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Gettysburg, PA
(717) 338-0400



January 17, 2024

Independent Regulatory Review Commission
333 Market Street,
14th Floor,
Harrisburg, PA 17101

Via Email to: irrc@irrc.state.pa.us

**Re: No. 3393 State Board of Certified Real Estate Appraisers #16A-7031:
Federally Mandated Revisions**

Dear Commission Members:

The Coalition of Pennsylvania Real Estate Appraisers (CPREA), consisting of the Keystone, Philadelphia Metropolitan, and Western Pennsylvania chapters of the Appraisal Institute appreciates the opportunity to provide written support for IRRC #3393, State Board of Certified Real Estate Appraisers #16A-7031: Federally Mandated Revisions that will be considered by the Commission on January 25, 2024.

These rules, as adopted by the State Board of Certified Real Estate Appraisers (BCREA), will require completion of an Appraiser Qualification Board (AQB) approved continuing education course on valuation bias and fair housing laws and regulations as a condition of renewal of an appraiser certificate or license beginning with the 2025-2027 biennial renewal period. The course is required to be 7 hours in length for the 2025-2027 biennium, and 4 hours in length for each subsequent biennial renewal period. These rules are necessary in order for the Commonwealth to remain in compliance with the federal Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as well as the *Real Property Appraiser Qualification Criteria* adopted by the AQB.

Valuation bias and discrimination have no place in the real estate appraisal and valuation processes. On-going continuing education will help appraisers to identify and interrupt any unconscious and implicit biases that they may have so that they do not inadvertently and unintentionally become part of an appraiser's work. In addition, continuing education will help to ensure that all appraisers are aware of, and stay abreast of any changes in, federal and state fair housing laws and regulations.

CPREA participated in several BCREA meetings where these regulations were discussed and provided extensive feedback to the board when the regulations were in

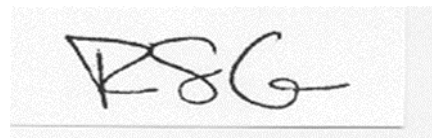
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draft form. CPREA applauds the BCREA for adopting these regulations prior to the AQB mandatory implementation date of January 1, 2026.

We also support the other proposed rule changes included in the package, including allowing an appraiser who has had a license or certificate refused, denied, cancelled, suspended, revoked, or voluntarily surrendered for a non-substantive reason to serve as an owner or key person of an appraisal management company seeking to be licensed in the Commonwealth.

CPREA appreciates the opportunity to offer its support for these regulations. If you have any questions or need additional information regarding the impact that these proposed rule changes will have on appraisers, please contact me at (717) 338-0400 or via email to scotthartman@cbbigham.com.

Regards,

A handwritten signature in black ink, appearing to read "RSG", is positioned above a horizontal line. The signature is written in a cursive, somewhat stylized font.

R. Scott Harman, SRA
CPREA Chair

cc: Mark V. Smeltzer, Sr., Chair, BCREA
Ronald K. Rouse, Esq. Board Counsel, BCREA
Jacqueline A. Wolfgang, Esq. -Regulatory Counsel – Department of State