this type of work. This type of work appears to be an "ADD" for the "SKIPPIES" completing assignments fast with many, many shortcuts as well as unsupported adjustments. My vote is No.

Why not just promote and support the appraiser trainee process. It allows each appraiser more control over how the inspection is conducted.

These reports will be a perfect opportunity to defraud the lenders and ultimately the taxpayers. So many things that can be glossed over and disregarded by using a property observation that is limited. Neither the inspector nor appraiser will have any liability or all the liability. This is a garbage system. Do away with AMC's fee/turntime shopping and appraisals can get done in a timely manner.

The bifurcated product seems to be a direct contradiction to the accuracy required when completing an appraisal assignment, particularly the FNMA created UAD product and the expectation of AMC clients

Bifurcated appraisals only save money for the bank, not the borrower or seller. They also are solely an effort to split appraisal fees and pigeonhole appraisers into taking lower fees for the same type of opinion. Additionally, once all of the older, lazier appraisers retire, there will be even fewer appraisers willing to take a fee hit just so that they can stay home and be a heavier alcoholic and lazier baby boomer.

What happened to USPAP. How can an appraiser complete a creditable report. E&O will not be happy.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Personally do not support bifurcated reports... I do have fellow appraiser(s) who have outsourced their reports to third party writer(s) for years and have first hand knowledge of their numerous complaint(s) to the board... The appraisal industry does indeed have a long illustrious and successful history with in-house teams, be they family members, college friends, military acquaintances and the like... but to fully trust someone you do not know with your personal liability risk is ill timed... We currently have a culture of divisiveness and mistrust... until that has been corrected I will not be a fan... Happy Holidays to you and yours... Sincerely, don beebe/able appraisal, inc beebster1@lvcoxmail.com (702) 636-2093 office (702) 285-7474 cell

Real Estate agents, insurance agents or other non-appraiser individuals are not trained to properly measure homes and we will not be able to depend on the GLA, which can potentially skew the results of the valuation.

This will only work in suburban conforming neighborhoods built over the last 30 years with no external influences. It will not work in urban areas with high land costs and new construction replacing the older housing stock.

The overwhelming reason against it is liability. How can I guarantee my final product when I was not involved in some part of it?

You are setting the system up to fail worse than before the crash. You would reduce the appraisal business to a drive in hamburger shop. See as many as possible, pick a few items off the menu, plug them into a boiler plate format, and crank 'em out as fast as you can because there is no need for detail or proper analysis. Big, Bad, Mistake! I'm just a trainee and can see this! I'm dumbfounded you can't!

Appraisers provide more than an opinion of value. With new hybrid appraisal options that are currently being tested the appraiser is being "appraised". When Fannie Mae CEO, Timothy Mayopoulous, stated "Appraisers should be at their desks," not in the field with a measuring tape, making phone calls to track down homeowners" showed a disconnect with the service a real estate appraiser provides. The appraiser not only provides an opinion of value but confidence in the real estate market. The appraisal report can "literally" be taken to the bank. Of course the appraiser is also independent proof from a respected and certified person that the property actually exists and is "as advertised". Viewing, measuring, and photographing the property is all part of the process to understand what is being appraised. For anyone to suggest that the appraiser can sit at a desk, never go in the field, and appraised base solely on provided data is ignorant of the appraisal process. I want to end with a concern with the new hybrid appraisals being order by FNMA. I recently did a 1004D final inspection on a new construction home. The lender said that the original appraiser is unavailable and asked me to simply complete the final inspection for the closing and I agree. Once I received the original appraisal, I learned that the appraisal had been completed by an appraiser in Texas, not Georgia, and this is the reason the original appraiser is unavailable. Robert B Miller

none



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

While I can complete a bifurcated appraisal, I do not see any savings in time, in fact I think it adds time. However, based on today's technology along with a licensed appraiser inspection I believe a credible report can be completed. After all we rely on mls data by a third party realtor inspector.

Desktop appraisals have been done for many years. While their reliability is limited due to inability to know the exact condition of the subject, they can be a good option for less risky loans. Having a PDC with measurements and several photos completed by a trained professional will strengthen desktop appraisals.

I think the lenders would get rid of appraisers all together. This is a step in that direction

For no one is less certain that the banks benefit from this, as much as the unscrupulous lender predators that put at risk the economy and the credibility and trust of the clients to their benefit

Do not take my living away

This is the future

With the advent of USPAP and its requirements for competent, ethical, and professionalism in the practice of real estate appraising, bifurcation in real estate appraising is not compatible.

Duties as the Appraiser/Analyst provides for additional assignments otherwise not practical due to physical or health issues.

I can go on and on. The whole process is full of Assumptions which we now try to avoid. Why do they want to fix a system that works, This will end after lawsuits, etc.

I did not answer number 10 because I do not consider the bifurcation process to be an appraisal report so it would be unfair to say it will speed up appraisal turn times. I would have great concern as an appraiser and anyone who is relying on data supplied by a third party. In 30+ plus years of completing appraisals, it is quite frankly scary what I have been provided as comparable data by agents or 3rd parties. Question number 10 was answered only because it was required, please see my original thoughts I to why I did not want to answer number 10.

The Appraisal process can be bifurcated by the appraiser themselves by hiring a trainee or other appraiser to complete the inspection. A bifurcated appraisal should cost more than a standard Appraisal if the lender wants to receive the benefits of speed and quality. There is no way to complete a USPAP compliant report in the time that most companies are saying it takes to complete a 1004p

guess arcated appraisal - just make a wild value guess based on a picture of the house or a similar house or any house -- yeeeeehaaaaaaaawwwww!

To speed the turn time, allow comp photos from the MLS for all loan types. Driving to take comp photos is what causes delays especially when they are miles apart.

This is a bad attempt to save money otherwise well spent to protect the lender from lending money on an asset that is not accurately represented in this bifurcated process.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I have done bifurcated appraisals for 7 years for two different clients, on their platforms, and also did the property inspection side for two years in the beginning. As long as one stays in touch with the local market and is geographically competent it is great work. Not every appraiser knows their market well enough to do "sight unseen" work. I have worked the same market for 30 years so have no issues with not having seen the subject because I know the nuances of my market. As long as the appraiser can add caveats to the report there should be no issue. Also, one must understand USPAP in order to get a grasp on this. It's great work and the more appraisers there are who shun this work means that there is more work for me!

Bifurcation in real world practice is unlikely to be a substantial cost and/or time saver. The push for bifurcation activities are more loan production driven & consent with lender disdain for prudent regulation / responsible collateral consideration.

The MLS that is connected to the 1004P report does not work well for subject properties in Townships. My client is not willing to provide me access to all MLS in my state. This limits my area and forces me to obtain local assessment data. I live in Wisconsin and the assessments information is good. However, it takes time to get the information I need which defeats the reason for completing the report in the time frame (2.5 hrs). My average time is around 5 hours.

bifurcation should be illegal.

It is a hand grenade to the profession due to unlicensed , untrained and uninsured personnel doing inspections. As always garbage in garbage OUT.

...if it were my money being loaned...I would insist on a qualified licensed appraisal professional doing both the property inspection and appraisal analysis to insure everything is on the "up and up"...there is a lot of money (collectively) involved here, as evidenced by the "great recession"...

Biggest issue I see as an appraiser is more fee than time based. What they are paying to actually do a full field inspection with measurements is not sufficient in at least half the cases.

I would consider doing a "bifurcated" appraisal if the inspection were done by, e.g. a licensed home inspector who was identified by name & qualifications, and who I could optionally contact if I had questions. I would identify him/her as a contributor in the report.

This is a good reason for them to blame and sue appraisers in the future if the market fails again.

None

Will never consider appraising a property without seeing the property myself.

It does not make sense to split the appraisal. There is no time savings in this behavior only increased risk from an unqualified professional or disjointed thought process. Using a qualified appraiser professional protects the asset from risk. This is good for the consumer and the economy. Per Bankrate.com, appraisals are important to mortgage lenders because it ensures that they did not approve a loan to a borrower for more money than the property is worth, says Al Graham, regional manager of Georgia, Alabama and Florida at Silverton Mortgage. The appraisal also protects the buyer from overpaying for a property. Well said - Thank you.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Mistake!
Regarding question 8 - I would reword this - there is no "long term" benefit to bifurcated appraisal. They may be cheaper or maybe faster (probably not) but they are not as accurate and will hurt the industry in the long run.
For years, trainees have not been allowed to inspect properties. Now an unlicensed person is going to be allowed? Make no sense.
This is the worst thing I've seen happen to the housing market in the over 30 years I have been an appraiser. Yes, the housing market, not just appraisers. No one but appraisers care about, or understand, collateral value and safeguarding consumers.
Quality and Condition of subject and potential comparable sales and listings are of prime importance. The appraisal industry as a whole, is just at the beginning of unraveling the nuisances this key concept to value. We as appraisers and those on the lending side actually need to take a deeper dive into this vital concept to continue our role in consumer protection - not back away.
Its just stupid
I'm open to new methods and technology as long as fees are reasonable and liability are limited. Change is inevitable. If you cant adapt, you become irrelevant.
USPAP has always allowed desktop appraisal assignments. It is governed by the scope of work. That needs to be clearly set down in the appraisal product produced. You value on the data you are provided and comment accordingly.
BY definition, an appraisal is an opinion of value based on factual data. MY opinion of Value is based on MY collection of factual data; MY analysis of the factual data. And the process includes MY determination of what factors are given weight. The minute some other person contributes ANYTHING to the process where I am required to rely on THEIR data collection or their analysis; AND sign MY name to it..... then it is no longer MY OPINION OF VALUE and by definition, the results are no longer an appraisal. WHOMEVER came up with this "bifurcation" concept is an idiot. And those trying to legitimize this sham of a process.... are criminally insane. I have 35 years experience and it is far more important to focus on paying appraiser's the fee's we deserve for the work we do. Minimum of \$750 for a basic 1004 SFR and go up from there - to, say \$2,000 for complex assignments; with a 1 week turn time from date of inspection. AND, getting rid of the AMC's - they are nothing but thieves hiding under a corporate blanket.
Its bad for the profession.
This type of valuation process leaves the door open for another major housing market crash. It is a time bomb and the public will be the ones that pay for it. If you consider the amount one pays for a home, the appraisal fee is not that significant as compared to the cost of the home and the much higher fees that the borrower pays to the lender for the loan.
AMC'S are the problem not the appraisers.
Bifurcation has got to be a joke, right???



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The risk of turning over an important part of an appraisal to someone other than the appraiser is frightening. Part of the competency of an appraiser is to be able to both physically inspect the subject property and comparables and then use that information to create a credible report. I am sure there would be analysts out there that would be exceedingly good at collecting data, but others will learn to cut corners. Appraisers will get sloppy and fall back on poor data collection to justify a bad report. The clients will be hard pressed to know who to blame for a bad report. We have regulations and rules preventing lenders and property owners from colluding with or overly influencing appraisers. How long will it be before we uncover analysts colluding with appraisers, or colluding with lenders simply because there are no laws to address this newly created "bifurcated" business relationship?

I have completed two 1004P's as the appraiser analyst, and one went smooth, the other I wasn't supplied with sufficient photo's and they were not labeled properly so it took too long to type trying to figure out the photo's. I kicked back a 3rd assignment this week for insufficient photo's of the property because I couldn't see all of the rooms, only 1/2 the kitchen, and only sinks/counters in baths, not showers. The lender/AMC are giving me grief and pulled the assignment to re-assign, but after a phone call and explaining that I cannot report material or quality of items I cannot see, they are going to send the "property inspector" back out who is not licensed in any fashion I learned. I am a very thorough property inspector when I look at the homes I appraise, and this is the most concerning is that they are providing me with insufficient data. No license, improper training, and the lender said they are working for a 3rd party who schedules the inspections, so no loyalty to the client. Seeing the property and neighborhood is a fairly critical portion of the what an appraiser does in order to properly value a home. So far, the homes I have done are cookie cutter ranchers, but I cannot see this working for a property with any complexity.

Slow turn times are typically due to lack of access, waiting on data from bank
Should be illegal based on lack of USPAP compliance to all standards 1 and 2.

I'm not taking a pay cut to do these type of assignments. I also like getting out in the field. I would go nuts sitting in front of a computer screen all day long.

If bifurcation becomes an accepted practice for determining market value, I'll leave the profession and never look back.

See no good reason for bifurcation. Don't see the appraisal cost being less as there would be two fees. one for the property data collector to cover time and travel (not to mention insurance and other costs) and the analyst, while saving on travel costs, would still require a fee commensurate with one's knowledge and experience along with covering their hard and soft costs. Don't see a significant time savings either as the analyst must wait for the data to be provided before producing an appraisal to be in compliance with USPAP ("COLLECT, VERIFY and ANALYZE all information necessary for credible assignment results").

Why should I cooperate with efforts to drive me out of business and destroy the appraisal profession?

None

The process is difficult to understand as an appraiser and likely to confuse borrowers. Who fields questions from reviewers, borrowers, underwriters...



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I'm interested in these assignments because I don't have to leave the office. I work in the Los Angeles area where it is getting increasingly more difficult to drive due to constant, heavy traffic.
More people involved more. mistakes. More wasted time. Invites fraud
Fees are to low to support the appraiser profession in the long run.
These assignments are simply a bad idea, let trainees do the inspections and cert res complete the reports under direct supervision. There is just too much room for fraud, anonymous data collectors along with undue AMC influence and incompetency is not a credible way to develop an opinion of value - bad for the public interest.
The banks will make more money as usual and credibility and details of actual appraising will be lost in the process.
Perhaps its time to actually support appraisers versus figuring way out not to use them. Where is the love and respect?
I have completed over 200 desktop appraisals and they do add to the appraisal process for a number of situations.
Appraisers already rely on data collected by sources such as realtors , assessor etc. My thoughts are that using an inspection report as long as it is deemed reliable does not hinder the appraisers ability to produce credible assignments result.
Bifurcation is a bad idea that will compromise the validity and accuracy of the data provided and analyzed.
I think this is the beginning of the end!
I've been appraising since 1991. The appraisal process has changed from an analysis and critical thinking valuation to data processing. Why even bother with an appraisal at this point, other than to have someone to blame. It's been proven we can't blame the too big to fail banks, or the borrower who shows no responsibility to fulfill a contractual obligation. Loans should be made based on the worthiness of the BORROWER, not the property.
Rather than speed appraisal turn times, I believe it will extend turn times when a valuation is needed, as the Property Data Collection/Inspection would be assigned, scheduled and completed, then after the lender/client reviews the report and determines that an appraisal/valuation is needed, then that assignment would have to be assigned and completed resulting in a process that at best would take the same time as a typical 1004 appraisal, and would likely take longer. (Delays could be the appraiser/analyst having a question about a photo or other information in the property data collection report... what if the property data collector made a mistake or omitted relevant information?)
Make sure appraisers are doing the property data collection.
Show me the money
BAs are OK but only in limited cookie cutter type assignments with ample comps.
This reduces liability to the lender and adds liability to an appraiser. It has been studied and affirmed by lenders to reduce their fees and liability. It is definitely not in the public interest!
The data is not trusted by appraisers. Therefore, the report would not be trusted by the public.
Again, this is a money grab by the banks and amcs.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I feel bifurcation process is simply trying to remove the appraiser from the process. Creating new threshold values where an appraisal is never needed and a data collection agent can verify value and evaluate risk associated with a loan.

In a Real Estate transaction, the Appraiser does the most work, has the most liability and makes the least amount of money. 2 weeks to become a real estate agent and make 6% of the sale and 6 years to become an appraiser and make a few hundred dollars. This is an outrage. And the mortgage and title people? They make way more than appraisers. A lot more. So now they want to kick us further to the curb and pay us nothing. I call my appraisal career 30 years of abuse. The HVCC wasn't enough to destroy us. This will do it. The lenders do not care about colateral. They know the Government will bail them out with our tax dollars. My biggest regret was becoming an Appraiser and wasting 30 years of my life to now live in poverty. No pension and lousy social security because of the HVCC. I am bitter so stop throwing more shit at Appraisers. We are all bitter. I am still working at 70 years old and can barely afford to eat.

big mistake

Just another way the consumer is getting cheated. Who wants to sign something or be accountable for this product? Will E and O cover an appraiser? 2 people will not speed up process.

There is a decreasing reliance on accuracy in appraisals. Acceptance of a good guess is where this is going.

It makes zero sense to send an appraiser to do the inspection then send it to another appraiser to complete the valuation part. It will not save time or money. It should be the same appraiser from start to finish. I would never do the valuation portion as the inspection is an important part of any interior appraisal. I need to see, touch, smell the home I'm appraising.

Best of luck, people forget about 2007-2008. This is a liability train wreck.

these assignment are about beating down the price on legitimate Appraisers at the cost of accuracy & Appraiser liability. Won't touch them unless there is dramatic changes to the process

For me, even exterior only appraisals take more time because I have to do more market research, not less.

This is an extremely bad idea for everyone involved. In the transaction of purchasing and refinancing, the appraisal is one of the lowest fees that are paid on behalf of the borrower, yet it is the most essential element of the process as it is the collateral on the loan for the lender. This makes no sense that they would be willing to reduce the one thing that is the most important. If I was making a loan, I would want an accurate appraisal of the collateral for that loan, period!

For me this is mostly about fee. I can not mitigate the risk with such low fees that are being offered.

Driving the area and neighborhood that surrounds the Subject and the comparable sales is underestimated in all of this.

The newest wave of professional liability suits comes from doing bifurcated reports. The fee offered is not commensurate with the risk.

This will allow appraisers more time to spend on the part time jobs they will have to undertake to a livable wage



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I would never complete one of these reports.
N/a
Would be very interested in knowing the estimated fee breakdown. Is the charge the same as an existing appraisal fee, if so, how is it split between property collector and appraiser. Reason for concern, I have been offered only \$85 for my part, and that's way too low for the most important valuation part of the process. If fee is not higher, then I really think there will be limited participation. This process can work, however, greed should not exist for lender or AMC, and appraisers should be paid fairly based on state location and city.
The reason I do not like bifurcated appraisals is that they are essentially getting a full appraisal (almost same amount of work) for a fraction of the fee. The Appraiser/Analyst portion is really no different than just doing a desktop appraisal, which in that case my fee would be about \$400. Not worth it for the minuscule fees they are offering (\$75-\$150) with the same amount of work involved and liability as a desktop appraisal.
How is this anything other than trying to pay appraisers as little as possible? Find trainees who would die to just have a chance to just touch a tape measure and pay them nothing then find some desperate appraiser who just needs to put food on the table and end up paying half of the fee of a normal appraisal. These things offer NO benefit to appraisers and only save money for the lenders. Ridiculous.
Terrible idea
i would never rely on anyone else's observations I think it is unethical and will lead to unreliable results.
Your options aren't in my concerns. Those that order think we can do this in just 45 minutes and they will give us the comps to use! UGH! I don't want to be an inspector since it is not what my profession is. I don't think trainees or agent will see what a trained professional sees. Also, I don't want to climb on roofs.
I reflect this pilot program.
I've got a physical problem that makes measurements difficult so this option is ideal for me. The problem is the low fees.
This type of appraising will deter potential (new) appraisers from entering into this profession.
It doesn't appear they will be any faster or reduced price for the consumer. Apparently only reduced fee for the appraiser with same amount of liability.
There are many more cons to this type of appraisal than pros. The biggest con is LIABILITY OF THE ANALYSIS. I would not want to put my license and my liability in the hands of someone else, especially a trainee.
The fee must be adequate because the appraiser will spend whatever time necessary to complete a credible appraisal, with or without inspecting the Subject property.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I believe there are other ways to accomplish the same goal of lowering appraisal costs and turn times without bifurcated appraisals. I don't think all properties have to be measured and we don't have to drive comps. In my market area I have good access to MLS and Google photos to confirm comp location. Additionally I believe the appraisal process is better when the appraiser views the subject property then selects comps, rather than the other way around. Is there a credible appraiser who would argue we should always research comps before viewing the subject property? Taking away comp photos allows appraisers to do a better job more efficiently with better accuracy because they are not forming an opinion of value before seeing the subject property which is especially important when the subject property improvements differ from what was anticipated.

Bifurcated data collection should be done by appraisal trainees under supervision of a licensed and certified appraiser. Ironic clients don't want trainees to inspect without a supervisor but will get anybody else to inspect without supervision
Ridiculous

This is a bad idea as appraisers will become uninformed to new market areas and neighborhood conditions. Second hand data has never been a good idea. Garbage in garbage out.

I think they are great

Person inspecting may not be familiar with FHA or VA MPR's, or knowledge of what is permitted and unpermitted in additions, local code, etc.

I would never do an appraisal on a property I have not personally seen. Our E&O insurance would not cover it and I do not trust anyone else doing my job.

I had the opportunity to later inspect a home I recently completed the valuation on in a bi-furcated assignment. The inspector had failed to tell me the stairs to the second story lead into the roof peak to where you had to duck down as you climbed the stairs, the top step ending at only a 4' height. They also failed to identify that the home was only 3' away from the commercial building behind it - a zoning compliance issue in an area of 10' minimum set backs. Also failed to report mold growth and water stained ceilings. My second appraisal, after personally inspecting the home 2 months after the bi-furcated appraisal, came in 25% lower! I find that these assignments are only marginally better than a 2055 drive-by assignment, but still not as reliable as a traditional 1004 where the appraiser performs all. As an appraiser - CYA disclaimers will be critical!

The use of bifurcated products is potentially the tool that would bring down the house of cards that it creates in the mortgage industry.

It takes almost the same amount of time to do the bifurcation appraisal minus the inspection which out of the whole process is the least amount of time

I have been an appraiser over 40 years. Many years ago I received additional, exceptional training at World Savings and Loan. I cannot tell you how many times we heard "the knowledge is in the field." Additionally, the limited information I have seen regarding the bifurcated appraisal has the separate fees for the bifurcated appraisals less than the fees currently paid to the appraiser who completes the entire 1004 conventional appraisal. How can the value of the completed bifurcated appraisal be less? I have not studied this issue, my information is limited, so if I am wrong, please let me know. Thank you.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Fannie and Freddie have crafted this so they can still hang the appraiser if the loan goes bad.

I do not want to be made liable for an opinion of value based on some one else's work. If the inspectors have no liability or responsibility and are not licensed or accountable for their work what is to prevent them from ignoring information that would have a negative impact on value or marketability. The appraisal is a process of discovery about the subject property and its overall appeal and condition, the neighborhood and its overall appeal, site appeal, external influences, etc. If the appraiser signing the appraisal did not do all of this how can he be expected to take responsibility or liability for it. If FANNIE and FREDDIE are going to base loans on a value range and the borrowers good credit they may end up with more properties under water in the future. Many people with good credit walked away from their mortgages in 2007 and 2008 when they found that their properties were under water.

I don't believe this is good for the industry and not seeing how it will speed the process up. We are still responsible for researching, verifying and the final value estimate. E and O is saying they might not cover us for these products or raise rates substantially but yet they want to pay us almost nothing for all this work. We will also lose touch with our markets. Visual of the area and sales data can tell a different story then what is just raw data from county and mls.

In the rural market that I work in, there is info and data that only an active participant in the market would know and/or understand. If you would like another financial crisis like we had 10 years ago then I think these bifurcated appraisals would be a good way to get the ball rolling.

Photos are deceiving, there is nothing like visiting a property to get a real sense of what a typical buyers's motivations, or turn-offs are.

I only accept assignments where I already have geographic and market competency.

Nine

In my particular situation, being an Appraiser/Valuation Analyst pays better than traditional appraising and I am at the age where inspecting houses and driving comps is too strenuous.

Bifurcated appraisal are just a way for the lender to rubber stamp their avm valuation with the appraiser participation.

This is of the interest of the Real Estate Moguls.

I can see (appraisal mills) large companies doing this to increase volume which will likely further decrease quality of their reports.

It's happening for corporate america, not for industry service providers or consumers. No consumer will save money and a lot of appraisers will need another career.

If change is eminent we must change. Reasonable fees must accommodate our analysis and our liability should be minimized or eliminated for this type of work

Mini times agent know not sure need many unnecessary photographs



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I think clients are understandably trying to compete on time/fee for something that they need for risk analysis. I think these so called bifurcated appraisals give false risk awareness, truly if they would otherwise forgo an appraisal they should just lend without the appraisal. They don't, because they want to know the risk. The bifurcated appraisal product does not provide a reliable picture of risk, so it's a waste of resources AND is dragging down the reputation of the appraisal profession at the same time. There is no place in the market for bifurcated appraisals the way they are being used right now, but appraisers can be released from some of the more ridiculous scope requirements in order for appraisers to provide faster/cheaper appraisals (allow trainees to inspect, eliminate comp photo requirements, allow value range rather than value point reporting, etc)

I am a commercial appraiser and only due select residential assignments. They should use the word bifurcated appraisal report or there can be confusion by clients or parties not familiar with the appraisal process in the first place.

Without the appraiser who estimates the market value without seeing the subject and comparables in context, then the finished product is suspect. It would no defense to say the Value Estimate was wrong because the appraiser didn't view the subject and comps.

See survey

If consider the time of inspection and write the report, the time will be the same. The appraiser who will carry responsibility for the value is going to be in a difficult situation to protect himself/herself if the potential issue of the creditable report will arise. My opinion to be on save side for the lender, only reliable work must be done by the appraiser. (Yesterday I have talked to the realtor and she does not know what is GLA. What kind of inspection she can perform?) 2055 must be done in rare situations when the report was done recently and need just make sure the property still there. The lender finance hundred of thousands for the property and trying to save \$50 for serious work? There is no common sense.

Process will take MORE time since another party is involved and their data needs to be checked and/or re investigated due to lack of skills. The economy will suffer from additional mistakes!!!!!!

I don't understand why the apprentice appraiser that works for me and I have trained for several months cannot do an inspection without me present. Then you expect me to work with someone else's data collection when I trust my apprentice and cannot use them.

The use of creditable databases like MLS where licensed Realtors input data and photos of properties is the best solution to expedite the appraisal process versus random non-licensed property collectors who have nothing to lose if they report incorrect or misleading data. Appraisers should only have to inspect the subject property.

none

If someone has to inspect for data collection prior to either them or someone else completing the report process, I do not see how this saves time. The 2nd part can't be completed prior to the 1st part being completed.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

It's IMPOSSIBLE to be USPAP compliant and complete one of these "appraisals." Most times, lenders want you to complete it on their form, they provide the comparables, there is limited if any space to provide actual data/information, etc. The liability for appraisers is astronomical. I've seen AMCs stretch out an appraisal time to over a month trying to get the cheapest price. I've also seen them ask for a revision 1-2 months after the appraisal was submitted (and have delayed closing as a result). Appraisers are available. It's just that banks want a cheaper solution and maximal control. Why should the appraiser put their head on a chopping block and compromise their professional and personal integrity to work for free while the bank continues to rake in millions? Its absolutely disgusting. I refuse to play this game. I produce credible appraisals and do my full due diligence. This "trend" (along with appraisal waivers, BPOs instead of appraisals, AVMS, etc) is going to cause a MASSIVE and WIDESPREAD economic collapse once people's houses are continuously overvalued and they overpay. It's going to be the 2008 crash all over again, but this time it will be 20 times the size (especially after S. 2155 was passed last year, see link below). And when it all comes crashing down, banks will get their buyout and look for someone to blame. All those appraisers who are completing these products will probably lose their licenses because it doesn't comply with USPAP. Then there will be less available appraisers and banks will really use that as a reason to get rid of the residential appraiser, despite the idiocy that the lack of consumer protections and an unbiased party involved in real estate transactions is what is causing this economic instability in the first place. S. 2155 was passed last summer. The last parts of it that really take the regulation off the biggest banks that do business in the US is only now kicking in. The crash is coming. And it's going to be bad. I intend to still be standing once the dust settles. And if I do these shoddy products, I won't be. Ref:

<https://www.americanprogress.org/issues/economy/reports/2018/02/28/447264/fact-sheet-senates-bipartisan-dodd-frank-rollback-bill/>

I have seen first hand how poor the data collection is and the unwillingness for the AMC to secure accurate data once you go back to them with concerns about GLA, Condition, and quality.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The appraiser who is actually doing the appraisal should inspect the property-always. Many bigger shops have been doing appraisals for years based on inspection data gathered by someone other than the appraiser who signs the report. However, it is always another appraiser or appraiser trainee in the same company. Sometimes I wonder if the lending industry learned anything from what happened in 2008. Bifurcated appraisals and AVM type valuations are not good for the lending or the appraisal industry in my opinion. There is no substitute for physical inspection by the appraiser. Is the data collector going to see that same things and make note of the same things as an appraiser if the data collector is someone outside the industry? Doubt it. Besides bad valuations coming from a possible shot in the dark by the appraiser, the appraisal industry will suffer. It is already difficult to get into the business and many of the younger appraisers that have come into the business in the last 10 years are getting out because of lower fees from AMC's and higher levels of scrutiny that mostly causes redundant work for the same fee. There are not many young appraisers. The average age of a certified residential appraiser in my state is about 60. If FNMA has their way, appraisal reports for mortgage lending could be eliminated or severely reduced in volume in the next 5 years.

The "data collection" part of the hybrid appraisal process is an "analysis" of a property. The data collector will be "analyzing" which features are or are not important in the process of collecting data. Under our state law anyone "analyzing" data for the purpose of an appraisal has to be licensed by the Appraisal Board. On the other hand, if the data collector is only checking boxes with no independent thought process for analysis of the property features required, and with the valuation analyst never visiting the property, WHO actually analyzes a subject property and the neighborhood at any time during this hybrid process? As analyzing a property and a neighborhood are major factors to consider in the valuation of real estate, I believe these "hybrid appraisals" will result in another major collapse of the financial markets as they fail to adequately acknowledge the fundamental principles of valuation.

Its a GREAT sign that surveys are being conducted now on these crap products. That means that ENOUGH APPRAISERS are saying no to the chump AMC's whom are trying to steal a MAJORITY of the appraisal fees and appear to be unable to locate appraisers desperate enough to work for wal-mart hourly salaries. No way..no how..I will leave this profession before I assist in its destruction with these garbage hybrids.

I will stand in court and defend my appraisal all day long, because I inspected, measured, took all photos, talked to homeowner about house and neighborhood, drove neighborhood. Further I have appraised in Whatcom and Skagit county for 20 years. I KNOW MY MARKET.

I believe it is a terrible idea and I do not want to depend on anyone else work to make my decision and be liable.

It is bad enough that appraisers/lenders/review appraisers rely on realtors' exaggerated, embellished comments in the MLS. Appraisers now do the work based on the third party (mainly realtors, I assume)? What are they thinking?



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

No one who actually understands valuation would think this is a good idea, therefore it is obviously not about any consumer benefit, or does it serve/increase the public trust. It will not be faster, especially with AMCs shopping both ends. It will not be cheaper. It will not be better. It will be rife with fraud. But, everyone already knows that, it will only serve those that profit by the loss of checks and balances. Often times appraisals are the only check and balance on a transaction. This will be great for those builder/lender/agent operations, no check on them at all. Why bother at all? Just check credit and employment and cut a check, worked well for the save-a-loan, 125%LTV products years ago..... The excuses of why it all happened again are already written.

The main purpose for bi-furcated appraisals is for lenders to save money. I do not believe any time will be saved in the entirety of the process.

For appraisers to have had so much liability in the appraisal process. It seems now none of that matters!

Bifurcated appraisal will be the reason for the next depression and bank/mortgage failures.

I cannot believe that no one saw this coming when Fannie started data mining. I believe that there is nothing that appraisers can do about it at this point. For the post part, appraisers are stupid in thinking that the higher ups are going to come to their senses and realize they need us. Appraisers have always been the fly in the ointment! Getting rid of our voice is one of first orders of business for them

The questions in this survey are worded very poorly and can lead to bad survey results. For instance the questioning in what we believe would be a benefit of the bifurcated appraisals. Even just the first question is terrible. Because most lenders not have the ability of passing on an appraisal under a certain dollar amount. The questioning assumes that appraisers are ok with all aspects of what is allowed now. Obviously this would be a benefit to the client to pass liability to the appraiser at a fraction of the cost but if we are forced to do this anyway to remain in the profession? I think the wording in the survey is terrible and assumes we are all on board with the changes being made behind the bifurcated appraisals.

This concept is a complete disconnect. How they can even consider it is beyond me. I am a Certified General Appraiser with 38 years experience nearing the end of my career. At this point, it would be easy for me to do inspections only. However, I feel the best way is to do the appraisal "soup to nuts" by one person.

As an older appraiser, it seems a natural to move my business in this direction. I am concerned that familiarity with locations will diminish if the appraiser does more bif's and fewer full appraisal that requires inspection of the subject's area.

One of the most important aspects in appraising is viewing the property and the market area. There is no substitute for physically viewing the area and the property. I do not see how turn times and even fees will be reduced when you are introducing additional people in this process.

This will lead to another Fannie Mae bailout.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

My biggest concern and complaint is that appraiser's are handcuffed into a certain product due to federal law (appraiser rotations), lender and GSE requirements (forms and inspection requirements) making it difficult to provide faster turn times and then are going to be forced into bifurcated appraisals. If trainee appraisers can't be relied upon to complete the field work, how then can this process be more reliable?

The bifurcated hybrid report is a dangerous sham concocted by mortgage industry bad-actors (appraisal management companies). It replaces a credible appraisal done by a skilled appraiser at an adequate fee with a shoddy bifurcated report done by a desperate "lowest bidder" willing to cut any corners necessary to survive on an inadequate fee. The lender is charged for a top-dollar product, provided with a bottom-dollar product, and the bad-actor keeps the difference. This sham negates the collateral risk assessment: if the lender cannot establish a credible collateral value they should just make an unsecured loan.

Who's stupid idea was this anyway? Who does it benefit? Highly suspicious!

I don't think it will speed up the process or reduce the cost and it will definitely not improve accuracy

A serious mistake.

Bifurcated/hybrid assignments work better in urban areas with lots of data. Negatively in suburban/rural areas. "One size fits all" is not applicable with these kinds of assignments.

The things they come up with!! Go after bad appraisers, problem solved at a minimal cost!! I turn appraisals usually within a week, lenders take 30-45 days to close a loan, why is it the appraisers fault??

New way to try to deny that the full appraisal process is needed and an additional way to cheat the appraiser out of part of their fees.

There's one too many "r"s in the words Bifurcated Appraisal

This is a weakening of collateral analysis. Speed is not always a benefit.

Is it any wonder why no one wants to get in this business.

None

I see no reason to continue in this profession if this is what the future holds.

The push these days for everything to be "faster, faster, faster" is appropriate for many types of services and technology. However when we're talking about the largest single investment that most folks will make in their entire life, isn't it more prudent to maybe slow down just a bit and make sure it's done right? To make sure the homeowner is confident that they are making the right decision and not getting ripped off, etc.? As someone who helped develop the industry standard format of the forensic field review for the GSE's back in 2005 and 2006, and someone who has completed literally thousands of such reviews prior to, during and after the crash, I know first hand about the mirriad of things that can go wrong (for everyone involved) when sloppy and/or careless (or God forbid misleading) appraisal work is done. It can not only affect the borrower and the investor adversely, but indeed also the entire economy. While I believe these types of reports have a LIMITED purpose in the financial world, I fear the push to make them the norm could be dangerous. While the industry as a whole keeps seeking to find the "light at the end of the tunnel", I fear that light could indeed be another "oncoming train".



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I tried one. Filled in report. Waited a week or more for the field work . Report was cancelled. I wasn't paid. Could have done the entire report in less time.

Bifurcation could work, but liability and adequate fee issues need to be clearly addressed. With the advent of google maps and satellite imagery services, I think concerns about neighborhood factors can be addressed with the use of those tools.

Inspections are still dependent upon access to the property. While everyone in the lending process is racing to cut time, the borrower will still control a good part of the timing. If this was about efficiency, appraisal consumers should be using drive-by appraisals where the turn-time can be quicker. This is the fastest solution without an inspection. This is about getting rid of the appraisal in the long run. I believe the strategy is that if enough "data" can be accumulated, then the appraisal can be eliminated.

Appraisal fees have not advanced in twenty years. I as an Appraiser cannot make a profit and continue with the fees this new process will pay.

I expect the way costs will be lowered, will be to have poorly compensated or or poorly trained property data collectors, supply information supply information to AVMs for valuation. In non - homogenous areas this can/will be disasterous.

A lot depends on faith and qualifications of the person doing inspections and data collection!

It's all about the money

An extremely important part of the process is viewing the home, getting a feel fro the overall condition, lay out, appeal, etc. Imagine if someone were buying a home. Would they want someone else to view the home and then tell them about it, so they can make a decision.

But at what cost. If you haven't personally seen the property you can't accurately assess its condition or value.

I think this will be the end of our professions as appraisers if others embrace this. The reality of it is just another way of the industry to cut our fees and boost the fees of others in the process and ween themselves away from getting true unbiased market value appraisals on properties. The mortgage industry will crash again if this is embraced the appraisal profession as an industry. Who in their right mind as appraisers would complete these on either side of it. After 22 years as an appraiser it would spell the end of it in my opinion.

The big thing is fees. I am not optimistic that the fee offered to the property inspector or the appraiser/analyst will be high enough to make bifurcation feasible.

As technology gets better the need for analyst will decrease. Appraisers need to discover new skills in order to be in demand.

Will not do them.

i am sure that the collection of this data will be used in an effort to counter the opposition to these bifurcated appraisals

This will not speed up the process. In fact it may make it worse by waiting til the last minute to hire the appraiser. Hiring the appraiser at the end of the loan approval is part of the problem.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

While I understand many professions undergo change and in some cases become obsolete, I cannot see where the bifurcated appraisal/valuation can even remotely be seen as engendering/promoting the public's trust.

This process appears to be a work around to the appraisal process. The fees are not worth the effort as the analyst or the PDC. The whole point of the appraisal is to protect the lender from a bad investment. I believe this will prove to be a complicated process that will inevitably negatively impact both the lender and the consumer.

Important that the appraiser is competent in the area where the property is located.

A thorough inspection is essential to determining what comps to use. Determining the condition and quality is also essential. If we could use other opinions to arrive at these assessments, we could use listings and listings are not always thorough nor do they present the entire picture. I believe that the use of bifurcated appraisals, will cause the market to be vulnerable to bad loans (over-valuing the collateral).

The focus on appraisal speed is a diversion of poor mortgage servicing. In other words, the faster an appraisal is done the longer it sits in a lender's file until it closes. When things are very busy as they are now, lender's take 2-3 months to close a loan. 2-3 weeks or less for a full appraisal. Outstanding service by comparison. The lender will still likely charge the borrower full appraisal fees and pocket the difference. We all know what lender's are about. Every deal needs to get done at maximum profit. A better solution is to go back to shorter forms and more drive-byes by real appraisers. I guess this has slipped everyone's mind, and proves correct my prior commentary. Thank you.

I am 100% against this as I think everyone in our profession should be. We need to come together as a united front/profession and take a stand, a stand for our profession . We need to not allow or continue to allow other entities / professions to lead and/or dictate ours. - If we do not stand for something...we will fall for anything.

3rd party ordering only increased appraisal costs to the end user. Less money to the appraiser. Something very similar will happen here. Accuracy and credible results will suffer.

I am a licensed appraiser but I would much rather do the data collection. That's the easy part.

I am against bifurcated appraisals for all of the above reasons. I believe the liability on the appraiser is too great and the fees are not worth it. Appraiser's are professionals and are being pressured to lower their fees and quicken their turn times. It's unfortunate.

This is one more attempt to diminish the appraisal profession in disguise of saving the consumer money, but will only save the lenders bottom line. Appraisers go through many hours of education and field experience and are constantly fighting to prove their worth and its getting old.

Bifurcation makes sense.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I can schedule an appraisal and have it back to the client in the same amount of time that it would take to have someone else go inspect and me do the report. If a lack of appraisers in certain regions is a problem maybe the governing bodies should roll back education requirements to bring more people into the profession

Na

Another way to try and get rid of the appraiser

There is an appraisal process and when you don't do the whole process the end results are compromised.

My biggest issue is that most of the order requests I've received for this type of product are for properties way outside my normal work area. Just because I have an Arizona license, doesn't mean I'm geographically competent in all of Arizona, however it seems that lenders do not care, as I have received offers for bifurcated appraisals where the subject is located over 200 miles from my home / office, in towns I've never even visited...

This is like separating the brain from the body . . .it just doesn't make sense.

It's just a less expensive tool for lender . Liability is still with the appraiser.

Visiting the property and the neighborhood is crucial to understanding the appraisal problem.

At the end of the day: does the industry want professionals that generate enough income to raise a family ? Or does the industry want a part time person making secondary income ? I costs over \$5,000 for a loan in the United States. Are there others in the chain that have a license and Insurance? If the Industry does not need a professional that makes enough income to support a family, it seems to me the industry is going the correct direction. If the Industry feels an Appraiser Should be a professional, the industry should spend a bit of time considering this. Does the Industry need Professional Appraisers or "Hobby" Appraisers ?

The appraiser doing the data collection inspection should have the first opportunity to complete the last process of the bifurcated appraisal.

The bifurcation process appears to be designed to build the lenders databases of home details and reduce the quality of appraisals. While reducing lenders cost it will also reduce the number of professional appraisers (perhaps the true goal of lenders so that can go to congress and state "there are not enough appraisers, therefore we should not be required to use appraisals.").

