

Delaware Chapter of the Appraisal Institute

Q3 September 2026 Newsletter

President's Message

I hope everyone has had a joyful and relaxing summer; we are quickly approaching the end of summer and the start of the new school year.

We are all moving into the renewal year for state continuing education credits for the various states in which we practice. The Delaware Chapter will be offering the Delaware Rules & Regulation 2 hour seminar twice in 2027-- once in person and once via zoom. The chapter will also offer the 2 hour Pennsylvania State Board of Certified Real Appraisers Update seminar and the New Jersey Rules and Regulations 2 hour seminar. These are all going to be available for all those who practice in these three states.

The Chapter is also in the process of developing a chapter generated 2 hour seminar, titled A Brokers Panel on New Castle County Real Estate. This will be held in the fall. The chapter is also going to sponsor two new national programs synchronously: a 4 hour seminar titled Valuing Solar PV Methods, Market Support and Free Tools and a 7 hour seminar titled Appraising Senior Housing and Nursing Homes. If any member has an idea for a chapter generated seminar on a local or regional topic, along with a national seminar that has premiered, please feel free to contact Lisa Weiss or myself with the particulars.

In closing, the Delaware Chapter appreciates your support and participation in chapter related functions and continuing education offerings. Without all of your support, we wouldn't be as successful as a chapter as we are! Be safe in your travels and we look forward to a successful fall.

Thank you, Jim Mullin, SRA

Chapter Website!

<https://www.appraisalinstitute.org/chapters/delaware>



Visit the site often and stay current on chapter affairs!

Delaware Chapter 2026 Education Scholarship

Delaware Chapter members, in good standing with the Appraisal Institute, can apply for funding from this scholarship fund by submitting an application. This scholarship fund is available for this year only, based on recent profits with chapter educational offerings.

Continuance of this fund will be reconsidered on an annual basis. For the application, email Lisamay.weiss@appraisalinstitute.org

Interesting Article

Appraisal Institute instructor and friend of the chapter Woody Fincham, SRA, AI-RRS, has recently posted an article "The Quiet Upside of UAD 3.6 -- and the Fight Over Who Pays for It." You can read it here:

https://www.linkedin.com/pulse/quiet-upside-uad-36-fight-over-who-pays-woody-tzsie?utm_source=share&utm_medium=member_ios&utm_campaign=share_via

Woody has also started a new blog. This is an outlet on industry and professional topics. You may be interested in signing up!

<https://remdamno557947.substack.com/subscribe?params=%5Bobject%20object%5D>

Membership with the Delaware Chapter has a LOT to offer!

- Scholarship funds are available to ANY chapter member for ANY Appraisal Institute educational offering! Apply, and the board will act based on current requests and finances—it's easy!
- Going for a designation? We'll help-- WE WANT YOU DESIGNATED!
- Mandatory Delaware Law seminars are FREE for Delaware Chapter members! (In 2025, the chapter also paid for Delaware Chapter members to take local offerings of the NJ and PA Law seminars!)
- Events—in person and on Zoom—offer chances for members to network.
- Weekly chapter email, keeping members informed on local, regional, and national information.
- Award-winning quarterly newsletter, filled with great information related to our profession.

Membership in the National Organization:

- Distinction in the marketplace: Appraisal Institute membership demonstrates pursuit of knowledge and excellence.
- Discounts on education: Appraisal Institute members receive discounted pricing on all education offerings.
- Find an Appraiser: The Appraisal Institute's Find an Appraiser tool helps the public find appraisers in their area.
- Scholarships: The national organization offers many scholarships in addition to those offered by our chapter.

The Delaware Chapter is lively and robust:

- Commitment to professional growth
- Willing to share knowledge
- Supporting the appraisal industry makes the Delaware Chapter alive and robust.

We're proud of our members... and look forward to welcoming new members!

Non-members: What are you waiting for? <https://www.appraisalinstitute.org/why-join>

New Chapter Website: <https://www.appraisalinstitute.org/chapters/delaware>



Delaware Chapter



EDUCATION INFO

Valuing Solar PV: Methods, Market Support, and Free Tools

A NEW Four-Hour Continuing Education Seminar for Residential and Commercial Appraisers

Friday, October 16 8:30am – 12:30pm Zoom

Instructed by Woody Fincham, SRA, AI-RRS

Registration coming soon!

