# Form Follows Function: Reporting Market Trend Data Via The URAR and 1004MC

By:

Tammie L. True
1317 Farley Ct South
Arnold, MD 21012
410-903-1073
tammietrue@comcast.net

### XXV UPAV Congress

Theme

Valuing Our World: Challenges Facing The Global Market

Subtopic

Raising The Valuation Profession Through Enhanced Education and Training

Abstract

"Form Follows Function: Reporting Market Trend Data Via The URAR and

1004MC,"by Tammie L. True, examines the standards of practice pertaining to

research and analysis of market data, specifically in conjunction with the

question: does the reporting mechanism in the URAR and 1004MC reliably

communicate the intended function; i.e., the reporting of timely, accurate and

meaningful market trend data?

Toward that end, the author presents the results of a self-designed 6-year study

that examines the market analysis trend data extracted from a sampling of 3,100

URAR reports, dating from 2004 through the first half of 2010. Specifically, the

market trend data is examined in relation to the effectiveness of the reporting

mechanism to identify and reflect market change in a timely, accurate and

reliable manner. As a method for comparing the reliability and effectiveness of

URAR form reporting during periods of significant market change, the data is

further segregated by effective date into one of the following three timeframes, a)

prior to the economic downturn, b) at the height of market decline, c) as well as

post implementation of the 1004MC.

Finally, based on conclusions derived from the analysis of this data and in the

spirit of "don't find fault; find remedy," the author includes a mock report form

designed to exhibit for exploration potential changes to form reporting, aimed at

facilitating the goal of increasing reliability and timeliness of market trend data

provided via residential form reporting.

Contact Info:

Tammie L. True 1317 Farley Ct South

Arnold, MD 21012 Cell: 410-903-1073

Email: tammietrue@comcast.net

### **Table of Contents**

Summary	i
The More Things Change, The More They Stay The Same	1
Bursting The Bubble Of Blame	1
Communicate, Innovate, Educate and Train	2
Market Analysis and 1004MC Data: A Sample Worksheet	3
Sample Worksheet – Figure 1	4
The Declining Market	5
Matrix of Market Trend Results – Figure 2	6
Market DataTrend Results	7
Market Analysis and 1004MC Data: Sample Worksheet	7
Case Study: Figure 3	8
Case Study: Figure 4	9
Case Study: Figure 5	10
References	11

### The More Things Change, The More They Stay The Same (Or Do They?)

The 1980's Savings and Loan Crisis was described as the greatest banking collapse since the Great Depression. Two decades later much the same, and then some, is circulating about the ongoing Great Recession of 2007. And although admittedly different in cause, effect and outcome, one common thread of discourse is strikingly similar: the blame-game. The finger pointing knows no bounds with seemingly plenty of blame to go around including the government, lenders, mortgage industry, investment banks, unqualified homebuyers, as well as over-valued appraisals.

However, as evidenced by the enactment of the Financial Institutions Reform Recovery and Enforcement Act of 1989 (FIRREA), history dictates that calamity often precipitates necessary change. And as further evidenced by the progress made thus far, specifically in terms of the HVCC and the 1004MC, the most effective change stems from the coordinated effort of many. In fact, during an interview by "The National Mortgage Professional Magazine," David H. Stevens, FHA Commission, was asked what he thought about the mortgage broker having been "portrayed as a major culprit in the mortgage mess by both the media and select legislators." Stevens responded, "I shudder whenever I see someone point the finger of this housing problem at any one particular area of the market. At the end of the day....we are all responsible." Toward that end, in the words of another whose industry has rivaled the challenges of calamity and change, Henry Ford championed the phrase: "Don't find fault, find remedy."

### **Bursting The Bubble Of Blame**

As the credit crunch in 2007 turned into a full financial meltdown in 2008 ultimately leading to a global recession, not one faction of the financial or housing industry was immune to the fall out. Accepting that "we are all responsible," fosters the realization that we are also inextricably intertwined in terms of both the problem(s) and the solution(s). Leslie P. Sellers, MAI, SRA, President, Appraisal Institute, aptly surmised "Let's not let a good crisis go to waste. The current environment opens doors that might not otherwise be open for us to articulate our profession's importance to good financial decision-making processes."<sup>2</sup>

### Communicate, Innovate, Educate and Train

Appraisal quality is critical to the risk management process. "The loss from overvalued properties extends beyond the immediate client, the secondary market, and investors – the profound impact is the effect of overvalued properties on the overall economy and ultimately, the consumer and taxpayers." Communicating the importance of our profession to good financial decision-making processes begins with quality appraisals, the foundation of which is market analysis. However, one of the most common deficiencies cited by lenders is appraiser misreporting in the neighborhood trends section of the URAR.