Looks like a disaster in the making.

Only one person will sign the report. No one else?

The solution to the issue is to prohibit amcs and or lenders from NOT allowing a supervisory appraiser trainee to complete a site visit alone.

This is an assault on the public trust in search of profits by the banking industry

Sort of doing an appraisal with MLS comments "too many upgrades to list" . Who gets the blame/ liability for a bad appraisal?

I have spoken with friends that are not appraisers about this type of report and they think this is crazy and makes no sense. They would not trust this type of appraisal on their homes.

Value is not only based on condition of the property and there are potentially external physical factors that the appraiser analyst may not be aware of. It's a lot to ask the appraiser to be liable for second hand information.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The Bifurcated Appraisal is being touted as being "quicker and cheaper" by its advocates. It is not being touted as being a "better" appraisal. The "Quicker and Cheaper" spiel on Bifurcated Appraisals is a false narrative, too. By definition a Bifurcated Appraisals is a two part process consisting of one part data gathering and one part analysis. That's two separate vendors needing to be contracted, assigned, monitored, reviewed, and compensated by the Ordering Entity (i.e. AMC, Bank, etc.). Any potential cost/time savings anticipated in the Bifurcated Appraisal process by not having the appraiser physically inspect the property is offset from the appraiser and pushed to the inspector and the Ordering Entity. Having to contract and manage two vendors, an appraiser and an inspector, creates twice the management responsibility for the Ordering Entity than just using a single appraiser to produce the appraisal. Again, any cost/time savings that is anticipated in the Bifurcated Process will be lost due to the doubling of the management responsibilities of the Ordering Entity. So, the reality of the Bifurcated Appraisal process is that fees paid to appraisers is reduced, fees paid to the Ordering Entity increase commensurately, and turn time increases due to having an additional party, the inspector, involved in the process. The true consequences of the Bifurcated Appraisal process, besides increased cost and turn time, is that the overall quality and reliability of the Opinion of Value will be reduced. That is due to the fact that most truly skilled appraisers refuse to accept these assignments due to the offensively inadequate fees being offered to complete them. That leaves only unskilled licensees (Note: "Appraiser" purposely not used in this sentence) that have no other business to complete these assignments for bargain basement fees. In reality, Bifurcated Appraisals will end up costing more, will have increased turn times, and be less reliable than today's one appraiser process, and will result in increased risk and losses for those GSEs and Investors dumb enough to believe they are a good thing...

This will result in a less reliable product, but hey it's cheaper and quicker so...

I need to experience the property in order to properly gauge where it stands in the market, not attempt to rely on a square peg into a round hole code that may not capture the complexity of the component being measured.

I don't think it is in the public's best interest to not have a third party independent appraiser review the value of the home for a loan. The appraiser is the only one in the transaction who doesn't care whether a loan is made or not. Banks cannot be trusted to self-regulate.

It's sad. In the beginning all appraisers needed a college degree in whatever but it showed you had perseverance in nothing else. Then when appraisers started to move to other employment the banks still wanted to pay \$250 for a 1004 report and still do. Now the field is full of older appraisers who are thinking of retirement. Guess you won't need to know much about what you're doing but the fees won't be there either.

It sounds like the process will be more complicated with more hands in the process. It seems like it might be the start of a cluster muck for the process

It will increase turn time & lower cost, what happen to the quality of a report?

This whole process appears to be a cost saving measure for the lenders. In my opinion, this will contribute to our next crash. AMC's need to go as well.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

These reports add nothing to our profession, they only take away the fee structure for appraisers and make them accept the onus of the report when they haven't seen the property. There are no plusses for licensed and certified appraisers in this structure. It would further erode the public's trust of the appraisal process. It sound like the only reason to use these is to destroy the appraisal profession as a whole....remove our 3rd party disinterested experience and protection from the process.

This will eventually result in poor appraisal results. It will not speed up appraisal turn times as appraisers will simply have to accept more volume to account for the loss of fee. Also, I wouldn't fee comfortable appraising a property in which I didn't personally inspect.

None

I would never consider signing my name to a report without visiting the site or never rely on another person's inspection.

NA

I would question the reliability of this kind of an appraisal

The inspection of the subject property is the foundation of how I discover the quality, quantity and characteristics that allow me to analyse and compare the subject property to the market sales in the neighborhood to determine which of those market sales are truly a comparable sale.

This process was conceived as saving time and money. It will do neither. Most appraisers have done the 2000 forms with 3rd parties providing the data and under similar circumstances will continue based on fee and circumstances. Most agree that providing the pertinent and necessary information to support value is possible and can be done by severely shortening the current URAR. . FNMA refuses to accept the appraiser saving time by reducing the amount of extraneous information required. It appears they believe they will get more property data from the 3rd party inspector thereby feeding the algorithms which will, in turn, provide much of the value direction. The idea of a compromise where the URAR is shortened is out of their business plan. My greatest concerns is their failure to recognize the american tax payers as "Stake Holders" not the lenders. An additional concern is that their business plan is based on fee structure that is not realistic thereby severely shorting their market for appraisers. Making an already perceived appraiser shortage worse.

The only advantage (to user) is potential liwer fees, fir less reliable results.

AMC's slow the appraise always process too much

Appraisers who sit at desks and are never in the field will lack market competency. The drive & the inspection tell a story.

How can it speed up the process if it takes a few days to get the data, then a day or 2 to decide that want the analysis, then a few more days to order and get the analysis? Pictures can be misleading so how can you develop a credible analysis of you don't inspect the property? Also, you can't be sure if something was missed. This seems to be another way of slowly getting rid of appraisers.

I have no interest in completing a bifurcated appraisal. It's a bad business model and increases risk in the national housing market for little to no benefit.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The inspection will be performed by individuals NOT trained in valuation techniques such as the inspection of the property and individuals trained to gloss over the deficiencies in properties; therefore appraisers must do added due diligence to ascertain relevant characteristics about the property and the neighborhood in order to perform credible analysis. The bifurcated appraisal process has been adopted to purposely keep the appraiser from the property. This is a means to get around the problems associated with appraiser independence.

Reduced accuracy and increased liability!

I haven't done one yet so I can't comment on the reports themselves. My hope is that this isn't removing one of the checks and balances we have in place to protect lenders from loss.

If I was a consumer making such a large purchase and I truly understood what lenders and banks were up to, I would INSIST on having a full appraisal done to be confident of the market value of my investment.

The AMC's that have approached me have fees that are horrifically LOW! I will not even consider them. I did one, one was enough.

This process does nothing to speed the appraisal process or provide a quality product. Fees being offered are grossly inadequate. Should be in the \$250+ range for each side which totals \$500, which is about the fee for a standard appraisal. So there are no benefits to the bifurcated process. Just a scam thought up by the AMC's. The bifurcated appraisal is a foreclosure waiting to happen.

It's all about the fee. If I could do the field inspection all day long, I would. However, I have heard quotes of \$85 for the field work. No Thanks

So currently we have to guarantee that subject and comps were appraiser inspected for quality confirmation and now we are considering throwing all that out the window?! and now

I do not like this type of appraisal for several reasons - it still takes me about 3 hours at least to do each report so the fees being paid for these are not enough. Also, there have been reports where the realtor/broker who did the exterior appraisal called the subject's condition "excellent" which they are not - I put the condition as "good". So I believe they need to be educated better on the condition ratings so we are more in line with each other. Also, there's just too much left up that is unknown when doing this type of appraisal as far as the condition of the interior goes, any updates, etc...It's really not fair to either the lender or the borrower.

Bifurcated appraisals MAY work in areas where there are numerous, similar properties, such as huge residential developments. In my market where there are numerous SMALL developments with a varied housing supply, bifurcated appraisals cannot be done efficiently. In my experience, outside inspectors leave me with more questions than answers.

Bifurcated appraisals is an EXTREMELY bad idea. Instead of trying to streamline the appraisal process, accept the appraisal process and requirements needed to produce a credible report and then pay for that valuable process accordingly. No other profession has had more bureaucracy with their hands in inappropriate places with the exception of politicians!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I think this will work. But will take longer. I would not accept an assignment for a property where I am not geographically competent. Same old story: cheap fees, two day turn around, bad values or inspections and who suffers? The consumer.

The lending community tends to have very short memories!!

Too much of a disconnect between gathering data and analyzing it with out eyes on both the comps and subject. The bifurcated appraisal done on my house had an insurance inspector do the inspection. I provided the prior sketch from the appraisal from 1 year ago and list of all upgrades and amenities. He took an hour and 10 minutes to complete his inspection - told me he gets paid hourly. I got no credit for fully paid solar \$23k cost - saving me over \$300 per month on bills. In addition an adjustment of \$25k was made in comparison of a house with the same upgrades - with little to no explanation.

I have seen recent 1004p reports and have reviews. There are so many items missed and not represented correctly with most being over valued by \$20,000 to \$30,000. Most property inspectors seem to be missing vital data for the appraisal such as possible flood zones easements and items that are only noted by an on site inspection. This will eventually ballon values in areas that are stable or having decline.

There is a place for desktop appraisals, but when an inspection is made it should be by the appraiser or trainee of the person producing the appraisal.

Having completed quite a few 1004p reports i have concluded they are fraught with problems for any valuator

Tri-furcated (AMC also needs disclosure) is an asinine attempt to attempt to reduce turn times when the opposite will likley happen. Fees offered are ridiculous and will only attract non-reliable and non-credible "appraisers". Get the time and resources back to the real Appraiser so we can hire assistants and trainees and the turn times will take care of themselves. The AMC business model of shopping for 7-10 days is what is destroying turn times.

For accurate information and speed appraiser trainees or appraisers should do inspections. There's too much liability, additional time and a lack of information when appraisers rely on third party inspections.

Its an abomination of the appraisal process set in place to protect the lender and borrower. The profession is being altered for the benefits of the banking industry

I have a hard time imagining what sort of providers would accept partial fees for inspections, but would also be qualified to accurately measure a house, accurately assess the quality of the finish-out and accurately determine whether the finish-out meets current styles. I'm also unsure about what sort of training would qualify a data gatherer to accurately assess the critical items regarding the comparables - view, surrounding properties, etc.

I will get out of the appraisal business if bifurcated appraisals take over a significant percentage of the business. I am sure many others will too. Count on it. Then you will have a real shortage of appraisers as opposed to now, in which you really just have a shortage of appraisers willing to work for cheap in most places. If you just want cheap and fast, professionals will move on in droves as it is already hard enough to make a decent living in this industry, and there are plenty of other good careers with a demand out there these days.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

its a joke created likely by lenders/brokers in order to hypothetically expedite the process, create add'l income to them when it will undoubtedly create even More credibility issues. How can ANY property be appraised accurately without the signee inspecting the property. IT CANT

I have seen too many bad appraisals with wrong information throughout. Why would I jeopardize my license for some crap product that does not benefit anyone?

Just say no to bail out of Fannie after the Bifurcated farce fails.

Like AMCs, the only thing Bifurcated appraisals will do is increase the cost to the consumer and increase the amount of time it take to close a loan. There is no benefit to this at all.

the fnma effort to speed the process will increase risks and inaccuracies.

I prefer a uniform defined Evaluation process is for bifurcated valuations.

It is a bad idea. Nothing is better for the protection of the lender and the borrower, than a good home inspection and a well prepared and well reasoned appraisal. This protects the borrower and the lender

I think there's a place for an "inspection only" data collection. If the property value clearly is adequate to secure a loan (<50% LTV?). If not this clear cut, a traditional appraisal is in order. I think it's necessary for the subject and comparable be viewed by the same eyes as the person doing the analyses particularly when the LTV is high based on loan request vs purchase price.

Who thought up this. Seems like you are asking two people to do the work of one. Mind boggling.

The profession will be affected as already there is a perception that everyone and anyone can appraise or is an appraiser; with no qualifications, no education, and no ownership.

Question #9 - is the biggest concern of the bifurcated process, the appraiser doing the analysis at a desk will soon loose the intimacy with the market which is necessary to produce highly credible appraisals. So much is learned in the field talking with agents and property owners, the factors that do not show up in the data. Big data is NOT an all encompassing source of all factors that influence values or reflect market interaction. If appraisers, loose this level of market knowledge than AVMs should just be used. Obviously, there are scenarios where a bifurcated appraisal is an adequate risk assessment tool, but, a massive proliferation of them that forces appraiser to sit at a desk will eventually marginalize the appraiser and we will not posses the necessary market intimacy required to truly be analysts.

THIS IS JUST ANOTHER WAY FOR THE PEOPLE WHO SELL THE LOANS TO BYPASS THE CHECKS AND BALANCES OF THE SYSTEM. A BETTER WAY WOULD TO LET APPRAISER TRAINEES WHO HAVE BEEN WORKING UNDER A SUPERVISOR INSPECT THE HOMES AND THE SUPERVISOR INSPECT WITH THE TRAINEE WHERE NEEDED. THIS IS HOW THE PROCESS WORKED FOR YEARS BEFORE THE LENDERS STARTED REQUIRING THE SUPERVISORS TO INSPECT ALSO.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The bifurcated appraisal was born at Fannie with their analysts that have the cutting edge tools, analytics and tools way beyond the typical appraisers ability to obtain deep the deep pockets and abundant big data they have access to. This gives them economies of scale, access to proprietary tools and they are unwilling to share access to any of these tools to the greater appraiser groups. In this scenario I would see how this would appear to be more efficient, a complex solution for this simple economic problem resolved by paying higher fees for the work. Appraiser's will hire if the money is there. It is a dangerous experiment to employ due to the lack of direct interaction with the property appraised. Condition of the property is the biggest concern and many items can be missed even if photos are present.

see previous commentary

Sacrificing quality for speed

This is all about fee and turn time reduction. No one cares about the buyer who is making the single largest investment in their life (quite possibly) with little guidance or care. Eventually the tax payer and the market will feel the effects of this new Product.

In my state(New York) only licensed appraisers can do the inspections as well as BPO's. No other person can do them. Let's see if this is really happening. Need enforcing

Truly believe this format would run its course and end up being detrimental to the overall loan process. Cheap & Fast aren't good motivations for success and reliability.

a. Where to I find a Competant 'Bifurcator.'? 'Appraiser Trainee'. Come on!! Will his sponsor be signing off. I see 15 yr licensees that still don't understand the process. b. With AMC's taking their 40% off the top, this guy has to work for free!! There is no money left to pay said 'Bifurcator' Whomever thought this up is living in an Ivory Tower. This goes back to the '60' when we had "Tape Boys" But: we had no liability then (and no Liability Insurance) AND we worked for Lenders directly who trusted us. "the people ain't there, the money ain't there". That Simple.

Will become more complicated and less reliable. Don't see any time advantage in overall process when multiple people and communication become necessary.

Doesn't matter what we as appraisers think, the lenders always get their way. They don't care that much about accuracy & quality, they look at the final value and that's about it. Very few actually read the reports, so they might as well speed up the process (they think). They are slowly phasing the appraisers out, more pie for them.

this idea sucks

None of the changes that have taken place due to Frank/Dodd and resulting AMC involvement have been a benefit to the appraisal profession or the public trust and this is no different.

Appraiser-Analysts should also accept and complete full appraisal assignments so they are able to visit neighborhoods to view changes i.e. conditions, growth, etc...

bifurcator reports seem to take longer for the whole process. for a bit more money just get a good appraisal.not a "i can save \$100 on this appraisal" report.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Just another lame attempt to make our process faster.
This is 100% a ridiculous process. To appraise a property correctly it is ALWAYS better to collect the data, drive the neighborhoods involved, actually inspect the property you are reporting on, etc. As an appraiser I am trained, educated and have experience doing all these. Doing it "piecemeal" will contribute to killing our profession, creating MORE and WORSE mistakes, and slow down the overall process. AMC's have been killing the appraiser profession for many years. I'd like to see how long AMC's (or a similar model) last for: attorneys', accountants, REALTORS, doctors, surveyors, etc. There is NO shortage of licensed appraisers; simply a shortage of appraisers willing to work for TOO LOW PAY offered by AMC's, ridiculous, unneeded and unpaid for revision requests and micro managing appraisers as if we were AMC's employee's. Anyone spending \$100,000 to \$5,000,000 or more for a home should NEVER have a problem paying \$450 to \$750 for an appraisal report, or at the very least the lender should not have any problem paying the appraiser. Appraisers are the EYES of the lender who is risking money. Paying the appraiser for their education and experience should NEVER be a problem to protect the lenders interest.
I am far more comfortable doing the inspection than I am doing the valuation as I don't have the opportunity to get the "feel" or "essence" of the subject and the neighborhood.
Adding another person and service to the valuation process will only delay the turn times even more. A huge part of the appraisal process is physically visiting the property, comparable sales and neighborhoods to gain a better understanding of market reactions. Sitting in the office and just filling in the blanks on a report will not produce credible or accurate results in most markets.
I think in my rural areas there is not enough data to do statistical reports only. Few similar sales, higher varies land and neighborhood values. They may work for the large cookie cutter type developments, but not in rural areas. 2nd the agencies have all the data that the appraisers do not have. We don't have the details on all the sales other than the ones we do and the limited MLS data. They base a lot of these new ideas on data that is not generally available to others. So many of my lenders don't even want a trainee to inspect the home, let alone a non-trained person. That make little sense to me.
bullshit!
If it is NOT BROKEN we do not to fix it.
Too much intellectual data lost when more than one individual involved in the process.
I have been doing bifurcated appraisals for ten years, mostly for lenders, for their internal use.
I'm not sure who thought it would be a good idea to bring in non qualified individuals to speed up this process but they are wrong. There is so much liability using someone else's data that I'm not sure how any institution would accept these.
Liability, Education, Knowledge of neighborhood, Protection of my license. There is always something left out of the report that is needed. Oh, did I say Liability?
Why don't the creators of bifurcation want appraisers to go to the home?



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

In the long run, how will new appraisers gain the knowledge and experience to adequately perform either of these 1/2 appraisals? I don't think it is possible and maintain quality.
You end up with two people assigned to one appraisal. That doesn't sound like it is more efficient. I think an appraiser who has seen the property and knows the market area will be able to complete an appraisal faster than a property inspector working with an appraiser who has not looked at the subject and/or comparables.
The lender is forever trying to get rid of the appraiser, whom is key in providing protection to the consumer. Get rid of the appraiser and appraisal process and you have nothing to protect the consumer; all of which has been in place since the S&L crisis. Raising thresholds, adding bifurcated valuations, etc. etc. leads to more foreclosures, less accurate values, and an no consumer protection.
I don't object to this type of appraisal. We do many desktop/drive-by appraisals and I am comfortable with the results. Even if it's not an appraiser doing the field work, we still have the additional photos to use for further data. The main problem is the fees being offered. The two half portions of the job are being paid at an hourly wage that a non-professional can earn. We are still professionals with a licensed skill set that should be compensated accordingly. If the clients paid our typical hourly wage, they would have to charge more for the product and it wouldn't be cost effective.
The field inspector unable to get style and measurement correct
Adding more people and steps to a process does not improve anything. It will create more confusion, less reliable values. Stupid idea.
I trust me more than anyone in all phases of researching, measuring, inspecting, comparable selection, and "VERIFYING EVERYTHING". Bifurcation is an accident waiting to happen.
Getting close to retirement, sounds like this is for the younger generation. I was always taught that hands on is always better and more accurate.
It is like putting the fox in charge of the hen house.
Nothing
get rid of AMCs which are taking making profits on both inspection and analysis. On top of double dipping they are offering nothing. I had 3 AMCs offer \$50 for analysis. I won't do anything for \$50. The liability alone is cause for higher fee.
Why is it so important to reinvent the wheel? Is the wheel really broken? Why are time and money such a concern? Maybe a drive-thru appraisal at the local McDonald's might be the best answer....
There are far too many variables for this to work. I do not understand why this is even being considered. Appraisal assignments are to be completed by the inspecting appraiser. This is in most assignment instructions from lendersso now that means nothing and any appraiser can just do a desk top appraisal from another (collector). In my opinion this will just cause confusion and delays to the process.
I am retired. I answered based on "if I was still doing appraisal work."
Lenders have made it difficult for Trainees to do any inspections, NOW they are all of a sudden OK with them doing inspections for Bifurcated appraisals? They are purposely creating the shortage of appraisers so they can push this agenda.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

<p>Allow appraisers to phone interview owners for more reliable property details. Allow home owners to upload photos or do remote inspection with smart phone app. Double appraiser fee.</p>
<p>The appraisal is one of the lowest fees charged to the borrower. It is the most important cost of borrowing money to ensure the bank that they are making a good loan. I just don't understand why this is even an issue. I always finish my appraisals by the due date and am paid a reasonable fee for my time and expertise.</p>
<p>I think they are undermining a profession that we work very hard to become licensed for. Why is the answer always to put the loss on the appraiser? No appraisers I know will be completing these</p>
<p>Lower cost and increasing speed won't create overall benefits or credible results. If the goal is to speed up the process and the cost, we should focus on decreasing the percentage the lenders charge for their services to a flat fee and the time the lender waits to order the appraisal. We are talking about thousands of dollars in savings, not in tens.</p>
<p>If speed and cost is driving this issue, which appears to be the case, why are there so many layers of lender and mortgage industry compliance requirements, that do not improve appraisal credibility, still in place? And being added regularly? One example: If taking a picture of a comparable from the street is so important to a credible appraisal, why are the powers that be, suddenly willing to forego this requirement? Makes one wonder what is truly important; what the ultimate goal is; and what entity is driving/benefitting here.</p>
<p>There are many issues with this that may have unintended consequences.</p>
<p>No way</p>
<p>The appraiser should be directly involved in all aspects of a particular appraisal assignment. The bifurcated appraisal concept may somehow benefit the lending process; however, it will not, and cannot, maintain the accuracy, reliability, or credibility of the appraisal process in general.</p>
<p>Why don't the secondary market participants consider letting the Appraiser/analysis select their own property data collectors? I have trained many individuals to become appraisers and know when they are competent to conduct a property inventory assignment. If you want it faster let the appraisers control the process.</p>
<p>I have heard that the data collectors fee is \$100-\$150 and the analytical fee is also \$100-150. The client will still be charged \$500-\$700. 25 years ago we made \$300 per appraisal and 25 years later they want to pay us less.</p>
<p>Simply another way they are trying to get rid of the appraiser. Unfortunately, it will result in inaccurate value opinions. "If it aint broke don't fix it". Just my opinion.</p>



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

<p>I certainly believe there is a place for these type products; for low LTV - high FICO score borrowers. I believe the only reason Fannie/Freddie are developing these alternatives is they have been mandated by FHFA to improve the appraisal process, which I believe they have defined as "Faster/Cheaper". I do not believe this entire process is faster; it likely is cheaper though. I also believe that the two bifurcation "parts" can be an alternative income stream for some retired/semi-retired appraisers; some that winter or summer in different geographic areas but can still provide income from the desk. Overall, however, I'm not convinced it is good for the industry.</p>
<p>Due to the necessity of understanding and properly valuing exterior obsolescence and neighborhood influences an appraiser would still be required to gain this type of knowledge. Be it through field work on other files or taking the time to do the additional research before completing this type of assignment.</p>
<p>I am not going to risk my license by performing a bifurcated appraisal where the inspection is done by someone other than myself or my trainee.</p>
<p>Your analysis is based only on data that may or may not be fully accurate. Maybe in Archie Bunker Brownstone town it could be fairly accurate but not in most of the world.</p>
<p>Current systems is not perfect but much better than direct lender ordering to appraiser. Lack of management restriction on fee spit (acceptable minimums and max percentage to AMC never addressed by regulators) is the current greatest shortfall with no regulatory stomach to even engage on the topic. That said, wait until they can split it out with reduced oversight and increased complexity in fiduciary responsibility, fees will fall and bad actors across all parts of the process will abuse the system to its maximum profit without fear of liability</p>
<p>Assembly line appraising really cheapens the industry at a time when much of the public is already willing to trust an AVM (when it's in their favor).</p>
<p>It always comes down to fees. I will not do them if I am not properly compensated.</p>
<p>I don't think the bifurcated appraisal process is good for appraisal profession. We have much liability and are always getting cut out of fees and spending more time. Why the lenders would want more than one person in the process is beyond me. Saving money is not always saving money.</p>
<p>I believe that this will take more time as it will need two people to work this job into their work flow and if it is to cost less to owner, I question if appraisers will be willing to complete.</p>
<p>It won't work, and it won't last.</p>



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

First of all, as professionals, I believe we must not do the inspection OR the analysis of data in areas outside geographical competence! But, I'll bet that will be the first challenge and lenders will push the envelope for sure. If appraiser's become experts at inspections or data analysis and not both (I believe the advantages of doing both are good for the industry) the industry will suffer. Appraiser's will develop expertise at one OR the other and the industry will suffer in the long run. Lastly, I believe this "Bifurcation" movement may work for some locations, but will cause serious issues in valuation support, AND further will lead to another crisis. WHY NOT, cut the useless regulation and report requirements that have been thrust upon the industry (i.e., UAD, MC Form, FIRREA, ad nauseam) and allow the professional appraiser to do his work from start to finish - inspection to completion? This would reduce time necessary to complete every appraisal and both turn times AND fees would fall!! That's what we ALL want! It's really very simple. The lending industry has pushed the appraisal profession to the regulatory brink and fees and turn times for 'well documented' and well supported reports, have increased dramatically. CUT THE PAPERWORK AND REGULATION, the fees and turn times will fall and BIFURCATION will NOT be necessary! It is maddening how government sponsored entities will jump through hoops to come up with these ridiculous ideas (MC FORM to name one), but not see the 'forest for the trees'!

I believe that full appraisals will be done after the Bifurcated Appraisal due to various reasons creating more time and money for the borrower.

As a 27 yr. CA CERTIFIED Appraiser, working in a heavily NON - CONFORMING market, the real value is SEEING the subject property up front and inside, and reviewing, in person, the latest comps -- Bifurcation is false way , to make financial stakeholders, believe there is COST savings... or TIME SAVING.... the opposite is true... the Appraisal profession will be weakened by this very thin paper tiger !

I do not believe they will increase turn times, nor do I believe that they will be cheaper. I am concerned about possible USPAP violations. And I do not see the point in bifurcating the process.

Another attempt of the mortgage and secondary mortgage market to eliminate the appraisal profession. Similar of the AVM allowance before an appraiser gets any work.

If you call bi the olumb



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I would be great if we could just be honest about the driving forces behind bifurcation. This is version 2.0 of how to monopolize the appraisal industry by a few big players. The first attempt via HVCC/Dodd Frank to force AMC's upon the market failed, so now this. Combined with the dramatic watering down of licensing requirements, this is a recipe for disaster. The model is this, Mega Corporation A hires hundreds of want to be appraisers, puts them through a six months training class, with no real world experience, through their wholly owned subsidiary education company and out pops a huge crop of "appraisers". They will then put all of these appraisers in a giant building full of cubicles and feed them information from poorly trained data collectors who are racing around town trying to earn a living doing \$50 inspections. The "appraiser" is then expected to produce a credible report on a property in a city that the "appraiser" couldn't find on a map! And what is the supposed benefit, cheaper and faster appraisals for the consumer. What nonsense! The appraisal is about 5% of the closing costs, so what would it be after bifurcation, 4%?! This is not an impediment to sales. And speed is also nonsense. The appraisal typically isn't even ordered for about 15 days after the home is under contract! With an approximate seven day turnaround, even with a 30 day closing, waiting on the appraisal to be completed is rarely an issue. If there is a need to close quickly, just order the appraisal a day or two earlier and it completely eliminates one of the supposed benefits of bifurcation. But what about the harm to consumers? Does anybody think that the bifurcation model is going to produce a better product than a very experienced appraiser that has been working in his market area for years? In summary, the benefit of bifurcation for the consumer is negligible but the downside is likely a much inferior work product. So, who really benefits? If Mega Corporation can monopolize the industry, like they did for a period of time after Dodd/Frank, but now actually control the appraisal process instead of just the ordering of appraisals, they could stand to make BILLIONS!!! Stop the lie and stop AQB from destroying our industry!!

With the appraiser not being out in the field and inspecting the properties, they can lose some perspective of the market long term.

This product seems to be cutting the fees for appraisers, but software and other items we use keep going up in price.

An easier solution to become a certified appraiser is to reduce the total number of college credits required and/or get rid of this requirement completely. This does not help with becoming an appraiser, plus the fee to attend or take college courses. Furthermore, after the college courses you have 2 years as a trainee and your income is not substantial during the trainee period. The 2 year training is more than enough time to train a person to become an excellent certified appraiser. In addition, I applied for a loan at my credit union and the loan officer said they are so busy it will take 2 months to complete my loan? Sounds like we need more loan officers or a automated loan service and not deal with loan officers. My turn time for an appraisal is still 1 week.

This type of product truly jeopardizes the credibility of a report, period!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I believe the bifurcated process is nothing more than a new money grab from the client/AMC from the Appraiser. The bifurcated Appraisal will ultimately diminish the profession and erode public trust which is why the appraiser is necessary in the first place after the saving and loans crisis. The delay in loan processing is not from the appraisal process, rather the lenders paperwork delays and underwriting.

please see my above commentary.

This is driven by banks that truly do not care about quality, they just want cheap. You get what you pay for! I say this as both a banker and appraiser. I am against this and will personally not do them...much like many others who are reputable that I work with nationally.

If you want quicker turn times, change the rules and eliminate many of the unnecessary requirements.

Time to get rid of the AMC. They are trying to pay the appraisers what they were making for a appraisal 25 years ago.

Real property appraising is not a "part-time" profession. Total immersion is required in order to remain geographically competent and to be able to detect any gradual market changes that may be occurring. Leaving out the component of actually driving the subject's area is a VERY RISKY move; let alone, relying on a minimally trained individual to "report" 80+ data points. I'm not sure why Fannie Mae thought ONLY 80 data points was sufficient. I realize that technology has improved in regards to the availability of online data for a subject property's list of improvements; however, remember, judgment is the greatest tool an appraiser has for determining quality and condition. Judgment for improvement condition is the missing factor -- and it should not be. Photos are NOT a sufficient substitution for my own set of eyes viewing a property. I am a 27 year appraiser; I understand that change is inevitable and I embrace it when it is progressive. This bifurcated change is not progressive -- it is regressive. Progressive change would actually strengthen and solidify the opinion of value that has been determined; not be in a position to undermine that opinion of value. Bifurcation definitely has the potential to undermine or lend doubt to the reliance upon a minimally trained individual to gather such pertinent, foundational information. Just my humble opinion.

The analysis of data, and the experience of doing this work is the vast majority of the work and the value. This is nothing more than an excuse to cut fees, plain and simple.

I have done appraisals in the past where I received information from a third party realtor. I stopped doing these reports because the information provided to me was incorrect and not reliable. I did not want the liability connected with these reports.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The days of appraisals coming in below the sales price are over. There will be no Tidewater in VA appraisals which will hurt the Veterans because they will be overpaying for properties. Whomever is pushing these has forgotten about 2007-2009. This is going to be a huge problem for Fannie. I bet the AMC's are not lowering there fees either. Turn times are going to go up because now you have to rely on two individuals to complete an assignment. Here comes another mortgage disaster. I will be shorting several stocks bank stocks in the near future.

Deception of the public

I did these within a company I used to work for. It was always a mess because the information that was gathered by other appraisers was always questioned. So phone calls and emails would go back and forth and time management was an issue if lenders and buyers would back off the scope creep of expecting appraisers to be 100% knowledgeable of and responsible for home INSPECTION issues (wiring plumbing and whats behind the walls) and quit asking appraisers to perform the task that KNOWLEDGEABLE COMPETENT ASHI certified home inspectors refuse to do (repair estimates) and quit nit picking minutiae, and allow an appraiser to do what competent appraisers do best -- OPIN VALUE -- in a frame work of other homes values and get the middle man out of the way and pay the types of fees that the borrowers are paying instead of 20-40% the profession would return to a higher level of competency instead of a race to the bottom. and would once again be useful not only to the lender but to the BUYER.

The liability for such products is to high and information already available through third party sources is not always as accurate as it should be. There have been some data that has been prepared or presented by peers (appraisers) in the industry that has been completely inaccurate because of their lack of training and understanding of information (square footage breakdown, type & quality of construction, other valuation factors, etc.).

Perfectly willing to perform bifurcated appraisals if the data collector is my trainee or assistant over whom I have control, with whom I have a relationship, and whom I know to be competent and ethical

We will be dinosaurs soon.

This is a very slippery slope Fannie Mae is headed down. I believe majority of appraisers will not risk the liability of inspection made by a third party.

None

THIS IS BAD FOR THE THE PROFESSION/LENDERS/BORROWERS

None

To many variables, to many pieces, not enough credibility, or liability for the product.

Exterior only appraisals where the same appraiser inspects, collects data, and provides the appraisal are a much better option than a bifurcated appraisal. Exterior only appraisals lower fees and turn times.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

There are communications problems with entities who are already involved in the process and who do not understand the fine details of what we (appraisers) actually do. Adding another layer will create further problems that will adversely affect the lender/client/borrower and the appraisal profession on a whole. As an appraiser, I always check and double check sources, even in my own office. I would end up rechecking information and sources and would not be doing less work, but in some instances more, in correcting misinformation.
My experience has been with the client selecting the PDC, but I might be swayed if I can select the PDC. However, I don't think that will have any meaningful impact on lower fees.
Needs to be further discussed and analyzed.
Bifurcated appraisals will harm the profession.
In non-disclosure states information at the city and county offices is frequently incorrect. Also, without observing the entire property inside and out the overall condition and quality of the property cannot be accurately determined.
I may consider this process as long as there is some flexibility on the valuation side in determining the credibility of data furnished by the Property Data Collector. This would include being involved in decision making with regard to whether the Appraiser Analyst should inspect the subject property due to prior inspection data considered in insufficient. Also, the fees still need to be adequate for either side of this scenario in order to make it work. At the end of the day, we still need to be compensated at a fair rate. As the old saying goes, you typically get what you pay for.
Realtors can't produce accurate information on properties and I am sure appraisers that take on these inspections are new appraisers or incompetent so they will do anything to get a check
I've done about 30, and prefer to inspect myself, but is still viable as an alternative and for lender's purposes.
I would not consider doing them in my market as it is a rural market.
None
Turn times will be faster but at what cost to the general public if the information gathered and/or analyzed is not correct.
None
In field data collection is not needed. They are trying to split the liability between the field person and the desk person. Just make the assignment a desk top appraisal utilizing data sources such as the MLS, Google Earth etc. No field person is needed at all with the data sources available today.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I'm not sure of any other profession that has changed more than ours over the previous ten years. After the crash the feds made appraisers the scapegoat. We've had our reports changed. We've had to revise the way our reports are completed. We've had our fees cut with the addition of AMC's. We've had the total number of people entering the business cut due to education requirements. We've had those requirements removed because the profession wasn't renewing it's self. Now there's a threat to do away with the appraiser and appraisal process to make it cheaper and faster? Wait till a bank lends money with one of these bifurcated appraisals and that property turns out to be a complete dump, or meth lab, or something they thought it wasn't. Then they'll change their mind about them. And then our profession will have to change again... ARGH!!!!!!!!!!!!

I am 62 years old and have been appraising 40 years. Counting every day until retirement.

Costs to be an appraiser are not decreasing. Income will decrease with the bifurcated process

I feel that there is the possibility of non-credible data.

Potential for fraud, inaccuracies, loss of time and probably the temporary loss of appraisers, until the scenario causes another debacle and they need appraisers back

In some situations a bifurcated products can work for the client when accuracy within a range can solve the clients problem. However, full appraisals with support for an estimate of market value should be completed in all purchase transaction to protect the public and maintain checks and balance within the market.

without verification of comps with realtors, there is no way to truly understand the market as MLS is intended as a marketing tool and not to truly portray the market

This is an attempt to make the AMC more profitable. It still takes the same time for an appraiser to type a report. The inspection process takes the same time if an appraiser does that. This is no benefit to this, except to allow an AMC to pay a cheaper inspection fee, and to pay an appraiser a lower fee for the same analytical work. In addition, there is a data loss that a separated inspection creates. As an appraiser, while driving to a property, I can see external factors, that will be lot through a bifurcated appraisal. This exposes the lender to incompetency and inaccurate, less reliable value results. Hence, in an effort to be more profitable, the value results become less reliable, and there is an attempt to take money away from professionals, while the economy and prices inflate. There are other ways to speed up the appraisal prices, and reduce costs. Like eliminate AMCs, take away the 2 listing comparable requirements, and focus on giving appraisers the software and technology to increase the analysis process. The AMC process has created most of the issues within the industry, and now they are attempting to become more profitable at the expense of the professionals, and the quality of the appraisals.

This concept is a step, or two, below the ability to provide a credible result when compared to the 2055's.

This needs to be taken to a significantly higher level and appropriate fees paid.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

FNMA and others have been mining our data for years now, its a wonder why the even bother with having an appraisal completed.

It can work if competent people do both parts.

Lenders do not want oversight in any way. If they fail the precedence has been set - government has already bailed them out before with taxpayer money, no risk for them

The only benefit to this process will be to the lender and or AMC making more money. Fees will not decrease, and most probably will increase to the cost of the buyer and or homeowner. This is just another avenue to get rid of the appraiser.

THIS IDEA SUCKS.

I gave them a run to see what it looked like from the inside. When the company I did them for asked me to do one on a partially rebuilt previously burned property, I knew that the purveyors of this product would not confine it to its most appropriate place in the process, which is to say due portfolio diligence/post closing quality control and that kind of thing, and would instead push it as a credible alternative to actual full appraisal products, which it is not and cannot ever be.

I believe those that perpetuate the Bifurcated appraisal hope to get the appraiser to complete their analysis at a reduced cost. Most companies are stating \$100 to \$150, I have calculated my cost to perform and it is \$350. These folks discount experience, credibility & competency.

There is zero real need for this. It's a solution in need of a problem. We have Trainees. If lenders would allow OUR supervised, licensed, insured Trainees to do field work, the "problem", whatever it is, would be solved.

MORE AMC BULLSHIT - WHY DONT YOU JUST TAKE THE REST OF OUR BUSINESSES AND GIVE THEM TO CROOKED AMCS

THIS TYPE OF APPRAISAL WILL LEAD TO OVER/UNDER VALUATION. I WOULD NEVER SIGN MY NAME TO SOMETHING I HAVE NO 1ST HAND KNOWLEDGE OF SO MANY FACTORS THAT GO INTO THE STEPS OF A REAL APPRAISAL. PARTICULARLY WHEN RELEVANT DATA IS COLLECTED BY SOMEONE UNLICENSED AS AN APPRAISER

Fees way too low. Companies should also allow appraisers to hire non appraisers for the data collection- and then the data collection fees may be more reasonable to accept assignments

I believe that the bifurcation is as credible as an AVM. It might have some accurate information, but it's results are not as reliable as a full inspection and analysis by an experienced professional. If I were a lender I'd just suck it up and get an appraisal completed by someone who knows the appraisal process, is liable for their work and knows the market, aka an Appraiser.

The liability and credibility is just not worth it. Furthermore, I don't see any way it will speed things up. The same amount of time will still be needed to try and produce a credible report and may even take longer when two separate individuals are doing different parts of the appraisal process.

Bifurcation will crash the market again. Trust the professionals. Appraisers are a necessity. Protect the people, full appraisals are necessary.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Typically, more time is spent when a PDC is used because verification of much of the data (particularly re: the neighborhood) is required. While Google Maps and Google Earth are relatively reliable sources, instances occur when the area photography is too dated (particularly with respect to newer projects or outlying areas). I believe that the appraiser should be consulted prior to ordering a bifurcated appraisal to account for the areas where Google Photography is not current and/or relevant. Extra work is also required with respect to the subject property by both the PDC and the appraiser ... by the PDC in terms of photographs taken and by the appraiser in evaluating those photographs. Often, but not always, MLS photographs are helpful, particularly when the area of the residence is identified.

This product is a massive client screaming for new in a market place that has yet to see major disruptors break in. Historically that's a strong suggestion to get on board. While I don't see this shortening turn times, I do think this can lead to greater relevance for those appraiser analysts that make the transition. I don't believe this is the BEST way, but appraisers have heretofore failed to meet the market need, which is utterly ironic.

the data collectors are not trained nor have the experience that a licensed appraiser do.

if the industry would allow my interns to inspect without me on site I could produce better results and speed the process faster than the bifurcated system. they are hiring people with no inspection skills or experience (I have friends doing it with no experience)

Market is n verge of a crash again due to lose lending guideline and unreasonable high ltv and like in early 90s in 2005s again they will point blame at appraisers whole their push away from appraisers and lose policy created problems

At the fees quoted to previously quoted to me, there is NO room for fee splits of ANY KIND in an office environment where independent contractors are on fee splits.

this is not a benefit to the 'public" only to the profit margin of AMC and lenders. It isolates the appraiser from "the market" in that there are less opportunities to talk with buyers, sellers, owners, brokers at the inspection about what is important to them,

These are risky and the amount of time to produce a quality report and review all data could become costly.

For the purpose of reporting, the concept fails to recognize efficiencies in the streamlined process of memory recall from an appraiser's personal on-site visit, rather than having to "piece together" findings from yet more 3rd party reference materials.

Take AMC's out of the equation, give the extra money to the appraiser, and the speed of an appraisal will increase. Many times I have received an order request which has bounced around appraisers and now it is a RUSH!