Are you navigating the uncertainty surrounding solar photovoltaic (PV) adoption in residential and commercial real estate, changing solar incentives, shifting tax credits, and rising electricity costs? Are you unsure how to analyze or defend your opinion of the contributory value of solar PV systems in today's rapidly evolving real estate environment? This seminar is a dynamic, hands-on seminar designed for residential and commercial appraisers, real estate agents, reviewers, lenders, and solar professionals seeking practical, defensible, and market-supported approaches to basic PV valuation, list pricing, and cost/benefit analysis. Whether you have minimal exposure to solar systems or simply want to strengthen your technical competency, this program equips you with the tools to produce basic, credible, supported solar PV conclusions in both residential and commercial settings.

Why This Seminar Matter: Solar PV installations continue to expand across all property types. Appraisers who understand the mechanics, marketability, ownership structures, and economic impacts of PV systems are better positioned to produce credible analyses—and to differentiate themselves in a rapidly changing marketplace. Whether you're new to solar valuation or looking to sharpen your skills, this seminar delivers practical tools, real-world case studies, and professional insights that will immediately enhance the quality of your work.

USPAP NOTE: All materials will need to be purchased by the student directly from the Appraisal Foundation.
<https://appraisalfoundation.org/pages/store>

Are you currently working towards a designation? The chapter would like to assist you on your path towards this goal. Please email Lisa Weiss to get the ball rolling — WE WANT YOU DESIGNATED!

Putting Fannie Mae's \$3 Billion Appraisal Savings Estimate in Context

Published by The Appraisal Institute

Fannie Mae's second-quarter 2026 earnings report highlights what it describes as \$3 billion in estimated

borrower closing-cost savings from appraisal alternatives since 2018. The figure sounds substantial, but the limited methodology disclosed by Fannie Mae raises important questions about what the estimate represents and what conclusions policymakers should draw from it.

According to Fannie Mae, the estimate covers 5.34 million loans delivered between January 2018 and June 2026 and uses approximately \$550 as the weighted-average appraisal cost savings per loan. The \$3 billion figure therefore appears to be an estimate of appraisal fees borrowers did not pay, rather than a study of actual borrower charges, net savings or broader housing affordability outcomes.

The transaction mix is particularly important. Historically, appraisal waivers have been concentrated in refinances, especially rate-and-term transactions involving lower loan-to-value ratios, established payment histories and properties already represented in government-sponsored enterprise databases. During the 2020 refinancing surge, an Urban Institute analysis found that 63% of rate-and-term refinances received waivers, compared with 10% of purchase transactions.

More recent data from the AEI Housing Center show that this distinction continues. The combined GSE waiver share reached 28% in March 2026, up from 26% in February but still well below the nearly 50% peak recorded during the 2021 refinance boom. Freddie Mac's overall waiver share increased to 32%, while Fannie Mae's rose to 25%.

No-cash-out refinances remained the most waiver-intensive transactions. In March 2026, approximately 52% of Freddie Mac no-cash-out refinances and 48% of comparable Fannie Mae transactions used waivers. AEI attributed the overall increase both to higher waiver usage within loan categories and a modest shift toward refinances, where waivers are traditionally more common.

For these borrowers, the primary financial benefit generally comes from obtaining a lower interest rate or changing the loan term. The waiver removes one relatively small closing cost. The favorable collateral characteristics that make these transactions lower risk also help make a waiver possible. These circumstances do not necessarily support the same conclusions for purchase transactions, properties with limited market data or complex collateral.

Purchase waiver usage nevertheless warrants attention. In early 2025, Fannie Mae expanded eligibility to purchase certain loans with combined loan-to-value ratios between 80% and 90%. By March 2026, approximately 9% of those higher-leverage loans received waivers, compared with about 2% one year earlier. That increase represents a meaningful expansion beyond the lower-risk refinance transactions that likely produced much of Fannie Mae's historical savings estimate.