While some potentially obvious causes for this deficiency are explored in subsequent pages, consideration of the less-than-obvious begs the question: does the URAR form, now utilized in conjunction with the 1004MC (Market Conditions Addendum), best facilitate the function for which its intended?

For instance, per the FHA Mortgagee Letter dated March 23, 2009, regarding the implementation of the 1004MC, "Although there is no standard industry definition...a declining market is considered to be any neighborhood, market area or region that demonstrates a decline in prices or deterioration in other market conditions as evidenced by an oversupply of existing inventory or extended marketing times. A declining trend in the market will be identified by the conclusions of the 1004MC."

While the inclusion of the 1004MC succeeded in providing transparency in the reporting of neighborhood trends, the form falls short of facilitating a full assessment of neighborhood trends, most often due to an extreme lack of comparable sales data. Sales data in a declining market is very limited and not always sufficient to fully identify some, or all, of the market trends observed in the neighborhood. Conversely, the neighborhood analysis trend data is based on all sale/listing data in the subject neighborhood, which may include properties that are not directly comparable to the subject. In the neighborhood trend analysis, there is often more data to draw conclusions from as it is based on the typical buyer wanting to live in a specific market

area, which encompasses a variety of homes, commercial uses and similar influence, all of which play a part in understanding market trends.<sup>5</sup> That said, a 1004MC form that incorporated on one page neighborhood trend data from both micro and macro perspectives would be optimal.

### Market Analysis and 1004MC Data: A Sample Worksheet

A sample worksheet is included on the following page. The expanded 1004MC format incorporates subject info, as well as macro and micro neighborhood info, in addition to the identification of existing sub-markets. Initially designed to expedite market data collection during the appraisal process, the form is also used for in-house reviews, as well as a teaching tool for trainees.

Most notably, as illustrated by the Case Study included on page nine, incorporating the general neighborhood data along with the subject-specific 1004MC information provides a comprehensive, at-a-glance understanding of market trends for appraisers, underwriters, appraisal reviewers and quality control personnel. Underwriters and appraisal reviewers, especially, have limited time to review appraisal reports and in most cases have limited firsthand knowledge of the subject property's market.

## Sample Worksheet - Figure 1

WORKSHEET: MARKET ANALYSIS AND 1004MC DATA

Effective Date:		Subject Addrass:			α F	Report	
Subject		Neigh Name		Market Area		Market Area	
Neigh Name		No. of Homes		North		Submarket Type	
Style		Styles		East		Style(s)	
GLA		GLA Range		South		GLA Range	
Lot Size		Lot Sizes		West		Lot Size Range	
YrBlt		Yr Blt		Price \$(000)	Age (Yrs)	YrBlt	
Notes		Notes		Low		Notes	
				High High	Jul.		
				Predom Pre	Predom		
GENERAL MARKET DATA	[Housing trends an	d overall market conditions for t	he Neighborhood sectic	on of the appraisal report form.	Includes all sales/listing	[Housing trends and overall market conditions for the Neighborhood section of the appraisal report form. Includes all sales/listings located in the subject market as defined above.]	s defined above.]
03/	No. of Sales	Sale Price \$	to \$	Median \$	Subsidy \$	8 %	S/SF/C
09/	No. of Sales	Sale Price \$	to \$	Median \$	Subsidy \$	8 MOD	S/SF/C
12/	No. of Sales	Sale Price \$	to \$	Median \$	Subsidy \$	S MOD	S/SF/C
Active Listings	No. Listings	List Price \$	to \$	Median \$	I	BOMS	S/SF/C
1004MC / PG 2-URAR [Sale	s/listings that compe	1004MC / PG 2-URAR [Sales/listings that compete with the subject property, determined by applying the criteria that would be used by a prospective buyer of the subject.]	termined by applying th	e criteria that would be used b	by a prospective buyer of	he subject.]	
90/ /00 - 90/ /00	No. of Sales	Sale Price \$	to \$	Median \$	Subsidy \$	8 WOD	S/SF/C
09/	No. of Sales	Sale Price \$	to \$	Median \$	Subsidy \$	S WOD	S/SF/C
12/	No. of Sales	Sale Price \$	to \$	Median \$	Subsidy \$	S MOD	S/SF/C
Active Listings	No. Listings	List Price \$	to \$	Median \$		SS	S/SF/C

### **The Declining Market**

As summarized by David Phillips, SRA, in *Appraising In A Declining Market: A Practical Guide For The Residential Appraiser*, "A generation of appraisers has been dealing with rising values. For many, the present situation is the first experience with a <u>declining</u> market."