Would want to see new certification statements and pre-printed forms by the GSE's agreed upon by ASB and GSE's before bifurcated appraisals become the norm.

I will retire, if I have to rely on limited appraisal work



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The appraisal process may be shortened by a day or two, but at what price? The only assignment of this type that I accepted paid \$60. For that money how much analysis do they really think can be done? It still took me 4 hours to do all the basic property research for subject and comps and all without the benefit of actually seeing what I was researching. In my opinion, this process is flawed.

The days of the AMC appropriating the Field Appraiser is coming to an end. AMCs and their push for the appraisal profession have been driven by the Appraisal Institute and its members and the #1 reason they lobbied the ASC to drop the Bachelors requirement for CRs.

If the lender/bank wants a reliable appraisal report, then they shouldn't hire someone to complete an inspection that doesn't have an appraisal license. Most certified appraisers would hire more interns and licensed appraisers if the lender/bank would let the intern or licensed appraiser complete inspections and sign reports. I would trust my own employee/intern to complete an inspection much more than an outside 3rd party that doesn't have an appraisal license. It would also speed up the appraisal process if I was allowed to use my intern more. The state, as well as the ASC allow interns to do inspections and sign reports however, the lender/bank will not allow it. I don't understand why the lender/bank would trust an outside 3rd party more than someone who actually has training in the appraisal profession and carries a license?

I find data collectors ill-informed about Q & C ratings, and do not adequately photograph externalities that are evident in Google map/earth/prior MLS etc.

Appraisers who do not have open minds and consider all types of assignments will be like travel agents and 1 hour photo operators

This is just a cheap alternative to spare the banking industry the costs associated with Actual Appraisals. These are even worse than the 2055 forms. Credible results cannot be obtained in this fashion. It is just one more step to eliminate the profession as a whole. If you want a BPO, then get one. This product is a glorified BPO, and by calling it an "appraisal" seems to give it the illusion of credibility.

I do not believe that a bifurcated appraisal will save time. If I understand the process correctly it will be up to Fannie Mae to determine who needs an appraisal and who does not. Again, removing the appraiser from the chain of events that should take place in mortgage lending.

Lenders have been trying to get rid of appraisers since the early 1990's. These kind of "appraisals" fit the lender's goals, not the appraiser's goals. I'm very happy that the majority of my work is for private clients. Those clients really want to know what I think and how I developed my opinion of value.

They should clean up their own sector and stop micro managing the appraisal industry every few years

None

If Property Data Collectors are paid a reasonable fee for a complete job, AND Appraiser-Analysts are also paid a reasonable fee for a complete and accurate job, neither will the fees be lower nor the turn times shorter.

I see no benefits in this type of "appraisal." They would lack credibility. In my experience, much of the information found on line, Zillow for instance, is incorrect.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Appraisers are Already the most under paid part of the process, now they are reducing our pay again! My licence is on the line with every appraisal, I am not going to trust that to some unlicensed smuck I do not know and have not personally trained. World Savings tried this process in the late 1980's early 1990's. It was one of the biggest fraud mistakes that cost over \$2ml. P.S. the loss was covered up...

The fees for the appraiser need to be higher. Afterall, the appraiser is the professional. The turn times are to short.

If quicker turn times without increase in fees are needed, then physically obtaining photos of comparables should be eliminated if the appraiser is already familiar with its neighborhood. Due to aerial technology, there is no reason for appraisers to obtain photos of each sale and MLS photos taken by licensed realtor should be acceptable. Also, there is a high level of danger trying to gain photos of past sales due to the property owner, people, and busy streets/high traffic situations. If the appraiser is familiar with the development, sees nothing on the aerial photos of the area that would cause alarm, and states in the report the familiarity with the area and that an aerial has been viewed and no adverse factors have been observed, that should be sufficient and acceptable.

Photos are misleading. Either intentionally or not.

I was recently contacted by a bifurcated appraisal AMC. They want 48 hour turn time, \$130.00 for the 2-3 hours work minus your cost to due business. Basically, you need to drop everything and work on these reports.

I have reviewed enough appraisal to realize that there are appraisers wo will say do anything for an assignment. Omitting condition issues, external issues, and functional problems, not to mentions lack of measurement skills, market incompetence, unable to spell, or use reasonable grammar (raise instead of raze, etc), do not understand data sources. Do not understand the basics of appraisals.

The issue is with lenders, there is not a shortage of appraisers, just not a lot that will work for low fees.

I hope they stay with the current system.

It is impossible to do an accurate value without the subject and comparable inspections. You have to know the neighborhoods of both and just using MLS sale data many times makes the sales appear much better than they are. They NEVER mention any outside depreciation from neighborhood decline, mixed use neighborhoods, etc.

One more gimmick that will lead to another financial crisis.

Dumbest idea I ever heard of. Makes no sense.

Housing crisis take 2

This is a really bad idea that purports to save time & money but a \$500 appraisal fee is the BEST insurance against multiple points of potential error in the valuation process. This is the death knell of the Appraisal profession.

This is just one more reason to cut our 20 years of stagnant fees!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Bifurcated Appraisals don't change the reality of the time it takes to sift through conflicting and often bad data on MLS. They don't change the fundamentals of developing credible reports with well supported analysis and adjustments. The AMC's will still Shop around for low fee/fast turn time appraisers. The main issue is that by lowering fees appraisers will be forced to either look for supplemental work or increase volume to make up for lost income so the result is a net zero or even negative because there will be even more AMC and lender pressure for unrealistic turn times. The need to make up for lost income will result in appraisers being even more overworked than we are now. Appraisals take time and developing a credible report relying on questionable third party data, with undetermined liability, no clear guidance under USPAP for miserably low fees is absurd.

I already do this product. The data collectors that my clients use have no clue what they are doing. They're using real estate agents that can't make a living otherwise and it shows.

It's a simple matter of the fee. For example, if a standard fee for full appraisal is \$500, then I expect the PDC fee to be at least \$200, and the 1004P to be at least \$350. However, I have heard the fees are much less. Just look at any other business where you break up a product into separate parts.....the sum total of each separated part cost always equals a greater amount than if the product was purchased as a whole (aka "economy of scale").

The trend to push Bifurcation is only about 1 thing...removing the professional appraiser from the lending transaction. Appraisers are the ONLY party in a mortgage transaction that is independent, neutral and not an advocate for any party...including the lender. Our position is one of public trust. Remove the professionally trained appraiser and you are putting the fox in charge of the henhouse. The consequences will be far worse than the real estate market crash we've experienced, when the majority of borrowing public are underwater mortgages. *The lie of appraiser shortages has been promulgated to fuel this bifurcated effort. Truth is, any real shortages are sparse and very local. The shortage is in the number of appraisers willing to accept increased liability for decreased fees through AMCs.

This product just doesn't make sense, there is no upside to the appraiser. I would also bet that turn time would take much longer than if the report was completed by the appraiser his/her self

Just stop ordering appraisals and the lenders can say just sell me your income to me and I do not care about your assets!

Nothing good will come from this.

will result in grossly inaccurate value estimate and pose potential for risky loans

evaluations would be better than these

This has got to be one of the most idiotic ideas proposed for this industry in recent history.

There are bad for the profession.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

It is obvious that this is the first step in eliminating appraisers. The next move will be a home inspection who will also measure, take photos, and submit to lender/FNMA who will then do a regression analysis, thus eliminating the appraisal altogether. Big lenders want to make a loan at about the same speed as it takes to make a credit card transaction.

The inspection is such a small part of the complete time I spend on an assignment so what is the saving in time really? Also, I would still have to go drive-by my comparables or I would not use them. Again, where is the time savings. I really believe this is just the next step in doing away with RE Appraisers altogether.

The bifurcation process will diminish the valuable insight obtained from an appraiser actually seeing the subject property & immediate surrounding area and the road side observation of the comparables. Also, over time appraisers will lose visual awareness of changing neighborhoods via growth or decline. In my opinion, the bifurcation process is a mistake for the residential valuation industry.

My experience doing bi-fabricated appraisal work lasted approximately 6 months. The company was very professional and appeared to be trying to be fair to the appraiser. I ended my bi-fabricated work for the following reasons: 1) I made less money. 2) I became less independent. Constant updates, training, and useless conference phone calls. 3) The field work was "lazy". The appraiser needs to completely "trust" the person doing the field work. They are eyes. This is my biggest issue. I believe this is why the "apprentice/trainee" system is relevant and crucial to the appraisal integrity. Lenders made it impossible for years, for any one other than the appraiser to do inspections, but now to save a few bucks, a person likely being paid minimum wage with no license or anything to lose is considered "good" for the consumer. The consumer will not benefit from a bi-fabricated appraisal. They will end up paying the same fee for a watered down/less credible version of an appraisal that major financial decisions are based on. The only benefits will go to "middle companies".

There is ABSOLUTELY no way I would could defend myself if someone called me out on something I "overlooked ". Then what happens? I get blacklisted for 30 days from a Lender with no work but the "process" does not or the "data collection" does not get spanked for being wrong. AND that is just the tip of the iceberg that can happen to an appraiser

i like them



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Fannie, Freddie and the Lenders in general, have been trying to find ways to avoid getting an appraisal for years. This is just the latest effort to get appraisers out of the process. This will have a major negative affect on our economy in the near future. Fannie, Freddie and the lenders did not learn their lesson in the last meltdown because our government bailed them out (with tax payers dollars), while every else suffered. If you will remember, The CEO of Fannie got an extremely huge bonus for running our economy in the ground. This will happen again if they do not realize the benefit of a true professional appraisal. There is no way a non professional or a computer program can determine the value of a home. Boots on the ground is the only true way to determine the value. Appraisers play a huge role in protecting our economic system. Just how important our role is, became evident in the last meltdown. But again no lessons were learned due to the bail outs.

This is a bad government idea just like the last one where they decided everyone should get a mortgage based on stated income. I remember that, do you?

Why are people losing their minds over these assignments? It is all about scope of work and intended use. Relax. Read USPAP.

AMC's shopping for the lowest fees while charging the consumer much higher fees are a big problem. Pay the most qualified appraiser a reasonable fee!

After 30 years of appraising, although the inspection is very important, it accounts for less than 10% of the deviation from the anticipated value from preliminary research. I do feel an experienced appraiser should be collecting the data so they can recognize potential value issues with certain functional obsolescence in the layout of the property or other issues that a general home inspector would not recognize.

Lenders have turned the appraisal from a lender cost to process to a lender profit center by gouging the borrower with inflated appraisal costs. Shame on the lenders.

Used to be a term in the early computer era-- gigo (garbage in, garbage out) which is applicable to this type of situation.

I enjoy having a new stream of income that does not require travel. I also have a daughter that is an appraiser and she has felt very unsafe at properties at times this provides a stream of income for her that does not put her in physical danger.

Reckless way to determine/estimate market value and should not be allowed.

The mortgage industry has a short memory. Field reviews have shown memory that there are weaknesses in both data reporting and analysis.

Brutal profession which continues to slide down to no-existance

Who picks the inspector and how would you know if the person is doing a thorough job and providing accurate info to the appraiser.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

With regard to FNMA coming up with a value w/o the 1004P. This removes any unbiased approach to value as FNMA profits from each loan. With regard to the 1004P process. A majority of the reason for long turn times is the time it takes to set the appointment. With regard to fees. If the 1004P Fee were to be the typical appraisal fee minus the typical trip fee I may consider this if it gets to that point. The irony is that the government instilled a process which added time and fees to the process. If you were to pay appraiser the fair amount the turn times would be shortened as appraisers would not have to accept excess work to make up for inadequate fees. The sad part is the consumer is the one that's been paying the price with regard to time and price and they don't even know it.

I think that going from "a supervisor must attend a class and a trainee must attend several classes, and lenders will not permit trainees, even those with supervisors who think they are competent, to inspect alone", to having lenders suddenly say - for bifurcated reports - 'anyone can do physical inspections' is asinine. The fees to the consumers will NOT be lowered with this process, time will NOT be saved with this process, especially if AMCs are involved, and the public trust will NOT be served either, which is why we are all here. Protect the public trust; we are not here to facilitate greed and unnecessary speed for a process that requires a certain amount of time to do competently. If one is not an appraiser, one cannot understand how intensive the valuation process is, and how 'boots on the ground - TRAINED AND COMPETENT' BOOTS ON THE GROUND are essential to assignment results.

Our business has been dilluted

Why continue the farce of having appraisals? Let the lenders do what they want but make it clear there will be no bailout

Bifurcated appraisals are just another cash grab by Lenders and AMC's to wrestle more control from the hands of actual appraisers.

In addition to all of the potential liability issues, the proposed fees are insulting.

I would only consider accepting assignments for neighborhoods I know well and that I am currently working in

They don't want appraisals, they just want paperwork for the file in case they are audited or loan goes bad and they can blame someone. Let the lenders, underwriters, etc. be held accountable for a change and they will sing a different tune. Did they not learn anything 10-15 years ago? I agree these may work in homogeneous neighborhoods, but they are useless in many locations. They say they want more analysis, but forget analysis takes time. One size does not fit all, it is not a track meet, and quit trying to ram it down appraisers throats. Not sure how any appraiser who does these can look in the mirror and call themselves an appraiser. They are simply becoming part of a form filling machine that in time will throw them to the curb and tell them they are no longer needed. Fortunately, I only have a few years left of this nonsense and won't have to put up with it much longer.

Bifurcating the appraisal process will prove to be inefficient and unacceptable, however it will be defended by Fannie and others despite it's failure.

If this continues we will have the worst recession in our time. It will be 1933

Primary concern is the appraiser's liability for the written report and limitations for commentary due to online forms.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I believe that this process will significantly impact the Appraisal profession negatively. The credibility of the assignment will be diminished, the accuracy of the work will suffer, and the public trust will decline. There are several USPAP concerns that I have along with possible State Appraisal Board violations that will arise with this format. If speed and lack of appraisers is an issue, why not use the Registered Appraiser(s)/Trainee(s) in a more significant role as this is already in place? Do not understand why we would blow up the house to repair the plumbing. I understand and respect that Appraisal costs have gone up, but we must all realize that the profession has not seen fees on the standard inflation trend and that they are simply balancing out recently. If turn times is an issue there are several ideas that could increase those times, versus convoluting the Appraisal process. I also believe that inviting more people into the kitchen will cause for more errors in the meal. I believe that by allowing more people to touch an assignment the accuracy will decline and there will be more room for error. Jon Filson, SRA, AI-RRS

Based on what I have received, this appears to be another ploy to reduce. I have received requests for both sides of a bifurcated report. These quotes have been in \$75 - \$100 range as a fee. If both people receive this same fee, that means the total cost is less than half of what a conventional appraisal is now. Where does the difference go. More money in the pockets of the lenders/AMCs.

Yes, change in our industry is here. We must adapt. But taking away part of our role AND reducing our fees with new products that have already been reduced by AMC's who provide no value at all to the process will ultimately do away with appraiser's all together.

Again, this is bad for the borrower. Speed does not equal quality.

See federal financial agencies decision to raise the appraisal minimum threshold from \$250,000 to \$400,000.

How can the process take less time when you are adding additional people to the process

This is wrong and will bring nothing but conflict for lenders and appraisers.

The clients I have say they will never use anything less than full appraisals completed by panel appraisers. Obviously if this changes I will have to consider what to do but I would probably be a data collector as I enjoy being in the field and I already spend too much time at a computer writing appraisals. After 37 years it may be time to find something else to do as well. I enjoy what I do but the hybrid version would change that.

If we have licensed appraiser trainees, why not use them. It makes no sense to use anyone other than a licensed trainee or licensed appraiser to inspect properties when they are available. No liability on the "inspect only" specialist. This is pure stupidity to create another person to inspect when there are licensed trainees who are already qualified. The reason that licensed appraisers don't currently want trainees is that the current regulations make it nearly impossible to effectively use a licensed trainee.

Bad idea.

Benjamin Franklin said: Do not be penny wise and pound foolish. Bifurcated appraisals are a prime example of this axiom. It is just plain stupid and I will not take any of these assignments, ever. Thanks



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

It appears the reducing the cost for an qualified professional is one of the main reasons for this new approach
I understand the industry wants Appraisers to be faster, but I do not see where turn times are much over 10 days, in some cases faster and some longer. It is not the appraiser that is slowing down the process, there are many cogs in the wheel. Generally there is a 10 day option, then say 10-15 for the appraisal, Title should be done, underwriting 5 days, survey then close. Survey could take 10 days depending. It is going to take 30 days to close min, It is not like they are buying a couch!, buying a house is a big deal and you cannot turn this into quick & easy 10 day deal or people will get hurt financially in the long run.
The assumption that AMC can control the process more with and give lip service to cost savings and turn time is disingenuous at best.
Will e and o cover these appraisals?
Bifurcated appraisals will lead to unreliable assignment results and put the entire housing market at risk of another collapse.
this is driven by people that don't want to pay an adequate FEE.
Quality, order appraisals quicker in loan process, everyone is taken a cut out of appraisal fees, lenders, AMCs, transaction fees.
In reference to #10 above- While increased turn times may be a benefit of the AMC and lender only, Everyone else in the game gets fucked. I will NEVER sign or complete a bifurcated appraisal as the appraiser / analyst. Only a fool would risk their license over such god damn stupidity and ignorance..
Disgusting development and there is no need for faster turn times, if anything appraisers need time to properly complete the analysis , this will wreak havoc on the profession and the worst appraisers churning out long distance reports will be the only survivors.
Bifurcated products will be the end of public trust in appraisals and the real estate process. New technology is undoubtedly great and will help appraising, However, when this boom market goes bust, the banks and investors holding the bag are going to be begging for full appraisal products. Anyone demanding faster appraisals must not have been around for 2008.
The easiest ways to speed up the process are: 1) to get rid of AMC's, 2) stop unwarranted call backs, 3) create a uniform appraisal portal
I have reviewed dozens of bifurcated appraisals and every one was horrible. Appraisers are in serious danger of disciplinary action or even losing their license by doing these assignments.
A "bifurcated appraisal" is simply a desktop appraisal with better, more current property information about the subject than would typically be available for desktop appraisals in the past.
The fees offered for the work and liability involved with Bifurcated appraisals is what hinders them and puts a stain on the profession. Arriving at a credible valuation requires extensive knowledge of the market and the process. If fees were increased to pay fairly for the work/liability then I believe there could be some benefits to the Bifurcated process.
N/a



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I am open to performing bifurcated appraisals. However, the fees are way too low for me to even consider them. It takes me almost as long to do a bifurcated appraisal as it does a full 1004 appraisal, minus the inspection time. If the fees were much higher, I would do them.

This concept flies in the face of what the real estate valuation process is all about and will only lead to more problems, consumer confusion and poor valuation results.

Lenders & GSE's are simply trying to buy my liability and access to my E&O for pennies on the dollar.

If we can't have our own trainees do the inspection without us being there why on earth should we trust a total stranger with questionable training and qualifications to do the inspection??

As an appraiser the lending community to trying desperately to remove the one independent entity from the equation the one that lenders can't control, so they make it sound so great your now an appraiser/analyst Depending on someone else for the data collection etc is troubling. The old garbage in garbage out you have to be able to trust the data collector to analyze their info so your final analysis is credible

My Name is on the appraisal...I verify everything...

I've done a few of these and lenders feel that they can be done in 20-30 min, which is absolutely not true and is their justification for very low fees (under \$100). My average time to complete accurately and proficiently is 1-1.5 hrs. There is a lot of analyzing, calculating and adjustments that need to be extracted from the market and not just guessed. My biggest issue is the fee paid for the amount of work required and liability these poor appraisals can cause.

I'm all for streamlining the process, but this seems like a step backwards with little upside (little savings, time consuming, riskier, etc.).

"a picture is worth a thousand words" how many times have you heard the above quote??

The bifurcated process is equivalent to a blind person driving a car. He may get away with starting the engine and backing out of the driveway but eventually he'll crash and cause a lot of damage and possible fatalities. This process is the same concept. It might save money for the lender but as the old adage goes, you get what you pay for. The disservice here is to the public, especially to the unsophisticated buyers/sellers (which most are) who, I'm sure would rather pay the extra money for an appraisal done the right way as opposed to cutting corners. The only winner with bifurcated appraisals is NOONE.

It's an incomplete process.

While I may "consider" these types of assignments, the reports would certainly require certain "extraordinary assumptions" about the other persons work and credibility. I would not do them if I was to be held to a standard similar to that of a review appraiser.

This is a disaster waiting to happen. It may speed up the process but it greatly diminishes the quality of the report. It may quicken the turn around times but when it all goes bad (and it will eventually), it looks like the appraiser is one that will get blamed.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

As an appraiser who's been in the position of trying to produce a credible report using field work done by another inspector, I can tell you that it increases my time and my risk.
16,000 appraisals we've tracked over 20 years and there's 30% of the tax records are inaccurately reporting square footages. I'm not taking on the liability of trusting someone who's gathering the data is doing it incorrectly.
If you want quicker turn times and lower fees then come out with a product that doesn't require me to drive and get real comp pics, let me use MLS pics and I can do cheaper and quicker turn time.
No comments
Na
I urge appraisers not to take these assignments.
After all the years of required training, lawsuits, and the penalties inflicted on appraisers, it is suddenly ok to have a valuation placed by someone who has never been to the property?
Property inspection is too important to the process to be done by anyone other than the signing appraiser.
I think they are good products for money and time saving options for those who qualify
The whole idea of these is bad. Liability from inaccurate data is the main issue. I wouldnt trust someone else to gather my data and then me be liable for it. Not to mention this is one more way for them to chip away at our profession, livelihood and fees.
This model will result in unreliable valuations. Will encourage shortcuts.
A bifurcated appraisal goes against the "spirit" of the independent appraiser. An appraiser can currently complete 1 assignment per day (with full fee). With bifurcation, the appraiser will be liable for 4 to 5 times the number of assignments for the same or less income. BAD FOR THE APPRAISAL BUSINESS AND ONLY BENEFITS THE OWNERS OF THE APPRAISAL MANAGEMENT COMPANIES THAT OFFER THESE SERVICES
Property inspection is part of the appraisal process and cannot be separated and still produce creditable reports.
We're supposed to be professional real property valuation specialists. If we are given information regarding a subject property and we are familiar with the area where it is located, we should be able to provide a reasonable value for that property. However I do think the industry should develop a somewhat uniform (similar to UAD) way of measuring or describing the condition of the improvements so all parties are on the same page.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

If appraising was simply applying statistical modeling to data gleaned from Realtor's MLS databases, appraisers would not exist. Big Data using personnel who have never completed appraisals in the traditional sense will not have a clue regarding the games Realtors play with MLS data in order to mislead their clients, their peers, and appraisers, and that will matter and get worse if appraisers are replaced. If the current proposals take hold, it will soon be possible for a gamer to live in their mom's basement, get all their "appraisal experience" from the new ASB computer game, and crank out the analyst portion of bifurcated assignments, never having to climb the stairs and look at a house or a neighborhood (let alone risk having some of the pot smoke escape through a briefly opened door). With the taxpayer on the hook for nearly 100% of the unsound loans being made, we are already facing a wreck of monumental proportions, and it will exxcellerate exponentially if this garbage becomes the norm.

appraisers need to make themselves relevant by doing quality inspections and reports as opposed to the form fillers. this is a major contributing factor regarding the present situation. we have been filling data bases for over a decade reducing the need for appraisers. if all you do is fill out the form and more concerned with how many inspections you can do in a day, you are the reason the industry is in trouble. produce quality reports and make appraisers relevant so that needed and useful in order to make lending decisions (as well as other needs for valuation).

Stupid idea

The banking industry created the problems with fewer appraisers. They can fix it, too

Bifurcated appraisals causes a problem with the mandate of always having to drive each comparable and the notion that it is "important to view the neighborhood rather than using MLS/Internet photos". This was either not necessary or a giant waste of time for the previous entirety of our appraisal careers!

I don't think the public is suddenly going to purchase or refinance a home just because of anticipated time/cost savings. That being the case, there will be exactly the same number of mortgages written over a given timeframe. Since the borrower is paying for the appraisal anyway, there are no savings to the lender and no increase in mortgage quantities due to bifurcation. No increase in revenue but yet a definite increase in risk does not seem like a wise move.

The liability associated with this process would be incredible. Sadly this could be a reason to retire after appraising since 1986

Lenders should understand that because we appraisers are first taught the profession as an assistant, and then after completing certification, we are protecting theirs assets by doing what we were taught and have experience to do our jobs, and that is to appraise properly and to protect the lenders assets (backsides). Computers have taken some of the responsibilities for unreliable values, but the appraiser is learned to value the properties based on years of education and practice. John Rothermel, Certified since 1996.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Bifurcation is about money and control, not speed or quality. Banks want to break down the process so they can control more aspects of the entire appraisal process and adding additional steps gives them more areas to charge fees and takes away more of the the appraiser's influence. They are bad for the profession and do zero to help consumers or mortgage investors.

Field work is critical to the analyst as you learn what is impacting neighborhoods such as neighborhoods that have been exclusive to custom built homes changing to Production Builder (Track Homes) that you may only notice from the field. Also, important info can be learned by talking to the occupant of the subject if you have the communication skills greater than checking a box.

If it ain't broke don't fix it!

I do not understand how for years a trainee could not inspect a property without the supervising appraiser seeing the property. Now we are expected to do a credible report with just anybody inspecting the property.

After 35 years I know my market area pretty well plus it is always possible to look at aerial views of the subject and comparable properties. Knowing me if I had any questions on a particular property I would still go out there and look at it. That is just how I am.

If an appraiser simply receives full fee +- 500.00 for typical non complex appraisal, quality and turn time will improve significantly. Appraiser will do exceptional to ensure they do no loss client at full fee rate. It's that simple.

Speed & cost savings does result credible appraisal reports.

I don't like them. I feel it will eventually lead to a lot of foreclosures due to bad value estimates for the subject property. I don't like to rely on someone else's opinion to develop my opinion. Also, pictures do not convey the smell of the house or the feel of the house. Some homes just feel wrong, or the fact that there are several untidy cats and dogs in the house. After 18 years of doing appraisal inspections, seeing a house through someone else's pictures and their comments regarding the house is not the same as doing the actual inspection yourself. Did the person doing the interior pictures get to talk to the owners and find out all the updates done to the property, or did the home owner have to fill out some kind of check list for updates. If the home owner stated they remodeled the bathroom, and then it looks like a do it your self job, the pictures might not convey that look or feel. uneven flooring or crooked tiles, uneven vanity or loose vanity. A picture just doesn't convey that. I will refuse to do bifurcated appraisals, as long as I continue to receive real appraisal assignments from my local lenders.

Appraiser will argue all day long about quality and condition, for properties that they actually inspected. How can they ever produce a true credible value estimate, if they are relying on a third parties eyes, opinions and photos. There's no way to get a real feel, for the overall condition, of the subject, comparables and neighborhoods, without doing the inspection(s). As long as the emphasis is placed on producing the cheapest and fastest appraisal possible, we are destined for another market collapse.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Another ridiculous concept concocted by Fannie Mae and particularly by lenders, who want more control over the valuation and greater profits. I will not sign off on data gathered by someone whose competency and integrity I cannot personally verify, regardless of their credentials. It is inane to think I would accept full liability for errors made by an unfamiliar third party. I will not do it. Nor do I have any interest in being stuck inside the office doing analysis only, which Fannie Mae and lenders ridiculously try to spin into an appraiser benefit. I got into this profession after sitting inside all day in corporate offices for years. Site inspections is one of the more enjoyable aspects of this job. I would not consider providing a valuation without a 3-dimensional, personally observed inspection of a property's interior and exterior and the surrounding neighborhood. Like laughable Zillow and other AVM methods, bifurcated appraisals will only dumb down and dilute accurate valuations.

The appraiser signs the report and is liable no matter what. It is the appraiser that determines the scope of work to produce credible results, not the lenders which have no liability in the appraisal.

I get reports back to the client in less than 48 hours and that is a credible report with a accurate value. Not only have I appraised over 10,000 houses. I have also flipped over 100 houses and I help my wife run a successful real estate brokerage. In all my experience I would never make an offer on a home that I had not seen with my own eyes because pictures tell very little of the story.

These are short-cut appraisals. Borrowers will pay the same, or close to the same, for the appraisal and get a lesser product.

I have never heard met a borrower, real estate investor or appraiser that thinks these products are good for the health of the real estate market. Real Estate is most people's most important asset and should be given proper analysis by qualified appraisers.

I pride myself on producing quality appraisals. I can not trust others to do a thorough inspection or analysis of a property in my market. Reliable results do not come from a watered down system!

I am overall against bifurcated appraisals, but would consider doing them if the profession moves in that direction. Fees are another big concern. We have worked many, many years to finally achieve reasonable and customary fees and I feel this may be a large step backwards in that realm.

Already seeing assignments with non qualified individuals doing PDC. This is not good.

We spend all these years being heavily regulated. All of a sudden we now don't even need to see the subject property. How many fees/penalties have been charged as well as certifications have been pulled due to an appraiser not having performed or missed a feature on an inspection. No all of a sudden all is okay. Sounds similar to the 125 percent loan to value or B mortgage again. So all the blame all the education was a waste? I say to all appraiser's who have had to pay fees for infractions should be reimbursed. Lost certifications should then be returned.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

With the fees they are offering the Fisk is not worth it Also there is not enough work available An appraiser will need to do 5 of these assignments for every full appraisal to make the same income but there is not 5 times the assignments available in the market This will put most appraisers out of business

The current fees the AMC's are trying to get us to accept these orders at are absolutely ridiculous. They need to pay what an appraisal would cost minus an inspection.

In practice, the lowest common 'skill' set will always apply to these hybrids. Starting with the inspection process. Given the inadequate fees, no one is going to spend 4+ hours doing the desk top analysis required to produce a credible report as opposed to one that is wholly assumptive and based purely on unverified data-usually provided by the promoter of the hybrid. The forms continue to be misleading with the possible exception of the Freddie Mac 70H (It also has a couple of areas of 'discomfort' related to certs 12 & 13 but it appears correctable. NO appraisers should be calling a desktop or desktop with 3rd party PDC an 'appraisal'. Nothing about them or the way they are offered suggests any degree of credibility. The entire process is geared toward automated data filling and auto derived adjustments in the fastest time possible to make up in volume what cannot be earned in quality work.

I have completed both sides of the process just to see how it works. In my observations of both assignments, there was no benefit to the borrower. The time frame from assignment to completion appeared to be longer based on dates on engagement paperwork. The property data collection that I received was a joke. Thankfully, I had inspected the subject previously and consulted my work file for sketch and building material content. The photos provided were actually plentiful and really good. If this product stays around, I would allow my trainee to do the property data collection as an additional source of income. There is no time savings on the appraisers end other than the inspection, which in turn makes the report writing take longer. This product will only be relevant in my office for an appropriate fee. There is no difference in the form 1004P from a time to complete aspect. As far as the online forms, there is a time issue due to lack of familiarity.

The PDC should be performed by appraisers.

I have been appraising in rural Missouri for over 29 years. The split appraisal would not be practical for rural properties.

You give an accurate analysis when you don't know what's in the house. Can't compare sales. There could be under value or over value.

I was told, in 2000, by the regional manager of the large lender who was terminating the staff; "You guys will be out of business in five years". They keep chipping away. This is the next phase of trying to eliminate professional appraisers from the process.

Sellers should pay for the PDC as soon as they list so that their property can close more quickly. Agent gets out of liability for measuring. If Appraisal is needed by borrower, same appraiser does desktop. Fast, fair, builds great comp database.

How quickly we forget the lessons of 2008.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I've done a couple of these and I really don't see and/or understand the benefits. The company I did these for obviously has an inspection appointment done then there was the time to put the information in the report, whereas it was done by someone who didn't understand the FannieMae definitions such as the difference between a Q4 and a Q3 so most of the time was spent correcting items such as this as well as trying to get thru a report that was from there website. I also struggled with the photos that were provided as 90% of them were not necessary and it took at least an hour getting thru them to decide what was applicable and what was the 14th photo of the same thing. So time wise I don't get it. The other problem I had with these was the expectation from the company. They get the assignment. They assign out the inspection then get the basics done in the report (prior to any type of notification that this assignment was heading my way) THEN I get an email that I have 24 hours to get this back to them with ABSOLUTELY NO CONSIDERATION TO MY SCHEDULE! Like I'm suppose to just drop what I'm doing and get to there report. They probably had at least a week of receiving the report and getting the inspection done and so forth then I'm expected to stop whatever it is that I'm doing and get there report done. The other problem I have was the comparable selection. It's from there data base. Obviously I would have to leave and doe an exterior view from a public street before submitting them saying that I visually inspected them so there again, what's the point of having someone else do the inspection if I'm having to leave and view these properties anyhow. In my opinion this is just another way to get yet another finger in the pie and its messy at the least. I won't do these types of reports as long as I have a standard work flow.

This is just another product the AMC's are using to ultimately charge more money to the borrower and cut their costs. It serves no benefit to the customer.

The majority of time spent on an appraisal assignment is in processing/writing the report once all the data is collected. The property inspection only takes a very small percentage of the time required to complete an appraisal report.

A gimmick to reduce fees and push appraisers out of the profession. Has nothing to do with speed or accuracy and lenders know this. Another strategy in the ever-ending goal to remove the burden of appraisers from their process.

These products will destroy the appraisal profession and erode public confidence in the appraisal process.

Bifurcated appraisals will negatively affect the credibility of appraisal assignments.

This is just another ploy by AMCs to lower fees to appraisers and take a bigger piece of the appraisal fee pile for them.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This is a banking initiative. Instead of making up reasons why the lender doesn't want or need a complete appraisal, lets try honesty and transparency. Make appraisal fees and AMC fees separate line items on the settlement statement. Let the public be made aware that they are paying for unnecessary AMC services. Services that do not add value to the overall process, but instead add costs and time. Costs are absorbed by the unsuspecting borrower. The additional time the AMC adds to the process by searching for an appraiser who will accept the lowest fee (to add \$\$ to their pockets) adds to the borrower's frustration making it appear that appraisers take too long or their are not enough appraisers. Its just another end-around made by the lenders so that they do not have to appropriately disclose risk prior to selling paper on the secondary market.

I've been offered 2, both times they changed them to a 2055 because the inspector got the wrong house or they couldn't get someone to go out.

These split reports are just a bad idea all around.

I feel that these bifurcation appraisal will result in another mortgage meltdown. In a few years when properties appraised this way start to go into default and Fannie or Freddie find out there are major problems with the properties due to no inspection by a licensed qualified appraiser or home inspector. There will be major issues (ie: structural issues, poor quality or workmanship, etc) and the appraiser that puts their name on that report will be sought out for liable and possible the data collector but first it will be the appraiser.

Na

Use a desk top appraisal instead or rewrite the entire appraisal profession purpose.

Due to our VAST experience, we can get information WE need to perform an appraisal in a few minutes. We have no idea what the actual condition of the property is without controlling the inspection ourselves. Us or a trainee that does what we do exactly. No way we can produce credible results.

Appraisers are needed to do their own inspections, analysis and reporting to prevent another market crash.

Na

Not good for rural areas, great for suburbs with similar housing

This is just one more step that moves to automated valuations and the field would just verify the computer. Bottom line profit to the bank.

In theory the process is sound, the main problem is the AMCs pushing this have soured appraisers to anything that comes from them. Plainly stated: Bifurcation isn't the problem, AMCs are. Fannie's new process is caught in the middle.

This is the worst idea Fannie has ever come up with

Although I am willing to accept either part of the bif assignments, it will be on a very selective basis and only if I or a licensed appraiser was the data collector. I don't see how this is saving time or money for the end user(s). I won't do them for small fees and for completing both parts, my combined fees would actually be higher and would take similar or more time to complete overall as would a full appraisal. Only would accept to stay competitive in my small rural market and again, only selectively. I feel another market crash is in the making.

Fannie Mae once again shows their inability to understand the appraisal process. UAD is a joke and now this.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I'm convinced that banks and politician are not concerned about the proper appraisal of real estate or the appraisal industry as a whole.
This is very bad for the profession and there is NO REASONABLE REVIEW PROCESS for these appraisals.
The potential claim risk, be it from a client, homeowner, or the State, is entirely too dangerous. I hear many appraisers stating "I can't get in trouble; it's what the client ordered". This is not a viable defense. It is up to the appraiser to determine the appropriate scope of work.
Its a joke as they are trying to eliminate the credentialed appraiser.
THE APPRAISAL COMMUNITY HAS BEEN RAILROADED THROUGH REGULATION, LAWS, CON ED REQUIREMENTS AND JUST THE OVERALL REQUIREMENTS THAT THEY HAVE PUT IN PLACE FOR US TO COMPLY WITH IN EACH APPRAISAL, AND THEN THEY WONDER WHY IT TAKES TOO MUCH TIME TO PROCESS AN APPRAISAL. I FAIL TO SEE HOW WE STAY WITHIN USPAP WITHOUT SEEING THE HOUSE. WE HAVE BEEN BENT OVER MANY TIMES BY THESE PEOPLE IN AGENCIES, NOW WE ARE GOING TO TAKE IT AGAIN.
The problem with turn times lies with the AMC's. 99% of the people working for them do not understand real estate. Someone could develop a computer program or "app" to assign assignments to appraisers based on years of experience, turn times and errors and then the lender could run the reports thru CU themselves and save oceans of time & money. AMC's are the problem in this industry.
There is no benefit to having one appraiser view the property and a second appraiser complete the analysis. That make no sense.
.
This entire process is aimed at reducing appraisal fees, making more money for lenders, and giving lenders more control of the evaluation process.
the fallacy of "The appraisal slows down the process", or there is an appraiser shortage is largely manufactured by the lending and realtor industries to bypass appraisals. Having reasoned analysis by experience certified appraisers is key to sound collateral management. Allowing realtors or anyone on the "sales" side of the equation will be a disaster due to "skin in the game" and inexperience. We spent our adult lives learning this profession, let us do it.
its all Bullshit
Seems to be a catch 22 where the lenders apply more requirements on the appraisers but throw them out the window for computer generated reports.
You can not accurately appraise a property without personally viewing it. You wouldn't buy a house without viewing it yourself.
Speed increase will come from inadequate data collection.
.
Will only provide this product if I can produce a credible report. Additionally if fees are not appropriate I will not accept one of these types of assignments.
The appraisal business is always shifting with no input from appraisers that actually do the work. The only people I hear talking about bifurcated appraisals are multi credentialed people that do not do this work on a practical level. Also, I refuse to train anyone in this business.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Bifurcation appraisals do not always work on rural appraisals with acreages over 5 acres. The comp selection process may only provide sales in cities with larger populations and forget about sales in the Towns and Villages if the subject property is in a Township.
A bifurcated appraisal will lead to misleading , unsupported market values for the subject property which leads to higher probability that loans will default. Didn't the mortgage crisis of 2007-2009 not result from bad loans ???
If the loan to value ratio is low..less than 60%, then just order a short form appraisal, it's that easy. If loan to value ratio is over 90%...are they crazy for ordering anything but a full appraisal? The lender DESERVES to get the loan back & reimburse fannie on the foreclosure. Most of my bankers can't even believe this is happening, some will go ahead and use it though as they have forgotten how to make loans based on their bank capital & giving their bankers higher interest rates to promote savings and higher capital.
I believe this is just a way to reduce the cost of appraisal. Appraisers will lose income in this process to say nothing of the liability of depending on another's data collection.
None
I believe as long as the lenders get what they want they will be fine until the reports come in short of their predetermined value then they will say they need real appraisals
Just another poor decision by FNMA and the industry for even thinking of allowing such a piece of garbage product to be considered for valuation purposes unless the lender holds the paper and assumes the liability when it goes into receivership with no taxpayer backstop.
None
Why would Fannie Mae go back to where they were a few years ago and they will still have to be bailed out again. This is the worst thing for the consumer and the taxpayers who end up paying for bad loans.
Inspections are an important part of the appraisal process and should be completed by an appraiser. The most time consuming part of the appraisal process is report writing which includes comp verification, support for adjustments, driving comps, scope of work, disclosures and disclaimers. Eliminating appraisers from the inspection process will not save an appraiser a significant amount of time. This is not a sufficient solution.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The future is in energy efficient properties. The more green features there are the more complex the assignment is. I can tell you first hand from appraising owned solar systems that there is so much information that has to be obtained to be able to appraise the property. I have to physically be there to see the system, to observe any shading or issues, and collect and obtain all the data needed, which often times takes up to an additional week or two, in order to complete the assignment. There really is no way for someone else to do the inspection and gather the data needed to appraise a property with energy efficient items. It takes longer to do the inspection, gather and obtain the data, and actually complete the valuation of properties with green features. No one seems to have taken this fact into account. The future lies in green, and the more green features a property has the more complex the valuation becomes. Sorry to say but in the future it will take longer to complete appraisals and will require higher fees. Fannie, Freddie, and the other GSE's are pushing a false narrative that is backed by big companies pushing these ideas because let's face it, there is a lot of money at stake for these technology companies.

I have done a few and they are an awful product. You spend too much time confirming/verifying inspector's data, and honestly, how can you appraise a property that you've never even seen. This might work in cookie cutter subdivisions, but not where I live (new england). I felt like i was appraising blind when i did them. Simply awful product.

The appraisal process is exactly that, a process that starts with observing the property. For a quality report, the process should be completed by an individual, start to finish.

Get rid of the AMCs they add immeasurably to the time and cost of an appraisal.

