

**Charlie Oppler**

2021 President

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**March 31, 2021**

Wayne R. Miller  
Chair, Appraisal Standards Board  
The Appraisal Foundation  
1155 15th Street, NW, Suite 1111  
Washington, DC 20005

Submitted via: <https://www.surveymonkey.com/r/ASBComments>

RE: Exposure Draft of Proposed Changes to Advisory Opinion 16

Chair Miller:

On behalf of the 1.4 million members of the National Association of REALTORS® (NAR), I submit this letter in response to the Appraiser Qualifications Board's (AQB) *Exposure Draft of Proposed Changes to Advisory Opinion 16 of the Uniform Standards of Professional Appraisal Practice (USPAP), Fair Housing Laws: Avoiding Bias in Real Property Appraisal and Appraisal Review Development and Reporting*. NAR, as a sponsoring organization of the Appraisal Foundation (TAF) which oversees the AQB, fully supports efforts by the AQB to improve guidance and training for appraisers as it relates to fair housing law and diversity and inclusion matters.

NAR is America's largest trade association. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,200 local associations or boards, and 54 state and territory associations of REALTORS®. NAR represents a wide variety of housing industry professionals, including approximately 25,000 licensed and certified appraisers, committed to the development and preservation of the nation's housing stock along with its availability to the widest range of potential homebuyers.

Recent media stories and research papers highlighting problems with discrimination in real estate appraisal demonstrate that the appraisal industry as a whole must address the challenge of bias in valuation. The proposed changes to Advisory Opinion 16 are a step in the right direction. However, it is imperative that the AQB and TAF go further in the development of guidance for appraisers in terms of bias and discrimination. Simply updating Advisory Opinion 16 is not enough. The AQB should develop extended training related to compliance with the Fair Housing Act, as well as



education focused on the recognition and prevention of bias that can arise in the appraisal process. These new education requirements and related coursework could be done internally, but will likely be more efficiently created in partnership with established fair housing focused organizations. NAR, as a sponsor of TAF, willingly offers its support and guidance in the development of materials and curriculum, and help in fostering collaboration between AQB and experienced fair housing focused entities.

Thank you for your consideration of these comments. If I may be of any assistance to you, please do not hesitate to contact me or NAR Director, Sehar Siddiqi, at (202) 383-1176 or [SSiddiqi@NAR.REALTOR](mailto:SSiddiqi@NAR.REALTOR).

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Oppler", with a long horizontal flourish extending to the right.

Charlie Oppler  
2021 President, National Association of REALTORS®