



May 22, 2023

Ms. Lori Schuster  
Management and Program Analyst  
Appraisal Subcommittee  
1325 G Street NW, Suite 500  
Washington, DC 20005

Docket No.: AS23-02

Dear Ms. Schuster:

On behalf of the 16,000 professionals of the Appraisal Institute, thank you for the opportunity to comment on the Appraisal Subcommittee's ("ASC") proposed appraisal profession survey.

We note the proposed survey does not include appraisers working in commercial real estate appraisal, which unnecessarily limits the information to the ASC. We encourage the ASC to reconsider inclusion of commercial property appraisers to compile a more complete picture of the appraisal profession.

Further, we see some value in the ASC conducting a longitudinal study within the scope of the survey. In a longitudinal study, researchers repeatedly examine the same individuals to detect any changes that might occur over a period. This method would provide a wealth of information on what a prospective appraiser goes through during professional development and in the course of becoming a credentialed appraiser.

Lastly, we note the ASC frequently cites the Bureau of Labor Statistics (BLS) property appraiser and assessor data in its public commentary on the real property appraiser profession. The BLS data includes personal property appraisers and assessors in its compilations, which is beyond those performing appraisals of federally related transactions or for loan purchase to the government sponsored enterprises or for loan guarantee programs. We recommend the ASC reevaluate use of these statistics in reference to appraiser population and demographics as they may not accurately reflect the makeup of appraisers under the purview of the ASC.

Thank you again for the opportunity to comment. Should you have any questions, please contact Bill Garber, Director of Government and External Relations, Appraisal Institute, at 202-298-5586 or [bgarber@appraisalinstitute.org](mailto:bgarber@appraisalinstitute.org), or Brian Rodgers, Manager of Federal Affairs, Appraisal Institute, at 202-298-5597 or [brodgers@appraisalinstitute.org](mailto:brodgers@appraisalinstitute.org).

Sincerely,

Appraisal Institute