So I was involved with a bifurcated process and it took 30 days for the AMC client to figure out the scope of work as I informed by AMC client traditional appraisal would have been done quicker

When I left a position as an in-house reviewer and returned to private practice I did about a dozen of these appraisals. I can say from my personal experience that the quality of inspection photos was fair at best. Also, the valuation Analyst spends a lot of time waiting for the field inspection report and only has limited time to complete the report in order to meet the due date.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

NOT a done deal and as a provider of E&O to appraisers, I am offended that you would publish an article saying that it is. Appraisers need to understand completely their requirements when performing these things....and many DON'T. 1. The professional Appraiser is the only party to a mortgage transaction that is unbiased and advocates for no one except the public. 2. The Appraiser's primary function is one of protecting the public trust. Remove them from the lending equation, and you are putting the fox in charge of the hen house. 3. The issue with fees and turn times for appraisals is NOT about an "appraiser shortage" ...it's being caused by AMCs. They spend days, sometimes weeks shopping around for the cheapest appraiser, thereby causing delays in turn times. 4. AMCs engage the Appraiser for \$200-\$300 while charging \$600-\$700 to their client which is passed on to the borrower. 5. When TILA-RESPA was in the process and open for public comments, Appraisers tried to make everyone involved aware of the urgent need to separate and identify the actual Appraiser's Fee from the AMC's fees on the new closing documents, with NO LUCK. AMCs fought it tooth and nail. So the borrowing public remains CLUELESS. 6. You think that we had issues with the housing / lending / mortgage industry back before FIREAA...and as recently as 2007-2008, just hold on. Who honestly thinks allowing untrained, unregulated people into someone's home is a good idea? 7. Even engaging brokers as "data collectors" is crazy. Brokers are famous for inaccurate MLS data and artificially inflating square footage and features of homes. I hate to say it, and I am actually a Realtor since 1988 (as well as an Appraiser) but I seriously question the reasoning of thinking that brokers are a good data source. Some do a good job...many do not. 8. Brokers regularly hire APPRAISERS to measure their listings. Who thinks brokers want to actually even do property data collection? Fees I've seen offered to brokers are \$20-\$25 per property.(yeah...you'll get rich that way) 9. The truth is that the data collectors AMCs will be able to hire for the fees being offered, will not produce reliable, credible data. You can try to convince everyone that these collectors will be

Against USPAP

They expect us to rely on someone else's research when you cannot even find people who want to work at all. Please! I have been an appraiser for 31 years. I would never trust anyone else's research. Need to see and do for myself not to mention the liability of the inaccurate data you are most likely to get.

It is always about the money, they want to pay 2 people a little money each, than to pay an appraisal professional a reasonable fee to do the job we have been trained for. Could it speed up the transaction process? perhaps, however, now there are two moving parts to coordinate in the process which could lead to a similar number of days as a typical appraisal request, only at a much lower cost to the AMC/lender. For such a critical part of the real estate transaction, protecting the lender as well as the borrower in some cases, it is the lowest expense on the closing statement, other than the courier fee. It's really sad our contribution in the valuation process is not considered valuable. What's next? The real estate agents will just let the lender know the house is worth what the contract price states and it's all good? Simply delusional I say, but nothing would surprise me at this point!

It's all about the FEES.

JUST SAY NO



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

It's just a way put downward pressure on appraisal fees.
Reports take so much longer than they did 20 to 30 years ago due to the report content required after the last mortgage meltdown. The actual viewing of the property takes only a small part of the time to complete an assignment. Agents also lack proper training in above and below grade square footage and room count, identification of design on housing. The preliminary research to find comparable sales takes much longer than in the past due to bad data.
Working close with the data collectors to get things correct. Doing your due diligence on all aspects of the process to service the client to the best of your ability.
I'm 65 with a bad back. Transitioning to desktop only work is my only way of staying in business.
I believe it is so contradictory that appraisers are required to proof adjustments, follow many guidelines, comply with so many regulations and lenders are promoting a product where anyone is inspecting the subject and the neighborhood and then the appraiser has to produce a credible report . The contradiction is ridiculously evident.
To accept another person's data when you don't know their experience level is wrong. Accepting another results is dangerous when you sign a legal document agreeing to all of the results and data. It's a bad idea and when your E & O insurance doesn't accept it then why should you. Make the money you deserve for an appraisal not when Fannie Mae wants you to make to cut costs and time for their benefit. Has the market crash of the late 2000's taught the banks and Fannie Mae anything. Where's the accountability and blame going to be placed on next time?
It is an illogical version of appraising. I cannot see any benefits to this type of an inspection and I cannot rely on another persons data that I do not know and trust. It is a cause for alarm. It will result in unreliable results. I have held my ground so far and refused all orders of this type.
The bifurcated appraisal means that I must estimate a value on a property I have not seen in potentially a neighborhood that may have negative influences on value for less than half my typical fee??? No way!
If trainee appraisers were allowed to work with more independence, there would be less need to bi-furcate the process. Supervisors could focus on analysis with experienced trainees completing more inspections.
How many times must the market collapse before someone will understand the importance of an appraisal. I take pride in my job, I do what is necessary to complete a credible appraisal. My residential fees have not increased since 2001, other people in the industry are making money off my appraisal and putting the blame on the appraiser for increased fees, I don't know how this can happen if my fees haven't changed. If I can't turn around an appraisal in a reasonable amount of time, I don't accept it.
I'm concerned the PDC won't adequately convey adverse external influences (and affect on property) and/or functional utility (interior flow) of the home. This is something that is best understood by actually being at the home.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Although not directly related, the Texas Appraiser Licensing & Certification Board announced 10/19 that appraisers licensed in Texas cannot complete 'evaluations' due to conflict with both USPAP and Texas Code. It would be a logical step to include these garbage assignments as 'evaluations' or, also likely, prohibit appraisers in Texas from doing them due to the same USPAP and Code issues. All it takes is one large state to kill these things.

I think this is a stupid process. I don't see the need for a 2 step process. I think lenders should realize the value of a true appraisal and be willing to pay a decent fee for the product.

Part of the analysis that I perform as an appraiser comes from the inspection process itself. Spending time in the neighborhood and in the property itself gives me a sense of how the property relates to its neighborhood and the impacts that the surrounding neighborhood has on the subject property. Sights, sounds and smells all enhance the knowledge that the appraiser gets about the property that you would never perceive from a written report from someone just collecting data by checking off boxes.

I am a review appraiser for the largest lender in the US. I have reviewed a number of bifurcated reports and most of the time I recommend a product upgrade due to poorly selected comps or poorly collected data - think partly below grade being included in GLA. Most Realtors are not versed in FNMA lending guidelines as they relate to appraisal. I'm not sure if appraiser's are being conservative in fear of liability. More often then not, the values are low and the borrower suffers. If me and most of fellow reviewers are recommending product upgrades, where's the time saving? They are actually taking more time with an additional cost. Why isn't anyone talking to the end users?

I have completed several bifurcation appraisal where the inspection was completed by someone else. Each inspection report was marginal at best. Much more training is need for the inspectors. The inspection reports which I have been given are full of errors. It takes time and money to properly train an inspector. Its the old adage..you get what you pay for

Stupid idea and no good appraiser will do these

I do not like lowering appraiser qualification standards; I think that qualified appraisers should be able to earn a decent living, and not have to "bid" every job.

If the licensed/certified residential appraiser simply said "NO" to this Fannie Mae idea/plan, it would go NOWHERE!!! Do not sell your good name and career to this crazy idea. The appraiser should always be the party that inspects the subject property...period!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I have done many of these types of appraisals lately and the biggest problem I have is the GLA is significantly different than what is on MLS or county records, the inspector does not give enough information about the inspection, poor photos, the companies the inspectors work for require specific photos as per the client and they never show enough information. I have declined one order because it was a home in a newly constructed project, they wanted to refinance the loan 8 months after they purchased it, and the area had many new homes for sale by the builder which were not listed on the MLS. The only way to get the information for comparables was to visit the sales office for the information. The end result was the order was canceled. There are many situations that don't fit into the bifurcated model but these companies are trying to do it. The positive for me is I know my areas very well and can work these reports from anywhere in the country.

AMC's are the problem! This is a horrible idea.

I think that bifurcated appraisals have a place. They're essentially an improvement over an exterior appraisal in my opinion. But they should not be used where loan to value ratios are high as they are less reliable than an appraisal in which the appraiser also inspected the property. My biggest concern from a business perspective is that significant increases in appraisal waivers and bifurcated appraisals within a short time frame could lead to very low fees paid for both the inspection portion and analysis portion. That will lead many experienced and knowledgeable appraisers to leave the field and be replaced by less experienced and knowledgeable appraisers willing to work for a much lower wage.

The person completing the appraisal will spend more of their time trying to qualify the information by a third party individual

Just another way for lenders to overcharge borrowers for the appraisal product as a revenue source.

This is bad for consumers and eventually these type of appraisals will get worse in quality and information. Very bad for the profession in general.

Bifurcation of the appraisal process is an absolutely absurd idea. Over time the quality of appraisals will diminish in my opinion. This idea is simply yearned for by greedy lenders in order to pocket more money. In my opinion some, if not most, lenders don't care about the quality of appraisals being performed. These lenders want their loans to close so they can collect their money and move on to the next loan. Quality appraisers and appraisals are a vital tool in the mortgage loan process and bifurcation of this process will only cause crisis.

1004P IS THE SAME FORM AS THE 1004 WHICH REQUIRES THE SAME AMOUNT OF RESEARCH THUS, THE ONLY THING YOU ARE NOT DOING IS TAKING COMP PHOTOS AND INSPECTING THE SUBJECT FOR ONLY AND ARE ONLY GETTING 18% OF THE FEE!!!!

this is a solution in need of a problem. Pay appraisers what they should get paid and there would not be a shortage. the only shortage is appraisers willing to work close to or at minimum wage

Lenders are pushing Appraisers out. The ASC sold us out years ago.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

At this point in time, it appears that the changes will hurt the appraisal process. It will not improve the appraisal product, it could be less reliable product. I see it as undermining the appraisal process. Adversely affecting appraisal fees. The AMC companies that have contacted this appraiser have quoted fees of \$85 to \$100 for the subject inspection portion, and \$135 to \$185 for the analysis portion of the report.

Its totally unnecessary, and will destroy trust.

Bifurcated Appraisals is an obvious attempt at driving the costs of mortgages and refinances down without having an affect on the banks' bottom line. This is merely a cost saving measure that hurts the little guy (appraisers) that do not have a lobby to stick up for them. Further this virtually guarantees that the banks will be accepting additional risk over time leading to yet another financial meltdown as a result of bad regulation and voluntary risk adoption, in the hopes of further advancing the short term goals of stock holders and day traders.

I am 78 and my appraisal practice has reduced because most people want faster appraisals and I am slower in completing than I was 5 years ago. Yet, I will appraise as long as I can.

This is just an effort to have the computer decide if an appraisal is needed after a property inspection. They should just use whatever data is already available (and there should be tons by now) and skip the bs visit to the property from a soccer mom for \$50.

Bifurcated appraisals are a terrible idea. What are the benefits? I see none.

Bifurcation is a scam on the appraisal profession and will harm public trust.

I believe if the appraisers had a set reasonable fee across the board, it would speed the process up and keep the AMC's from shopping for lowest fees. I waste a lot of time on researching properties and bidding on reports that I hardly ever get the order on.

USPAP as we know it might be compromised with the bifurcation process.

There should be a comment area after every question. #8 could include the following. I can do the analysis from anywhere in the world. #10 I've done several of these 1004p or a hybrid created by a 3rd party management company, title co, etc . getting the individual to do the inspection and then completing the analysis takes about as long as the appraisal process. This is about money. 1004P or BACs are best as the software is in place. 3rd party inhouse forms are at best difficult and time consuming to complete.

Where is the time savings for the process? If appraiser's are supposed to be getting \$85-\$100 for each and they "only take" 45 minutes, why not? Because it's m license and my reputation on that signature line and no one elses. The fox is not in charge of the hen house and the mortgage industry and FANNIE/FREDDIE have not learned one thing since 2008. So lets ramp it up and make more \$\$\$ and then let the tax payer bail us out again.

My state appraisal board is already receiving complaints from homeowners / borrowers about these "products". They are being marketed to borrowers as being "just as good" as a full appraisal. NOT TRUE. State boards are going to be swamped with complaints.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Bifurcated appraisals are a way for lenders to bypass the appraiser independence rules and send out untrained, uneducated people to inspect that do not know how to measure, how to evaluate physical, functional, external obsolescence.
Bi- Fucking Appraisals are bullshit.
It would appear that these type of appraisal reports are hurting the industry since the appraiser is not inspecting the property .
This is another way for lenders to lead the economy down the road to collapse again.
Good questions, I hope to see the results posted
SITTING AT MY DESK RELYING ON SOMEONE NOT AS DETAILED AS MY SELF IS BAD. PICTURES LIE. NOT ALL OF THE DEFERRED MAINTENANCE WILL SHOW IN THE PICTURES. I AM WAITING FOR 2008 AGAIN AND SEE WHO THEY BAME NEXT.
I am hopefully retiring from this beat-down profession. Bifurcation may provide me some easy retirement income. Conventional appraisal is dead.
This is all being done to drive down appraisal fees.
I', still going to accept full appraisal assignments, so I'll still be in the neighborhood regularly! Bifurcated is not really much different than supervising trainee appraisers. I am suspicious, however, that this whole thing is another shot at lowering fees/doing away with Appraisers entirely.
This is a bad idea which will likely lead to greater losses to Fannie Mae and ultimately to taxpayers in the event of a downward market such as was experienced in 2007 & 2008. Appraisers are the best resource for determining an unbiased opinion of value. In addition, licensing was initiated in 1991 and did not prevent the fraud and abuse which occurred in 2007 & 2008. Further abuse is likely and a bifurcated approach will only lead to greater losses with little change in the fees and turn times.
Bad times ahead for mortgage appraisers.
I am an agribusiness appraiser, so this doesn't really apply to me very directly; however, I have used other CGs to do site inspections for me for non-complex ag appraisals.
This is a terrible idea that Fannie Mae has come up with and I see absolutely no benefits. I am at a complete loss as to why they would diminish the role of an appraiser in mortgage transactions. We are the very people they will blame when it all goes wrong! Disappointed in FNMA...
This will not serve the public interest well, since they currently don't understand the current process, which is communicated by commissioned sales people.
This is a horrible idea that does NOT promote the Public Trust.
FNMA is contradicting themselves. When CU started, Fannie was sending warning letters to appraisers sating the ratings used for condition and quality were different than another appraisers. Now it is OK to have an untrained third party making those calls? How ridiculous is this?
I like the idea of working remotely as an appraiser analyst



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I BELIEVE THEY WILL SPEED TURN TIMES BUT AT THE COST OF ACCURACY, QUALITY AND PROFESSIONALISM. THE INSPECTOR WOULD BE REPRESENTING THE APPRAISER IN THE EYES OF THE HOMEOWNER WHICH IF A DISPUTE ARISES DUE TO INSPECTION ERRORS OR A VALUE ISSUE THE APPRAISER WILL ULTIMATELY BEAR THE BURDEN AND LIABILITY. BAD FOR BUSINESS.

Why would ANY Appraiser open themselves up to such a liability? The property inspection is a HUGE part of the process. I would not trust anyone else's judgement on condition of the property and surroundings. If the lender/client thinks this is such a great idea then take the word of the PDC and let them do the entire report. Why the need of the Appraiser?

None

These short cut assignments are a wonderful theory. Many theories are wonderful yet not reliable or accurate. I review my peers as part of my appraisal practice, as many appraisers do. I see the "site visits" other "peers" complete and there is absolutely no way I would complete assignments based from their data. Bifurcated reports will further de-evolve data commonly found in the market place. Not only that, where is there any recourse for inaccuracies and/or poor quality thrown together reports? We, as appraisers, fight bad data daily be it from county records, mls, etc. AMC's, Fannie Mae, Freddie Mac, etc continually push the fast and low cost valuations. I understand that time is always if the essence and low cost drive all markets. That being said, it doesn't make sense to want to protect their investments with the shortest and least expensive product available. There isn't a savvy investor in the world that won't utilize their due diligence to protect their investments. Why on earth would the banking industry? Why on earth would our elected officials or anyone else think that is a grand idea? It's bad business. It is ludicrous to think you'll get consistent high quality valuations from a model or multiple 3rd parties providing differing sets of data. Some times, more eyes isn't the best. This proposed alternative is a way for big data and large lending to bank more into their pockets in the short term. All well and good until the theory presents it's true outcome...as a bad idea. Appraisers as a whole are a very dedicated group of specialist whom take their position extremely seriously. There are always, and will always be, bad apples in any industry. Replacing these "peers" with a bastardized process does not solve or fix an issue. Start with your AMC's. Rein in there time consuming useless data "required" by the "client". 8 out of 10 I deal with state their client requires some sort of data, form, time frame, etc there client actually doesn't require, need, or even want for that matter. It's a sale tactic. These are not compliance issues, they are justification issues. The large majority of the AMC's use the compliance card to sell lenders on their services. Lenders are often misled about what info is actually required and why their reports are better coming through the AMC. The reality is they are not. Cheapest and fastest, which is what the middle man pushes, doesn't

I would only consider doing analysis if the inspector is Appraiser trained or familiar. If I do the inspection its better I just do the whole report. I worry about credibility issues, misinformation, perception of conditions etc.

This new idea is ridiculous.

If they didn't want the Trainee to inspect and now want some \$10 per hour flunky to do it - this is just another profit skim for the lenders and does nothing beneficial for the public.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Any waiver only damages market credibility. The waiver of an appraisal may result in a buyer under or overpaying for a property, resulting in skewed data in the market as there is no requirement for an agent/broker to state when a property has sold with an appraisal waiver. Also, I am not sure how a bifurcated appraisal would make things faster. The lender/AMC would now have to coordinate two people and wait for two different parties to get their work completed. It's now like if someone else inspected the property I as an appraiser would all of a sudden have to backlog of work. I have to keep work in the pipeline to make a living. I am not just sitting around twiddling my thumbs waiting for something to come over so I can jump on it. We are far away from any real AVM being accurate, honestly, it is generally AMCs that slow the process down dramatically. It's a middle man with almost no real purpose.

This is a bad idea, Fannie Mae is just looking to create another mortgage fiasco

The fees are paltry and the time savings is a wash. They take less time maybe, butch more time to actually get assigned.

Do not do this! You will destroy a profession.

N/A

N/A

No sure what the advantages are, versus the just appraiser completing the process as usual. It appears that no one else cares about USPAP but the appraiser it held to its standards and integrity.

Sounds like these inspections should be done by home inspectors that will and can disclose the true quality and condition of a property. As for analysis, with technology today appraiser can develop data on markets. Lets look at the effects of form filling and the limited analysis currently done. We need more than 3 sales and more additional analysis and reasoning for conclusions.

I worked hard to become an Appraiser and I truly enjoy the advantage of having a career that allows me to be "on the road" and in the office. If I wanted a 9-5 desk profession, I wouldn't have chosen this career path. The fees that are being offered for this type of work is insulting to all the time, money, and energy appraisers have worked into becoming experts in the profession. Thank you for listening!

This is a short sighted attempt to change something that isn't broken. Ultimately, this is about money, not speed.

Bifurcated Best Guess.

This has the potential to be a disaster. What about competitive bidding situations where the inspection has nothing to do with the fact that some people will offer more than a property is worth, then what?

Real Estate agents are not thorough enough in providing information

For years Lender have been trying to get appraisers to accept this concept- The main reason we wont is that it does not benefit us at all - They only benefit the Lender - the appraiser will still have all the liability of the end product - with less pay - In order for these Bifurcated appraisals to be accepted you must find a way to make them mutually beneficial - This same principle is true in any profession

IF I PUT A VALUE ON IT, I OWN IT SO IT BETTER BE RIGHT. THANKS GARY TOWNSEND



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Inspectors in my market area are typically Realtors, whose focus is not that of an appraiser.
I have completed two bifurcation appraisal where I did not inspect the subject property and I found inadequate and/or incorrect information supplied to me both times. The fees offered are not sufficient for the time involved to investigate subject data and appropriate market data.
My biggest fear is that when this process begins to unravel the appraiser will be held liable for any deficiencies, despite disclaimers. There are too many neighborhoods and properties where advanced technology and computer analytics are not the answer. The systems only work well in recently constructed, spec neighborhoods, similar site sizes and views, and similar quality. Computers will never replace a trained appraiser's eyes.
Appraisers Familiar with the neighborhood will already know the sales that exist which are most representative on the property and having to examine comparables provided from a second party might lead to more delays and confusion because eventually the final destination of the report will go to a company which will have the comparables supplied from the second source and will want to know why the appraiser did not consider them and detailed Explanations will be the result which will lead to more delays
I will stop appraising if these reports become the norm
Product is unreliable at best and unprofessional. appears data collectors such as Corelogic are trying to monopolize the real estate market MLS data, appraisal of real estate ,alamode etc and now trying to convince the gov that an appraisal is all about data collection.
It's real simple, USPAP allows for a licensed appraiser to stop inspecting properties with trainees after six months if the certified appraiser is confident in their work. So why not get the lenders on board to allow the supervising appraiser to check the did not inspect. Benefits: more appraisers coming into the market.
Third party inspectors are not regulated if they do not have an appraisers license. The signatory appraiser is responsible for the actions of the third party inspector per USAPAP.
To rely on an on site inspection by a Broker or agent is no more of a problem than agreeing with another Appraiser .
The 45min it takes to inspect the subject and additional 45 min to drive the comps is tile well spent. I see nothing but problems in using data collected from someone else. Having to rely on google maps street photos is nuts. Lenders are just trying to squeeze a few more bucks out the professional who benefits the least from the transaction.
Quality of appraisals will go down



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I'm continually amazed at how the industry wants to shorten the duration on the biggest purchase/ investment in one's lifetime, as if we were buying a car, or other consumer good online, and I understand, and appreciate, how technology has made my 30 year career easier, and I see the dilemma with the current lower mortgage interest rates creating a longer processing time to close on a home, but this is not a long term issue. It appears that one side of the industry/market wants a totally automated process from viewing a house on line to closing, with no human interaction, with the other side (the older generation like myself (50 & older), who wants the direct relationship with the loan officer, real estate agent, home inspector and appraiser, and will know that shortcuts & greed were not the main focus for their personal major investment. It's my opinion, as with others that have expressed concerns, in my state of WI., where the average age of the home appraiser is 50, and older, and typically a "one man" shop, that the writing is on the wall, to have only a handful appraiser's in each state, with their role solely being limited for complex property inspections, and litigation purposes, with the major role being that of a quality control review appraiser for the mass, automated valuations. I'm thankful to have made a long career in this industry, but is evident that technology will eventually eliminate the role of the appraiser as it is today, to the point of extinction.

Appraiser is still the only person in the transaction with E & O. GSE's just want appraiser's signature so they have some recourse when things go wrong. Apparently everyone has forgotten the financial crisis we just experienced. This is bad for the Appraisal profession and for the American people.

The first page of the 1004 is produced efficiently using my memory of the home I just inspected minutes before. If I must refer to a WRITTEN description of the subject, this will create a huge, time consuming inefficiency personally.

As a senior review appraiser I will not accept these appraisals.

This will not solve the long term problem of appraisal delays, as long term consequences will be detrimental to the quality of appraisals as experienced appraisers retire - how will new entrants gain the necessary experience to become competent appraisers? Appraisal industry needs structural changes to a system more similar to real estate agents, where new appraisers MUST work under an established appraiser; this PDC work could be done by appraiser trainees and first tier appraisers, with senior appraisers handling analysis portions.

Another way to encourage poor lending habits that will result in another banking meltdown.

I would only consider these types of appraisals if I have no other choice. (answer to question 3)

These things are just a bad idea. I'd rather have an appraiser trainee that I've trained inspect a house rather than someone I know nothing about.

The appraiser needs to be at the property as you learn so much from physically being there. Real estate is not a commodity homogenized into a loaf of bread. Each property has unique characteristics that have to be observed. How much administration BS is going to happen with gate keepers escalating stages of service. How bout the homeowner or borrower hiring there own appraiser and shop their loan with one full appraisal.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

IT SOUNDS LIKE THE WOLF IS STILL IN CHARGE OF THE HEN HOUSE. AFTER 35 YEARS OF APPRAISING AND TEACHING SEVERAL CLASSES NOT MUCH HAS CHANGE. FNMA WILL ALWAYS TRY TO GET RID OF APPRAISER THROUGH SHADY/IRRELEVANT TYPES OF VALUATIONS.

Bifurcated appraisals will slow the process, because there is another party involved in the appraisal process. Why add additional variables to the equation.

See above

This is just one more way to make the appraiser extinct. And it an albatross for the lending industry. This will be the new gateway to future foreclosures and properties that are not worth their loan amounts.

I have done 1 of these per year for the prior 3 years. I am in no hurry to complete 1 in 2019. I believe the secondary market participants are slowly beginning to push appraisers out in favor of using the big data to tell them what they want to know.

Appraisers have enough difficulties relying on the accuracy of comparables and on the information shared with them by lenders, property owners, and other appraisers. This adds an additional layer of risk to an appraiser who now must rely on the skills and honesty of a data collector. A poorly trained collector may contaminate a huge number of appraisals simply by being less than thorough when inspecting, lying, or become manipulated by lenders or property owners to omit critical information to the appraiser. An inept appraiser could blame all their mistakes on the collectors or collude with collectors to help gain control of work in certain markets and protect each other from being audited. Appraisers who are not trained in or do too few inspections on their own will lose valuable skills needed to understand how the physical aspects of a property can be unique and play a huge role in its valuation. With the ever increasing fees appraisers are charging, the public should fee confident that the person estimating the value of their home is doing so with as much first hand knowledge as possible. A good attorney will easily place doubt in the mind of a court by simply asking the appraiser if they inspected the property and how they can be 100% sure the collector did as thorough a job as they should have or as they would have done themselves. As I said earlier, appraisers already have enough problems verifying comparables plus what they are told by lenders, owners, clients. Why would they want to add another layer to their report that could be called into question for accuracy or jeopardize their career by taking on assignments that they are not 100% in control of. If an appraiser, lender, client, or attorney wants to rely on a bifurcated report, there must be an enhanced level of liability should issues arise out of the assignment. Lenders should inform borrowers that the appraiser wont be inspecting the property, attorneys inform their clients similarly, underwriters be made aware that the appraisal is bifurcated, and that additional liability insurance is made available to protect appraisers harmed by unscrupulous collectors.

Denigration of the inspection process does not protect the public.

This would be a disaster for the appraisal industry.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Just another way for AMCs and bank to steal more from appraisers and hind there fees being charged to the consumer and not protecting the public. Amcs need to be regulated more and be fined for their fraud to appraisers and the public they serve. I will hang up this bull shit before I complete any of this corrupt crap!

There is so much room for error in basing your decisions for value on other peoples work. Tax records are wrong most of the time, realtors make mistakes by putting wrong information in the MLS. This process leaves to much room for error and when you are talking about the most expensive purchase many people will make in their lives, too risky....

Na

I have no problem with the concept. If I had another appraiser in my office we could easily work as a team, with one of inspecting and one of us writing. My concern is their attempt to use non-appraisers (realtors? insurance adjusters? whomever is willing to do it for \$35?) in which case I would be hard-pressed to rely on the results of that inspection. I barely trust other appraisers to correctly measure a house, there is no way I would trust a realtor to do a second floor on a mildly complex home competently. But I'd happily go measure houses and take photos all day long, assuming the pay was commensurate. Let the computers do the math, that way I never have to hear from an upset borrower or realtor again!

And what about comp photos, there has been no mention of those either, except that it would be a desktop appraisal, not a full appraisal. Why not do the OLD limited appraisals with no comp photos if time and money is the reason. An appraiser would need many years of experience to know the neighborhood without driving it. And most realtors don't measure a house, so I sure wouldn't trust someone that didn't have much training to do inspections. Again, I go back to if they won't let trainees, inspect by themselves, nor sign the report as a trainee than why are they taking a chance on someone else doing an inspection. I think the lenders are trying to create a shortage of appraisers so they can cry about not having enough and lesser options should be considered.

This is crap and should not be done.

This is just away for the lender to obtain the number they are looking for without having to obtain a credible appraisal

It is ludicrous to think that an unqualified and unlicensed person would be able to adequately inspect and understand enough of the market conditions necessary to relay information to a second person who is required to rely on this information to credibly analyze the information. Basically, junk in equals junk out.

None

My market is complex and rural, with a number of issues that only local appraisers are familiar with (wells drying up, cisterns, superfund areas, areas poised for rezoning, etc.). At least 90% of the local appraisers are over age 55, and may not adopt the new technology, which means most bifurcated appraisals will be done by out of town appraisers unfamiliar with this unique market. I believe this will be a disaster, and the only "benefit" is to AMC's with a "how cheap/how fast" mentality who might save a few bucks. I've started researching other career options for when the appraisal industry collapses. Thank you for the survey, OREP - love you guys and appreciate all you do for appraisers!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

N/A
Bifurcated appraisal is an idiotic notion
The credibility of the appraisal is only as reliable as the expertise of the person inspecting the property. Why regulate the standards and credentials of appraisers and turn the inspection process to someone who is not regulated at all. It completely undermines the consumers protection.
This downgrades the professional appraiser to a data entry job and has greater liability to the appraiser
They are here to stay.
It is bad idea and seeks to cheapen the profession
We tried this in the 90's, it failed. It will lead to inaccurate appraisals, and fraud. The funny thing is that all of current regulation was caused by the "Fraud" completed by appraisers. The reason most appraisers were even open to the practice is the lack of money in the field. In the 1990's it took 5 hours on one page to do an appraisal, maybe 3 comps, for \$250 per appraisal. Now I have to have 5 to 8 comparables get challenged constantly by people who want me to consider additional sales, have to have this massive appraisal (60 to 100 pages) completed in 5 hours for \$250. In the 1990's gas cost \$1.90 now it \$3.90. My car was \$9K, now it is \$30K, and do not get me started on health care... Every one is wondering why the numbers of appraisers are declining? Let me tell you one 30 year veteran's opinion, the pressure is greater than ever before, the money is less, and everyone wants to cut my fee. I am working as fast as I can to get out of lender work, and out of the appraisal field. By the way, USPAP states I cannot let time to complete an assignment be a factor in my appraisal, so wouldn't the failure to grant additional time to complete an assignment a violation of "AIR"?
No
Appraiser trainees under direct supervision of mentor appraiser is a far better solution to speeding up the process while minimizing liability and with the benefit of questioning the trainee if additional information is required by the mentor. There appraiser must be able to trust the inspector who must be held to account for his/her actions to the appraiser. I believe those who are pushing the bifurcated appraisals are attempting to cut costs at the expense of quality and credibility. Ih how short or memory is of the past great recession. Out industry has been vastly improved. Let's keep it going in that direction and not dumb things down again for the sake of making more loans.
Will be ruinous for appraiser income and lenders understanding their collateral.
I have a problem for the fees, if I'm asked to do a desktop appraisal and the inspector send photos etc. By the time I do the research, choose the comps verify the results, I spent as much time as I would on a field appraisal but I'm asked to do all this for under \$125. The only thing I didn't do was measure, take photos and drive thru the neighborhood. So for all this I'm expected to take a drastic cut in fees. I don't mind a \$100 discount from my regular fee but it is my education, knowledge, experience you are hiring not a typist (fill in the blanks)
A bifurcated appraisal is merely a way for the lender to purchase an insurance policy (my signature) for a ridiculously low one time "premium".



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Appraiser/Valuation Analysis - Licensed/Certified Appraiser are once again being damaged by having to split fees with data collectors now. I think this type of appraisal is back for appraisers in general, along with the liability issues. I understand we need to move forward and embrace technology, however, I am not sure this is the way to do that.

Back to 1989 and 2008 all over again

A bad idea conceived by individuals who have never done an appraisal. If they saw the things that I see on a daily basis they would know why they need a trained professional in the field. Houses sliding down the hill, houses that are rat and insect infested, houses that are not owner occupied when they are supposed to be, cracked slabs, mold, environmental hazards from adjacent properties, encroachments, etc. Honestly, I envision that the property collection people will skim over all of those things. Also, the chances they will know how to measure a house are slim and none- half the appraisers don't even know how to do that; they stretch the dimensions; fail to mention to buyers and/or lenders and in general it's a disaster. This is not going to improve.

my 2 cents (and then some) - NO, it is NOT a done deal and as a provider of L&C to appraisers, I am offended that you would publish an article saying that it is. Appraisers need to understand completely their requirements when performing these things....and many DON'T. 1. The professional Appraiser is the only party to a mortgage transaction that is unbiased and advocates for no one except the public. 2. The Appraiser's primary function is one of protecting the public trust. Remove them from the lending equation, and you are putting the fox in charge of the hen house. 3. The issue with fees and turn times for appraisals is NOT about an "appraiser shortage"...it's being caused by AMCs. They spend days, sometimes weeks shopping around for the cheapest appraiser, thereby causing delays in turn times. 4. AMCs engage the Appraiser for \$200-\$300 while charging \$600-\$700 to their client which is passed on to the borrower. 5. When TILA-RESPA was in the process and open for public comments, Appraisers tried to make everyone involved aware of the urgent need to separate and identify the actual Appraiser's Fee from the AMC's fees on the new closing documents, with NO LUCK. AMCs fought it tooth and nail. So the borrowing public remains CLUELESS. 6. You think that we had issues with the housing / lending / mortgage industry back before FIREAA...and as recently as 2007-2008, just hold on. Who honestly thinks allowing untrained, unregulated people into someone's home is a good idea? 7. Even engaging brokers as "data collectors" is crazy. Brokers are famous for inaccurate MLS data and artificially inflating square footage and features of homes. I hate to say it, and I am actually a Realtor since 1988 (as well as an Appraiser) but I seriously question the reasoning of thinking that brokers are a good data source. Some do a good job...many do not. 8. Brokers regularly hire APPRAISERS to measure their listings. Who thinks brokers want to actually even do property data collection? Fees I've seen offered to brokers are \$20-\$25 per property.(yeah...you'll get rich that way) 9. The truth is that the data collectors AMCs will be able to hire for the fees being offered, will not produce reliable, credible data. You can try to convince everyone that these collectors will be "virtually trained" and be given a data collection sheet



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Point 17 For well over a decade now, lenders would not accept a 1004 appraisal report where the home had not been "personally inspected" by the certified appraiser signing the report. Not only that, but it has also been required that the exterior of each comparable sale must be "personally inspected" by the signing, certified appraiser. These functions were considered to be "significant appraisal assistance". For years now, we appraisers have been complaining that these conditions make it impractical for us to hire trainees.... but no one listened... for YEARS. In addition, AMCs will oftentimes shop appraisal assignments for 2-3 weeks, seeking the lowest possible bid to maximize their profit. Then they complain about long turn-around times when most of it is on their end. For at least 3 years now, AMC & GSE leaders have been complaining about an "appraiser shortage", as they have pushed to create this 1004P hybrid appraisal. So this purported shortage is most often due to the fact that AMCs cannot get a qualified appraiser to accept their low-ball, well below C&R fees. What they will never admit to, though, is that this made up "appraiser shortage" is a phenomenon that..... They created! But NOW, all of a sudden in 2019 the AF/AQB turns on a dime and claims that the inspection of the subject property and the comparable sales exteriors is NOT "significant appraisal assistance"..... and now all the old rules and conventions are thrown out the window. The 1004P is NOT a streamlined form. It is not an alternative product like the 2055 or the desktop appraisal. The 1004P is nearly a carbon copy of the existing 1004 form. A primary function of our services as certified appraisers is to provide a credible product that adheres to ethical standards. So my suspicions of the corrupt intent of the 1004P initiative begin with the facts described above, but could be allayed if those responsible for it will begin by providing adequate answers to the following questions: * How are these hybrid 1004 appraisals an improvement over the many changes/enhancements that were made to appraisal reporting after the 2008 financial crisis? * How do 1004 hybrids enhance the accuracy & reliability of home appraisals.... or is it possible they they will detract from them? * How are these 1004 hybrid appraisals (with subject and

N/A

This appears to just be another way to end the appraisal profession.

As a homeowner, I would want to know that a qualified professional is going to inspect my home. The bifurcated appraisal will lead to an erosion of the public trust in the appraisal process.

Once fees are fair, Appraisers may re-think things.

See number 6 above.

The only ones benefitting from the Hybrid assignments are the lenders. Period. Just another way for faster. Cheaper. More Profit. GREED! What happened to protecting the consumer? And why are the entities that had to be bailed out by tax payers dictating how collateral should be valued. They obviously do not know what they are doing.

As stated I do not see any advantage in this, other then saving a few bucks for lenders. Also I do not see how these will or can produce as good, or better result overall.

I do not believe the lending industry is interested in well supported valuation thus this bifurcated charade. A desktop is certainly reasonable some of the time but as this is presented currently there is far too much liability and complete lack of control as well as scope of work for far too little compensation.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I have been appraising for over 46 years, and this is the most ridiculous concept to ever come along.

Appraiser's fees relate to time to complete. Fannie Mae and the AMC's have made the reports far to complex and detailed, and time consuming to complete. Add the requirements of live same day photos and specific language in the reports as well. Then, each AMD and each lender will have specific requirements which must be addressed, and each upload process is more hoops to follow. Simple answer, reduce the long forms and extensive report writing, and let appraisers do what we do best, look at properties and make market determinations. The Bifurcated format is going to make appraiser's report writers who never leave their office, and allow appraiser's who have never set foot inside the county of the subject property setting values for the property.

These valuations not good for the economy! !!

The inspection of the subject is critical in my selection of the comparable sales. Without inspecting the subject myself, I can not question the brokers on the comparable sales about their listings.

I will not sign anything that I have not done 100% of the work for. It's my license, e and o insurance, my liability. I have taken the education, done all of the training and continue to do the education to renew my license. I pay for all of these things and put in all of the work to get to be the knowledgeable appraiser i am today. And it took doing the research and doing the inspection and driving the area for me to have a dependable appraisal. I will not be doing anything that falls short of that and put my license and e and o at risk.

By the time a valuation is needed, its because its deemed a very complex assignment. Inconclusive comps. Wide sales price range, 2 acres with a huge semi truck garage, difficult like guest houses. Enclosed patios. Ive looked up addresses on 4 recent valuation portion only assignments \$115 to \$125, very difficult. Do you want to spend 2 hours entering comp data and hand picking very complex matched pairs. For \$115?

I have seen mentioned the use of aerial views as part of the bifurcated appraisal process. At least in the markets I work in, our areas is growing so fast that the aerial imagery IS NOT UP TO DATE! There are subdivisions that are 100% built-up and the STREETS don't even show up on the maps. This alone should give most appraisers cold chills about doing these assignments.

Bifurcated appraisals are the dumbest idea since someone said hold my beer and watch this...

I'm 63 - if this happens it is just another good reason for me to retire - it will reduce the number of appraisers out there in a time when lenders are screaming about how there are not enough appraisers.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I find it insulting that we as professionals are not allowed to use a trainee that we have personally worked with and trust to make our office and workflow more efficient and train future appraisers . Now all of a sudden it is perfectly acceptable to use any joe off the street to inspect and relay critical information to the appraisers for our now half blind analysis. I also find it insulting to be told that appraisers do not like change and better get with the program because this is the future. We as a profession are constantly adapting and changing from the take over by amc's to form changes and the uad reporting. This new and improved scheme will only create more problems and slow the process down. The reality is this is just another tactic to abuse the lending and put the economy and families and great risk. This is a farce to skirt safeguards legislated to not repeat the past failures.

There is an army of professionals working on advancing this model from inside the GSE's and it doesn't matter what I think. Even if they destroy the economy with this garbage they will just develop a replacement method for cutting out full-appraisal reports using technology rather than independent analysis. The profession is dead, Thanks for playing!

Did we not learn anything from 2008-2010?

in my waterfront area 1.5 block away the neighborhood diminishes drastically. If you do not drive the neighborhood you would not know it. These will not help public trust and will cause a collapse of the housing market. The only one will benefit for a while is the stockholders.

Even though I'm totally negative on this process, I may change my mind in the future. I simply think the appraiser should see the property and neighborhood him/herself.

These bastardized so-called appraisals are just another way to steal appraiser fees.

This would work if they get realistic about the fees, however, I am sure that will not happen

Drastically dropping standards may be heralded by impatient (and greedy) participants, but it doesn't make it right or beneficial in the long term. Demand for speed has always had a high cost.

The entire bifurcation process is designed to lower fees paid to appraisers without reducing fees charged to consumers. A secondary objective is to reduce inconvenient property disclosures. In short, to bypass MINIMUM, USPAP mandated appraisal requirements.

More "short cuts" will lead to 2008 crash all over again. When will they ever learn?? I'm not surprised though.

Bad idea all around

When an issue will arise, and it will, who will they blame for value problems? Real Estate is cyclical.