This observation is further supported by empirical data collected via an ad hoc study by the author that examines market trend data reported in URAR reports written during 2004 through the first half of 2010. This was a blind study; i.e., only the market analysis sections and pertinent property-specific information were collected. Comprised of properties located throughout the state of Maryland, the reports were written over the course of six years by roughly 27 licensed appraisers, which included Certified General, Certified Residential and Licensed designations.

Specifically, the report data was retrospectively examined in relation to the effectiveness of reporting market trend analysis data via the URAR form during periods of significant market change. The data was further segregated by effective date into one of the following three timeframes: a) prior to the economic downturn [2004-2005], b) at the height of the market decline [2006-2008], and c) post implementation of the 1004MC [2009-2010].

Included on the following page is a matrix of report market trend results.

Figure 2

Figure 2 Year	# Reports		Market Data	Frend Results	
		Barrell William	Increasing	Stable	Declining
		Property Values	100%		
2004	1097	D 1/0 h -	Shortage	In Balance	Over Supply
2004	1037	Demand/Supply	25%	75%	
		Marketing Time	Under 3 Mos	3-6 Mos	Over 6 Mos
		Marketing Time	73%	27%	
		Property Values	Increasing	Stable	Declining
		Property values	100%		
2005	686	Demand/Supply	Shortage	In Balance	Over Supply
2000	000	Demand/Supply		100%	
		Marketing Time	Under 3 Mos	3-6 Mos	Over 6 Mos
		maintaing rime	9%	91%	
2006	535	Droporty Values	Increasing	Stable	Declining
2006	องอ	Property Values	25%	75%	
Market		Domand/Supply	Shortage	In Balance	Over Supply
Begins To		Demand/Supply		100%	
Decline Q1-06		Marketing Time	Under 3 Mos	3-6 Mos	Over 6 Mos
Q1-00		warketing rime	37%	63%	
		Draw auto Malesaa	Increasing	Stable	Declining
		Property Values	10%	67%	23%
2007	404	Domand/Sunnly	Shortage	In Balance	Over Supply
		Demand/Supply		83%	17%
		Marketing Time	Under 3 Mos	3-6 Mos	Over 6 Mos
		warketing rime	1%	78%	21%
		Drawart / Values	Increasing	Stable	Declining
		Property Values		81%	19%
2008	392	Domand/Supply	Shortage	In Balance	Over Supply
2000	332	Demand/Supply		88%	12%
		Marketing Time	Under 3 Mos	3-6 Mos	Over 6 Mos
		Warketing Time	3%	82%	5%
		Droports Value	Increasing	Stable	Declining
2009	297	Property Values		93%	7%
2000	201	Domand/Sunnly	Shortage	In Balance	Over Supply
1004MC		Demand/Supply	8%	76%	16%
Introduced		Marketing Time	Under 3 Mos	3-6 Mos	Over 6 Mos
		warkeung rime		100%	
		Dronorty Value	Increasing	Stable	Declining
		Property Values		100%	
2010	124	Domand/O	Shortage	In Balance	Over Supply
2010	124	Demand/Supply		93%	7%
[Part]		Marketing Time	Under 3 Mos	3-6 Mos	Over 6 Mos
_		ivial ketting Tillie	4%	86%	10%

### **Market Data Trend Results**

Beyond a predominance of reported stabilized market data, the three most notable variances between reported vs. actual market data trends shown on the preceding page occurred during the following periods:

**2006:** Market indicators began to reflect some fluctuation in the market during the first quarter of 2006, specifically in terms of decreasing demand and increasing supply. However, the reported data during 2006 did not reflect a declining market.