The calculation also combines value acceptance with value acceptance plus property data. These

programs are not costless. Property data collection carries a separate charge, yet Fannie Mae does not disclose how many of the 5.34 million transactions required that service or whether those costs were deducted. AEI reported that property-data alternatives remained a relatively small share of March 2026 originations, ranging from approximately 2% to 2.4% for Freddie Mac and 2.7% to 6.3% for Fannie Mae, depending on loan purpose.

Finally, the \$3 billion accumulated over eight and a half years. That equates to approximately \$353 million annually and about \$550 per participating borrower. The savings can matter to an individual consumer, but the aggregate total does not demonstrate a transformational reduction in national housing costs.

Appraisal alternatives can serve an appropriate role when carefully matched to collateral and transaction risk. A meaningful evaluation, however, requires Fannie Mae to disclose the savings by year, loan purpose, loan-to-value ratio, valuation option and actual borrower charge.

Without that information, the \$3 billion headline is better understood as a broad estimate of avoided fees than as evidence that appraisal alternatives have materially improved housing affordability.



WIN (Women's Initiative Network)
Zoom Speaker Series
Wednesday, October 7th at 2pm EST (1 hour)

Women in Agricultural Appraising

*Female Leadership *Agriculture
*Forest Service *Getting More Involved

Featured Speaker
Rebecca L. Stone, ARA
2026 ASFMRA President Elect
CEO/Certified General Appraiser

Questions? LisaMay.Weiss@appraisalinstitute.org

[Register here](#)

Tax Court Valuation Cases Put Highest and Best Use in the Spotlight

Recent Cases Point to a Recurring Judicial Focus
Published by The Appraisal Institute

In *Ranch Springs, LLC v. Commissioner*, the Tax Court evaluated a tract of vacant land purchased for roughly \$715,000 and valued at more than \$25.8 million about a year later. The court noted that the taxpayer had not filed a rezoning application or taken meaningful steps toward quarry approvals, but the larger problem was the appraisal's treatment of raw land as if it were an operating limestone business. The court rejected the owner-operator income approach as "wholly illogical and erroneous as a matter of law" because it equated the value of property rights with

the projected value of a hypothetical business enterprise.

That distinction matters. Conservation easement valuation focuses on the fair market value of the real property interests conveyed and retained. When an appraisal assumes a future quarry, mine, subdivision, or other alternative use, courts may look for support beyond physical adaptability, including evidence related to legal permissibility, physical possibility, financial feasibility, market demand, and a realistic path from the property's current condition to the asserted highest and best use.

Highest and Best Use and "Reasonably Probable"

The Appraisal Institute's Body of Knowledge, including *The Appraisal of Real Estate*, has long recognized that a property's highest and best use may differ from its current legal use when a zoning change, permit, variance, or other governmental approval is reasonably probable. That concept does not require certainty, nor does it assume every approval has already been secured. Instead, it asks whether knowledgeable market participants, as of the appraisal's effective date, would reasonably anticipate the change and reflect that potential in the price they would pay.

Because this issue is now arising in tax litigation, the legal backdrop is also relevant. The "reasonably probable" concept in valuation has roots in eminent domain law. In *Olson v. United States*, the Supreme Court warned against allowing "mere speculation and conjecture" to guide value and excluded elements that depend on events that are possible but not fairly shown to be reasonably probable. In this context, the standard functions as an evidentiary guardrail against speculation; courts generally have not treated it as a strict mathematical threshold requiring proof of more than 50% odds.

That distinction matters when reading recent conservation easement cases. Decisions such as *Ranch Springs, LLC v. Commissioner*; *North Donald LA Property, LLC v. Commissioner*; *Rising Rock Partners, LLC v. Commissioner*; *Excelsior Aggregates, LLC v. Commissioner*; *Jackson Stone South, LLC v. Commissioner*; *Piton Holdings, LLC v. Commissioner*; and *Savannah Shoals, LLC v. Commissioner* show courts scrutinizing HBU opinions that depend on rezoning, mineral extraction, or future demand. But they should not be read as creating a universal rule that a rezoning application must always have been filed. The better reading is that each judge will examine the evidence and decide whether the asserted use rises above possibility or conjecture.