It is a slide down the slippery slope to elimination of the appraiser! I am 87 with 45 years of appraising so I like just sitting at my desk -- with apologies to the profession!!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

In my market I am performing up to 50 full appraisals a month at fees ranging from \$400 to \$500 and still turning down additional available assignments. Why in heaven would I have any interest in a minimal paying, poorly supported valuation product? Nor I am not going to put my license on the line by putting my hard-earned signature on reports from data gathered by inexperienced parties, and yes that includes experienced real estate brokers -- a majority who can't even properly measure a home. (ANSI?) That is crazy to think that I am willing to take full responsibility for errors provided by someone else. Fannie Mae thinks it can dictate to appraisers that we should stay in the office doing analysis, and then spins it like they are doing us a favor. Part of the reason I got into this business is to get out of the office after years in the corporate world. Fannie Mae continues to prove that it doesn't understand most appraisers and even the process. Its bureaucratically devised 1004MC has proven to be an almost worthless waste of time and paper because of its shortcomings. Bifurcated appraisals will cause more problems than it is intended to solve. It is just asking for sketchy data and laughable Zillow-like valuations, and ultimately another 2008-like mortgage meltdown. I once had to deal with an unnamed national lender that temporarily blacklisted me based on their internal reviewers who, ultimately missed the valuation by \$250,000!!! relying on faulty 2-dimensional computer data. (Of course I received no apology after being quickly reinstated and the ultimate use of my in-the-field appraisal). The eyes and ears of experienced appraisers, while not faultless, are critically needed in the field and inside properties. If lenders and Fannie Mae make bifurcated appraisals the norm, I will find another line of work or retire early.

There is a process in developing an opinion of value that involves a physical inspection of the property. A "PDC" is only going to inspect at the Subject property and no further. We as Appraisers are asked all the time if we are competent in the market area in which we are appraising. We are told we will be provided with photos and description of the Subject, but from my 21 years of experience, photos always look better than in person. Not to mention, if the PDC misses the stain on the ceiling from a roof leak or the smell/odor of mildew in a basement. These things can't be conveyed from a photo. I have yet to see how this is going to speed up the appraisal process. One last thing to take into consideration is if the PDC inspects the property and an Appraiser is engaged to provide a valuation, who is liable if the loan defaults?

After speaking with clients about what they're expecting and the fees they're offering they're basically wanting a full appraisal for half the fee. I don't mind doing one part or the other but I'm not going to do it for half the fee. Also the same amount of work requires the same amount of time and breaking it up into two parts to me just seems like now you have twice the risk of delays because you have two people involved. If they want to quality to stay high they need to be willing to pay for it and allow us to do it in a reasonable amount of time. I personally don't take that long to do appraisals. I can turn them in less than a week usually.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The few bifurcated appraisals I have done had the inspection done by Realtors. The photos were almost always blurry, impossible to understand, and never matched room counts or other information available via the county. Also as an appraiser it is difficult to assess the overall quality/condition of the home without seeing it. While I might receive a picture of a kitchen, that kitchen may be accessible only through the master bedroom, the layout of the home may be extraordinarily outdated, or the home may smell foul. All of which cannot be determined through photos and cannot be accurately assessed by an unqualified inspector (typically a Realtor who has no training on appraisals, the appraisal process, or home inspections). This only leads to liability on my part, potential losses for a buyer when their home gets over valued, and losses for the bank. We've gone from a 50 page URAR report with unnecessary statistics and wording requirements, to the nuclear option of just guessing a value during a bifurcated. If we were REALLY interested in speeding times and decreasing fees, we'd get rid of AMCs. The number of times the AMC has bid an appraisal around for 2 weeks and I've bid on it several times before it's finally assigned (for my first bid fee) is incredible. Then in addition to my reasonable fee the AMC is also taking an extra 20%-50%. So now the client has been delayed two weeks and is paying an outrageously high fee. If it came directly to me it would have been done two weeks earlier for 50% less. The AMCs are the ones pushing bifurcated appraisals due to a mess of their own making. We already no longer have anyone becoming appraisers and the current appraisers will no longer be in the profession within the next 5 years. You can make better money doing anything else rather than bifurcated, and there is no reason to get a bachelors degree and train for two years to do a job that suddenly has no real qualification requirements.

FHFA mandated modernizing the GSEs. I'm fond of some of the improvements I've heard on the front end but the program shows it's holes as the program unfolds. The GSEs still in conservatorship from their last debacle went right back to the same people who helped put them there. The funding going toward this abyss is almost unimaginable. We only have 8-9 more years to go this cycle and wondering when capital investors will be exhausted of their losses. I'm ashamed of my Congress for even allowing this to happen. It is akin to the ND appraisal waiver as far as bad planning goes. If GSES would work with appraisers instead of against us ~ the market would function as it should with all the proper checks and balances in place. GSEs seek to eliminate those checks and balances. Eliminating neutrality from markets is a destiny to disaster, again.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I have completed hundreds of these bifurcated appraisals. I do not believe bifurcated appraisals are the answer. They seem to be a stop gap measure / knee jerk reaction to industry challenges. I believe that, initially, bifurcated appraisals may provide relief from the long turn around times for appraisals. But, over time, the appraisers who are no longer "driving" their markets will certainly lose touch with the market dynamics and developments, which are only visible / noticeable from having the appraiser physically view the market from within (by driving our markets). Interesting point - these bifurcated appraisals are a reaction to the extended turn around times for appraisal reports. However, the extended turn around times are mostly due to the heavy "scope creep" experienced over the past 10 years. Lenders want 3 times the product , for a portion of the price, in half the time (look at our reports & text addenda today vs. 1995 or even vs. the late eighties with the old "green hornet" form) . I agree changes need to be made to the profession to meet this new emerging GIG economy, but I do not believe bifurcated appraisals will be the long term answer, moving forward. Appraisers need to become more educated, embrace & use technology to their benefit and to their advantage.

WILL NEVER COMPLETE A DESKTOP APPRAISAL. THIS WILL DIE A SLOW DEATH. WILL BE FUN TO WATCH. GOOD LUCK WITH THIS ! LOL

Not good for final product or additional production.

If the lender assumes the liability. I am all for it. But for 1 day less in the process not worth the liability. Too many cooks ruin the soup.

Ten years prior the banks and consumer would point to faulty appraisals as the main source of the market collapse. It was the 'greed' of lenders with minimal and inadequate oversight of the valuation process. I believe this has been cleaned up somewhat, with reputable AMCs support, but again, this is simply a process of cheapen a valuable commodity. The cheap, any number needed appraiser will now be defined as the cheap property data collector. This is comical.

It is my understanding that they are here and will be here to stay because Lenders continually seek a way to pay less for an appraisal but continue to require more work from the appraiser-which is what the bifurcation process does. Less money, shorter turn times and overall more work.

It is not wise to rely on a third party inspection. There is too great of a chance of errors and many things that can be missed. A typical appraisal would be much more time efficient and cost saving. If we get rid of the AMC, the borrower will be saving money. Order one of these, then changing to an appraisal wastes borrower money and time. There is NO liability for the inspector, only the appraiser. Let the appraiser do their job. Many areas have not recovered from the last housing crisis, we cannot afford another. Appraisers are licensed/certified and are rarely treated as the professionals we are=let us to the jobs we are trained for and experienced at. Also-if a Realtor is doing the inspection-they often cannot even list a property correctly and you want us to rely on their inspection? NO!!! Way too dangerous for the appraiser. I will not risk my hard earned Certification, reputation, career, E&O, and profession by doing these.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Very little information in MLS systems is accurate, builders supply inaccurate information and the appraiser will have to shoulder all the liability. I trust my self for inspections only
Why don't lenders want appraisers to go inside the home?
It's a disgrace that we are even discussing these type of assignments...they are not reliable..they are not protecting the public..a full appraisal which includes a walk thru are the are the only way to go...computers cannot tell that there are leaky pipes, frayed wires, mold in the house etc..
I do them know as the appraiser and the inspection results are awful. They measure homes with a wheel rather than a tape measure or laser device, they also use pictometry to measure the footprint but have no idea if there is a partial basement. They do allow me to work in another state and do appraisals in my home state.
I've done 2 on the data collection end, fees are no where near adequate.
This is more work for less pay. Big surprise as that is the trend of the appraisal industry since 2002 when I started.
Good, fast, cheap... pick 2
These reports do nothing to improve or "modernize" the process. They are a data grab by the GSEs and a data AND money grab by the AMCs. They have turned one job into two. Two fees, multiple data points, a pot if gold for an already inefficient and corrupt process that has nothing to do with getting an appraisal done.
Long turn around for data collection.
This is an example of how they are making this profession less rewarding every day.
None
Its a helpful system to every appraiser.
With the lack of education and licensing for "observers" vs what we appraisers have done in scary. Who holds the observer accountable? This is a money and market share grab by the banks as well as corelogic
I have no problem with the bifurcated process in terms of liability or credibility. I think liability is reduced when an appraiser was not there to see something that they should have seen. I think the reports can be credible with good processes on both sides. This is a more efficient way of working. My only concern is that if appraisers who were once doing one appraisal per day, now do five appraisals per day, there will be much less work to go around. I am also concerned that the prices of the bifurcated may never produce a good hourly wage for appraisers who are doing quality analysis. This problem could be made worse by the loosening of appraisal licensing standards and an oversupply of appraisers due to the shift in the market.
The current AMC model has been detrimental to the appraisal profession. Lenders are demanding alternatives and the results we now see are hybrid products and/or waivers. Eventually the market will adjust and we will see a repeat of the financial crises of the past.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

<p>This is just another way to eliminate a percentage of actual appraisals in lieu of cheaper, less reliable and less credit reports. using the assessed value would be almost the same. i do not want to rely on someone else's eyes on the subject - especially when i don't know them or their level of integrity or training.</p>
<p>I've done the inspection portion and the training is an absolute joke. If I wasn't an appraiser I wouldn't have been prepared. They are sending unprepared non-appraisers into the field. Also, banks not allowing trainees to do inspections for their own supervisors but allowing reduced regs on who can inspect for bifurcated appraisals is the definition of hypocrisy.</p>
<p>I would only consider being the Appraiser Analyst if I could have an appraiser trainee or a staff member I've trained and trust their judgement and ability to gather data and measure properly. I believe this will not be good for the Appraiser profession or the mortgage industry.</p>
<p>Cheap form of value. Not the answer to faster appraisals. Quality over quantity</p>
<p>Bring em on</p>
<p>This is a train wreck waiting to happen. And I don't mean for appraisers, I mean the economy as a whole.</p>
<p>I tried it and I felt so isolated and detached from the assignment. Different then a desktop appraisal because you are relying on the available data sources. Relying on someone that you do not know; that will not sign or have any liability is simply irresponsible. If the data collector was someone on your staff that you had trained and developed a relationship with you could probably trust the situation a little more. Finally driving the neighborhood and walking through that home and property gives the appraiser a clear view of the home. It's not just my age or fear of change it truly takes away from the appraisal process.</p>
<p>If the appraisal foundation and regulators could agree to get rid of 70% of the useless BS rules that sound all pretty, but actually don't add a dam bit of public trust or validity to the reports that result in work that is time-consuming and costly, and get the regulatory/guideline monkeys off our back, as well as the incessant and unceasing demand from lenders and AMC's for updates each hour of the day.....we could produce a far more credible report in far less time, with slightly lower cost. Heaven forbid anyone just consider letting us do our dam job without all the BS that adds no further credibility to the report or the value. This entire profession has completely and utterly lost sight of the entire point of the job....the value. No cares if the value is reasonable, only if you have updated clients and followed all the useless and time-consuming rules put in place by people have never done our job and need to justify their job.</p>
<p>I am open to either side (or both sides) of the bifurcated appraisal assignment given sufficient fees. Appraisers do desk top valuations all the time or exterior only. We know our areas so if we don't work outside of our areas of competency that shouldn't be an issue. But seeing and being in the property being appraised lets the appraiser observe things that photos and other peoples politically correct and non offensive inspection statements won't.</p>
<p>None</p>



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

If a licensed appraiser is the property inspector and the property then needs an appraisal, does the appraiser analyst who writes the report have to make another trip to shoot photos of the comparables? This seems like a waste of time.

I have done these in the past. The way they try to defend the low fees is by saying it takes less time now, because you do not have to do the inspection. But the analysis is the most essential aspect of the process (assuming the inspection information is accurate). Would they tell a surgeon they are now getting paid by the hour now because someone else already prepped the patient before the operation? No, they would not, because the expertise that an experienced doctor brings is the key to a successful outcome, just like the opinion of market value development coming from an experienced appraiser. With the expected cut in fees (again) my revenue will be cut in half as I see it. And they wonder why people are leaving the business. I spent 20 years building this business only to watch fees get cut over and over. Most people make more money over time. Appraisers are making less and this might bring the death to the profession. With Big Data (IE: corelogic buying MLS's companies, software companies, analytics companies), the writing is on the wall. They would prefer a computer or someone else to approve the loan and values. If someone was to rob a bank, they would be lucky to get away with a few thousand dollars. But now, letting people with skin in the game (lenders, FNMA, non-appraisers) deciding if an appraisal is needed or worse, coming up with an opinion of market value and approving loans, it will be like hundreds of banks being robbed every day. And when the market takes a dive and all these bad loans come home to roost, who pays? You. Me. Every tax payer. For years there was a unbiased disinterested third party in the chain and now they want that person to go away, or have his or her abilities greatly hindered, all under the guise of "big data" is better and faster. I also don't understand how they want appraiser's to be Property Data Inspectors and/or a Valuation Analyst. If I did the inspection, why wouldn't I want to do the entire report. The reason is clear; because they want to pay us less and less. They want to remove the one person who has his or her foot on the ground in the marketplace and replace with someone at FNMA who decides if an appraisal should even take place. All this leads to rampant fraud which could lead to catastrophic collapse. A house next to mine could sell for \$500K by my house might only be

I find it difficult to reason that the industry has not learned it's lesson. Most recent crash was largely due to inexperienced, unqualified individuals being involved in the appraisal process. Realtors, and green appraisers will most probably be engaged in data gathering...ever read an NMLS listing, and wonder where they got their GLA? Majority of listings state "Buyers realtor to confirm square footage" or "Deemed reliable, but not guaranteed". Do we really want them aiding in data gathering, when they have a hard time getting the proper square footage, even on the easiest of homes! Additionally, they have a tendency to include screen porches in GLA, add additional bathrooms, exaggerate views, and probably most important, condition.

I would only consider this in my immediate neighborhood, no other locations.

The fees paid for these bifurcated appraisals to the appraiser are low considering the amount of time that it requires. Also, it appears to me in my experience that most of these assignments or complex appraisals and probably couldn't be completed with an AVM.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Anything that takes away the combined hands-on and personal knowledge element of the appraisal process creates a product that is potentially unreliable and misleading.

"He said"... " she said" when a problem arises down stream with the loan and then what do you do?

The idea is completely ridiculous. By the time all parties are paid including the AMC for both portions a more accurate full appraisal could of been ordered. From what I have seen, I will take no more liability for someone else's inspection. I won't even have a trainee much less trust the part time realtor that took pics for me. No thank you

I just completed a mock PDA. Took 45 min to complete on APP. It was terrible! Back and forth, no flow, irrelevant info.

I do not believe that this is good for the industry but I will go along with the changes so I can continue to have a successful business.

Who will they blame when the market tanks? I can't be the appraiser anymore. To may hands in the pot and only one person holding E and O insurance, so that person takes the fall. Every person involved with an evaluation needs to carry E and O so when the loan goes bad then everybody involved takes the hit. The appraiser cannot be the punching bag anymore because the guidelines and reporting standards are way too strict.

They will still wait till the last minute to order

This proposed process diminishes the appraisal profession.

Assignments are not worth the risk of liability especially now that management companies insist on indemnification clause is that allow them to back charge the appraiser for any losses incurred in an assignment.

what happens when all the data is created by a computer and not actual eyes on the scene? I'm already seeing questionable values on comparable sales because of waivers. Fannie mentioned that the fees to the buyer would still be the same, who is taking most of the fee? The AMC? This is all about production and not about quality and maintaining good data.

Clearly, no one involved in the development of this Bifurcated process has any interest whatsoever in trying to create more credible assignments. The fact that on analyst will be depending on the observations of another creates two separate people who will then have some responsibility and clear liability in the final estimate of value. There is no logical reason to assume that this would create a higher standard for the quality of the appraisal itself. This system is created to attempt to speed up times I suppose and possibly reduce costs to the lender and hopefully consumer, though I doubt that very much. What will happen is you will have individuals who are not competent and certainly less experienced completing these reports. The appraiser analysts will eventually stop visiting the locations and become less and less familiar with the neighborhoods, including changes to neighborhoods that are imperative to the neighborhood analysis and comparable sales selection. Just another bad Idea, like AVM's which simply do not work.

Another bad idea. Get FNMA out of the process. Make bank keep the loans on their books and watch quality concerns come and quality improve.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I will NEVER sign off on a report or value that I did not perform the inspection on. The best part, and the most important part, of the job is getting out and looking at properties and comparable sales. I generally view a minimum of 6 comparable sales, sometimes as many as 12 for every appraisal I complete.

The bifurcated process is just that, a process. It is a convoluted process to benefit the client and and to their agents the AMC. It has no measurable benefit to the public, the overwhelming requirement of USPAP. The acceptance of these assignments requires Advocacy to the client. This is never acceptable and is strictly prohibited under USPAP. As a certified appraisal professional, especially in my state, accepting or participating in this disastrous scheme would be likened to a doctor breaking the oath. Biforcated assignments could performed and reported in our state, but the signing appraiser must be in complete control of the assignment(s), beginning to end. This is the only possible way for the public to be protected from predatory lenders or from participants who may have unrestrained bias in the process.

From a liability standpoint it is my opinion that the desktop appraisals that result from the collected data will likely result in a lower overall values as quality and condition is often difficult to determine from photos and the limited information included in inspection reports.

The potential for fraud will be greatly increased in the Real Estate Appraisal field. horrible, horrible, product.

Appraisal turn times in this area are very good. Lenders may very well use "turn times" as an excuse to guard their own hen house. Shame on anyone this myopic! History WILL repeat itself at great expense.

When appraisers charge \$650 for a garbage report its no wonder the industry had to find a better alternative. There is no premium on quality and those who produce a good report suffer.

It is incredible to me that lending institutions would roll back appraisal requirements. Have we learned nothing from previous market crashes? This is such a breach of the public trust.

Would not accept such assignments which will lead to a marginalization of the appraisers role and increased risk to consumer (and lender).

The consideration that bifurcation will speed up the appraisal process is likely based on the delays caused by the current AMC model that itself causes the delays while the AMC searches for appraisers willing to accept inadequate fees and/or "tech fees", fee splits etc. Our office frequently sees requests for bids on the same properties from different AMCs over the course of 1-3 weeks. This seems to indicate that the unreasonable fee expectations from the AMCs are not accepted by appraisers and multiple AMCs attempt to place the assignments in succession. This adds at least days to turn times if not weeks. The PR from the AMC lobby claims report delivery delays are the fault of lack of appraisers when the reality is the flawed AMC business model.

These types of appraisal will greatly reduce the accuracy and reliability of the end valuation product

My firm works in 6 states and our average turn time is 5 business days. The only extended turn times are in rural areas. The bifurcated process should not be applied unless there is a need for it in extreme circumstances.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

None
The is a number of reasons this is being considered. One being the lack of licensed Appraisers primarily due to the difficulty in getting licensed due to the time involved Might as well go to law school or become a dentist and get paid a lot more
I think this process will open the doors for mortgage fraud, and property misrepresentations.
These are great for portfolio loans-the fee is currently ridiculous-these could take more research than an inspection and cost time but much of the payment has been based on the time to type-that's not realistic-we all go belly up.
An appraiser's responsibilities have evolved with the advent of USPAP and those responsibilities cannot be met with bifurcated appraisals. Bifurcated appraisals are likely to lead to more lawsuits against appraisers who accept such assignments and who certify to the final value. They would seem to retain the ultimate responsibility in the eyes of the clients and users of appraisal services. Mistakes in valuations will lead to a lot of finger pointing and denial of responsibility for defective, erroneous, and incompetent appraisal results.
I'm already getting pinged for these assignments. As I suspected, anything that actually reaches the appraisers desk is a complex 5600 sq ft, multi acre or building basket case for \$70. No thanks.
No provision for updating, improvements, remodeling, and WHO knows a C-3 from a C-4 or a C-5????????????? You can put frosting on a cake, but that doesn't mean it is a good tasting cake to eat.
Again, the future is green and tons of verification is needed with each green feature. There is no way just anyone is going to be able to inspect and obtain the information needed to value a property with green features. Valuing properties will be more complex and take more time and cost more, not less.
Let the trained experts to there job.
Unknown liability exposure due to inaccurate data collection resulting in misleading and inaccurate property valuations.
If someone measures and someone does the appraisal, those two people should be combined into one person, as it is now. Doesn't make sense....
In this area every property is different, no matched pairs. Rural market with blighted areas that have to be seen by the appraiser doing the analysis.
It is all about cost and control. Lenders do not wish for appraisers to have any control over their profitability. No one that is NOT an appraiser understands what it takes, time, competence, etc. to complete an appraisal and therefore have no concept as to why we should be paid for our time and experience. We should not sell out cheap, that is a slippery slope. Consumers should not have a problem with properly compensating an appraisal professional for doing a credible job, no matter the outcome.
Bifurcated appraisal is supposed to speed up the process & reduce costs. In the long run, it will increase costs to taxpayers who will foot the bill for another bank(s) bailout.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

We are supposed to be specialists and they are trying to take away fees from us. I spent many many years preparing for this career and should be paid accordingly. Until I know I will be compensated properly I don't see how this can work. The cost per hour they share does not justify this.

Appraisers are going to have to fight for a customary/reasonable fee here. What I've seen so far are fees that are so inadequate for the scope of work.

I believe 1004P appraisals are fine for newer tract homes that have been on the MLS more recently. The appraiser then has public records and MLS data to verify inspection data. I don't believe they are good for hillside property, custom homes, large luxury homes, view homes, very old homes or homes in C4 condition or less.

These things are good for low risk/low LTV loans, and that's about it.

We are entering a very large bubble. High de minimis, automated market values and rolling in all closing cost (seller paid items) will eventually catch up with the market I helped clean up the last mess and see it coming at us hear on.

The banks and secondary market didn't learn from the S&L, they didn't learn from the 2007-2009 market crash, now they want to repeat the same mistakes. It's pure greed. The National Association of realtors does nothing for appraisers except take our money. The AMCs are putting more and more requirements on appraisers while taking as much of the fee as they can. The realtors and banks want to eliminate appraisers from the mortgage process, plain and simple. If they wreck the economy again, they don't care; they get theirs and that's all that matters. We need to unionize to fight back.

More distance and insulation from the actual property will not improve accuracy and real value.

If the industry goes the way of bifurcated appraisals and continued downward pressure on fees I will quit doing residential appraisals altogether. There is no shortage of appraisers in the vast majority of the country - there is only a shortage of appraisers willing to work for cheap AMC fees and willing to put up with where the industry is going.

The appraiser views a property and takes photos for others to view but in most instances he or she has had the ability to view and inspect the exterior and interior of the entire structure..when later writing the report and making analysis and adjustments for condition and other pertinent factors the appraiser is relying upon everything he saw at the property and the neighborhoods as he drives through the neighborhoods for both the subject property and the comparable sales data....there is no substitute for that firsthand viewing of the neighborhoods and market areas that is made when personally viewing and taking photos and directly applying that to the report....there is also a knowledge base developed and accumulated driving through different areas and neighborhood....seeing new construction in some areas or deteriorating structures in others....To say that some other person can take photos, know what is relevant to capture, and what is not, and then convey to the appraiser/analyst what is there is folly and gives way much too much control over what is conveyed back to the appraiser and will lead to and open the door wide open for fraud and abuse.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

AMC's are more than part of the reason for longer turn times and deter new professionals due to lower fee structures.

Fannie DU is an overrated program that had failed in every other opportunity and now they're shoving it down everyone's throat because the major banks decided not to purchase it after multi-millions invested. It's the beginnings of the next great bubble

I just visited a neighborhood that is transitioning. I wouldn't have known that without driving the streets.

I feel that if there is lack of appraisers available to fill the needs of required assignments, it's because many qualified and talented appraisers are leaving the profession to pursue other opportunities due to low fees and constant revision requests by some amc's and lenders.

Can't fix greed and power

Appraiser's like field work AND analysis AND fair fees. Inspector fees are low and appraisal fees are low in the bifurcated products. Fee are an INSULT.

my 2 cents; 1. The professional Appraiser is the only party to a mortgage transaction that is unbiased and advocates for no one except the public. 2. The Appraiser's primary function is one of protecting the public trust. Remove them from the lending equation, and you are putting the fox in charge of the hen house. 3. The issue with fees and turn times for appraisals is NOT about an "appraiser shortage"...it's being caused by AMCs. They spend days, sometimes weeks shopping around for the cheapest appraiser, thereby causing delays in turn times. 4. AMCs engage the appraiser for \$200-\$300 while charging \$600-\$700 to their client which is passed on to the borrower. 5. When TILA-RESPA was in the process and open for public comments, Appraisers tried to make everyone involved aware of the urgent need to separate and identify the actual Appraiser's Fee from the AMC's fees on the new closing documents, with NO LUCK. AMCs fought it tooth and nail. So the borrowing public remains CLUELESS. 6. You think that we had issues with the housing / lending / mortgage industry back before FIREAA...and as recently as 2007-2008, just hold on. Who honestly thinks allowing untrained, unregulated people into someone's home is a good idea? 7. Even engaging brokers as "data collectors" is crazy. Brokers are famous for inaccurate MLS data and artificially inflating square footage and features of homes. 8. Brokers regularly hire APPRAISERS to measure their listings. Who things brokers want to actually do property data collection? Fees I've seen offered to brokers are \$20-\$25 per property. 9. The truth is that the data collectors AMCs will be able to hire for the fees being offered, will not produce reliable, credible data. You can try to convince everyone that these collectors will be "virtually trained" and be given a data collection sheet to "check off" to be sure they gather what is needed at the property. How does any of that protect the public? How does that result in unbiased data or analysis? It doesn't. 10. How does it make any sense that for years Lender's have refused to allow Licensed, Supervised Appraiser Trainees to perform the inspection of the subject property, but now all of a sudden, will allow unregulated, unsupervised people to do "data collection"? The truth is that everyone understands how important the information gathered while

Data collectors need to be more specific in descriptions of any upgrades, and of the properties in general, take better pictures with cameras instead of cell phones.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

as an older handicapped appraiser, bifurcated appraisals might be a possibility to remain active when i can no longer perform physical inspections.
Bifurcated appraisals were created to benefit the lender and do not contain any real benefits to the appraiser. This is simply a tool being used to rush to the bottom of the talent ladder as these are the only participants who will agree to the timing & fee dictates of the lender.
It might speed turn times if it could comply with USPAP. I would rather no do these.
Appraisers need to know the credentials of the data collector
I think the small reduction of fee isn't worth it. AMC's should be capped at 25% of a reasonable appraiser fee. If AMC fees were not so high, the fees would be reasonable and this product would not be necessary.
IF this was the case. Why can't the appraiser select their own data gatherer who they have trained. Why do we have to drive comps and cant use comps from MLS?? Why not require the agent to use actually puctues and not drawings. This would ensure we have accurate pictures
This whole thing is a bad idea. It is hard enough to produce a creditable report on some properties when involved in the entire process of the appraisal. Having only second knowledge of the subject property is just asking for trouble.
As a 30+ years professional appraiser with an SRA designation from the Appraisal Institute I believe the Bi-furcated appraisal process creates more confusion, more risk to all parties, will not reduce fees, will increase turn time and it will be more difficult for the lender/AMC to find "qualified professionals' to perform "quality work" for the fees proposed to be offered. This process is a train wreck waiting to happen leaving the tax payer to pick up the tab, again.
none
They are always trying to find ways to do away with good analysis. They just want to do loans with no require to values or making sure the value is there.
There are so many factors are involved with value, just basing a value on #'s can't produce credible results...Zillow is a perfect example
Why are those in the lending side so in favor of cutting corners? Loans are not closed any faster appraisal or not. We just had a market meltdown again after lenders cut corners on valuation of real estate. Let the loan officers have accountability for crap loans just as appraisers have accountability for the appraisal they sign.
The fees are so low, and our expenses are so high, most independent appraisers would have to leave the business.
These would be okay if the lenders understand and pay for a credible analysis. There is no short cut to developing appraisals. If they select comps, that's significant assistance and may not be the most relevant sales
I am of the opinion that bifurcated appraisals are only appropriate for very low risk lending.
I am not open to this type of appraisal at this time and don't anticipate getting involved with them, however, if that segment corners the market on the appraisal business as a whole, I may have no choice. I fully believe, however, that a bifurcated appraisal goes against the "spirit" of what it is to be an independent appraiser.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Great concept, but absolutely flawed in process, the appraiser is not seeing the property/neighborhood,,and the fees I have seen will not enhance my ability to provide for my family.

There are solid reasons for using professionals and when banks try to cost cut, they're cutting the consumers throats and placing undue stress on the economy. I wouldn't go to a computer for a checkup and I wouldn't go to a computer for legal advice. The appraisal process has been hampered by banks using AMC's therefore adding to long turn times and low fees. If banks wanted faster more accurate appraisals, they should do what has always worked. Bifurcated is a huge mess that is computer driven, not based on fact, and greed based. A deadly combination.

Bifurcated appraisals seem to represent an efficient alternative to full 1004 appraisals on simple properties, i.e., tract housing, and/or properties with low borrower risk/low LTV.

With different companies using differing software for these reports, the "learning curve" is not financially feasible.

If it is done properly, this could be a great idea.

Tech is changing what we do. Period. Lending may eventually use google earth as property source. Lending is not the only reason for appraisals.

I will not be completing bifurcating appraisal. There is a wide range of questions and potential hazards. This will lead to the appraiser completing less than professional reports. There are select assignments that this maybe applicable.

Quality standards for data collection is critical, as I'm sure you are aware of. Garbage in, garbage out. I have no issue analyzing data and making determinations based on that data. However instead of relying on a trainee which was personally trained, now we would rely on information from strangers.

Limited scope appraisal reports done by one appraiser would shorten completion times and maintain credibility of the process

how can adding another person to the process make it more efficient?

If 100% of appraisals are bifurcated it may save time, but when full appraisals are being completed for other clients, it is nearly impossible to work within the tight deadlines for inspection or analysis.

Let's just not have appraisers anymore and instead of the government back loans have the individual banks take the liability then see if they will use these stupid type of appraisals. OR MAYBE THEY WILL REALIZE APPRAISERS VALUE AND EXPERTISE



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Taking short-cuts is not the best way to for lenders to make their investments. They've obviously forgotten about the housing crisis and have once again plunged into something they'll soon regret. Relying on data from someone less than a certified appraiser is certainly a very bad idea. Mistakes, collusion, inexperience, putting quantity over quality, inattention to detail are just a few of the reasons I see this as ending very, very badly. How an appraiser can trust the data, especially the measurements, compiled someone else is beyond reasoning. It's not a matter of not accepting change and technology, it's a matter of refusing to compromise the integrity of the report. The data collector will be paid very little per "inspection" so they will be motivated by quantity rather than quality. The fact we're heading in this direction is scary and my personal faith in lenders has diminished a great deal.

Same reconsideration request, same lender/amc overlay corrections, same liability, significantly reduced fee. That's a no.

This seems like a terrible idea that will end up backfiring for all involved. Just another mortgage crisis waiting to happen.

Having two people involved in a project relies on trust. An appraiser will need to trust the data collector. I am hard pressed to see how two people involved will speed the appraisal process for buyers. I predict a new bank crisis with this process. I have lived through several banking crashes and know that fraudulent and inflated appraisals are a top reason, and taxpayers pick up the tab.

These type assignments are currently being used for in-house type loans in Arkansas. They are completed by non-licensed people with minimal knowledge of valuing real property. The banks are happy because they get to do business like they did prior to last financial disaster, and they will soon be able to order "as instructed" values by people that have little knowledge or experience, not to mention no liability concern. EVERY state appraisal agency across this nation should be screaming to make people aware that this is just another step toward financial fraud, which will lead to the next collapse that tax payers will have to bail out. The appraisal profession is held to a higher standard, but greed and the power of the banks will ultimately win over sound ethics and accountability. Get your pocket books back out for the next financial fraud bail out, courtesy of decreased regulation and greed of the financial system.

If done properly, this could be a great way to get trainees back involved and to gain experience leading up to completing a full assignment. If not done correctly and have non-appraisers doing field work the liability and inaccurate information could be a real issue. Non appraisers look for different things than an appraiser. Would be like placing a car salesman on an assembly line for car manufacturing as quality control. They will only be concerned on how it looks, not on whether it runs and was built properly.

In reality appraisal turn time is not that major a factor. Lenders take nearly as much time to assign an appraisal as the appraiser takes to receive and complete the appraisal based on comments from borrowers (refi) and realtors (sales).

As of right now I am turning these down until the quality of inspections improve and USPAP concerns are addressed. Further, the data collection fees are too low. Turn times are about the same if not longer than a standard appraisal.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The fees would decide if I would be able to accept assignments of this type. I have been working in the real estate appraising field for almost 30 years and somebody has been trying to replace us since I started.
I have done this in the past but only if I have inspected the subject and sales.
bifurcating the appraisal process is a slippery slope
The appraiser analyst should get 2/3 to 3/4 of the total fee. I have a feeling that the lenders will be willing to pay only 1/4 to 1/3 of the regular appraisal fee. This is something I would never accept.
I have worked with Insurance Inspectors, Real Estate Agents, etc and do not find that they do a careful inspection. But in truth some appraisers don't either, But I'll continue to work as an appraiser doing as much private work as I can find.
Turn times over quality, side stepping USPAP, we have been down this road before. Advisory Board to USPAP has been expanding what is an appraisal, Limited, etc...and is playing right into the hands of large banks and GSE. Won't end well and we the appraisers will end up with more regulations. Just great.
Nah
Times are changing!
This is a horrible idea. The market and the consumer will suffer. However, if the industry is changing, we have to change with it. At least until the bottom falls out and they realize what a horrible idea this is.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Yes it will probably speed up the process (depending on what you are including as the appraisal process (someone will still have to see the property then send it to the appraiser so maybe it won't)), and possibly reduce cost (depends how much will inspector charge and how much will appraiser charge, could still be the same total cost)), but the offset is that you CANNOT expect the same results when the appraiser is not the person who personally inspected the property. There is a feel or familiarity that is obtained for a property, that cannot be relayed by someone else. I have turned down assignments for the desktop portion of the appraisal because I did not have a good enough feel for the property to ensure proper comparable selection and value. There is typically a wide range of unadjusted sales prices of otherwise what would seem to be comparable properties, but seeing the home gives a better feel of where it should fall within that range and which properties are the most similar. Pictures and notes do not always translate into a clear feeling of the property. It may as well be a desktop only. That is just as good as the bifurcated appraisal and uses the exact same extraordinary assumptions since in either case the appraiser did not see the property personally. If a certain property would qualify for a bifurcated appraisal, I believe that a desktop only would be just as good. If appraisers decline based on what the property is to perform a desktop only, then a full appraisal (not bifurcated) should be ordered. There is usually a reason no one wants that assignment (uncomfortable with the data). I do not believe the bifurcated appraisal process is the correct answer, however, I think there could be a place in the industry to expand the use of desktop appraisals. I also believe that maybe the form could be redesigned to spend less time on each assignment (form more similar to desktop form as it currently exists, but where the appraiser still sees the property), where you get quality results but the appraiser could perform the work for a fraction of the cost and fraction of the time. I think this would be a much better option and would probably actually shave more time and money on the appraisal than performing bifurcated appraisals. An appraiser could write a very short or abbreviated report but come up with just as good of results. More time is spent

I do 1004Ps already and I can attest that the "inspectors" that are used are all idiots.

Dividing the appraisal process will result in longer turn times and less reliable/credible reports.

A bad idea that will lead to more bad ideas. Appraisal is more of an art than science. The bi. appraisal might work in subdivisions where same builder built the same house.

My state has provided no real guidance on these.

Why are appraisers and our industry treated as second class partners in the real estate sales industry? Not to mention the lowest paid of the industry.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

All of the 'possible benefits' proposed above are not 'mutually exclusive' of the existing appraisal model. Appraisers should always be looking for opportunities to focus on higher-level analytical skills and embrace advanced technology that computer analytics. If appraisers no longer 'remain relevant', it will be to the detriment of public trust, market participants, home buyers and sellers and ultimately the financial underpinnings in our country. It's taken decades to bring the appraisal profession to the level of training, consistency and accountability we now rely on, and the bifurcated process will be a giant step backwards and serve only to undermine the credibility and reliability of property valuation, with unintended consequences and high probability of increased risk. Appraisers would be ill advised to rely on another (unknown) individuals skills and abilities and put their license and livelihood at risk in the process. It is just the strangest idea yet, and another instance of the 'tail wagging the dog' where secondary market participants are implementing changes that benefit those entities only, at the peril of others.

After 30 years will quit the profession before being relegated to an Uber driver

I feel good experienced appraisers familiar with wide area ranges and many years in the field under their belt can likely perform many of these with some accuracy if proper subject data is provided. Those with fewer years in the field or a limited range of area may feel more at risk.

Terrible idea.

Not receiving a beneficial payment for my knowledge and skill base.

Bifurcated appraisals are great for file cabinet appraisers with greater liability. When a resident after a property walk-through mentions, "I have had my house appraised 3 times before, and I never understood the inspection process. After watching you I understand my confusion. The other appraisers were never taught how to properly inspect a property. You know my house as well as I do, and asked questions that you knew the answers to concerning my home and neighborhood."

I am for it - but like baseball. You don't want to put a pitcher in that only know how to play Cricket. The PDCs need to have knowledge of the game we're playing. Not someone that sits in the stands and "thinks" they know everything necessary to play the game themselves. Professional baseball players are on the field for a reason. Appraisals should be handled by professional appraisers on both sides of the bifurcation.

Again, I have done both products just to see what the process was in order to make an informed opinion. I can't see any reason to separate the two for any reason other than monetary motive for the bank. Many pertinent details are caught in the fieldwork that may be overlooked by a person who is a trainee at the very least. With an end game being the banks do their own valuation with just numbers and algorithms will contribute to the already faltering economy again. Collateral underwriting allowed lenders to appraiser shop and now they want to tell their clients how much they will loan on the borrowers home with limited information to mold as they wish. Appraisers are the only independent and impartial person in the whole transaction.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Having 1 person schedule an inspection then having another person having to review AND confirm THEIR work, results in actual longer turn times and absolutely reduces the accuracy of the opinion of value-the fees are awful, it is a way to firewall the appraiser from value influence however the main goal appears to save more \$ for the amc, allow less experienced appraisers to do more work for less \$-cant wait for the market to crash bc of these-

Why, when, and which lenders are leaning toward bifurcated appraisals? What is going to be a customary fee? How are AMC's going to maintain a biz model when appraisers are making dirt?

The problem in my opinion that non familiarity of markets from not doing a hands on field inspection (new construction, buildings etc - all sorts of factors) will have appraisers lose knowledge of markets on a micro-scale. Analytics can not replace experience and knowledge from the human sight. I do believe from a lending standpoint if the borrower has a large amount of equity or low lending amount then then 1004P is a good solution but where in I am located in the Upper left corner of SC(Greenville area) we can have a million dollar property 3 streets over from a manufactured home. How can analytics work in these types of markets. I do not think it will work. But we will see. My clients which are regional southern lenders said that they do not want the Bifurcated Appraisals and do not plan to use them as of right now.

All the benefits FNMA is claiming will result with bifurcated appraisals is already in place. Appraisers are already under very short deadlines and deliver appraisal reports in record time. We already complete in depth analysis. This is just a ploy, a red herring, to loosen lending practices to make more Loans with NO benefit to consumers. It will ultimately lead to a weak and tainted loan portfolio and another real estate market crash. Do not let FNMA use this as a distraction for them to simply do more harm to the lending and appraisal process.

We appraisers are being squeezed out by greedy lenders and AMCs. Our profession is being prostituted. In the end the borrower and eventually the economy will suffer.

If fees were reasonable, appraisers would be all over these. But the fees are minimum wage and anyone who has invested decades of experience in this profession will not knowingly just throw a good paying career down the tubes for cut pay work that does not benefit us as working professions. Most of us are not in the business to sit behind a computer. We enjoy being in the field and would rather inspect, than type and valuate. And as long we dont do values, we dont have to abide by USPAP with less liability too.

