

From: Dan Lindeman <dan@empireappraisalgroup.com>
Sent: Monday, June 12, 2023 12:03 PM
To: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064-ZA36

To whom it may concern:

I have been a full time certified residential appraiser in the state of Florida since 2005. Regarding the reconsideration of value, most lenders already have an ROV process in place so I am not sure what additional regulations are needed now. Having completed many ROV requests for lenders, it has been my experience that the borrower only cares about the final value and nothing else. In the ROV the borrower or agent will submit sales from the area just based on the sale price alone and overlook the similar sales, all they care about is making the deal happen, they are not interested in an accurate opinion of value they just want a number hit so they can buy the house of refi at their best LTV. In very rare cases is a sale overlooked which would require the opinion of value to be changed. I would follow the same value appeal process that the VA uses, tidewater. If an appraiser knows the value on a sale will be lower than the purchase price, they reach out to the agent and request additional info to see if anything was missed. That should be the same process for FHA and Conventional loans. On a sale transaction the appeal process can be avoided if the agent does their job by supplying the appraiser with the contract and all addendums, a list of the home's updates / improvements, surveys, and then a list of a couple recent sales or pendings which they used to price the home. This way here the appraiser considers all the information and an ROV is not needed if the appraisal comes in lower than the clients expectations. Additionally instead of a ROV, allow the consumer to hire their own appraiser and provide that to the lender if they disagree on the lender's appraisal. With the AMC model most of the time a qualified appraiser is not sought out, the goal of the AMC is profit margin and oftentimes it's just the lowest bidding appraiser they select and not the most qualified, this I feel is the biggest issue for consumers. Let the consumer or lender hire the appraiser directly again and you will see this issue resolve itself. Also, better consumer education is needed about the appraisal process. Consumers do not know about the appraisal process and if they were educated they would understand how an appraisal is completed and what sales are comparables then they would understand. Also, if an appraisal is completed for a lender the appraiser is not permitted to discuss the results with the borrower, this is a huge disservice to the borrower. Instead of a ROV, the borrower should call the appraiser and ask questions and then if they are not satisfied then complete a ROV or allow another appraisal to be ordered. An appraisal is just an opinion of value after looking at the data from the area. Every appraiser views the data differently. I enjoy doing non lending appraisal assignments because I can explain the process to the consumer and then they can review the final report and ask questions, then they fully understand. They may not like my opinion of value but they will at least know how I arrived at it so they are fully informed and this is how they become an educated consumer.

Thank you,

Daniel Lindeman

Empire Appraisal Group, Inc.

8492 NW 15th Ct
Coral Springs, FL 33071
Direct: (561) 441-9298
www.EmpireAppraisalGroup.com