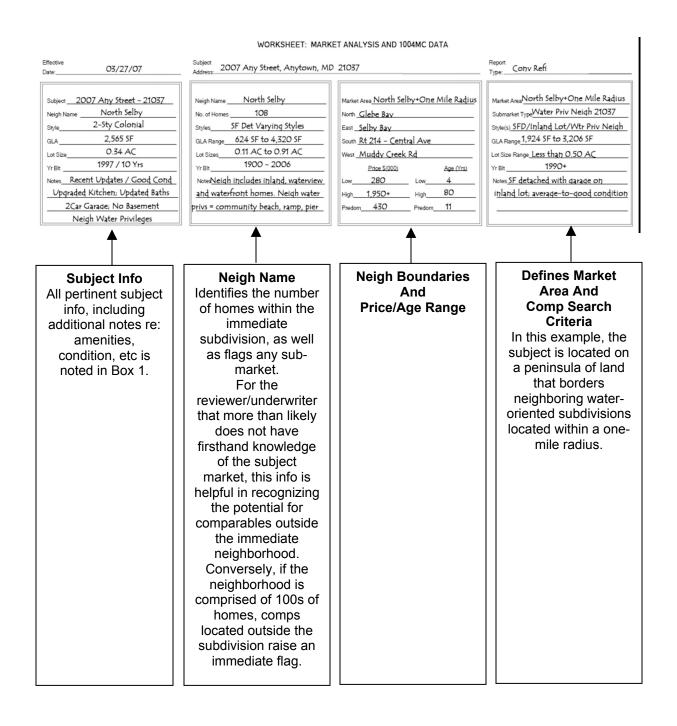
**2007:** Reported data for 2007 at first glance appears to reflect a more accurate view of declining market conditions; however, it was noted that the decline reported all occurred within reports written during the last three months of the year.

**2010:** Market indicators continue to fluctuate. There is a growing awareness among appraisers of stabilization occurring within pockets throughout the state.

Also of note, a significant percentage of reports reviewed during the 2008-2009 timeframe included comments stating the subject's neighborhood had suffered from declining values in the past; however, appeared to be stable as of the date of the appraisal. It is presumed that in lieu of a standard methodology for quantitatively assessing the date for a market that is continuing to fluctuate, this statement was considered appropriate. However, this type of statement was red flagged by reviewers and underwriters during the communication exchange for the Al course: Whatever happened to Quality Assurance In Residential Appraisals: Avoiding Risky Appraisals and Risky Loans. While these types of statements may be true, they are not viewed as an effective description of the neighborhood.

### Case Study: Figure 3

Included on the following page is a full copy of the case study for a property appraised in 2007 and reported to be located in a neighborhood that was increasing in value.



### Case Study: Figure 4 (cont)

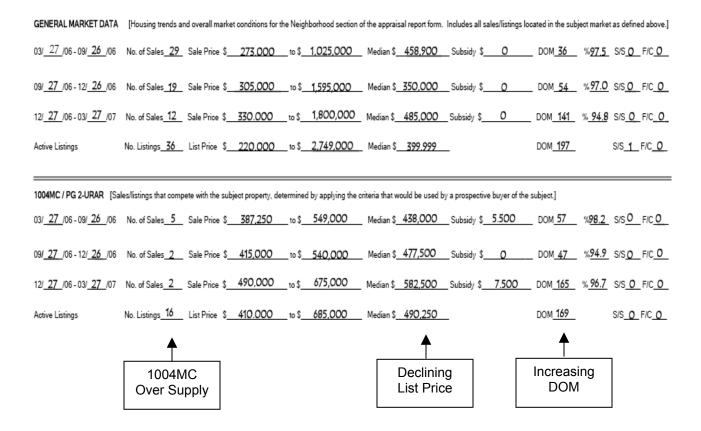
# WORKSHEET: MARKET ANALYSIS AND 1004MC DATA

Effective 03/27/07	Subject 2007 Any Street, Anytown, MD 21037	21037	Report Conv Refi
Subject 2007 Any Street - 21037	Neigh Name North Selby	Market Area North Selby+One Mile Radius	Market Area North Selby+One Mile Radius
Neigh Name North Selby	No. of Homes 108	North_Glebe Bay	Submarket Type Water Priv Neigh 21037
Style 2-5ty Colonial	Styles SF Det Varying Styles	East_Selby Bay	Style(s) SFD/Inland Lot/Wtr Priv Neigh
GLA 2,565 SF	GLA Range 624 SF to 4,320 SF	South Rt 214 - Central Ave	GLA Range 1,924 SF to 3,206 SF
Lot Size 0.34 AC	Lot Sizes 0.11 AC to 0.91 AC	West_Muddy Creek Rd	Lot Size Range Less than 0.50 AC
1997 / 10 Yrs	Yr Bit 1900 - 2006	Price \$(000)	Yr Bit 1990+
Notes Recent Updates / Good Cond	Noves Neigh includes inland, waterview	Low. 280 Low. 4	Noses SF detached with garage on
Upgraded Kitchen; Updated Baths	and waterfront homes. Neigh water	High 1,950+ High 80	inland lot; average-to-good condition
2Car Garade; No Basement	privs = community beach, ramp, pier	Predom 430 Predom 11	
Neigh Water Privileges			