I work in an area primarily rural in nature where no two properties are alike. The nuances between properties, particularly with respect to quality of construction, outbuildings, amenities and the interview of the owner makes a HUGE difference in the comparability of the subject with the comps, an in turn effect on the value conclusion. There is a sizeable risk of inadequate reporting by the PDC inspector that could result in reporting a misleading appraisal given the myriad nuances involved in appraisal of custom or rural properties. It seems like trying to learn to drive without the benefit of rear-view mirrors: you will miss something important.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

To me it is a matter of fee. I am fine doing either part of the process provided that I am compensated at a rate that allows me to continue to run a profitable business. I do think that non-appraiser property data collectors are a terrible idea.
I'm just not interested in this type of business. I'm semi-retired and have enough attorney and non-AMC business that I don't have to perform any traditional lender work at all. Eve if I was attempting to expand my business, I don't think I could ever get to the point that I could appraise something in which I didn't inspect the property.
The appraiser is the last stopgap to prevent out and put fraud on the part of all parties that profit from the transaction.
licensed appraisers are the only ones qualified to inspect, sketch and accurately communicate results to achieve accurate results.
this is all too typical of the "not quite bright" and their bright ideas that are just stupid crap. why continue to pay for courses, renewals, have govt' entities for appraiser's? there are some serious dumb shits that should not be in charge of fuck all, who are making some major fucking mistakes...
this is a horrible profession
A licensed/certified appraiser is educated, trained and experienced to do the property inspection and is the best choice for the task. I licensed/certified appraiser is educated, trained and experienced to analyze the data and produce the appraisal report. No valid reason to split the process. None.
I have done a few bifurcated reports in the past, but only when other work is slow. The fees are low and scope creep can be extensive.
Bad for Appraisers, we need to lobby aggressively against it!!!!!!
Difficult to determine the overall condition of the subject from photos.
None
When these bifurcated appraisals are found to be faulty, which they surely will - will the CEO's and managers of the GSE's be held into account by prosecutors for the enormous taxpayer's expense to insure these loans? No, they will just retire with millions. 27 years in the business and now I get to see yet another genius scam to save 2 days (BS) off the turn time. The hell with the value, just get the loan done before the customer walks away!
Appraisers should refuse to do either
Just say no to bifurcated appraisals. Let the lenders forego appraisal and when they are collapsing under bad loans do not let tax payers bail them out.
How does adding a second person to the mix speed things up. Now you have two people not making a living due to the split fees. How can an appraiser possibly rely on an unknown person to provide correct data about a house condition, floor plan functional obsolescence. Appraising is not solely a statistical excersize. It is an "Art". You are asking an appraiser to paint a picture blindfolded solely using the description of the object supplied by a chimp!
This is a slippery slope that will compromise the credibility of collateral.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I believe that the bifurcation process is solely intended to diminish the real purpose of the appraisal and to reduce costs to the lender at the expense of the appraiser. The bifurcation process will not speed the overall appraisal process significantly. Once implemented, it would only be a matter of time before the "analyst" will be contracted to "off-shore" country locations .

Just an overall bad idea. It was not appraisers that caused the prior crisis. We probably saved many a potential foreclosure.

Thanks

Driving the neighborhood is an important part of analyzing the subject and comparable market appeal.

It is a knee jerk reaction to over regulation of appraisers and extra work put on appraisers by AMC's trying to justify their fees. It has caused many to leave the industry or shrink their coverage areas.

I just go back to the 2008 downturn. Appraisers were blamed for a great deal of the foreclosures. We were stripped of our Professional Autonomy in choosing our own clients. HVCC and AMC's wiped our business out and took profits from us as professionals. In 1994, this was all fabricated by Politicians and Lenders and the government saying they wanted to provide more housing for those who could not buy a home. 2055, 2075, etc. products that drove the housing market down and the stated income programs put it over the top. This is just another way to put appraisers in the same position again. Therefore, anything I put my name on has myself as the only one doing the appraisal. When an inspector is insured and licensed and has 30 years experience just like myself, then I might trust someone else. Remember, all these laws and rules appraisers must live by were ingrained in our heads over all these years. Thus in this case, of all the rules and lawsuits, and insurance we have to purchase should include anyone who touches an appraisal. OR remove our license requirements. No USPAP, no insurance and no liability. Just like the Inspector. No requirements no liability. Then you can all move into the future recklessly. At least we can blame Fannie Mae for the next recession and bank failures.

This process may speed turn times but at what cost. Have we learned nothing from the previous market crashes. All we need is to properly compensate the appraisers. We do have enough appraisers we just don't want to accept assignments where the fees are what we got/or below 20 years ago. We are trying to fix a simple problem in a complex manner as is typical with the government and GSA's unfortunately. Thanks.

I am only one person and when appraisal requests come flooding in during busy years/seasons, I can only do so much in a week, whether it's part of a bifurcated appraisal or the entire appraisal. When everyone is busy, we get booked out 3-4 weeks. I don't see the bifurcated process providing expedited appraisals when volumes of request are coming in. The liability issues are huge in my opinion and not experiencing the property personally makes it difficult to competently arrive at a value opinion.

Take AMC's out of the equation and you'll see faster turn times and lower fees.

You get what you pay for.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Visual observations of the neighborhood that contribute to credible results, begin before arriving at the subject property, and certainly at the subject. If the bifurcated process included the requirement and compensation for the appraiser-analysts to perform an exterior inspection from the street, the credibility of results would increase to an acceptable level in many cases.

Dump idea.

Very bad for the profession

It's a terrible concept

If the data provided is TRULY good data everything would be just fine. However, an appraiser is ONLY as good as their data and without that being correct, any analysis on the bad data is irrelevant. Total alamode software has a sharing feature already for comps from appraiser peers. The accuracy there is horrible and inconsistent and therefore I choose not to use or be a part of that data. It blends information from professional appraisals who try to do a good job with those who just want volume with errors for a higher pay check.

REALTORS/BROKERS SHOULD NOT BE PROVIDING DATA FOR APPRAISER'S TO RELY ON. IN MY 30+ YEARS APPRAISING IN THE FIELD, MORE OFTEN THAN NOT, REALTOR INFORMATION IS INCORRECT, MISSING OR LACKING IN EXTERNAL DETAILS OR TRUE DESCRIPTIONS OF THE PROPERTY THEY ARE LISTING/SELLING. IT IS A PROBLEM IN THE MLS INFORMATION WE RELY ON AND IT IS A PROBLEM IN MANY TOWNSHIP AND CITY DATA. MANY OF THE PROPERTY REPORTS WE GET, ARE VERY BASIC AND LACK THE PHOTOS AND COMMENTARY NECESSARY TO PROVIDE A CREDIBLE REPORT. WHAT WOULD REALLY HELP IS STOP MAKING US DRIVE THE COMPARABLES!!! THIS INFORMATION IS ON MANY WEB SITES. I WORK IN A LOT OF RURAL AREAS, I CAN BE GONE FOR 8 HOURS TAKING PHOTOS OF DRIVEWAYS! MY TIME CAN BE BETTER SPENT ANALYZING THE DATA I DID COLLECT INSTEAD OF ON THE ROAD AND THEN BEING BERATED BY LENDERS/AMC'S BECAUSE THE REPORT IS LATE! HELP.....

Time it takes depends on when they send the order. Lenders delay. Realtirs delay. And, I believe that kenders are attempting to steal part of the appraisal fee. Fast, should not be a goal. Credible should be.

FNMA's memory is short. In 10 years the real estate market will be in crisis again! Making loans with false (FAKE) accountability will only lead to too many improperly secured loans,

Only Licensed / Certified appraisers should be engaged to do property inspections / measurements. Other possible inspectors (Real Estate agents, insurance inspectors etc.) have no incentive or training to do the inspection and measurements correctly.

The appraisal is an opinion of value. That includes the condition, quality of construction, exterior influences, etc. that a qualified, experienced appraiser judges.

What happens when a borrower does not agree with the appraised value of their property? They appeal to the appraiser, who throws up his/her hands and put the onus on the inspector. The inspector says he/she has done their job. So their only recourse is to order a full appraisal. Now they are spending twice as much money and taking twice as much time and they may or may not be happy with the final valuation.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Fannie Mae has apparently learned nothing from the real estate crash in 2008. As a risk analysis tool for a lender, all of the data in their data banks cannot replace a boots on the ground full inspection to determine condition and quality as well as an accurate measured GLA, especially in non-disclosure states where the public data is suspect at best.

I don't have anything else to add.

If anything it will increase turn times as AMC's will have to find someone to both the inspection and the appraisal. And speaking of the AMC's; will now take a fee from each (the inspector and the appraiser)? How convenient for them! It's no wonder AMC's are on board with this lunacy. With that said, is the consumer really going to save money (paying an inspection fee, and appraisal fee, and the AMC fees)? Appraiser's worth their salt will figure out a way to charge the AMC to compensate for the AMC fee they will be charged. I suspect this will be true of the inspectors as well if they know what they are doing. So I don't see a monetary savings. In fact, when all is said and done (inspection fee, appraisal, and AMC fee(s); I think the consumer could actually end up spending more for a bifurcated appraisal. And time savings?? If anything, splitting the inspection and the appraisal will add time, not reduce it. Especially in rural areas. Why? Because the AMC that is already having a problem finding an appraiser to complete a normal appraisal will now have to find an inspector (hopefully someone with some qualifications to inspect). And, they will have to find an appraiser willing to risk his/her credentials on a report using someone else's work. So I see this whole idea as insanity and a huge step into the next housing bubble! And, I will not be part of it! But, I will be around to do all the appraisal reviews and foreclosure appraisals; so there is an upside to the product, as I'm sure it will create future work!

It appears that FANNIE believes that they can get a quick report or decision by separating functions. They don't count the time coordinating and the fact that in the end no one will be directly liable. If they can get a number of report requirements exempted due to an inspection, fine, but don't call it an appraisal function or use it to push for cheaper or faster appraisals without worrying about credible results.

I have had one of these hybrids performed on my own home without my knowledge. I ordered the lender to do a full appraisal after finding out and getting the value. I was charged the same amount of money for the hybrid as the full appraisal. The hybrid came in at 360,000. The full appraisal came in at 495000 the next week. This product is nothing but a waste to the consumer. Double fees, twice the time to close. I know several other consumers that also ended up having to have another appraisal done after the first joke of a hybrid. I had no idea what a hybrid was until I experienced it first hand. 530 dollars wasted. The AMC paid the appraiser 25 dollars and the hybrid inspector 12dollars. They charged me 530. You tell me what the purposes of these things are.....to make the AMCs rich off the backs of the appraiser and at the expense of the appraiser liability. Insanity.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The property inspector....if different than the appraiser....has to have specific guidelines and established procedures for what he's inspecting and the appraiser has to be on the same page as the inspector....there must be mutual understanding of the scope of work provided by the 3rd party inspector.
I worked for a company that had junior appraisers inspect. It was only because we were so highly specialized (landfills) that it didn't matter. Otherwise, I was appraising in the dark - didn't like it.
I can see loans being made on properties that is not worth the value and would eventually result in foreclosures.
I live in a rural community where 80% of all appraisals are complex. I don't see much of a future in my market for the bifurcated appraisal beyond maybe 10% of the 20% that are not complex.
This will false inflate or deflate markets
The PDC is one of the last steps being taken to completely eliminate the need for a licensed real estate appraiser. They have concluded that ultimately "big data" will solve the valuation issue AND all that is needed to do this is the accumulation of massive volumes of consistently described property and neighborhood descriptions. This will not help the consumer in the long run and only serve to dumb down and eventually eliminate another job in the industry. Tragic that the appraisal profession has NEVER had a professional trade organization that is committed to looking after their interests.
Why would I be a party to a process that will ultimately destroy the residential appraisal profession?
Why would I rely on someone else
The process does not protect the client or homeowner . It does not save time or money and will Actually harm the real estate market
Current USPAP requirements do not allow for this type of Valuation from an Appraiser.
Honesty is being taken out of the process.
I hope other peers share the same concerns and the lender and people in charge will realize the bad consequences before we will encounter another market crash due to misleading information
Bifurcate appraisals are great if I get to select my well trained state approved trainees to do the data collection. I don't trust strangers and unlicensed people to do that work for me.
After 18 years in the business I still find myself learning even when I am at the subject property doing my inspection. I am a very visual person as are many people and a photo doesn't always do the property justice either good or bad. This is bad for the lending industry. Now with that said I don't have a problem with these types of assignments if the LTV is low.
1) I do not care about speeding up appraisal turn times. I believe it takes as long as it takes to produce a credible report.



You Can Enjoy...
FREE 14 HOURS
CONTINUING EDUCATION

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

How could this possibly work. If I were to rely on a third party inspector my analysis would no undoubtedly come with disclaimers that any of the data collection was not made by the appraiser and therefore could not be verified as reliable. Additionally, my average turn time is 7 days. I find it highly unlikely that this time could be improved by adding an additional person to the process. Furthermore I can't believe that lending institutions would allow a situation where the appraiser or party providing the analysis was not the same party performing the inspection. It seems as if Fannie Mae has forgotten the housing collapse of 2008 that was caused by simply allowing a failed system to exist. The only benefit I see is that there would an above average number of foreclosure sales for investors to profit on. I would not typically be adverse to embracing systems using new technologies but I just can't see how this would be an improvement to the profession.

It will allow appraisers to stay in the business who may have limited physical ability to do field work.

I did one that was one block from my home. I was very familiar with the home and the neighborhood. The information given by the "inspector" was not accurate and could have lead to an overvaluation of the property. I had accepted this assignment for double the fee offered and found that the time for the analysis was similar to the time needed to produce a 1004.

Come on

I have been in the RE Industry since 1979, and full time appraising since 1984. As an appraiser most of my 2010-14 work was doing 2 foreclosures a day because of bad loans.

Bifurcated appraisals should be limited to 50% LTV only where the lender has little risk and there should be no allowed insurance claims filed to FNMA for defaults on loans made with bifurcated appraisals otherwise it is a precursor to another national financial crisis that the American taxpayers are on the financial hook for, as well at 3 generations to come.

Bifurcated products work best in homogeneous markets and when the PDC is knowledgeable. Completing the valuation side is the most time consuming and liable portion of the product. To complete these, the compensation must be proportionate to the skill and expertise and time it takes to perform the valuation. If a full appraisal is around \$400 then the valuation side of it should be at the very least half of that fee. The appraiser has the most demand when it pertains to the education, experience, skill and credibility so the fee needs to reflect this.

If an appraiser completes the inspection why would you not send the analysis portion to the same appraiser?

I don't see how adding an extra step by having another person inspect the subject will speed things up. I doubt borrowers are going to suddenly set a time at the whim of the inspector. These type of reports seem to have developed by people who are not actual field appraisers and are not aware of time involved in just getting to and from appointments and pulling comparables.

It will make it faster for lenders who only focus on money.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

When I'm in a "subject" house; all my senses are on full alert. What do I see? What does it smell like? What do I hear when I flush a toilet or turn on a tap. What do the wall feel like, does the flooring give when stepped on, what's the grey spotting on the ceiling, are there yellowing stains on the wall, what's the funny color crud in the back closet? Has the deck been painted too many times? Where the septic field? Is the ground in the yard mushy even if it hasn't rained? When I leave the house, I have more than just a handful of photographs. I've lived in the house for a hour. It's touched me and I've touch it. I can't imagine being a jeweler, being asked to value a multi-faceted diamond bracelet, that I didn't get to touch & hold in my hands. How do I really know if the diamonds in the bracelet in the 6-photos I get are even real? How do I know the person who took the photos of the bracelet knew what features to look for when photographing them? Is this even the actual bracelet or pictures of a bracelet take off the internet? So now what I supposed to say? 'The apprasier makes the extraordinary assumption that because he didn't get to personally inspect it, see it, smell it, hear it, touch it, know it's pain.....

Remember the S & L crisis. Who got the blame? I wasn't Congress. This scheme is the result of increasing costs and time in obtaining an appraisal license and the lack of a commensurate increase in income. In January, I will have completed 48 years as a real estate appraiser. When I entered the profession, I was hired as a trainee by a savings and loan which had, as all did then, an appraisal staff. I was paid a competitive salary and provided a company car. I was just out of the Army, married with two small children. I could support my family in the suburbs of San Jose, CA. I was able to buy a house. Today, at 73 years old, with the income I receive from my appraisal business, I cannot support myself in San Jose. Much of that is due to changes in our society, but the real estate appraisal profession has failed to keep up. This bifurcated scheme is an attempt to increase turn around time for less money. Who, among you, would recommend your child go into this profession?

Speed and cost should not be weighted more heavily than quality and integrity

If this is the way the lending industry is going, then we will have to accept it and expand business to do the data collection also. However, it inserts another layer which may actually expand turn times and risk for lenders/servicers. By taking the appraiser out of the field or out of the in-field analysis, another form of risk is being inserted into the process and to the lenders. Physically visiting the property is germane and necessary to conduct accurate valuations due to potential functional and external issues that can't always be seen in photos, aerials, etc, due to changes in neighborhood, buildings, etc. Finally, the human elements of potential error or seeing things differently will be increased as now it is necessary to assume two people didn't make a mistake than just one, again, increasing risk.

The bifurcated reports that I have done have cost the client more than a full appraisal assignment would have cost them. There have been areas of concern with measurements (second floor was not included on one I received), outbuildings not measured or inspected.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

More concise forms with emphasis on the grid and condition and not so many irrelevant blanks that the client already can fill in would speed the process. Also clients once again handing out the assignments instead of AMC would help with timely turnarounds.

I've put over 26 years in the appraisal industry and have seen many times a push for more limited, speedier appraisals. This is always bad for the profession as a whole. This is easily fixed by ordering the appraisal at the beginning of the loan process with a quality appraiser would solve this immediately, and would solidify the future of the appraisal industry.

It's a sad day for the appraisal profession when appraisers have to resort to this type of work to stay in business.

None

Turn times at least for me have remained (typically) within 5 business days with a cooperative borrower or seller and many times are less when requested. It appears the main reason for this new process is to speed the process however I do not see this as a reasonable outcome of this new tiered process. If there is a time table that must be met then the client must make their borrowers more aware of the time urgency, have all appropriate documentation available at time of appraisal request (ie complete contract and addendums, condo resale certificate, building inspection resolution, etc.) as these are generally the reason for delay. If appraisers are unable to comply with a lenders time request because they are too busy, the location is not convenient and they prefer to wait to bundle a location for inspection and any other reason; turn down the request. I have no clients that have complained regarding turn time.

None

As I understand the time savings associated with the bifurcated appraisal, the property data will be collected at the beginning of the loan application whereas now the appraisal is ordered near the end of the loan process. That is where I see the time savings...

This is a very bad idea. I will not perform one. I cannot produce a complete, credible report with honesty and efficiency when under these lender restraints.

Just an overall bad idea.

This will remove the need for licensing of appraisors and in crease the use of AVMs.

Only appraiser trainees or a lic.appraiser should be able to perform these jobs. It also is a perfect way for trainees to gain more experience.

We as Appraiser's need to protect our professional status. I cannot see where this type of assignment will save time. Certainly it will be at a lower fee. Leave the Appraiser's alone as they are performing their task in a professional manner. For the most part anyway.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Why would having 2 different people working independantly of each other speed up the process? The appraiser/analyst can not begin until they receive the property data from the data collector. FNMA gets the data from the data collector first and then FNMA may or may not send it to the analyst for evaluation. If the analyst after receiving the data believes it to be incorrect, insufficient or unreliable then the process will start over. The time saved from not having done the inspection (about 30 minutes for most properties) will be spent reviewing and attempting to interpret the data from a third party inspector. The analyst will still have to drive the comparables and the neighborhood unless FNMA changes this requirement and USPAP eliminates or revises its competency provision as it pertains to location. I see the bifurcated appraisal adding days to the appraisal because the collector and analyst are not working together. As a data collector I will still have to schedule an inspection. The analyst will not know when this inspection will occur and nor will they know if and when they will get the inspection results for the evaluation. If the goal is to speed up the delivery of the appraisal then get rid of the FNMA requirement that appraisers take pictures of comparables and educate AMC's on USPAP so they quit asking for stupid and unnecessary revisions.

The appraiser still should verify all data and analysis of the neighborhood and comparable this takes more than an hour before the appraiser leaves for field inspection time saved is inspection which is critical for the final analysis of the opinion of value subject.

Why would you even think this is a positive issue Have they forgotten the nightmare in the past when they tried something similar It almost took banks under Bifurcated appraisals are a danger to the financial stability of the banking system. Allowing bifurcated appraisals is worse than allowing bundling of loans, guaranteeing loan amounts, and bypassing necessary safety measures all for the sake of the banks earning more money.

It is unnecessary to bifurcate the appraisal process, I question the reasoning. Concern exists to quality. "Big data" is consistently inaccurate and erroneous and reliance is diminished as factual, there is not one authority to answer or correct the databases which continue to be utilized by automated systems or reliance on them, end result flawed results. Being principle based on quality, the proposed alternative processes compromise integrity in standards of which my appraisal business is built upon.

Bank driven garbage.

It will create a mess with real estate and financial market and completely kill the appraiser profession, quality and creditability of appraisals. None of any data/source could replace the human factor during the inspection in in the process of valuation.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

" You cant tell a book by its cover. " is soo true in appraisal world. There is significant risk to the lenders in the future. Perhaps they should do away with appraisals completely and lend on "Stated value" as they did with stated income several years ago. Current computer data harvested from 1004 UAD quality appraisals will get old soon. Property inspectors or data collectors are unregulated, have no ethical responsibilities, no skin in the game so to speak and with any piecework job they will do it as quickly as possible. that may or may not result in quality. Its a dangerous lending standard that may not protect the borrower in the attempt to save them money. professional appraisers are trained to analyze ingredients of value. GOOD LUCK!

Vultures win, consumers and investors loss

Bifurcation already happens. There are appraisers using trainees now that don't inspect the property themselves. It's hidden in the profession and denied as standard practice by most. Bifurcation doesn't change anything in many offices across the nation.

This must be strongly supported by the banking/mortgage lending industry. Have we not learned anything about this kind of risky behavior??

It devalues the importance of an appraisal. This will lead to unreliable valuations which will only screw the public.

Most of the rural areas (5 counties) I work in have little to no data on the properties and the that do, most do not have current data and you can wait for days to get a part time assessor to respond, with data you can't use anyway, You surely can't send realtors out to do advanced work they can't fil out a listing now to prepare a property for future appraisal or use as a comp and the surely have no geographical competence or requirements with their license, they just follow the money. I find it odd Fannie wants to by pass the standard appraisal process, yet wants an appraisal when they foreclose. It is the start of the next financial disaster. This is not sour grapes for work, I'm 82 and been doing it for 40 + years as a one person operation being set upon by people that have never made their own living making decisions for those that actually know how to. I can walk away, but that does not make it right.

I don't see that the process speeds up anything , it doesn't lower fees and the inspection part is the most important part of the appraisal. I don't see a benefit to anyone really

It may be time to move on to something else!!!!

The boots on the ground (solo operator) has not had a seat at the table. Either in this example and including all formal changes since 2009. I worked in INFO Systems propr to RE Appraising. There is no decision intelligence to date that has turn housing data into better actions (w/o bias) at any scale. Think of who benefits from FNMA and AMC applications is it the consumer?

These work okay on non-complex properties like cookie cutter homes in cookie cutter neighborhoods. Complex properties will get declined by the appraiser along with REO properties.

Bifurcated Appraisals don't ultimately promote or maintain a high level of public trust, because the appraisal requirements have been substantially diluted.

Not interested



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

the future potential liability of these things when the market downturns. will appraisers be very liable for these values. no one knows now.

Fees are the major problem

Why would people put their biggest investment (their house) at risk with untrained people to save a few dollars?

Need to appraise them with extraordinary assumptions.

This bifurcation process is only a benefit for the lenders who could reduce their costs and possibly turn times but it would not produce credible appraisals since the data collector will/might and the analyst will probably have differing opinions about things which could negatively affect the final value.

They are trying to fix a problem that doesn't exist. I might do one or both of the jobs they ant, but the fee and turn time needs to be MORE!! Not Less!! I can complete faster if they allow me to skip steps that their USPAP Requires!! USPAP says if I use other data, I'm responsible for it!! I don't trust the Data gather!!

ther are already dozens of complaints in the state of Colorado. Through contacts the investigators are skeptical about the accuracy involved as well as someone other than the analyst stating opinions, judgements. Like to wait and see also fees must be worth liabnility

I read an article where a license appraiser tried the bifurcated appraisal as the analyst. He couldn't figure out why the comps were not adjusting to satisfaction. He then went to the area and found many reasons the comps were in adequate or not appropriately described by the data property collector. I think this story says it all.

It's a scam to try and cut appraisers out of the process entirely in order to keep more of the fees in the hands of the lenders. AVM's were supposed to cut appraisers out but Zillow has all but put a stake in that heart as everyone pretty much things their Zestimates are a complete joke. So now we're onto Bifurcation as a means of gradually limiting the role of appraisers. Qualified appraisers won't be doing PDC's because very likely the fees will be crap. SO they'll end up with the least qualified and most desperate people doing them and the end result will be shoddy work which lenders and/or appraisers will be relying on to determine values. The notion that insurance pros will be doing them is a joke too again for the same reasons. Unqualified hacks will be performing one of the most vital functions of the appraisal process. Good luck with that. I see a complete banking meltdown ala 2008 in our future because the values will be wildly off as a result of shoddy or nonexistent work in determining values. Because what could possibly go wrong by looking at a Google satellite image of a property to determine its value. Now if someone wants to pay me some money to do an inspection in which I have no liability whatsoever, fine by me. But don't expect me to rely on the work of others to come up with a value conclusion where I'm liable to be sued if I miss something as a result of someone else's shoddy work. This whole process is going to go over like a loud fart at Sunday mass. Or about as well as those Interest-Only loans did a decade or so ago.

This is bad for the lending community, bad for appraisers, and is a precursor to eliminating the appraisal profession. No one is looking out for the consumer or the appraiser.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Giving bifurcated appraisals to appraisers who do not qualify and/or have enough experience will result in poor valuations, which will affect the goal of creating a speedy and supportable appraisals. The intension should be clear, are lenders interested in speeding up the valuation process while letting AMCs reap the highest benefits, or hire AMCs that only hire qualified appraisers. The less you pay a qualified appraiser the more these assignments will be done by ghost appraisers, meaning their trainees, friends and family members. Qualified appraisers have said many times before they can deliver full appraisals fast enough if they are paid well. AMCs are keeping in many cases more than 50% of the appraisal fee charged to lenders, leaving qualified appraisers less ability to hire help which is linked to speeding up turnaround time. We are now creating a product that will be even less valuable if we choose to pay wages more palatable to unqualified appraisers.

Not good. Do not believe the data available is credible

I believe if utilized properly this can be very beneficial and I would consider doing them. However it is being implemented simply as a way to reduce turn times and fees. This will in my opinion result in appraisers feeling more pressure to truncate their analysis in order to meet the turn time and justify a low fee. With the technology and information available today if time is taken to utilize them it is possible to see and learn enough about neighborhoods etc. However due to turn time demands and low fees it is my opinion that most appraisers do not spend much time in market and neighborhood analysis. Based on fees and turn times I have seen for these products I believe it will result in less analysis.

speed, cost and quality....pick 2

I've had not seen any good reason for Bifurcated Appraisals. Anything developed by FNMA who are the criminals largely responsible for Great Recession is bad for the profession, The country and taxpayers

appraiser is still doing the hard work, not doing an inspection is not saving the appraiser any time from all the analysis he still has to do. They want to save time, cut back on the over-regulation of appraisers and the constant form-filling/blank checking requirements.

Another attempt to cheapen the appraisal process by lenders & FNMA. This will come back to bite them just as the Community Reinvestment Act (CRA) forced lenders to make home loans to unqualified buyers.

Too many unknowns that won't come out until process is in effect for awhile. Good for elderly appraisers through.

I wouldn't even consider completing either side of such an appraisal for less than I would have received for completing that portion of the entire appraisal. Therefore, I do not see how it would be a cost benefit for the consumer.

I think it's a bad idea and will only hurt the market, end user and homeowner.

I worked for a company doing desk tops and 1004p's. Lots of problems with the inspector/inspection. And issues with the company taking the inspectors word over mine even on properties within a few miles of my office and I went to and took pictures to show that the inspector was wrong. Anything to meet the 24 hour turn time. Anything!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Often data in our local MLS is not accurate and/or missing. Court records (assessment cards) are not online in my County. Inaccurate/missing data does not result in Accurate Appraisals.
Not worth losing my license
I've been appraising SFR's for over 30 years, and have heard talk of getting rid of SFR appraisers for at least the last 15 years. We'll see.
as long as the appraiser is familiar with the neighborhood, properties, etc, AND as long as data collected is accurate it should be ok. These should only be used for refi with same lender or as use for 2nd opinions, or HELOC loans. NEVER for a new loan or refi by a different bank.
There is no benefit to the appraiser and the end result will be a less accurate opinion of value. Credibility is lost when you split up the home/site analysis and the valuation process. "Pictures can't do this place justice". This could work for cookie cutter homes in cookie cutter neighborhoods. In suburban Michigan...this will not work. In addition, I will not participate in services that aide in me losing my job!
I believe this is a slippery slope. As AMVs become more reliable and accepted, the trend will be to rely less and less on the professional appraiser. Bifurcated appraisals are a step towards eliminating appraisers all together.
If this comes to pass, who will they blame for the next crash?
As analyst I save time and money not having to use my car i.e. Wear and tear, gas, insurance. As long as my hourly rate remains justifiable I will do these types of assignments.
I will retire first!!
As I get older, the idea of being able to stay employed by doing "desktop" analyses without traveling becomes more appealing.
There are always items/issues both positive and negative with the subject or comparable sales that must be determined by the actual appraiser at the time of observation. This cannot be replaced by separating the process. This will ruin the industry and put the economy at risk again. Did we not learn anything from loose standards the last time around.
In order to rent more money with a view to a compromised appraisal process (which is put in place to allow for more money to be rented and more excuses as to why bad loans were made), this "bifurcated" appraisal methodology is proposed. It does not adequately serve the American Public, the housing industry, or the economy for these reasons. It is another compromised scam [to rent more money].
The entire procedure contradicts how I was trained as an appraiser. I need to inspect any property on which I write a report. I have serious problems with relying on a third party providing information for a report I am supposed to complete. I would need some sort of satisfaction as to their qualifications. Additionally, I would be concerned about whether the inspector might have a conflict of interest. (If the inspector is a real estate broker or agent, are they looking for a listing?)



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

You have to be kidding-these "experts" nit pick everything we do in a report & have continually expanded our scope of work, now they are going to rely upon "outside" parties that have no or limited expertise, limited if any training, and limited to no liability??? They drastically cut our ranks by not allowing qualified and experienced State Licensed Appraisers the past 10 years or so and made it mandatory for anyone seeking a higher license to have at least a 2 year college degree. Now they are doing a complete 180 because they think it can save time and monies(which is not just a lie but a lie of the highest quality)--- Greedy people will always be greedy at the expense of the vast majority of people that aren't quite as "smart". I guess all of the years of following USPAP and having to deal with "corrections" by uninformed "amc" companies were pretty useless----

The parties pushing a bifurcated appraisal process have always wanted to try and fit everything into a nice little box where everything has conformity and fits nicely. It is not always so simple. An appraiser must consider qualitative analysis in quality and appeal of design, construction, condition of homes and properties, not to mention evaluate the appeal differences of location and views and their impact on value. For example, two properties on the same golf course can have very different locational and views appeal. The property on the slice side of the fairway at 200 yards with multiple broken windows and holes in the stucco has a different appeal than the property behind a green or one with expansive fairway and/or water views without the threat of golf ball damage. There are just too many important factors an appraiser needs to consider that are addressed in his/her own personal inspection of a neighborhood and home and property. Could the bifurcated appraisal work in some instances yes, but experience has taught appraisers Fannie and Freddie do not really value the appraisers or appraisal process. They seem to just want a quantitative analysis where everything fits into a nice little box. Which makes sense when you have a huge interest in mining information out of appraisal reports. I see a huge downgrade in the overall quality of valuations of residential properties if bifurcated appraisals become widespread.

I think these will end up costing just as much as a normal appraisal and the turn time won't be any better.

This will be a disaster for mortgage lending.

This is another scheme to do away with the appraiser... I want nothing to do with it



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Trust issues for the property inspector. It is too easy to "conveniently" leave out important pieces of information or for uneducated in property inspection purposes for taking photos that may leave out important aspects like mold or foundation issues. Why wouldn't you want the most qualified person to complete the entire job start to finish? Get rid of AMC's that are making the costs to the consumer rise and taking the money out of the appraiser's pockets. Streamline the process so you go straight from one place to another and skip all the middle man costs. Remove the place the fee with the cheapest bidder and regulate the ordering of appraisal assignments. AMC's do the same thing as brokers did 20 years ago. Who is fastest and cheapest...Fastest and cheapest most likely will result in poor quality, missing pertinent information and in the end bad loans. Here we go mortgage crisis. The advantage to us longer term appraiser's....we get them coming and going. Purchase, refi, foreclosure, purchase..

The analysts will be so concerned about how accurate that the data is that they will probably go to the house themselves and have multiple questions in order to feel more comfortable with the data, that no time will be saved. This is just another attempt to lower appraisal fees. When will they make attempts to lower mortgage fees and title attorney's fees?? This is going to be a garbage in/garbage out debacle that we will all end up paying for in the next 5-10 years. Thanks Fannie Mae. You always get it right...don't you...?

These types of appraisals are driven by banks in their ability to attract clients because of a lower fee associated with this type of appraisal. This is part of the entire climate in United States that is anti-union and they are looking to bust up real estate appraisers for their own greed. The raising of the ceiling from 250K to 400K and these types of appraisals will lead to another market crash in my estimation.

How did I ever get involved in a profession that doesn't value expertise, experience and ethics?

The industry (appraisal) is being driven by lenders motivation to close loans at the fastest pace possible with little regard for security of collateral. The same lenders that "freak out" over whether the appraiser personally drove by and photographed comparable sales?

Na

In my market appraisal turn-around time is 1 week. I don't understand why Fannie Mae is essentially destroying the profession to save 2-3 days time for a product that will be less reliable. If this type of assignment becomes common in my market I will leave the residential appraisal profession.

1. The RISK is high. I believe E&O insurance premiums would go up. 2. Errors in data from another source that is not verified and errors or omissions in data from other sources cannot be verified. Why take the risk. 3. Just do not do these and if you want an AVM, then do an AVM regression analysis and then if an outlier property do an appraisal.

these surveys always fall on deaf ears. nothing we say as a profession matters to the powers that be.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This week, county records showed 4.320 square feet for a property that was 3,000 sf and change. The guest house was included in the GLA. The next day the records showed a property at 1,200 more or less and it was 1.590. As field inspector and an appraiser you need to reconcile these things. I will not trust another to do it for me.

It's insane! Too many unusual properties and if comp pics have to be taken Appraiser is still on the subject neighborhood! It's like trying to read a book and on,y reading the cover, a terrible idea!

How is this legal?

The entire concept is flawed. Why should a licensed professional risk his/her livelihood based upon data gathering from someone they don't know? (Some articles say even a biased parties such as the homeowners themselves are being considered to provide photos, etc). Either Fannie/Freddie want USPAP-compliant and professional valuations or lower level, higher risk valuations. We've seen this trend before and it didn't turn out very well!!

Welcome back to 2008!

Having performed these I found major inaccuracies and not enough info and condition statements from 3rd party inspectors to produce credible results.

1) If the appraiser doesn't know the neighborhoods by now, he/she is not geo-competent and should decline the assignment...2) I have yet to complete a Bifu as the appraiser where I could not have reached the same conclusion using GoogleEarth, MLS, and all the other on-line sources..., and yes, there could have been a fire and the subject is no longer standing...So far the data collector has added nothing, except to verify the house is still standing since the Google Van last drove by.

This two level process is absurd. If they want to reduce turn time, FNMA needs to revise the form to include only what they really have to know, the rest is in the workfile. Having the Appraiser who viewed the property complete the analysis creates the most logical and seamless report. But I spend an enormous amount of time filling out the form. Some of the info is not necessary to create a reliable report and supported value.

This is ridiculous. Do away with appraisal management companies and pay appraisers customary and reasonable fees and your problems will be over. There is no "appraiser shortage", but many of the experienced appraisers refuse to put up with amcs.

The issue with cost and timeframes which this solution attempts to solve is not bifurcation, it is snowballing of scope of work into excessively detailed valuations where a basic appraisal MUST be completed as a 20-40 page perfect document. There has been no meaningful update of the way a completed appraisal looks to a client in the past 25 years. We are essentially using the same 1980s form based system with an awful lot more additional support, narrative, etc. We need to streamline reporting, and valuation requirements, not change the process which involves the valuation professional visiting the property.

None of this stuff addresses the public interest or protecting it. In the end, we will wind up with a financial fiasco and the taxpayer ("poor man") will pay the band



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The bifurcation of the process presents an opportunity for increased proficiency in the inspection and analysis thereby resulting in appraisals with a higher level of accuracy and reliability. Reality is that automated valuations can be highly efficient and accurate in homogeneous neighborhoods and subdivisions. As appraisers we need to evolve with the tools, techniques and technologies and should welcome the opportunities to bring higher levels of credibility to the profession. Local knowledge and geographic competence will, of course, all be important. If an appraiser chooses to concentrate on the analyst side of the bifurcated process they should also realize that driving neighborhoods and keeping abreast of developments and changes in the markets they accept assignments in will be key in maintaining their knowledge base. Build regular market trips and discussions with active realtors in those markets into the workflows they develop. The key to success is managing your time, staying educated and charging fees that are commensurate with the product you produce. The fee structure will be a key that lenders and borrowers will need to understand. Faster development and delivery of a higher quality valuation should equal a higher cost - not lower.

I wonder who came up with this idea. Surely it was not a licensed appraiser. I believe it to be the banks.

Involving two parties requires two assignments, bids, scheduling, inspection, data collection and time lag between the parts will lengthen the process.

If this is done, the appraiser will have to considered it or do only complex properties or quit the appraisal business.

I suppose there could be a need for such services in some parts of the country, but in most cities, there should not possibly be a need for such services as there are an adequate number of appraisers. I cannot see myself as ever putting my name on a report where I have not seen the property and neighborhood, but then again, I am an old-school appraiser. Many years ago, when I had not been appraising very long, I did an incomplete inspection, based on information from a third party, which ended up with some very serious consequences. I learned the most important lesson in appraising, which is that when your name is on the report, you are the one liable and the one they will be coming after, no matter what anyone else may have said about the property. That lesson resonates with me still, every time I inspect a property and sign a report.

The licensed or certified appraiser should ALWAYS inspect the property they are being asked to appraise. The property inspection or observation along with comparable selection are 2 of the most important things the signing responsible appraiser does. Cheaper/faster is not always better. If appraisers simply said "no" to this really bad idea, it would go nowhere.

Bad idea all around.

When you aren't sure, follow the money!



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Breaking the process into two parts and adding additional parties will only INCREASE the time it takes to receive an appraisal, not speed it up. There are few properties across the nation where a bifurcated appraisal, or desktop appraisal will work. Recently on review work it has been clear that I am missing something because I have not seen the subject / neighborhood and the data isn't lining up like it should. The number of appraisals that could be completed this way without increasing the risk to the lender (and the borrower) is minimal.

With the appraiser being the sole disinterested party, removing us from the process is only a recipe for disaster. Additionally, at some point the data will be corrupted due to lack of oversight.

After all the years of demanding the appraiser who signs the report also inspect the property, it is hard to believe they are going to completely change direction. How many appraisers have lost their license or been disciplined for the same action in the past? Unreal!

The greatest delay in the appraisal process is both the AMC's shopping fees and underwriting. A bifurcated appraisal will not speed either of these process. Also until my E&O provider gives written allowance for this type of appraisal I will not even consider them.

The goal of them is faster and cheaper, but speed kills and the danger to the public, in LTV situations above 65% there should be an appraisal to protect the public and all involved from going through a crash again and having to bail out the banks. Low LTV they can do an AVM, also why do they try to disguise it as an appraisal instead of the form saying bifurcated or limited etc.? that really concerns me as if they did is alter the limiting conditions and to the public the 1004P looks just like a standard appraisal form so why is it being hidden in the way it is.

It's awful and will eventually deplete the credibility of the profession

I have completed many assignments where the glia it's incorrect, sometimes by as much as 20%... It's hard enough to complete a drive-by without specific knowledge of a property's interior condition/features, but to have to rely on a 3rd party for property specifics is scary especially as I'm the one that holds the ball as far as liability is concerned. Also, in my opinion, lenders would be opening themselves up to another debacle like 2008... Why would they want to invest so much money without the appropriate means to clarify value. Makes no sense. Thank you

Change is inevitable

This is a bad idea and complete watering down of a profession

why does FNMA insists on trying to eliminate the only prevention out there - One over priced sale that goes through and ends up in default costs \$1000's to 100's of thousands - our little fee is worth it's weight in gold - left unchecked the agents and lenders will have a field day until 2006 happens all over again.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Lenders have always been in charge. Whatever the Lenders want the Lenders get. Appraisers have never been adequately represented and at this point in time never will. These hybrid products are not in the best interest of the consumer and similar products that allow non licensed persons are not either. Think about it a Real Estate commissioned agent doing anything that would reduce their pay check being objective they are trained from square 1 to be advocates. Valuations of any kind are to be by disinterested third parties.

Its all about risk. Desktop's are good for equity lines with low risk. When a more accurate valuation is needed an appraiser inspection is best.

Drive-by reports are hard enough - too much risk with collecting data only and making a decision.

I will reluctantly accept these assignments provided the fee is reasonable simply because I have no choice (this is being forced upon us). However, I do believe this will significantly reduce the reliability of these value estimates and in turn the bundled mortgages sold on Wall Street. It is as if the lending community has learned nothing from the sub-prime mortgage crisis.

Thanks

Rather than bifurcated, this would be the perfect opportunity to allow me to train an Appraiser trainee to do property inspections, drive neighborhoods, collect data and then I could value the property based on someone I have personally trained. Why would the GSE's allow an untrained individual to conduct inspections and gather data rather than allow an Appraiser/Trainee to do this? This would be the perfect opportunity to bring new Appraisers in the profession. I would take in a Trainee if they could be productive in a manner such as this after I have trained.