A useful counterpoint is *Townley v. United States*, a federal tax refund case involving Georgia granite-mining easements. There, the IRS sought summary judgment on the zoning issue, asking the court to rule

that the claimed mining HBU failed as a matter of law because no rezoning application had been filed. That position would appear difficult to reconcile with the Appraisal Institute Body of Knowledge's treatment of reasonable probability as a fact-specific market question rather than a bright-line procedural requirement. The court declined to resolve the issue against the taxpayers at summary judgment. The taxpayers offered evidence that a conditional use permit would be needed, nearby comparable active mines existed, and a local development authority chairperson had not indicated opposition. Citing *Palmer Ranch Holdings v. Commissioner*, the court concluded that a reasonable jury could find the needed zoning variance reasonably probable. Read in that procedural context, *Townley* illustrates that "reasonably probable" is not necessarily defeated by the absence of a filed application, although it still requires evidence beyond speculation.

The "100% Certainty" Assumption vs. Market Reality

Even if a zoning change or permit is reasonably probable, recent decisions suggest courts may question a valuation that treats the approval as though it were already a 100% certainty on the effective date. Recognized methods and techniques typically account for the risks, timing, costs, and uncertainty involved in obtaining the entitlement. A knowledgeable buyer generally would not pay the full "as-approved" value for land that still requires rezoning, permits, studies, community acceptance, financing, or time.

That is one reason *Ranch Springs* may be notable for appraisers. The problem was not merely that the taxpayer had not filed a rezoning application. The court also rejected an appraisal that effectively valued agricultural land as an active, fully permitted limestone business. When an HBU relies on a future approval, the valuation analysis may need to reflect market reality through appropriate risk adjustments, entitlement timing, holding costs, and a clear distinction between real property value and the value of a hypothetical operating business.

Core Takeaway

The recent cases should not be read as a panic over zoning paperwork or as a bright-line "filed application" requirement. They are better understood as a reminder that courts may examine whether the asserted highest and best use is persuasive, market-based, and tied to the property being appraised. The analysis generally turns on why the asserted use was reasonably probable as of the effective date and how the market would price the opportunity, the risk, and the time required to achieve it.

For members, these decisions may be useful to review in connection with how conservation easement appraisals explain the evidence behind any

"reasonably probable" use. Reports that clearly show what was known on the effective date, what market participants would likely have considered, why the asserted use was more than speculative, and how the valuation reflects both opportunity and risk may be better positioned to address the types of questions courts have raised in these cases.

Source note: This article draws on recent federal tax cases involving conservation easement valuations and highest and best use analysis, including *Ranch Springs, LLC v. Commissioner*; *Townley v. United States*, and related decisions. The discussion of "reasonably probable" highest and best use reflects appraisal practice as described in the Appraisal Institute Body of Knowledge, including *The Appraisal of Real Estate*, and relevant judicial treatment of speculative versus market-supported uses.



The **Volunteers of Distinction** program is back with a new look and a renewed commitment to celebrating the members who make the Appraisal Institute stronger. Do you know someone who consistently shows up for the profession, for their chapter, and for their community? Someone whose contributions make AI stronger but who rarely steps into the spotlight? Tell us about them. Any member in good standing may be nominated by a peer. Honorees are selected for their contributions to the Appraisal Institute, including to their chapters, as well as their service to the real estate valuation profession and their local communities. Nominations for Q3 close Sept. 15th.
https://www.appraisalinstitute.org/get-involved/awards-and-recognition/volunteers-of-distinction?utm_campaign=48897578-MBR+%7C+Volunteers+of+Distinction&utm_medium=email&utm_content=429485639&utm_source=hs_email&hsmi=429485639&hsenc=p2ANqtz-9OBvGAK_tnhYu9fiKiTnZj470xbr03vdBPvilaMKJfLr3yckmKN4ld2T5FkvVhjfbAT57FARIONzCa0cL_YdihEk3mIVf5-Vi-Z7nHmdNHi1Lna4&hsCtaAttrib=217240333208

