

**August 10, 2021**

**Charlie Oppler**  
2021 President

**Bob Goldberg**  
Chief Executive Officer

**ADVOCACY GROUP**

**Shannon McGahn**  
Chief Advocacy Officer

The Honorable Marcia Fudge  
Secretary  
U.S. Department of Housing and Urban  
Development  
451 7th Street, SW  
Washington, DC 20210

Dear Secretary Fudge:

On behalf of the 1.4 million members of the National Association of REALTORS® (NAR), I write to share comments on the Interagency Task Force on Property Appraisal and Valuation Equity (PAVE). NAR applauds the Biden Administration's focus on addressing the racial wealth gap and we urge the Administration to include all key stakeholders in the path forward. Appraisers and appraisals are an integral and longstanding part of real estate valuation and any discussion of changing the appraisal process must include appraisers and their representatives.

NAR recognizes that residential segregation and the disparity in home values between majority-white and majority-non-white communities did not happen simply as a consequence of individual choices. Decades of explicit race-based public and private policies, involving every aspect of the real estate industry, shaped the current market. We must remedy these disparities and proceed in a manner that advances the safety and soundness of the entire real estate market.

Appraisers and their representative organizations understand the nuances and limitations of the current appraisal framework. They appreciate the reality of having to provide an opinion of value that can be safely relied upon by the secondary market in order to ensure that there is enough mortgage credit available to prospective homebuyers, especially to those who have been historically kept out of the home purchase industry. While it is easy to suggest some practices simply be done away with, that requires the acceptance of multiple parties beyond just the appraiser. Including the real estate industry, especially the appraisal representatives, in the upcoming PAVE meetings is key to developing a course of action that addresses the concern of racial discrimination in appraisals without severely undermining the ability of the real estate market to function.

NAR welcomes the opportunity to introduce the Department of Housing and Urban Development (HUD) to NAR's appraiser leaders to start an ongoing



conversation on these matters. Appraisers who are also REALTORS® have a unique perspective on valuation and the real estate market. They would provide PAVE members with insight into how appraisals are conducted, and the regulatory and legal parameters that currently constrain the development of opinions of value.

Thank you for your consideration of these comments. We said in our press release of June 1st that we look forward to working with HUD on these important initiatives. We hope HUD will take us up on our offer to help move PAVE forward in a thoughtful and effective manner.

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®