GENERAL MARKET DATA [Housing trends and overall market conditions for the Neighborhood section of the appraisal report form. Includes all sales/listings located in the subject market as defined above.] %97.0 s/s 0 F/c 0 % 94.8 S/S O F/C O %97.5 S/S D F/C D S/S 1 F/C 0 DOM 141 DOM 54 DOM 197 DOM 36 0 q 0 Sale Price \$ 305,000 to \$ 1,595,000 Median \$ 350,000 Subsidy \$ Subsidy \$ Median \$ 485,000 Subsidy \$ Median \$ 458,900 Median \$ 399,999 to \$ 1,025,000 Sale Price \$ 330,000 to \$ 1,800,000 to\$ 2,749,000 List Price \$ 220,000 273.000 Sale Price \$ No. of Sales 29 No. of Sales 19 No. of Sales 12 Vo. Listings 36 09/ 27 /06-12/ 26 /06 03/ 27 /06-09/ 26 /06 12/ 27 /06-03/ 27 /07 Active Listings

S/S O F/C O %94.9 S/SQ F/C O S/S O F/C O %98.2 S/S 0 F/C 0 **2.96** % DOM 47 DOM 165 **691** MOD DOM 57 [Sales/listings that compete with the subject property, determined by applying the criteria that would be used by a prospective buyer of the subject.] Subsidy \$ 7.500 Median \$ 438,000 Subsidy \$ 5.500 0 Subsidy \$ Median \$ 477,500 Median \$ 582,500 Median \$ 490,250 to\$ 540,000 675,000 549,000 000'589 to S to S tos Sale Price \$ 415,000 Sale Price \$ 490.000 387,250 List Price \$ 410,000 Sale Price \$ No. of Sales 5 No. of Sales 2 No. of Sales 2 No. Listings 16 09/ 27 /06 - 12/ 26 /06 03/ 27 /06 - 09/ 26 /06 12/ 27 /06-03/ 27 /07 1004MC / PG 2-URAR Active Listings

### Case Study: Figure 5 (cont)



A review of the increased median sale price during the most recent quarter for the general neighborhood, as well as the 1004MC, appears to have lead the appraiser to conclude that the subject was located in an increasing market.

However, there is an oversupply of active listings, declining median list price, as well as increasing DOM. Three of the four market indicators, however, reflect a declining market.

**Case Study – Conclusion:** This case study reported an increasing market in the neighborhood trends analysis section of the URAR, while the above data indicates a declining market. The disparity between the market trend conclusions could be due to a number of reasons: appraiser error, inexperience, lack of in depth analysis of market

indicators, etc. However, utilization of a form that better fulfills the function – for the purpose of analysis and reporting – is another step forward in the goal of providing quality appraisal reports. This is especially crucial for in terms of our profession's responsibility for providing accurate data to better meets the needs of the client in terms of risk management.

### References

\_

<sup>&</sup>lt;sup>1</sup> Peck, Eric C., *FHA Commissioner Stevens Clears The Air: David H. Stevens details the new RESPA rule and the role of the broker and stabilization in housing*, National Mortgage Professional Magazine, March 1, 2010, http://nationalmortgageprofesional.com/news16299/fhacommission-stevens-clears-air-details-new-respa-rule-role-broker

<sup>&</sup>lt;sup>2</sup> Sellers, Leslie, P., MAI, SRA, President, Appraisal Institute, Crisis Management, Valuation, First Quarter, 2010.

<sup>&</sup>lt;sup>3</sup> Appraisal Institute. Whatever Happened To Quality Assurance In Residential Appraisals: Avoiding Risky Appraisals and Risky Loans. Seminar Handbook, Part 1-3.

<sup>&</sup>lt;sup>4</sup> Mortgagee Letter 2009-09, March 23, 2009, Adoption of Market Conditions Addendum (Fannie Mae Form 1004MC/Freddie Mack Form 71) and Appraisal Reporting Requirements For Properties Located In Declining Markets. https://www.efanniemae.com/sf/guides/ssg/annltrs/pdf/2008/0830.pdf

<sup>&</sup>lt;sup>5</sup> Morrison, Coleen, Maryland Association of Appraisers Continuing Education Course: Use and Completion of Fannie Mae 1004MC, Edition 1.0, February 2009.

<sup>&</sup>lt;sup>6</sup> Phillips, David, SRA, Appraising In A Declining Market: A Practical Guide For The Residential Appraiser. 2008 www.AppraisalBuzz.com