Featured AI Benefits

<https://www.appraisalinstitute.org/insights-and-resources/resources/ai-professional-benefits/additional-benefits>

JurisPro Online Expert Witness Directory Discounted Listings

As an AI member, you will receive a \$50 discount to have your qualifications as an appraiser featured to over 800,000 attorneys by listing in the JurisPro Expert



Witness Directory. To receive your discount, please call (888) 905-4040, and let JurisPro know you are an Appraisal Institute member. To learn more, visit [JurisPro/Appraisal Institute \\$50 Discount](#).

Lenovo: Members of AI are eligible to save up to 50% off the everyday public web price of the entire line of Lenovo products, including laptops, tablets, desktops, accessories and more. Members also receive free



ground shipping on all web orders and can take advantage of monthly limited-time special

offers. Experience the Lenovo difference! For more information and easy ordering, call 1-800-426-7235.

News From National

On-Line Education:

Learn at your own pace anytime, anywhere.



Top-notch Appraisal

Institute courses and seminars come straight to your desktop with online education! Learn from any computer anywhere, whenever you have time. It's easy, convenient and a great way to get the education you want. Check out the current course listings now! <https://appraisalinstitute.org/education/search>

Online Education click-through URL: <https://appraisalinstitute.org/education>

Save the date: the 2027 Annual Conference is in New Orleans, April 26 – 28 at the Hyatt Regency

Last year, more than 580 valuation professionals joined us in Nashville. This year, we're bringing that same energy to Louisiana. Registration isn't open yet, but you don't have to wait. Get notified when Annual Conference registration opens: <https://vist.ly/5e9jc>

AI Veterans Program The Board has approved a full [Veterans Program](#), including a dedicated landing page and a scholarship covering the first two trainee courses. Results from a recent GI Bill readiness survey are helping shape future support and resources for veteran-focused initiatives.

New Sign-in Starting August 3, you saw a new sign-in page when logging into your Appraisal Institute account. This update strengthens security and gives you a more convenient way to sign in. No action is required. Your username and password will be carried over automatically. This upgrade provides a more secure, modern, and consistent way for our members and customers to access our digital services. What's changed?

- Enhanced security to better protect member and customer accounts.

- A modern sign-in experience with an updated look and feel.
- A scalable identity platform that makes it easier to integrate future customer-facing systems and services.

What you can expect:

- You will notice a new, streamlined sign-in page when they click Login on the Appraisal Institute website.
- You can continue signing in with their password or choose a new passwordless option that sends a secure code or sign-in link to their email.

The Appraisal Institute website and supporting applications continue to work as they did previously.

Appraiser Development Initiative The Appraiser Diversity Initiative is the premier nationwide program, designed to attract new entrants to the real estate appraisal field while fostering diversity in the profession. Working through the National Urban League's Regional Entrepreneurship Centers, the Appraiser Diversity Initiative is designed to reach diverse, talented candidates and educate them about the appraisal profession; provide resources for interested candidates to help them get on a path to success; and offer guidance from appraisers employed by Fannie Mae and Freddie Mac. <https://www.appraisalinstitute.org/advocacy/appraiser-development-initiative>

Find an Appraiser Directory

With a modern, streamlined experience & more powerful search capabilities, it's now easier for the public and industry professionals to find & connect with Appraisal Institute members. Take a few minutes to review and update your profile to improve your visibility and appear in relevant searches. **Visit the Support Center** for step-by-step guidance and short video tutorials to help you complete and optimize your profile.

Chapter Service Hours & Outside Education

Instructions on how you can enter outside Continuing Education and service hours can now be found here: <https://appraisalinstitute.org/why-join/join-pdfs/how-to-self-report-ce>. Chapter service falls under Service to the Appraisal Institute for Designated members and Associate members wishing to receive AI Continuing Education points for that service. AI professionals will need to submit those hours themselves by logging in to their AI account.

