

Petition to the Appraisal Board

Commonwealth of Virginia

John C. Harry, III, Chair of the Appraisal Board
Department of Professional and Occupational Regulation
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The undersigned appeals to the Appraisal Board of the Commonwealth of Virginia for immediate action in prohibiting any entity doing business in the Commonwealth of Virginia from altering in anyway real estate appraisals during the process of transmitting, in any form, from the appraiser to the final end user (Client).

As it has become common knowledge that appraisal reports transmitted through electronic portals are being altered by methods that include:

- Unlocking reports sent in Adobe PDF format for change prior to reaching client.
- The Appraiser's Digital Signature being removed and re-applied or sent as a separate file.
- Appraisal being re-formatted and/or altered in manner that the Client does not receive what the Appraiser Created.
- The removal of forms and/or custom fonts not compatible with the portal's software.
- That images, sketches, maps, etc that exceed the number and/or size of attachments imposed by the electronic portal are omitted from the file received by the Client.

In that the Regulant is governed by the Rules and Regulations of Appraisal Board of which the Uniform Standards of Professional Appraisal Practice (USPAP) is the cornerstone of ethical and competent practice in appraising it is the concern of the Undersigned that the alterations and/or removal of the Appraiser's signature would be a violation of the following:

(137-141)The Appraiser's Signature is personalized evidence indicating authentication of the work performed by the Appraiser and the acceptance of the responsibility for content, analysis, and the conclusions in the report.

Comment: A signature can be represented by a handwritten mark, a digitized image controlled by a personal identification number, or other media, where the appraiser has sole personal control of affixing the signature.

1. Ethics Rule:

- a. (224-226) An Appraiser must not communicate assignment results in a misleading or fraudulent manner. An Appraiser must not use or communicate a misleading or fraudulent report or knowingly permit an employee or other person to communicate a misleading or fraudulent report.

2. Scope of Work Rule:

- a. (410-411) An Appraiser must not allow assignment conditions to limit the scope of work to such a degree that the assignments results are not credible in the context of the intended use.
 - b. (419-420) An Appraiser must not allow the intended use of an assignment or a client's objectives to cause the assignment results to be biased.
3. Disclosure Obligations:
 - a. (422-423) The report must contain sufficient information to allow intended users to understand the scope of work performed.
4. Standards Rule 1-1:
 - a. (472-473) not commit a substantial error of omission or commission that significantly affects an appraisal;
5. Standards Rule 2: Real Property Appraisal, Reporting: (612-613) In reporting the results of a real property appraisal, an Appraiser must communicate each analysis, opinion, and conclusion in a manner that is not misleading.
 - a. Standards Rule 2-1: (620-625)
 1. (a) clearly and accurately set forth the appraisal in a manner that will not be misleading;
 - (b) contain sufficient information to enable the intended users of the appraisal to understand the report properly; and
 - (c) clearly and accurately disclose all assumptions, extraordinary assumptions, hypothetical conditions, and limiting conditions used in the assignment.

The Regulant hereby requests the Appraisal Board of the Commonwealth of Virginia to require providers of electronic portals to cease doing business in the Commonwealth until such time as they provide the Appraisal Board with sufficient evidence and documentation that insures the integrity and unadulterated transmission of appraisal reports from the Appraiser to the Client and/or the end user of the appraisal report.

Therefore, Regulant Appraisers are prohibited from utilizing the following services and/or portals until approved by the Appraisal Board:

1. Appraisal Port aka AIReady
2. eAppraiseIT
3. Lighthouse
4. ILS/Fiserv Lending Solutions
5. LFS Delivery
6. Real EC
7. ACS Delivery
8. CoreLogic Appraisal Services
9. RELS/Value IT Delivery
10. Value IT Delivery
11. Any service provider and/or method of delivery of the appraisal report that does not maintain the integrity and unadulterated report created by the Appraiser for the end user Client.

Regulant Appraisers that use unapproved services and/or portals after the effective date of the Appraisal Board's decision are subject to fines, suspensions, and revocation of licensure.