Not sure about some of my answers because it seems it can be good but could potentially be bad

Appraisers get what they asked for. We let the government in under the guise of certification and increasing OUR PROFESSIONALISM and now they are screwing us to death

I think with bifurcation appraisals, I will not be able to make a living. Appraisers that would be retiring will now take these assignments because they can work from the desk. There were be a lot of appraisers and not enough volume.

Garbage in garbage out

They are a complete garbage product. I won't be doing any at all -

They demand you go see the comparison, but not the subject. If not seeing the subject, then why see the comparison.

What training and educational requirements are going to be required of the person that does the PDC? As an appraiser, once I have seen the property I am ready to write my report. If someone else does the PDC I will have to spend time on becoming familiar with their data before I can start to write my report. They have their data collection and reporting time into the project and then I have the time of my review of their data plus the report writing to add to the overall time so I don't see that this is going to speed up the process. Bifurcated appraisals will be the last nail in the coffin for most appraisers in rural areas.

It seems like these are designed so that the 80 year old can keep working rather than retire and open a spot for a younger appraiser to have a job.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

they are in danger to replaying the 1980's or 2008-2010 by down-playing the importance of the appraisal in the mortgage process.

I would participate in a bifurcated assignment if I was paid a fair fee. If I was engaged to complete one side or the other of one of these, my fee would be more than half of what I charge for a complete assignment. There seems to be little understanding on the part of the people pushing these about the amount of time and effort that goes into an appraisal inspection and a valuation analysis, and this idea in no way "simplifies" or "streamlines" that process. It will likely make it even more difficult due to a lack of continuity between the phases of the assignment. Not to mention the likely loss in quality. Just another example in the race to the bottom.

NONE

This process just wrecks of valuation issues, create numerous holes in the appraisal process and is not good at all for the appraiser who ends up on the hook for any issues. This is not a good method for the industry.

It is said that separating the data collection and analysis will speed up the appraisal process. Each residential appraisal takes about 1 day. How can the separation in the process save several days. The surveyors are generally the hold up. It is evident that lenders and agents want to remove appraisers opinions from the process. So . . . throw more people and money at the process. Bureaucrats must have proposed this solution.

I am unable to comment on fees as a suggested fee within this survey was not provided. I do not see how this protects the consumer or the mortgage company that are trusting appraisers to be knowledgeable and competent. A faster report has typically never meant a more accurate report.

If the banks are willing to hire, trust and rely on a 3rd party to inspect a property, why won't they let an appraiser trainee complete an inspection for their supervisory appraiser? I would trust my trainee more than I would a 3rd party, especially if the banks are considering to let a real estate sales agent do the inspections.

These reports are leading lenders into dangerous territory with insufficient data collections and analysis. It will be the downfall of the mortgage industry.

I feel that going to a bifurcation process will hurt accurate timely Appraisals. This process will endanger the lending process

Obviously, compensation is the main factor that will drive the acceptance of a bifurcated process. Unfortunately, I do not see the market being willing to pay more. With this process there will now be four vendors needing compensation (appraiser, AMC, Inspector & inspection company vendor/amc). So in theory bifurcated appraisals should cost the consumer more. Additionally, a consistent volume would be necessary in either roll; the appraiser inspector would need a minimum daily billing amount.

the inspection of a property is the single most important aspect of the appraisal process



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

why should the experience licensed appraiser pay for licensing, e/o ins, corp lice, business lic and be paid low fees. we will sit around and wait for someone to visit the property and then do the rest of the appraisal.....horrible we as appraisers can't possibly be called appraisers anymore and USPAP is all but obsolete. no more appraisers due to amc and corelogic data.

What a stupid idea

There is a plethora of nuance and information available in the visitation of the property and neighborhoodS that DOES NOT TRANSLATE INTO NUMBERS.

An appraisal is an opinion of value based on the information deemed important and analyzed by the appraiser providing the value. No two people are going to be exactly on the same page and see things the same way. Personally, a large portion of the assignments I receive are because of my personal appraising style and attention to detail. I live/work in a VERY rural area. It would be irrelevant, inconsistent and undependable to split up the appraisal process in areas such as where I am located. Stop trying to rush the process!!! An appraisal takes time to formulate. There are always going to be details that are noticed by one person and overlooked by another. I experience this all the time with properties that I visit. I often notice things that realtors, owners and other appraisers have not noticed or considered relevant, when in fact they just may be! The bifurcated appraisal is not a good idea for the rural marketplace. It always comes down to the lender not wanting to pay the appraiser for their time while the lender is stuffing their pockets with dollars the buyer or owner has paid out for the padded fees of the appraisal cost. Appraisals are necessary, relevant and have an important place in the loan process. We as appraisers are the eyes, ears and analyst for the lender...show some appreciation instead of constantly trying to eliminate us!!!

I still don't know much about the topic.

Bifurcated products are a slippery slope. and, as an appraiser, I would always err on the side of caution with a value.

This is an incremental step to towards the elimination of any human involvement within the lending community. The banks have their AVM's with their excepted loss equations and view the appraisal process as task interference. So much for the public trust. Removing the appraiser from the lending process would be equivalent to removing State troopers from the highway system. Chaos would reek havoc.

Make the lenders provide the liability insurance or accept all liability. Suspend USPAP for these assignments.

I see huge time wasting by amcs as they shop around for the best price they can get. They typically have no idea how Appraisals work and simply have no purpose. I have seen no less bias or advantage to including amcs and without them taking their cut of the process then the buyer could already pay less.

My personal experience is that the data collectors are either incompetent or lack necessary observational skills to provide accurate inspection data. I have attempted to do 2 reports but the measurements provided were incorrect and not consistent with the photos taken by the inspector.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I feel the bifurcated product is just adding another, not needed, person or entity into the mortgage lending process. This process is already very bloated. This new process leaves more room for error and does not allow the valuing appraiser to walk the house and get a better "feel" of what is being appraised. Pictures cannot always tell the whole story. If a lender is requiring an appraiser to do the inspection, then you might as well have that same appraiser value the property. Again, let's not add more steps and people to this process. Also, many people having their home appraised are looking at a 30 year loan. That is a very large chunk of time and allowing 2 weeks to get a market valuation is just a very small blip on this long timeline. As for the cost, it is very minimal too in the overall picture. The appraisal fee is typically less than the interest payment on the first month's mortgage payment....

lets send a pdc out to gather info for a robbery.....

Bad, bad, bad idea.

liability

If the objective is to speed up the appraisal process then shorten the form and eliminate some of the lender requirements. Several years ago an appraisal was 10-12 pages, now a typical appraisal is 35 -50 pages. Eliminate the AMCs which delay the ordering process and the review process and add their requirements in addition to those of the lender, fannie/freddie and others. The use of an AMCs in the ordering process adds at least a week to the time from when the appraisal is ordered from the lender to the time that the completed report is back to the lender. The cost of living has increased dramatically over the past several years and these new products will greatly reduce the income of appraisers. The number of appraisers needed to meet the demand would decrease and why would anyone want to become an appraiser if you can't make a decent living wage.

This is the watering down of our profession. An independent third party that is objective and not biased is necessary in order to make an informed decision on property value. I did not obtain a 4 year degree and go through 2 years of extensive on the job training so I can be forced to work for minimum wage. The problem isn't appraiser turn times, it is the fact that appraisals are ordered way too late in the purchase process. I regularly have appraisal requests for complex properties that expect a 24 hour turn time because it is supposed to close. Lenders have to order appraisals sooner. Additionally, there is a lot of analysis I required for appraisals that equates to time. A professional appraiser should be compensated for their time. Bifurcated appraisals are a horrible idea, and will absolutely dilute the credibility of this profession

I have not yet even really looked at the 1004P form to see what disclosures and CYA commentary is included, but the bottom line as I see it is that this is NOT good for the profession, but it is being pushed by lenders because they THINK it will be quicker and cheaper. My guess is that it will be neither, and also open up a can of liability worms.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

(1) A valid maxim on buying any sort of service: You can have the service (a) Fast, (b) Cheap, or (c) Right. Pick any two, no vendor, or employee, can provide you with all three at the same time. (2) "GIGO" = Garbage In, Garbage Out Programmers maxim on Information and analysis. If the data you analyze is junk/poor, you cannot make a valid analysis. Bifurcated "appraisals" that use appraisers for both roles are pointless, they can save no time or money. Bifurcated "appraisals" that do not use appraisers, or some well trained -qualified- inspectors, may be cheaper, but run a ****high**** risk of GIGO.

Poor product, will enable fraud

Really!

None

This process brings the appraisal professional closer to complete elimination by removing the human opinion factor.

This is the dumbest idea ever conceived by the human mind!

I would consider being involved as an Appraiser or a Property Inspector provided I was indemnified against all claims.

This is just a very bad idea.

The bifurcated appraisal process could eventually eliminate the appraiser by replacing the appraiser with computer generated analysis based off the property inspection. The art of professional appraising will be lost. As an appraiser I must inspect the property myself to ensure I understand the benefits or characteristics of a particular property, it's neighborhood and etc. as well as the overall physical condition and additional amenities of the property under appraisal.

I do not believe these bi-furcated reports are appraisals as they do not look at the interior of the house, do not look at the neighborhood and do not have enough information.

Difficult to rely upon others when poor exterior and neighborhood data provided. Exacerbates further problems and questions from lenders.

Accuracy is the key to all appraisals. Question #10 is ridiculous. Who cares about speed when accuracy is at the heart of the issue. Ridiculous.

Appraisal waiver is a cost and speed certainty. Inspection only may be a cost and speed reality. Cost and speed of having to do a full report anyway is more costly and more time consuming guaranteed. Appraisers are not employees - hate the concept of Fannie, AMC's & lenders controlling the process to that degree and forcing the appraisers to adapt....don't like the process, turn times or fees I am hearing so far.

Not sure who the data collectors will be? Hopefully not RE brokers. Most of them don't even own a tape measure. They are too lazy to do a competent job of measuring a property correctly.

N/A

This leads to a higher risk profile for the lenders and, like the last time, any downturn and losses incurred will be blamed on the appraisers. It it the latest attempt to do away with the need for a true appraisal.

For me, the liability concerns are too great for the low fees offered for these reports. Do I accept the liability and the possibility of a complaint for a \$ 75 report fee ?



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Adding yet another person will slow things down. The fees for the inspector will be minimal and so will the quality of work with a large turn over rate in that portion of the process. It's makes not sense and it's bad for the client and consumers

How would it reduce turn times if it has to wait to get onto the inspector's schedule, and then again to get on the analyst's schedule. What idiot thinks appraising a property unseen is a good idea?

In addition to completing some 1004P reports I have also had a bifurcated appraisal completed on my home. The resulting product was one of the worst appraisal reports I have ever seen. The were several major materiel errors within the report. Despite writing a 2 page summary exposing the errors the report was never corrected. Splitting the appraisal process into pieces significantly reduces the accountability of the responsible parties. The appraisal portion was completed by an appraiser located 90 miles from my home. I continued to receive appraisal request for the 1004P product in areas known by the client to be outside of my coverage area. I feel that this will be the norm and will hurt the appraisal profession.

The crash will come with these new unreliable products. It's a terrible idea.

How do you insure the information gathered by the inspector is unbiased? I often see real estate very differently than realtors.

In order to avoid careless reporting of either the properties actual condition or its real market value based on diligent observation by a qualified expert in the field, this practice should not be allowed unless the loan to value ratio is below 50 %.

It is good to finally have a new stream income as an appraiser and I see the benefits to our profession and the clients. I won't proceed with an order if the inspection is flawed. I also have a daughter that is an appraiser that loves these assignments as she is not put in compromising situations at properties. She has felt unsafe at many assignments in the field over the years. This may open the door for more women to get into the appraisal field. I hope we work together to improve how these are appraisals are done verses shutting it down. If we shut it down, I think it we will be making a step towards our demise.

I will charge the same fee to do either part- so fees increase

with google earth and reasonable level of appraisal skills, an appraiser can determine market boundaries and activity

The inspection process, while a relatively simple task, is an integral part of my appraisal process and provides an avenue for me to replay the inspection in my head as I prepare the appraisal report. I WOULD not be able to perform as well if I didn't personally visit the subject property.

I do litigation support and I do not believe a bifurcated appraisal would withstand cross examination on the witness stand. Thus, I would lose clients over time. Bifurcated appraisals may be okay for bank work but would be a disaster in litigation work.

In reference to Q-9 I think an appraiser should only accept assignments on the premise of being competent in the market. Bifurcated will work in urban areas with easily defined markets. I do not foresee it being accurate in rural, markets or recreational/vacation markets with vast variances in housing



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

F bifurcated appraisal.

I trust me more than anyone when it comes to collecting, analyzing data. Then compiling a report. I STILL have to verify all data given to me, if the data is not trustworthy or in error; is another "data collector" going to go into the field and provide? This opens appraisers to more liability. What is the goal here? Faster or Cheaper? Or both? Who pays this bill anyway? The borrower. NOT the Lender. So really, "Why" the push to get rid of the appraiser? If not for "Faster". But we'll still hold the appraisers accountable for the results on the 1004P. I will not be participating in the undermining of my profession.

This is a terrible idea. A lot of the problems would be solved if we could get everyone involved on the same page. Appraisers have to do things a certain way and follow certain rules. Loan officers have different rules and Realtors have no rules. If we were all playing by the same rules there would be less confusion. Everyone in the real estate business should be on the same page. Why are Realtor's not required to measure homes. They also count levels not 100% above grade as GLA. Lets just get everyone on the same page and many problems would be fixed.

It amazes me that often the one credible document in the loan file, the appraisal, is always where the secondary market and lenders go in terms of reducing fees. Here's a thought, if an applicant is unable to afford an appraisal, there's a strong chance they should investigate other housing options. Right? This is the deal folks, it's starting again; pressure on turn times, pressure on values, limited inventory in a seller's market, multiple offers.....history tells us, it's coming again. Maybe let's look at how loan products are being architected. There's an idea. How bout having Buyer put some skin in the game on government loans in the form of a maintenance escrow account, eliminate bogus, predatory early pay off charges and put the public in responsible loans?

Breaking rules in USPAP



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The biggest issue I've observed so far is the assumption that when an appraiser is not inspecting a property and "only" developing a report with similar analysis depth to a 1004 is that the fee is worth -50%. WRONG!! My drive time and inspection time is only a fraction of the hours it takes to properly develop and process a report full report. In addition, my drive and inspection can be duplicated for only about \$20-\$25/hour; whereas my analysis and skill set is worth about \$80-90/hour. Therefore, if lenders think they are going to get me to perform an analysis level of a 1004 for only \$150-\$200/file that I normally get paid \$400 on they are sadly mistaken. My drive and inspection are only worth about \$50 locally. If they can develop a report that cuts back on my scope and depth of analysis as well as the incessant explanations in exchange for some reduction in reliability and hand-holding language/addendums by me, then I would probably be able to lower my fee down to some of the numbers I've heard thrown around. I in fact do perform some desktop reports for major lenders for home equity or servicing and my fee falls into the acceptable \$80-\$90/hour range. The items that they ask for that has zero to valuation is near non-existent (and when it does start to creep in I cut them off for a month). Whereas a 1004/2055 report has about 40% of non-useful content when it comes to that "bottom-line" number: Jr. high level explanations, bad 3rd party public record slips, description of materials, field comp photos (most of mine are DRIVEWAYS!, rural market), CMAs, weighted average explanations, minor bracketing concerns, alternative sales questions from their damn database, map questions, well/septic/LPG questions in rural markets...etc, etc, etc. Its never ending!! When I complete a full report for a private individual my time is cut in HALF! Now they get actual discounts.

I don't think this is good for consumers or appraisers. To most people buying a house is their largest investment and the powers to be want to streamline the process and cut cost of versus a traditional appraisal. I don't think the reward is worth the risk. also if this train of thought is good for part of the real estate profession (appraisers) why is it not good for all of the real estate profession. Why don't we have just a real estate person and not a licensed agent sell homes to the public. Also why not tell consumers to just buy a house based off of pictures and that there is no need to even go look at the house or drive around to get a feel for the neighborhood. I don't think that would go over to well but basically that is what you want appraisers to do.

The bifurcation process looks good on the surface. However, it increases the likelihood of inaccurate valuation. There is a great amount gained by physically viewing and going through a home and walking the site. This process will lead to inaccurate valuation of properties and in the end, it will slow the valuation process.

Many of the items required are based on experience and personal perception which is not possible to express without personaly inspecting and researching together. Speed APPEARS THE DRIVING ITEM NOTHING ELSE LIKE QUALITY. IF SO: ANY ONE CAN VIEW AND TAKE A PICTURE, JUST USE GOOGLE,ZILLOW ETC AND RUN AVM. DONE! THEN FORECLOSE MORE. HAVE WE NOT ALREADY DONE SIMILAR ACTIONS WITH LOAN APPLICATIONS?



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The process creates a gray area because one person has to translate their vision to another person who is likely vastly more experienced and has particular methods they like to follow. This would work if you could provide a virtual reality tour of the property where the signing appraiser could look at all areas of the property not photos that do not convey the true optics of a property. What is lost here is that, inspection, photos and narrative work together when viewed by a single entity. If there are other parties, there needs to similar training methods between the parties and DIALOGUE to settle any discrepancies. The push for this is short sighted and people on the front lines know this! The suits who use to be front line many years ago, known this is a "sweat shop" model and have lost the field perspective as they stare at bottom lines. When this fails and it will, the only party without lobbyists will be blamed again for its failure, APPRAISERS. Never mind the underwriters and decision makers who want to streamline a process with disregard to proper checks and balances. My advice to these people is to stand up and take their heads off the chopping block because this is nonsense. Congress will be coming for you as you destroy the backbone of the American economy using property inspection waivers, AVM's and rely on computers to value an ever changing marketplace.

Bifurcated appraisals are the latest attempt to destroy the appraisal industry by again heaping the blame on appraisers for the next meltdown. I will leave the profession before I complete a bifurcated assignment. There will always be bottom-feeding 'appraisers' willing to do this type of work, but I am not of that ilk.

These hybrid appraisals are irresponsible and will kill the Appraisal profession

The plan to eliminate appraisers began with the UCDP. This is just the next phase.

It is preposterous to believe that removing the appraiser from observing the property and its surroundings has any advantage to his ability to analyze and understand them. There are innumerable considerations that affect the desirability, marketability, and value of homes in our area. It is not possible for a form to convey an adequate amount of understanding of all the components of the home that affect a purchasing decision. And, requiring us to rely on the point of view of someone else is never going to allow adequate understanding. Furthermore, suggesting that involving two businesses in developing what had previously been handled by one is faster and less costly defies reason. Really, we appraisers want the system to be the very best possible and to accommodate advancements in technology. But, forcing us to work in a manner that hinders our ability to provide credible results and do it with suitable efficiency is not a move in the right direction. If they are wanting to improve aspects of the appraisal system, they need to talk with the appraisers - the right appraisers that are experienced and proven with demonstrable success in business and wealth in their own right. We can we can work together developing solutions that are logical. This is the first time I've been asked anything in more than 23 years of appraising.

This is a gateway for massive fraud. You're lending hundreds of thousands of dollars and have a clownish bifurcated appraisal in the file. No accountability.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This would be like having two different bldrs build a house, as an example. One doing the foundation and exterior, and the other, the interior.....so WHO then has the final responsibility of the house's structure? On these B-fur reports, WHO signs the report? Both parties? This is a complete joke, and the only one it helps are the lenders and Genius grps that came up with this idea in the first place, in an effort to start the ball rolling to weed out appraisers from the middle of their deals, as they have been trying to do since 1995. And then when the market goes bad again, like it will, who then gets ALL the blame? The appraisal industry is the doormat and dart board for the whole RE industry, as there is no real accountability in the other two areas of lending and RE brokerage, and both of those Grps get away with violations I see every week, incl RESPA violations by lenders, and no one seems to even care about those.

As appraisers, we are not allowed to use MLS photos because they are not considered reliable, yet they are now marketing a product where we have to rely on those same people taking MLS photos to give us the data for a property so that we don't have to inspect it. The liability to the appraiser is too high for us to even consider doing this type of work as we are still responsible for everything that was provided to us. At least in a drive by inspection, we know that the property physically exists. We have been given assignments where the property "existed" in the internet world and on the MLS but when we went to do the drive by, it wasn't there and a "correct" address couldn't be provided.

Only a government entity would think that adding another person to the assignment will reduce fees.

The early stages of this will be a mess, so I am expecting it will be a while before this is too concerning. It will be business as usual for the next few years.

The fee structure is not adequate for the time/level of experience.

There is no benefit to the appraiser or appraisal process, this is solely for the lender community to capture more of the fee for the appraisal. The reports will not be faster as getting the information between two parties, hiring two parties and getting unreliable information is not a benefit.

It's a good idea to keep boots on the ground. Maybe some focus on the cost and inefficiency of AMC's and their damage to the industry will help guide future decisions for the appraisal profession. Technological advances have come a long way and when used appropriately, they benefit the market. Technology alone is not the answer. The bifurcated appraisal will diminish the quality of future generations of appraisers and help inflate a bubble until it pops and provides a global financial problem once again. Let's focus more effort on improving the appraisers we have in the field and encourage more appraisers to join the profession instead of splitting them up, pushing them away and making this field so unattractive that we have no new entrants. This was once a great profession, now multi-generational appraisers are encouraging their children to look elsewhere for a profession. Technology can strengthen or destroy an industry, be very careful with the implementation and listen to those who have spent their careers in the field.

I trust myself and ONLY myself. Remember what happened in 2008, it wasn't that long ago

Another knife in the appraisal back.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

2008 all over again

Appears to be a huge scam. AMC's are still charging the consumer for a full appraisal even though they are generating a compromised product. AMC's are pocketing the difference and ripping off consumers. It should be illegal or lenders should be required to pay any fees going to the AMC for their "service" and the amount the consumer pays for the appraisal should be paid to the people completing the actual appraisal. AMC fee's should be totally separate and not lumped together and paid by the lender that hires them and not the consumer. That would put a stop to this shady practice and scamming of the American people. I think the fee's to appraisers should be much higher for this type of product due to the larger risk they are taking and additional work and research needed to actually produce a credible USPAP compliant appraisal report. All the way around these seem like a terrible idea.

Appraisers are within 5 years of being eliminated like the dinosaur.

I believe this idea is horrible for the profession and will promote a more unreliable way of valuing real property. As a homeowner, I would be insulted if a non licensed non insured person came to my house on the banks behalf to take pictures for a computer to value my home. I do not believe this will work.

Desktop appraisal reports have been around forever. Appraisers have always relied on alternate data (tax, MLS, builders, etc.) in their appraisals, just a fact of life. The analytics of an appraisal is what I have spent decades perfecting, not measuring the house and taking pictures. If, as appraisers, we don't stay in step with consumer and lender desires we risk being eliminated from the process. I would rather have open discussions and be able to make suggestions for improvement than being left out of the discussion completely. I don't understand the "us" against "them" mentality that some coalitions are trying to promote. It's destructive for the industry. They have painted us a old white men who can't change and that is not true. What are you so afraid of?

These appraisals will speed appraisal turn times but will not always produce accurate/credible reports that any government agency should rely upon for lending purposes.

The forms and processes are decades old, time to move forward.

As a property data collector, your information is relayed to another party. Should that party misinterpret your information, you could be held liable if the party claims you gave them the wrong information.

This change is not about promoting appraisals, it's about eliminating appraisers from the mortgage process. Damn glad I have a lot of private work.

How is this going to provide better results than now?

I personally put in a lot of effort into performing an inspection that verifies not only the subjects condition but its physical attributes by extremely accurately measuring buildings. The percentage of times that my findings vary from public records is high. I dont feel I could trust someone else to provide me the data or visual description I need to accurately derive value



You Can Enjoy...

FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Once again, the banking industry & their powerful lobbying groups are hijacking the lending process & moving towards "Fast & Cheap" alternatives which WILL cause the appraisal industry to be severely damaged. Over time these "short cuts" will bleed into the market with data being skewed & market participants & their reactions being dangerously mis-lead. WE JUST CAME THROUGH A HORRENDOUS RECESSION BROUGHT ON BY GREEDY BANK EXECUTIVES & THEIR ONE SIDED, PROFIT DRIVEN VIEW POINT. Once again, there IS NOT a shortage of appraisers, just a shortage of those who can afford to take pay cuts, providing short cut appraisals. We are supposed to be professionals, held to a higher level of education & accountability, yet the banking industry & politicians see us as an obstacle, a nuisance. We are here for the good of the people, to protect not only the market participants but the stock holders as well. I see no bank lowering their fees, title companies - nope, lawyers- nope, insurance company- nope! Yet we, the appraisers, are supposed to work for less & sign our names to marginally reliable forms certifying their accuracy. Apparently our education, time & signature are now worthless. After all these years of education, con-ed, licensing - we are being relegated to second class form fillers. Speed is not always the answer - good solid lending practices backed up with "feet on the ground" checks & balance valuations with make for a healthy & viable economy.

Instead of saving time and money, Bifurcated appraisals will cost accuracy and integrity in the appraisal process and encourage fraud and incompetence . If widely adopted, they will KILL the appraisal industry. Qualified and experienced appraisers are the only people who should be ensuring the public's and lender's trust I personally know many appraisers who will quit the industry if these abhorrent Bifurcated appraisals become widespread. The "appraisal shortage" issue, long turnaround times, and increased appraisal fee are all because of Appraisal Management Companies. Do away with AMCs and there will never be a need for Bifurcated appraisals or any other shoddy product designed to save time and money.

I suspect turn times will be extended too many cooks in kitchen. These reports will require extra ordinary assumptions beyond typical and while it will comply it is an inferior product.

x

Sad that we, as appraisers have paid for the information for the appraisals that we have submitted to FNMA for years. Now they are taking our information and removing us from the picture in many ways. As an appraiser you traditionally get some difficult assignments and some easy assignments. FNMA is taking the easy cookie-cutter assignments away. Instead we are left to complete assignments on difficult property assignments which have increased liability. Unfortunately, I do not see the prices going up for these difficult assignments. I believe the reduction in available work will increase competition for these assignments and drive down the fees lower then they have been in many markets.

Overall energy should be spend elsewhere.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

If speeding the turn-time is a factor for doing these type of reports, then how about eliminating the requirement to get comp photos?? That in itself is very time consuming. We can embrace technology and see external factors using Google, etc. Also, I disagree with using Realtors to collect data when many of them don't provide sufficient data when they list a property in the MLS. I'd rather find ways to do a complete non-lender based appraisal than sell myself short with bifurcated work.

If I don't complete the inspection and the analysis of collected data myself, there is way too much liability. Doesn't Fannie Mae see that this will lead to another housing crisis? If a realtor inspects the property, they will be looking at it as a possible sale for themselves or a fellow realtor and price will be compromised. I would strongly advise Fannie Mae against this type of valuation.

Damages

In my opinion what's going to happen is -- unqualified data collectors and appraiser's that can't get work otherwise due to their low quality reports - will take these reports in order to continue appraising and making money. I sincerely doubt that appraiser's who are turning in quality work will accept assignments like this

The practices in bifurcated appraisals are exactly what Fannie Mae considers critical enough to red flag and blacklist appraisers for doing now. The UAD is designed to track appraiser activity and ensure that they are personally inspecting each subject property, each neighborhood, and each comparable. They have gone so far as to "fingerprint" photos to make sure that appraisers are not using MLS pictures, or somebody else's photos, or even dated photos. Until very recently, Fannie Mae required that supervisors accompany trainees on every inspection because they did not consider even licensed trainees capable of adequately inspecting and gathering the field information. Yet now, because of lobbyists pushing for faster and cheaper appraisals again, it's suddenly okay to have entire sectors of the mortgage industry secured by collateral inspected by people who are not appraisers at all. If understanding the market, seeing the neighborhood, and personally inspecting the property are so necessary to have reliable results for a standard appraisal that cutting corners causes an appraiser to lose his or her license, its absurd to actively court the opposite behavior for bifurcated appraisals. It sends the message that none of that stuff is really all that important, and you can be sure that appraisal quality across the board will go downhill. It's not human nature to work harder and be more detailed for the same net profit when another group is making the same money doing half the work with none of the liability. Bifurcated appraisals will wreck not just the housing market in the short term, but will over time drive out the remaining appraisers who are true experts and whose knowledge and experience is critical to training new appraisers. There will always be a need for appraisals on at least a portion of the mortgage market, and bifurcated appraisals will ensure that in 10 years there will be nobody left who actually knows how to correctly appraise them.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I did not answer the question with regard to why I wouldn't want to do the property data collector portion. The answer is I'd rather not drive around to multiple properties to lower my risk... not my appraisal-liability rather physical risk of getting in an accident, tripping somewhere at the property, etc. You provided an "other" explanation for why one wouldn't want to be an analysis; ideally, the same would have been done for the property inspector question. There are two things appraisers should focus on with regard to bifi appraisals in my opinion: 1. The first is fees. The higher the fee, the more acceptance this product would have. If the fees were high enough (whatever that rate might be) a large portion of appraisers would not be against this program (not all; there are some who believe this process weakens the appraisal profession. I don't). 2. Advocating reasonable boundaries for the use of this product. Trying to stop bifi's from being adopted is a losing strategy because they are going to be introduced on a wider basis. Rather, appraiser and appraiser organizations should advocate for limits on their use. Set certain benchmarks on LTVs, credit score, market changes (both local and larger-scale), etc. Worth with regulators or lawmakers for these reasonable boundaries and keep the bifi appraisals contained for those transactions that are low-risk. I tried to finish the survey with leaving the property inspector question blank. It wouldn't let me. I suggest, when you report these results, that you note there is some ambiguity in the question. I checked I wouldn't do the inspection component due to liability; but as I noted, that liability is not appraiser liability but personal-safety liability. Thank you!

My Experience - poor inspection reporting. Need to use trainees who are trained by appraiser, who have a license.

Without making an interior inspection, it is not possible to do a proper appraisal. Our job is to mimic buyer reaction to a specific property. Buyers inspect thoroughly. We must too.

This type of report reduces the cost of the appraisal. Many of the people doing the leg work have no idea what they are doing. I was told that the hourly pay for the appraiser was \$50. The second report that I did I didn't like their comps so I did a new search and completed the report with the new comps. Time spent: app. 3 hours. I received \$45.00. I'm sure they were not happy when I did my own comp search. That was the last time I will ever do that type of report.

Its the beginning of the end for residential mortgage appraisals. Until the next collapse due to Bifurcated shortcomings.

BAD MISTAKE!!

With all the data Fannie has collected on subject properties and comparables which they share with lenders, will they need a local appraiser. Could be a few people in an office anywhere deciding value. My experience with review appraisers leads me to think that they loose touch with the reality of real estate transactions. Many forget that lender requirements and guidelines do not reflect participant behavior. I think the bifurcated appraisal will be the end of the profession. How many appraisers who focus on desktop appraisals have trainees?

Realtors in my area report incorrect gross living area, condition, basements information all the time. Who is going to bail out who after this one?



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

You can't fight City Hall, but it doesn't mean you have to assist them. I signed on to do this with a company where it took 10 requests before I accepted the assignment based upon inadequate inspections. I'd rather do a desktop or 2055 than be accountable for someone else's inspection, appraiser or not. I've been asked (and have completed a few) of these that's it's crystal clear what's going on; Cheap fees bottom line. Most require ridiculous turn-times and I've done a couple where the stip's were worse than most 1004's. I guess Walmart doesn't have greeters anymore, but McDonalds pays more per hour with none of the inherent liability. RIP my 30 year profession and let the caveat emptor begin.

My concern is primarily is how reliable is the information being provided the appraiser & possible discrepancies in information coming from someone who is not an appraiser.

Do away with the AMC system. This will save money and time.

this will result in problems for banks and lenders in the long run due to pressure from lenders and to omit or falsely appraisals

FNMA has lost their minds

None

Big data will be the demise of appraisers.

SEVERAL USPAP CONCERNS

SPLIT THE BABY...JUST WRONG

I believe we are taking steps backward in the quality of appraising property.

The property data collected will be check the box on a form prepared by Fannie Mae and not contain necessary analysis of the neighborhood and market conditions impacting market values in that market area. The appraiser will be working with flawed data which will result in a flawed appraisal report.

The more people involved, the longer it will take. Trust me!

This is not an acceptable situation for Appraisers, and not a smart situation for borrowers or Lenders.

"Bifurcation" is what we often did in the appraisal profession 30 years ago when there were less restrictions on our creativity and business process. It is basic division of labor and has been utilized since the Industrial Revolution in pretty much every profession except real estate appraisal. It's a shame our clients don't allow us to bifurcate the process with our typical 1004 assignments. Their lack of vision in allowing appraiser to apply basic division of labor has done much to reduce keep fees high and turn-time longer.

shameful process...reduces all the years of professional experience and expertise to being meaningless....will cause massive pseudo-hyper price and value increases

Overall bad idea. Credibility will become a major issue! Sorry, can't do it! I'm done! Moving on to another profession. No more appraiser independence with this model

Obvious attempt to further the industry goal of automating appraisers out of the system completely.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This is ridiculous!! No part of the appraisal process is being taken out. This is not time efficient!! There will still be an inspection(data collection) and appraisal report(analysis) so how is "turn time" changing in the process? It isn't!! How is it quicker and just as reliable when now there are multiple people involved? The appraiser gains confidence/competence through his/her inspection by knowing the subject, local market, neighborhoods....etc. It's like we are to produce "credible" results while blindfolded. Then there is liability, accuracy and financial repercussion for the appraiser. How am I going to make an income when my fee is reduced or cut in half to pay another individual for the inspection? This is a recipe for complete disaster!! If I'm saying I want to do my own inspections why can't I do that? I believe appraisers are respectable professionals in their local communities and when you take away the ability to have dialogue with the public then how is trust created? This is nonsense and I hope that banks will recognize how this will be nothing short of chaos. How is it easier for a bank to send out an "inspector" then wait for that information and then issue an order for an appraisal to the appraiser and wait for the report? I think I speak for most if not all appraisers.

Bifurcated appraisals will become a huge liability for both the property inspector and the appraiser. As an appraiser, I do not know how you could appraise a property that you have not seen.

Too difficult for me personally to property appraise a property without actually seeing firsthand. It may work fir "cookie cutter" subdivisions of avg quality but would not work in a custom housing market. Fees are insufficient to break into 2!

If you wa by faster appraisals just let the trainees inspect and force all lenders to accept it. Currently most good lenders do not allow appraisals unless the certified appraiser inspect.

I'm an appraiser and I believe the appraisal is a waste of time and money. If a property sells and appraises 20% too high, but the borrower never defaults....everybody is happy. If the borrower got a bargain and bought a house 20% below market, but in a year defaults on the loan then TSHTF. Outside of outright fraud the risk is not with the appraisal. The risk is with the borrower regardless of the appraisal.

Licensed appraisers view the property being appraised and all comparable transactions considered. Most forms of communication have been removed from the appraisal process. The next recession, hard working, diligent, realistic, licensed appraisers will, once again, receive the unwarranted blame.

DUMB!!!

A very bad idea for the Lenders with no consideration to protect the collateral in their portfolios. I can see many more foreclosures and delinquent accounts.

Bifurcation is a bad idea

This is another attempt by Fannie Mae to commit fraud.

We serve the client. The lender/client today has a great many tools at their disposal to determine the level of risk associated with each loan, a valuation is just one of those tools and it does not always need to be a full 1004.

I don't see how this could save time or money as you have an additional person to pay. Also, the appraiser may not get the details needed to perform a credible appraisal.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I don't follow the need for saving costs from one of the most beneficial loan products, and least expensive closing costs. If costs associated with the loan are a concern, what about backing off the loan fees and agent fees? If appraisals are considered a hindrance to expedient loan closings, how about ordering them earlier in the loan process?

A genuinely terrible idea. Any lender should know with relative certainty everything about the house and it's true market value. The desire to speed the lending process is detrimental in the long run.

While they will most likely speed up appraisals they will certainly suffer in quality and reliability.

AMC's have ruined our profession and are the cause of this! Fact!

How can an appraiser state a creditable report has been created when you have no knowledge of an area first hand.

Appraisers spend a lot of time learning the skill of determining value. We spend hours on education so we can be the best at what we do. I feel this is taking our profession in the wrong direction.

Need to cut out AMC companies to lower the fees for consumer. Need better contact for undue influence

#1 - It's up to the appraiser to stay up to date on their local market and influences — including utilizing today's technology and old fashioned driving the neighborhood. This enables the appraiser to choose which assignments she/he wants to accept. #2 - If Fannie Mae is developing the form and direction of this type of inspection/valuation, it is pretty much going to happen. It can be an opportunity to make a new stream of revenue by doing what you're already licensed for. I'd rather see them call me before using local realtors or Uber drivers.

FNMA cares nothing about public trust, nor do they care about potential losses due to improper valuation. They will be the first demanding another tax payer funded bailout when the market inevitably corrects.

Bifurcated are really desktop appraisals and we've been doing them for decades. No real difference. In fact, it's better because you actually have "eyes" on the property versus just data with most desktops. I don't see the issue. Suggest appraisers embrace, and make it work for them before we have a bunch of brokers who think they are appraisers with no education in that field

This type of appraisal would reduce quality and increase liability

Wrong step in the appraisal profession in my opinion

A lot of work for less pay. The fee should be higher because there is still an analysis and license and insurance costs.

I think it's good for the profession. I have been a licensed appraiser for 10 yrs. Trying to get into this profession is a bit of a drag (nobody wants to help the new guy). This gives us little guys, at the very least , an opportunity to get our foot in the door. So yes it's a good thing!

How will E&O insurers handle claims when there are so many fingers in the pie?

This is just another step in the long-running push to make obtaining an appraisal of a home for collateral assessment purposes the equivalent of ordering a pizza from your phone. It is simply the commoditizing of what was once a profession.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I don't see this coming to fruition. There is no logic behind the supposed benefits of bifurcated Appraisals and it does not protect the public interest.
Bifurcation appraisals...not a good idea!
This will only contribute to bad data and a return to a housing melt down.
A lot of the changes that have been considered could be performed by a trained limited licensed appraiser. Allowing trainees to perform tasks on their own (with some training) would take care of all of the concerns, produce faster turn times and inject newer appraisers into the industry.
I feel it would still be the responsibility of the appraiser to keep in touch with their market through analysis, drive throughs and whatever is needed to do so.
As a state certified I do not even trust a trainee to go do the inspection for my company. From what I understand it is not even allowed. To say anyone can go out and collect that correctly to provide a credible result is a joke and nothing more. As long as I understand what I am liable for I'll decide if worth to add to product/service menu.
This has to do with appraisers quality of experience and expertise in the area. An appraiser and data gatherer could do good work IF they know the area. Every time I have heard an example of how these will not work it turns out the appraiser is SURPRISED that there is a water tower or other external factor - because they are working in an area they really do not know where they should be still in a learning mode. I am afraid this will happen often if appraisers who are cut loose to do this have money-making first on their minds. Will the loans really be secure? Will the homebuyer be protected? Who really cares if these loans are going to be sold off down the road anyway?
I'm all for speeding up the appraisal process, but adding more human capital (separate inspector and appraiser) to the equation will almost certainly slow it down as it requires more communication, a platform for those entities to communicate, and someone to ultimately take the risk and formulate an opinion of value. -It is my opinion that lenders should utilize data to complete their own (in-house) valuations and hire licensed appraisers for an unbiased review. This would allow lenders to determine their own risks/limitations, while speeding up the process as appraisers are providing only the quality assurance.
It's here, but I ain't happy.
The whole bifurcated process is less efficient than what was allowed before. I could have a trainee, someone I trusted, trained, and knew what I needed for a credible report, do the inspection. If paid fairly, I could scale this process and get more reports done faster and cheaper.
You always have 2 choices of 3 items. speed accurate cost. you can only pick 2. if its fast, you either get cheap or accurate, not both. if you want it cheap, its gonna take a long time if you want it right or a short time if you dont care about accuracy. you get what you pay for.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

How do I know if photos of condition of a property is being taken. A licensed trainee appraiser can't go to a property so it's okay to send whomever. Agents can't complete their own listing correctly. I had a situation of a sale that the agent didn't even know the property had a addition adding 400 to GLA and basement. He based his list price off of public record which did not have the updates. The property sold below market value by \$15,000. I measured the property and view the property and knew for a fact the square footage was wrong. Also I have seen issues in a property where its a safety issue how do I know another person I am relying on will take a photo. How about a sinking septic system with ground wet. What about a door locked and no mention of that room and no photo.

Don't know the fees but what's wrong with the system now? Having 2 seperate parties completing one appraisal doesn't seem to make sense.

This is a bad idea and Appraiser acceptance will be a problem.

The Golden Rule - The one's who hold the gold make the rules.

I can't make enough money at the fees quoted to move to this model and am not interested in fast or cheap.

I'll NEVER do these. I feel they do not meet USPAP Standards.

After 27 years of inspecting properties, I find issues that exist that no one else is catching, this won't happen if some one else inspects with less knowledge and experience.

I have been an appraiser for 38 yrs and have performed over 16,000 appraisals. This is the craziest thing they have come up with yet but they are going to do it, so I will give it a shot. Who knows, I was told that complex or large houses wouldn't be eligible only smaller cookie cutter types, so it may be easy money. If you can go and fill out the front page of the 1004 and a simple drawing and the whole thing takes 15-30 minutes and collect a \$125 fee, that's pretty good money or never leave the office and throw 3 comps on a form and collect \$150, either way either way it's better than them cutting us out of the process altogether. My opinion, two years and it will be back to normal.