Webinars If you are wondering where you can find Appraisal Institute recorded webinars, they are accessible from the Appraisal Institute website under

the "Insights and Resources" section or by clicking here: <https://www.appraisalinstitute.org/education/training-topics>

Scholarships Appraisal Institute Education and Relief Foundation (AIERF) offers numerous scholarships for AI professionals pursuing either their designation or state certification. Additional information and submission requirements are available on the AIERF website. If you have any questions regarding the scholarships, please email ai erf@appraisalinstitute.org or call 312-335-4133. DON'T FORGET CHAPTER SCHOLARSHIP FUNDS!!!

Appraisal Institute Upcoming Events

October 1 AIERF Scholarships deadline
October 22-23 Chapter Leadership Program
Nov. 12-13 AI Board of Directors Q4 mtg
April 26, 2027 Joint Region Meeting, New Orleans
Apr. 27-28, '27 Annual Conference, New Orleans
May 26-28, '27 Leadership Development and Advisory Council (LDAC), Washington, D.C.

FREE Student Affiliate Membership!

No Annual Dues!
Access to the prestigious Lum Library!
Discounts on education & publications!
Complimentary Subscriptions to the award-winning Valuation magazine and The Appraisal Journal!
Access to many additional **AI Benefits!**

Questions? admissions@appraisalinstitute.org
(312) 335-4111

Membership Support Links

[Associate Member Policy Manual](#)
[Designated Member Statuses](#)
[Designated Member Readmission: An Overview](#)
[Candidate for Designation Policy Manual](#)
[Candidate Resources](#)
[AI Continuing Education Program Overview](#)

Appraisal Institute Insurance Trust

AI Insurance Trust (AIIT) is the exclusive insurance home for Appraisal Institute members. AIIT provides comprehensive insurance solutions, designed to keep your finances safe throughout every stage of your personal and professional life. And through the power of group purchasing, AIIT is able to offer plans at competitive, member-only rates. With insurance options for life, health, business, and more, AIIT is committed to helping keep your finances safe—no matter what life throws your way.
<https://aiinsurance trust.org/>

Help Shape 2027's Key Conversations

What conversations should the appraisal profession be having next year? The Call for Session Proposals is

now open for the 2027 Appraisal Institute Annual Conference, taking place April 26–28 in New Orleans. We're looking for sessions that challenge ideas, share practical solutions, and prepare appraisers for what's next, whether that's technical appraisal practice, business development, emerging trends, or a fresh perspective from outside the profession. You don't have to be the speaker to submit an idea. If you know the right topic and the right person to present it, we'd love to have you send it our way. [Submit Your Proposal](#) by September 12, 2026.



IMPORTANT NOTE: The 7 hour AQB mandated fair housing/bias seminar is on demand only (online) through the Appraisal Institute.

[On Demand | Valuation Bias and Fair Housing Laws and Regulations](#)



c/o Lisa Weiss, Executive Director
43 Crescent Hollow Drive, Sewell, NJ 08080
856-415-0281

LisaMay.Weiss@appraisalinstitute.org
DelawareChapter@appraisalinstitute.org
<https://www.appraisalinstitute.org/chapters/delaware>

The Appraisal Institute is the leading professional association of real estate appraisers. The Appraisal Institute's Code of Professional Ethics and Standards of Professional Practice comprise requirements for ethical and competent practice, and advance equal opportunity and nondiscrimination in the appraisal profession. The Appraisal Institute's work includes an array of professional education and advocacy programs, and stewardship of the highest level professional credentials in residential and commercial real estate appraisal. Organized in 1932, the Appraisal Institute conducts its activities in accordance with applicable federal, state and local laws. Individuals of the Appraisal Institute benefit from an array of professional education and advocacy programs, and may hold the prestigious MAI, SRPA, SRA, AI-GRS, and AI-RRS designations.

2026 Chapter Officers and Directors

President: Jim Mullin, SRA
Vice President: Kevin O'Malley
Treasurer: Lissa Brutus
Secretary: Kristina Clark, MAI
Director through 2027: Philip J. McGinnis
Director through 2028: Tom Reynolds, SRPA
Director through 2026: R. Braxton Dees, MAI
Past President: Benjamin R. Bauer, MAI