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Oregon Legislature:

I've been appraising 40 yrs in Oregon, in Eugene, Portland, Salem, and currently in Hermiston-Pendleton and Tri-Cities area of WA. Appraisal changed drastically a few years ago. I keep hearing some appraisers are still doing one or two reports per day but I don't see how, as so much more detail is wanted. I struggle to get 3 done a week, and that is working weekends to do them. I think part of the reason is that my reports are 50 to 60 pages as the narratives are long, and all the information has to be researched. I look at far more sales than are in the reports, and the sales analysis takes a lot of time. I think if you were to compare my reports with someone who says they are doing 5 to 10 appraisals a week there would be a big difference in what is in the reports. I don't know how other appraisers skimp on what is included, or skimp on the research, as everything I do is required. There is a good chance if the reports done quickly by some appraisers are reviewed by the ACLB, they may not pass muster. And, who is to say they are accurate? It takes a lot of time to develop the analysis in each report, and any appraiser doing that analysis quickly, without studying a lot of sales and listings on each assignment, may not be developing an accurate valuation. As I hear time and time again in the field.

This leads to inconsistency. I can't see how it is possible for the ACLB to develop fees. A few years ago, AMC's developed fees, and they were based on the cheapest fees they found, generally from starter appraiser's who were hungry for business. Many of those appraisers did not belong in the appraisal business as their work was so poor and inaccurate. They accepted fees that did not support a business expense wise. For many years I was getting less fees than I did 18 years previously, and expenses had risen a lot. It was very difficult to stay in a business that wasn't being supported financially. Now I am experiencing a time where fees are up, but there is more demand for what is in the report, and I can't do as many appraisals per week as I used to do. My reports from 20 years ago look scant compared to the reports I do now.

I don't see how the ACLB can possibly regulate fees. I have a set fee for residential that goes upwards if the property is more complex, or located in an area where it is difficult to find sales. Fees can vary property to property. I think it should be required for the AMC to disclose their fee separately from the appraisal, and leave it at that.

The appraiser should be the one to determine what the appraisal fee is.

The AMC's and lenders I work for contact many appraisers for each assignment and they get turn around times and fees from each. They base their decision on which appraiser to select for each assignment on the appraiser that best suits their needs. The appraisers they contact are already on their appraiser panel. I think the issue of fees should be left alone, as the market is already dictating fees, except that the AMC fee should be separate from the appraisal fee. The ACLB has no idea of what fees to charge as it varies all over the state.

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