



New York Bankers Association  
99 Park Avenue, 4<sup>th</sup> Floor  
New York, New York 10016

Michael P. Smith  
President & CEO

December 11, 2019

The Honorable Andrew M. Cuomo  
Governor  
State of New York  
Executive Chamber  
State Capitol  
Albany, NY 12224

**RE: Support of S.6249 (Sanders)/ A.8024 (Zebrowski)**

Dear Governor Cuomo:

The New York Bankers Association ("NYBA") strongly supports this legislation that would clarify that an appraisal management company may hire or contract a person for property inspections or property evaluations if they are licensed as an appraiser, real estate broker, or home inspector, or a person for a broker price opinion if they are licensed as a real estate broker. We urge that the bill be **approved**. NYBA is comprised of community, regional, and large banks and thrifts across every region of New York State. Together NYBA members employ nearly 200,000 New Yorkers, safeguard \$2 trillion in deposits, and extend nearly \$70 billion in home and small business loans.

The Appraisal Subcommittee (ASC) is the federal agency that oversees, among other things, the real estate appraisal industry. In August 2015, the ASC adopted regulations that required each state to decide whether to license and regulate appraisal management companies. Further, existing federal regulations require appraisal management companies to be subject to state licensing requirements. New York enacted its conforming law last year (A.10831A/S. 9080).

The current law has been interpreted to prohibit appraisal management companies from hiring or contracting with licensed real estate brokers or home inspectors for certain non-appraisal services including property inspections, property evaluations and broker price opinions. As a result, many individuals that have been providing these services for appraisal management companies across the state have had their employment and contracts terminated. This amendment would provide clarity across the industry, while preserving jobs and ensuring efficiency for customers in these transactions.

For these reasons, the New York Bankers Association strongly supports this legislation and urges that it be **approved**.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael P. Smith".

Michael P. Smith

cc: Niall O'Hegarty, Esq.