I also feel that there would be a higher likelihood of a decrease in quality of an appraisal and higher chance of getting called before the state board for a poor report.

we should bifurcate the rules process...let the hacks in charge come up with ideas, and let the professional appraisers do the voting

Ridiculous idea

I think it's a very bad idea. High quality data, supplied by appraisers, is what has led to this possibility. Without quality data it's garbage in garbage out. Not acceptable.

If the bifurcated product's purpose is to speed up the process and cost the consumer less, the first place to start would be educating lenders about the use of AMC's. AMC's inadequate management has cost the consumer billions. In addition, AMC's increase the time it takes to get an appraisal back by shopping for the lowest fees or not having geographically located appraisers.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

I would rather hear it directly from the GSE's that they want to eliminate the role of the appraiser in the appraisal process, which is their ultimate goal. Speed kills accuracy, and if the real estate industry is attempting to leverage technology (AVM's & hybrid products) to produce faster property valuations, they are gravely mistaken. Technology is beneficial, but it is not the definitive answer in the valuation process. Appraisal waivers and hybrids appraisal products will distort the true value of homes and market areas without the knowledge of seasoned appraisers doing their jobs, boots on the ground. The implementation and acceptance of these products will eventually destroy the housing market long term. If the GSE's want faster, more accurate appraisals, they should; 1) eliminate AMCs; 2) revamp the 1004; 3) Simplify/Change the UAD.

This is nothing more than "fast & cheap" on a GSE level. Turn times will double. Quality will drop to nothing and then there will be a fall out that makes 2008 look like a hiccup in the market...Meanwhile everyone on Wall St will have their hand out expecting to be reimbursed because they all followed Fannie's lead!

If you want to save the consumer time and money, do away with the AMC's.

Very tedious writing the reports. I enjoy the inspection process of appraisal.

It is logical that for Appraisers to remain aware of changes in the market, they need to have as many avenues of knowledge that are available. This includes MLS, News outlets, Ordinance notices and physically knowing the changes within any community. An example is knowing zoning changes in a community that may affect H&BU. Just looking at pictures and forms from a property inspector will not transfer that knowledge. Decreasing appraisal turn times is a misleading statement in that the time it takes to have someone inspect the property is not taken into account for the second part of the Bifurcation, so is misleading. The lenders, along with other partisan players in this process, are looking only to utilize the process to increase the profit in each transaction, regardless of the effect that may occur in the long term. While Artificial Intelligence (AI) is here to stay, it is now being used as the front runner for values in the financial sector and is the next logical step in this total valuation progression. All programmers will admit that the checks and balances (final decisions) must be done by the human element. Despite all the assurances by those powers that be, that their will be strict rules and procedures in this process, history tells us that there will always be artists that will circumvent the true intent of the process, thereby placing our future in jeopardy. You will not get what you pay for, you will get what the financial powers deem necessary, while the foxes guard the henhouse.

It appears speed is the main concern for lenders. I would suggest valuation products be ordered much earlier in the lending process, not the last piece before closing the loan.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This was a problem created by regulators whom increased the requirements to become an appraiser while simultaneously allowing the industry to solely focus on accepting assignments from experienced appraisers and shun trainee appraisals. In response to this you have created a system where inspections are being completed by unqualified individuals, then force an Appraiser to perform an analysis on a property they did not inspect which only increases our liability and the potential for unreliable appraisals. This is a problem that could have easily been solved by going back to the old standards which would allow new blood to enter the profession and get rid of "management companies" which are directly responsible for the increase in turn times.

The expression, "too many cooks spoil the broth" comes to mind. If the Licensed/Certified appraiser does not inspect the property and comps, and develop all of the approaches to value, if applicable, isn't this a violation of USPAP?

It's a scope of work topic.

Speed and saving \$\$ are the only real reasons for these products. Trust me speed will NOT be happening. Appraiser Analysts will have questions for the data collector and tracking them down to get those answers could take days. Also fees we are not talking about alot of money to be saved here. The end client will lose out as they think they are getting the real deal...An Appraisal, when they are not. Thank you for your survey!

Photos can lie. Only the naked eye can really view a situation. One large and very significant definition of value is location. Driving a subject's subdivision, neighborhood & marketing area gives the appraiser a better knowledge and understanding of the subject's relationship in its location. These areas change over time too. Aerial photos are dated and only offer a partial area view. The old way of appraising will change unless FNMA & others in power stop it or only partially embrace it. The newer generation of appraiser's will not know the difference. It'll take time but the old ways will mean nothing to them after a while with the newer appraisal/inspection systems. Its about they getting more money & power. That simple. Its a concentration & exertion of their power in the lending process. Its funny how few politicians really care about the maintaining of appraisal independence and its vital role in the lending process.

It's not necessary to have this product, and it is not beneficial to our financial systems. The only reason these exist is an attempt by lenders to cut costs (as usual), without concern for the repercussions. Just order full appraisals, or 2055s when that is not possible.

I think that the bifurcated appraisal process is another attempt of lenders to find a way to get a cheaper, faster product they can use to reduce their liability in the valuation process. It doesn't make sense why lenders would for the most part not allow me to send a qualified trainee out to a property to measure and evaluate a property and then supervise or complete a report but will now allow me to use a stranger's measurement and evaluation of a property.

Appraisals were examined and well regulated after the recession of 2008. This move is a result of pressure by big lenders on Fannie Mae to cut their lending costs and time thus returning to practices that led to the financial crisis and collapse of the real estate market.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Fannie wants the appraiser to rely on online sources for pics of comparable and influences, problem is that data is very old in some cases pictures are over 5 years old..... Value is as of an effective date..... All sources used should be accurate as of that date. BTW, what does the appraiser do when questions come up about the inspection? Now you have to take the time to try and get in touch with the inspector and hope you get a satisfactory answer..... Things never get more efficient by adding another persons into the process..... Unless of course the true goal is to illiminate the appraiser from the process, and just do inspections on most properties...

As the number of appraisers is finite, you can, of course, speed the overall process by allowing non-appraisers do the inspections. If they do a good job, all is well. But remember, just because you break the process into two pieces, do not think that the total cost will lower. I caution you not to lower the inspector standards and requirements just to reduce fees. Remember the old computer acronym of GIGO, garbage in, garbage out!

This appears to be the worse idea FNMA has ever had...History teaches them nothing.....

Bad for all involved

This Idea Sucks

Replacing appraisal with bicurcated appraisal is a bad idea. It's like hiring two people to drive a bus: one to look out the windshield and the other to steer from a windowless box. All to try to save pennies on an assett appraisal by upping the risk to the hundred-thousand-dollar assett. Insanity.

Whether Conventional or Bifurcated, someone is always going to expect or place liability on the Appraiser/Analyst. It is in the best interest of both parties, Lender and Appraiser to have a thorough Physical evaluation of the Subject property and it's neighborhood(s).

How myopic of those who think this is a good idea. I'd like to know what force is really driving this change. It's appears to be as always about the bottom line and greed. In the total scheme of things, I don't see that much of a cost savings given the long term effects and risks. Erosion of public trust with disintegration of an honorable profession will be the net result. Good top tier appraisers are always focusing on better analytical skills.

Lenders continue to undermine the appraisal profession, this is just another step in that direction.

I've done over 100 of these. Theres a disconnect between the data collectors idea of quality / condition and the appraisers. Without photos of the interior, every appraisal is unreliable. However I do believe it gets you in the ballpark. +-5% of actual market value.

I am having a hard time trying to figure out how this will speed up the appraisal process. It certainly seems almost impossible to produce more credible results then a typical appraisal. I do not feel good about someone else inspecting the property. I really doubt that they have the same knowledge as I do.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Having had an increase in review assignments from clients in the past year, the questionable competence and/or integrity of my fellow appraisers is scary. It is apparent that too many appraisers aim for the highest value possible too avoid problems with the client, appraisal management company and borrower. In my opinion, lenders understand this and the bifurcated appraisals will decrease the number of deals lost because of a valuation and that is likely the driving factor behind banks support of this product. All banks want is to close the deal and sell the mortgage on the secondary market. Moving to the bifurcated appraisals will lessen the responsibility of the banks in bad deals while putting more responsibility on the appraisers while taking away control of the overall appraisal process from the appraisers with most to lose. The result, after the next real estate crash, will be a push for a fully automated system that collects data and gives a computer generated valuation and the end to the real estate appraiser.

I dabbled just to see how it works from the inside. Incompatible with my regular client load/time budget. When Mueller asked me to do one for origination lending that was a rebuilt fire job, insisting it was possible to do credibly, I told them to take a walk. It is best used as a niche tool and spot QC. Not origination, not for higher LTV and for dang sure not on rebuilt fire jobs. I think they are a bad idea.

The data available through public records/realtor based listings is often inaccurate , incorrect, or misleading. without actual visualization of properties there is no way to be certain the information is correct.

In my opinion, these types of appraisals are not good for the appraisal profession or the economy. Having a licensed/certified appraiser rely on information/data collected by someone else (even another appraiser) is a bad idea. I've been in the industry for 16 years and I still wouldn't be comfortable relying on data collected by another appraiser (regardless of experience). If the clients (banks/fannie mae, etc) want the most accurate value opinion they should not go down this road. Oh, I wonder who they will blame when we are in a recession, foreclosures sky rocket, and they find out the properties the lent on are worth much less than they thought or are in much worse condition than they thought. They will more than likely blame the appraisal they relied on. Then they will go after the appraiser. Will the data collector be liable? Will that data collector be required to carry E&O insurance? What happens when the data collector gets into the business for a year, leaves the business, and doesn't keep paying their E&O insurance (assuming they had it in the first place)? Will the bank be able to go after that data collector with no money in the bank and no insurance? Nope. They will go after the appraiser that has been established for decades and still carries E&O insurance (even into retirement).

As long as "big money" lenders/portfolios; are not concerned about "actual valuations"; can live with 20% +/- over/under portfolio values; then sell to Wall Street as "A" paper....Hmmm sounds like this already happened...



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

As an aging Appraiser and retired instructor, I am totally abhorred by the capability of data collectors and the Secondary Market participants whom helped create the last financial crisis are now in control of the process by virtue of "speed". Faster is not always better. Part of our societal problem is that all is focused on speed as opposed to quality appraisals. The real loser is the consumer, whom I can personally attest is not getting the best results of Opinion of Value, only a faster appraisal report. Thankfully, I can still work with private clients whom only want a personally responsible Appraiser, not a computer generated determination. I personally believe along with Mr. Bunton, that this is an attempt to eliminate the appraiser who has spent a great deal of time and money to become "qualified" to perform appraisal work for a computer dataport acceptance, as long as it agrees with the algorithmic logic within. This is a terrible injustice to consumers for secondary market consumers and investors. I have watched 3 crises due to market misrepresentation by the lending community and they always blame the Appraiser. The concept of "promote and maintain a high level of public trust in appraisal practice" is being pushed aside for enormous financial gain and speed. NOT GOOD!

There is so much information available on the internet regarding neighborhood happenings. Most appraiser's don't analyze the information, they just put it down on an appraisal and let the reader figure it out. However, there are some appraisers that act as the eyes and ears of the lender and provide an informative and excellent appraisal.

It is amazing that when someone gets the idea to cut costs of a loan that they always look at the appraiser, not loan origination fees, not discount points, not attorney closing fees, not insurance costs, not recording fees. Liability issues caused by bifurcated appraisals must be answered before these things will ever get off the ground. I don't see any time savings either.

I do believe appraisers should be performing the field inspection, not realtors.

Why would one risk a valuation split performed by unlicensed appraisers that don't follow guidelines or standards. Isn't this what happened before FIRREA? History repeating itself

Bifurcated or otherwise abbreviated reports are designed for "cookie-cutter" properties (medium size one story homogenous homes located in subdivisions with plenty of similar sales), however I am convinced that this new process is intended to be utilized on difficult or complex assignments (new construction, large 2 story homes with difficult upper level measurement, acreage, rural, subdivisions with lack of sales, etc), in hopes that the Client can obtain such a report for a low fee. It has been my experience that it takes as much time to complete a PDC as it does a 1004P, however the fee for each product is well below 50 percent of customary fee (Customary fee example would be what VA pays, since it is publicized). I would only agree to participate in a bifurcated assignment if the property was a cookie cutter. I am a 35 year experience Appraiser, ASA/IFA Designated Member, Former onsite FannieMae NUC Appraiser, Former Bank of America Review Appraiser with over 25,000 appraisals reviewed, Current Appraiser Investigator for my State.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

There are differences in levels of analysis from one appraiser to another; until everyone is using the ansi standards or the same standard within a geographical region, you will have variations in the outcome. Some appraisers try to appraise to the guidelines by trying to stay within 15% net/25% gross and no single adjustments over 10% even though these adjustments may be necessary in a market with less conformity. In some markets, the site values exceed 50% or more and in some markets, the layout of the region (mountains for example) may be linear and stretched out along one main road passing through the area. With lower density areas and remote areas, guidelines will be stretched requiring an appraiser with good writing and analytical skills. The ones that pick sales fitting a model instead of providing the most probable substitute are not reliable enough to gather data for a detail oriented appraiser.

bad idea overall, it should be the same person who collects the data that performs the finished product whether its a desk top or full appraisal

Lenders do not really want an appraisal that is professional and accurate. Linder's won't and inflated an inferior product as relates to value because ultimately the taxpayer will suffer when the collapse happens which it will again shortly

In my opinion bifurcated appraisals should only be used in large homogeneous subdivisions and PUD's with a base line minimum large amount of similar available and similar quality and construction properties. There should be large amounts of sales and listing data of similar properties in the subdivisions or PUD's available within a year time frame. If these conditions are not available I feel that a bifurcated appraisal should not be conducted and is not a viable appraisal product to reflect a truly supported opinion of value.

The entire bifurcated appraisal idea appears to be the latest race to the bottom. I have 18+ years experience and have been offered \$50 to complete a bifurcated appraisal as the Appraiser/ analyst. There would be no way to make an acceptable income with fees in this range. Also, I believe that this approach to appraising will entirely and irreversibly undermine the public trust in the legitimacy of appraisers. The number of consumer complaints will undoubtedly skyrocket as buyers/ owners will surely base their value complaints on the fact that the actual appraiser never visited their property. This is already a very common occurrence with exterior only appraisals. Lastly, this approach places the Appraiser in an unfortunate position of risk regardless of what is being said by the regulators and AMCs. Sadly, the worst and least experienced appraisers will likely be the early adopters of such products and the appraisal mill will be resurrected by a risk seeking individual with an army of trainees or administrators form filling as quickly as possible. Would not doubt if we hear of claims that a single Appraiser producing upwards of 20 bifurcated Appraisals in a single day.

The bifurcation process will require additional coordination/management between the property data collector and the appraiser-analyst. Someone will have to pay for that time spent coordinating/managing this. Also, by having to fit the work into the schedules of two people (the property data collector and the appraiser-analyst) rather than one, the likelihood of longer lead times increases.

There are simply too many properties that are more complex, which is not related to price for substantial errors to be made



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This will eventually cause another financial crisis. Lenders and data will skew values to their benefit. Lost protection of the public and their trust. Appraisers will be gone and there will be a shortage when they realize this was a mistake.

The appraisal profession will be completely gone soon.

So if Fannie and Freddie have already decided that the appraiser no longer needs to visit the property, then I guess they could hire a single appraisal firm which is licensed in every state to complete the assignments. Sounds to me as though they want an appraiser's stamp of approval on an appraisal with the only benefit to Fannie of the appraiser's liability insurance as a safety net in case things go sour. No thank you!

I will not put my license and my E/O in jeopardy for this kind of an appraisal.

Other than saving money, how can it possibly be more efficient and credible to break the appraisal into two parts. The site visit is the easiest and most valuable part of the assignment because photos don't tell the whole story.

Any licensed or certified appraiser who agrees to do a bifurcated appraisal is in danger of losing his or her license in my view.

Credibility and liability are compromised

The reason turn times are so long is because NOBODY reads appraisal reports thanks to the UAD. I see reports sit on my dashboard with AMC's for days because no one will read them. I constantly get revision requests from underwriters for things that are already in the report but they refuse to read the report because they just scan it through CU. The other problem is that 99% of people who work for AMC's didn't have a clue what an appraisal was before they began working for an AMC. The industry is controlled by non-appraisers. And did you know that assigning appraisals has become basically a popularity contest? So if you don't flirt enough or joke enough with the assigning teams, you won't get work! It doesn't matter about quality or professionalism. If you accidentally offend someone or don't kiss their butt enough, you won't get work! So the best appraiser in a market may not even be getting work because he or she isn't engaging enough! The AMC's & the UAD & scanning of reports is the problem!!!

I think some properties this will be ok to use PDC, however more complex files, View, updates, amenities, condition, etc will need the appraiser to actually observe the subject in order to have a credible value opinion. Kyle Norris, SRA

In my business, the longest lag time in the process is access to complete the inspection. The homeowners and realtors who schedule the appraisal appointment will not change, therefore the time to complete will not significantly improve.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Fannie Mae claims its not a problem for appraisers to rely on a Property Data Collector because appraisers already rely on third party property info from surveyors, county auditors, etc. The problem with that logic is that surveyors are licensed professionals who have a duty of competency & can have their surveyor's license taken away if they are in error, and auditors are CPA's or elected officials that have a duty of public trust and face repercussions if they are wrong. Fannie Mae says a PDC has the same credibility as a registered surveyor, but that's untrue! Second, Fannie Mae claims the info from the PDC is completely factual and not a matter of opinion. Also wrong. The simple fact of a PDC making cognitive decisions about WHICH photos to take, from which angles, showing which features, makes them a gatekeeper and means they made a decision about which data was RELEVANT to the appraiser, and that question of what data is or isn't relevant is for the appraiser to decide.

I think it is ultimately going to cost the borrower more and offer no benefit to the lender and certainly not to the appraiser.

This is a move to to remove appraisers from the industry. Appraisers have been contributing data to Fannie Mae for years and now big data is stealing the hard work for auto valuations with appraisal wavers. Fees will be reduced for hardworking honest appraisers to the point of losing decades of experience in the field to accomodate quick turn time and lower fee accepting appraisers trying to survive the industry. This move reminds me of the pre 2008 crash where AVM and BPO products were used to fuel the industry and when the market crashed appraisers took the brunt end of the blame. Sacrificing the integrity of the industry to provide the cheapest product should not be the answer.

Because a client orders a bifurcated appraisal, doesn't mean it can or SHOULD be completed. In some areas of high homogeneity a bifurcated appraisal can be completed at a reliable level. For SOME lenders this process makes sense. It remains up to the appraiser to determine if any appraisal or format can produce a credible result that is not misleading and USPAP compliant. There are certain homes/borrowers/lending amounts that it would be careless to utilize a bifurcated process, and lenders as well as appraisers should be cautious to not shoe-horn these products into any assignment.

Bad idea anyway you look at it.

The only possible benefit from this is for lenders, who have been trying for decades to get rid of appraisers completely. This brings them one step closer and I have no desire to be part of it.

Another failed attempt to quantify art. See you in Bankruptcy Court and in the newspapers and broadcast media in a couple of years! Meanwhile, I'll be producing the same excellent work with very reasonable TAT just like I have for decades. How stupid is this - continually trying new stuff and arriving at the same failed economic results? Oh, well. You didn't listen to me and people like me in the late 70s, the early 200s, and you wont listen now. Stupid.

Review all of the past "improvements" these agencies have posed or implemented in the past and ask yourself how this change enhances the appraisal process and additionally protects the consumer. It does not and will not.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

There is more to evaluating real estate than data collection and analyzing data. There is more to appraising than one approach to value. If you a professional and are concern about providing a quality evaluation and estimate of value this is not the direction to go in.

After reviewing full appraisals which have many issues, it is impossible to believe that doing these will not expose the appraiser to liability and/or loss of license.

The slipper slope is before the profession, once Appraising heads down this path of "easy for the client /Lender". its all over Why do appraisers need to make it easy for the Lender , they don't care about appraisals, and the regulations the profession has to follow they just want to close the Loan and move on to the next one . Get rid of the commission out of the Lending and real estate game , its a source of greed and brings out the worst in people . Lenders, real estate agent, and appraisers should be working together for the good of the people, but instead we are adverse to each other . The good of the people and society is not being served , and this bifurcated process is just another way to get rid of appraisal profession , or put it in a box

bad idea

As a profession we have been down this road before. There was a time that trainees could inspect alone. After the market crashed, many lenders refused any trainee assistance, and absolutely would not accept a trainee doing the field work alone. The bifurcated appraisal is just a different name for something we did years ago and was rejected by fannie&freddie. VA and FHA have always required the signing appraiser on every field inspection. We all know there is a reason why. The bifurcated appraisal apparently is the brainchild of someone that has not been in this business for very long or they would remember AVMS and trainee inspections and what a mess they caused. This is just a new name for an old game that didn't work then, wont work now. Of course they will go down that road again...and when the market shifts, it will be the appraisers fault and when the foreclosures start pouring in, the lenders will reverse course and want full appraisals just as they did before.

The process and even the forms being used for the inspections need standardization. Realtors / inspectors generally provide only what is asked of them. For example on a corner lot, they don't drive around the corner and take a rear photo if not specifically requested. Borrowers have told me that they find if offensive when an inspector spends less than 10 minutes in the home, doesn't measure the finished basement area and are uninterested in hearing about recent improvements etc. Lazy inspectors is a problem. Outbuildings aren't shot, dwelling measurements tend to lack detail, minimal commentary provided about features and finishes. Still getting opinions of condition and quality rather than just neutral commentary on what was observed.

As a highly trained professional with 20 years of experience, I would not expose myself to the long term risks involved with these types of products. Out training and mindset goes against cutting corners and supplying sub par information. Without seeing a property myself at least from the exterior and considering the neighborhood surrounding it, I would never put my name on it as a credible report



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Two different people, two different opinions, two different time frames...not sure how this would be a good solution.
None
I typically deliver a full report 48 hours after inspection. That is faster than any title company delivers a title report.
This is another step in deregulation of the industry as a whole. We must have proper checks and balances. Appraiser's and full appraisals are one step in the process. Each appraiser must complete their own data collection and not from a third party that may or may not have an interest in the subject in question. The most people involved in the data collection, the more tainted it can become.
This would be a terrible process for appraisals. Appraisers must physically inspect the properties they appraise, as it is one of the most important steps of an appraisal. Also, will have constant delays as appraisers wait on the physical part to get done. There are plenty of times I can work in an appraisal early, but if I have to wait for another person to do the physical part, it could delay other appraisals I am trying to get completed. The appraisal process should not be changed.
Whoever is doing the PDC does not know how to measure. They are always off, sometimes over 100sf from the assessor. The lender wants the appraiser to use that number anyway. Also, these numbers are being ROUNDED.
I just think if they want a lower and faster appraisal lenders could simply reduce the scope of work for the 1004 by eliminating driving by the comparable sales. In my area AVM's don't work anyway due to lack of comparable data in a rural market. I don't see how having someone not an appraiser do inspections will lead to greater credibility. And I don't see how I can give a Condition rating based upon pictures alone. Too many things don't show up on pictures.
It appears that Fannie Mae is trying to circumvent the appraiser in order to make the process go faster. We have seen in the past what happens when the secondary market and bankers have control. Some things should not be rushed just for the sake of a quicker turn around, the mortgage process is one of these things. I see another bailout coming in the future.
"Speeding up" the appraisal process is never a good thing just to save a buck.
The amount of money saved is not worth the effort. Either do a full appraisal or skip it altogether. Ken MacDonough SRA, CRP
It is ridiculous to think that adding another person in the process will speed up the process. This a ploy for the AMCs to make more money, I'm being offered \$20 to inspect and \$80 to do the appraisal. My opinion of value, regardless of how I communicate it is worth much more than \$80. The AMC is the only one benefiting from this process because the borrower gets a poorly done appraisal without understanding the concept of a diminished scope of work. As more consumers see these reports, with their inherent inaccuracies, the public trust in appraisers will plummet.
Most appraisers will not do this; thus it cannot fly without appraiser acceptance. There is a danger to consumers with lack of competency (it is what they are not seeing that is the issue)



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

It's unlikely turn times of receiving reports will be reduced. Chances are turn times will be extended due to coordinating schedules and syncing with the inspector and analyst.

I think they could be of benefit in a small number of instances but the potential liability must be worked out before appraisers should embrace them.

I think bifurcated appraisals put the entire industry at risk

I still have yet to have anyone with common sense and logical reasoning support why in the world I would depend on another person to relay pertinent data to me, to develop a reliable and SUPPORTABLE opinion of value. Lenders won't let an appraiser rely on a satellite image to check the surrounding area of a comparable used instead of driving by physically, but will allow "John the landscaper" to go take photos and complete an inspection of a home for the appraiser, This whole thing is a complete joke, and I'd love to tell someone that actually mattered why. In addition, living in an appraisal era of CONSTANT SCRUTINY from lenders and Fannie about every little detail in appraisals and adjustments, it's mind blowing to me they are ok with paying someone who is not even a Realtor, much less an appraiser to go determine conditions, finishes, and updates. Not even taking into account external obsolescence's and factors appraisers have spent YEARS determining, analyzing and reporting. This is nothing more than a way for lenders to try to save a dollar or a day on turn time while putting the same liability on the ignorant and misguided appraiser who chooses to participate in this appraisal form/type. Here's an idea, instead of lenders paying "Reasonable fees" that are determined from affected data in the first place, pay a reasonable fee for the time needed to complete and satisfy tons of requirements, tons of miles on a car, and liability that is commensurate with let's say what a plumber makes these days, not a fee that mirrors what my dad was charging for appraisals in the 1980's. Respectfully, Burt Smith

I have seen two of these products. One as an owner (refi for line of credit). The bifurcated appraisal was full of wrong information (including home having a two car garage when it did not) and was done by an appraiser located three hours away. The second one was handed to me by an owner when I was doing an appraisal inspection. It was a manufactured home with a stick built addition. The bifurcated appraisal did not mention the addition (even though it was obvious), did not mention the location on a highway, or that the property bordered a gas station. This is such a low quality product that attracts only greedy appraisers located far away - it will reduce the credibility of the whole industry. It only takes 1% of the appraisers out there to process these paper mill low quality junk appraisals - the industry will get the product but the appraisers credibility will forever be damaged and used as a reason to get rid of the profession as a whole.

Cheap and fast always precludes quality

It's just a bad idea - period

Appraiser time still includes verification of the data submitted and in the AMC world of how fast and how cheap are you willing to work I feel more work less pay is what will result



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The inspection is a fraction of the time it takes to complete a USPAP compliant appraisal if done correctly. The inspection would not speed the process as it would take additional time to verify all of the field information thoroughly. The subject is the what we are appraising. We need to ensure that the person placing an opinion of value on it completely understands are aspects of it.

Appraisals should be objective, quality should trump speed, appraisal fee should go to appraiser and not a pimp taken a share of our work

Hate to see the profession of real estate appraisals going the way it is going. Dumbing down the appraisal industry, reducing experience, reducing education, etc... Industry will have no one to blame next time there is a real estate bust. Wish I had chosen a different career 30+ years ago.

I believe bifurcation is to provide the lender an opportunity to avoid ordering an appraisal when certain requirements are met by the borrower or the subject property. It may significantly reduce the number of available appraisal orders in the industry. Having said that, I cannot say that this is a bad decision on the part of the lender. There is a lot of data available and the only wild card is the condition or uniqueness of the property. If they can determine the subject property is typical and in reasonable condition an appraisal may not be necessary. I would like to see only appraisers doing the data collection/inspection however.

Why get a value opinion at all? 34 plus years in the profession, i am constantly surprised at how good bad homes look in photos and how bad good homes look in photos...also, I've done a considerable number of review reports have found very selective photos taken by appraisers. This is a complete waste of money and time and will produce extremely non-credible reports in most market. Granted, I will do them, but the results will be extremely poor.

If someone is going through the property, it might as well be the appraiser. Experienced appraisers see things in inspections that others may not see or understand.

Ironic that the appraisal process is being vilified as the scourge of the residential lending process. Not agents, not mortgage brokers, not predatory lenders. The only party whom is assigned to be an impartial and unbiased professional is the problem. We're already the most regulated and scrutinized party in the process. Another case of trying to put the fox in charge of the hen house. Pathetic

Dont like them!

REAL professional Appraisers CANNOT possibly endorse these types of reports. DANGER, DANGER DANGER. It completely DUMBS DOWN our profession. LETS ALL JUST CUT OUR FEES SOME MORE and PUT OURSELVES AT ADDITIONAL RISK. Foolish, unqualified, uninformed, desperate appraisers WILL DO THESE to make a buck. AND, our software providers are doing us a disservice by "cowing-down" to the AMC (who invented this garbage) and creating forms that LOOK LIKE they are USPAP approved or protected. When or IF the housing market collapses again (because lenders continue to make stupid loans); these types of reports will be GREAT ammunition when the lender decides the appraiser(s) is/are to blame.

State regulatory agencies are staring to come out and say that the appraiser is responsible and liable for third party data they use. I'm never going to take on that liability.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

50 years in this industry - let them do this.. next generation will truly be looking for a new occupation

It is the nature of the lending beast. Within a few years, the appraiser as we know it will not exist. I am fortunate that I am at the end of my appraisal career (40 Years). I am willing to complete these however, the fee is typical inadequate. Thanks, Craig Davis

GET RID OF THIS PROGRAM ASAP.

The public will suffer from this product in the form of another national real estate crisis due to the lack of a disinterested 3rd party reviewing the transaction.

Everyone thought the last crash in the housing market was bad, wait until the next one if the bifurcation appraisals become very popular. If I as an appraiser was going to get a more loan on one of my properties I'd tell the lender !#@\$ no if they even mentioned a bifurcation!!!

I believe this will lead to yet another economic crash

This seems to be a great way to make an appraisal much more inconsistent. An appraiser needs to understand every aspect of the property in order to derive an accurate estimate of value. This feels like an additional way to cheapen a current appraisal in order to replace the appraisal completely in the future. This will not improve quality or add any additional "speed" to an appraisal. This will obviously reduce the cost but already being one of the cheapest parts of a purchase transaction this seems like a mute point. The removal of appraisers is less about cost and more about lenders getting what they want every time with zero checks and balances.

IF the appraiser who is signing does not take the time to see the property themselves and rely on the shortcut of using data that Fannie Mae provides it will end up at the detriment of the borrowers. I have seen far too many instances of even appraisers who I knew their data was inaccurate for a various number of reasons. I will not sign any appraisal that I do not personally inspect whether it be a full inspection or if an exterior only is requested by the client. Fannie Mae had to be bailed out for a reason and I won't be participating in anything leading up to another bail out at the expense of tax payers, borrowers and originators.

Birucated appraisals are bad for the Real Estate industry. Waiving appraisal requirement will result in inflated sale prices and quickly result in another housing crash.

I've only been a licensed appraiser for about a year. I do think the industry is ready for a change, but not sure if this is quite it. I'm afraid adding multiple components/people will slow down and complicate the process. I still see quite a few appraisers just shooting for the purchase price or way too large of a gap between value opinions between two appraisers in the same market. I think we either need to have the homes appraised prior to being out on the market or even giving a range of value prior to listing. I think the best way would be to use Analytics, similar to Cambridge Analytica to determine what a potential buyer would be willing to pay based on purchase history in the area, online searches, or surveys while on zillow, realtor.com or some of the other sites. Sorry for the rambling or jumbled thoughts! Good luck.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

The fees paid for these type of products along with the liability do not make these type of products feasible for a self employed appraiser. It is just another move on taking away customary and reasonable appraiser fees.
History always seems to repeat itself, remember the S & L bailout and the 2008 Wall Street melt down. You get what you pay for!
Very sad the way the appraisal process is going
It is reviewing the sale contract that slows down submitting appraisal reports for purchases. I finish reports and then have to wait for the attorneys to finish changing commas to semicolons in the P&S so I can review it. That is the delay in the appraisal process for all of my purchase assignments.
We've provided bifurcated for two companies. If I were to attempt that with ANY of our 4 current assignments, they would all be missing vital information about view, slope, condition, and more--and at least one of the contract prices would not be supported if we hadn't analyzed a great deal BEFORE site visit, to raise appropriate questions (the "appraisal problem").
Part of the appraisal process is seeing and witnessing the property "and it's surroundings". You are going to have appraisers from all over the place trying to do desktop type appraisals in areas they are not geographically with without having to come into the area and become familiar with the various neighborhoods and their differences. I do not want anyone picking comps. for me. This is already a problem in our area and getting worse.
Appraisers screwed again. Glad I am old.
It seems to me like the lender is only trying to save money I believe this will be a disaster when the market takes a downturn
If the appraiser does not complete the assignment for 100% of the job, then that report will always be subject to possible errors or violations. Photos provided by someone else can always be altered. Just as the do in the mls today
Significant concern is the reliability of the PDC and their qualifications, expertise. If it were a team set up where the appraisers get to meet the PDC inspectors it could increase synergy.
The total cost of the PDC and the Appraiser review will be more than a full appraisal by an appraiser- Will not decrease the time get the PDC and Appraisal review over a regular appraisal
Very risky, for appraiser's, for FNMA and for the tax payer, since the tax payer bailed FNMA out last time.
Another way for lenders to be assured that the appraisal process will not interfere with the loan.
think bad for the consumer, bad for the industry. But also guessing no stopping this train.
This is dumbing down of the appraisal industry and will create distrust in the profession. I took a test run of a few and it was horrible. No credible property info and it actually took longer to complete waiting on physical data.
I believe that as long as the property data collector is a licensed/certified appraiser, then a bifurcated appraisal is the way to go in the future.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

This will have long term adverse affects on the industry. Having the experience of both field work and office work helps an appraiser better learn markets. This includes conversations with market participants. Separating that aspect will basically make appraisers computers who are in the office. At that point, what is the purpose of in office appraiser

this process will not correctly report a property since Appr #2 will be making too many assumptions and non-appraisers will be not held accountable to the ethical integrity appraisers have had for years for correct reporting. Borrowers and Realtors protesting a report that was performed this way will increase and result in delays and more expense when it results in a full inspection the way it has been done for years in the end anyway. This is nothing but a plan to cut out the appraiser at some point in the future and the appraisal profession will become obsolete.

I currently value properties (for insurable value) where I must occasionally rely on another individual (lic. as a contractor) to inspect, photograph & measure the Subject property. Nine times out of ten, the photos fail to include relevant data, the inspection report lacks detail & measurements are inaccurate - leaving me to require a 2nd inspection where I gather this information myself.

What will the fees be for each process?

A train wreck waiting to happen.

In rural areas the online map source views are very often obscured by forests, mountain shadows, etc, with no clear view of the Subject or surrounding properties Similar to hay that has been eaten by horses and left on the road after digestion.

We as professionals need to stop allowing our work to be used to put us out of business.

I think an exterior appraisal performed by the appraiser can be faster and more accurate than a drive-by performed by a third party with appraiser market analysis.

This is the first step to disaster. With so low fees you will get work of the same low quality. Speed will take over quality.

I will retire from the business first

N/A

Appraisers need a lobbyist to voice or dilemma to Congress otherwise we are going to die.

More bullshit to steal what's left of our businesses. Aren't thes fucking crooked amcs enough?

Why is this even being considered??

Why work for almost nothing, the AMC's took most of our profit, and now this to take the rest. Glad I'm retiring soon.

Doesn't matter what I think! If I want to stay in business I have to go with the flow

I will not sign my name to a Report and risk my License by offering an opinion of value on a property I have not inspected myself.

Regardless of the source of the information/input, I am still required to corroborate/validate all information so time savings are minimized.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

Horrible idea. There should only be 1 appraiser involved in the process. If you want to lower costs and speed up the process, remove the amcs from the equation. In most cases, the appraiser is required to supervise everyone in the process. And you do a whole hell of a lot more than just collect data when you do the field inspection portion of the appraisal.

I AGREE WITH RICHARD HAGAR, WE ARE HEADING FOR A TRAIN WRECK.

I have reviewed dozens of Bifurcated appraisals and NONE have meet USPAP or State appraisal requirements.

Does anyone know what the projected fees will be for these new products?

FNMA hasn't learned its lesson from the last foreclosure crisis.How does it make sense to take inspection/collections & a full report out of licensed professional's hands.

FNMA gave us subprime, NINJA etc how did that turnout?

I was always against this type of thing until age and disability kicked in. Now I can continue to use my 30+ years of appraisal expertise from my desk. I find the stimulation of continued work outweighs the frustration of not being mobile enough to go into the field.

It will most certainly extend turn times by the time they actually decide an Appraisal is required. This will lead to more complaints about appraisals taking to long to receive. Also - will the general public be educated on the process? The average homeowner will believe the dta collector si the Apprasier. This is already happening the dta collector is calling adn setting up an appointment for the "Appraisal". Misleading at best. The entire issue is exaggerated. This will not save the borrower money. Eliminating AMCs would save time and 100's ofdollars!

Cost and speed are nearly always priority 1 & 2 to lenders; however having 2 people complete a report (assuming an appraisal is necessary) takes time and both people need to be paid. I have completed these in the past and found the data that was provided by the "field inspector" was lacking in detail (the subject property itself and the neighborhood). I also found from several lenders that I worked with that we were expected to value unique properties without seeing them (ex. lakefront where neighborhood values ranged from the mid-100's to well over 5 million; all properties on the lake). Certainly a cost savings when a full appraisal for these types of properties would be well over \$1,000 but a desktop can be done for \$50. If the industry moves to a majority bifurcated appraisal model, in order to remain employed, I would consider inspecting the property but am very hesitant to return to completing the valuation portion.

I see no significant need to do this. If appraisers will be doing the data collection, why split it? It just seems like a plan to not do appraisals as often. Many appraisers will have to retire or quit due to loss of income. Lenders will increase their risk. A greater shortage of appraisers will cause longer turn times & getting reports sooner will likely not happen. It looks like a way for AMCs & others to lower fees. Few good appraisers will stay.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION
ONLINE (\$238 VALUE)**

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

THE EXAMINER, appraiser contacted to complete the desk portion. Subject photos from the Dirt Road: a house in a pasture with cows enclosed by a barbed-wire fence & obvious-numerous deferred conditions to the aged structure. The comps: on Lake Badin, obvious different H&B use. Where is Lake Badin? GEO-not competent & I never heard of the AMC-Lender. I did indicate this service should have never been ordered & should never be less than a 1004 Form report. ** THIS should have been "properly vetted" by Fannies great new system. This is going to happen often. No doubt, Lenders & AMCs will abuse this system. PUBLIC, the borrower is the BIGGEST Looser. I don't believe "appraisers" can complete enough (A or B) OR even be offered enough in number: to remain in the costly appraisal business. Software this year: \$1500 = 20 \$75 reports, the going offer for the desktop version. They say it only takes 45- 1 hour to complete once you get going. 20 hours = _@3_ days. How about costs for E&O(s), CE, licenses, operating costs, etc. \$75 is what the AMC is offering. AMC Third Party keeps all of the PROFIT. I do not believe EXTERNAL influences to market value will be known. Eyes are the best H & B use method to know the house next door is NOT typical & WHY it influences the subject's value. Considerations impacting value: numerous unknowns until "viewed". What if the house next door is the subject? Again: Lenders & AMCs will abuse this system. I have seen where the borrower was charged \$675 for the loan's appraisal, a desk-top version was ordered, & the appraiser was offered \$75. Sounds like a scam: the lender & AMC keep the profit. THE FAKE NEWS: Reality: Appraiser's DUE DATES will not allow for the FAKE news of takes TOO long & fees too HIGH. AMCs can take extra days to find an appraiser willing to accept embarrassingly low offer FEES (a must to pay the bills). The PUBLIC borrower has NO idea, they think it is an "appraisal" (like a 1004 Form) & by no choice of OURS ...we are part of the scam in their eyes. Appraisers are the ONLY ones with license & where Appraiser's must HOLD the paper for a minimum of 5 YEARS. All of my clients have 5-7 day turn with a clock that never stops. Please tell me HOW any appraiser can "keep a business open" where turn-times are weeks-months. That was FAKE NEWS. Too HIGH: well

Curious, but concerned. I know that in my local market the data provided through the MLS is generally 50% inaccurate to some degree. Local real estate agents have been told "not to measure residences", as this can potentially put the in a liability situation, a good many of these real estate agents hire appraiser's to measure. Having been in this business for 30 years, I would certainly feel more comfortable with data from an appraiser/appraiser trainee, or my data files before I rely on real estate agents. Also, in my rural market, I have spoken with some agents and they state that they would not want to participate in gathering data, based on \$ and accuracy liability

When FNMA crashes again. Tax payers should not bail them out again.

bad idea, risky, back to the same old tricks

If local MLS data is showing the pattern of so called real estate professionals collection of data we are in very big trouble. MLS data is very hard to verify with the amount of errors and the local MLS not being able to force creditable data by the Realtors because they make their own Bi-laws to protect themselves. I see no difference in other less qualified third parties collecting data. Garbage in, garbage out

"Want it fast, want it now" does not equal appraisal quality. Borrower's should demand a real appraisal. It's in their best interest. The banks don't care.



You Can Enjoy...

**FREE 14 HOURS
CONTINUING EDUCATION**

ONLINE (\$238 VALUE)

Courses:

- **How to Raise Appraisal Quality & Minimize Risk (7 Hrs)**
- **FHA Appraisal Standards (7 Hrs)**

Shop Insurance with OREP Today!

CLICK NOW!

