

# APPRAISAL TODAY

## New Senate Bill Affecting Appraisers and Appraisals - Road to Housing

*Editor's comments: Information in this article is from mid-September 2025.*

*I wrote this article to inform you about the bill. There may be bill changes in the future. We don't know when the bill will pass the House.*

*Note: The online bills at congress.gov do not include the changes below.*

*The National Appraisal Database is/was a very hot topic so I wrote about it below. It has been changed to a GAO (Government Accounting Office) study on the public appraisal database.*

*Scott Dibiasio, Director of Government Affairs for the Appraisal Institute, was very helpful and replied very quickly to my questions. His comments are very well written, understandable and interesting. His comments are definitely worth reading, especially in comparison to reading the bill excerpts, which are very boring in comparison.*

*This was the first time I was able to obtain any of this type of information from the AI (Appraisal Institute). I stopped inquiring after a few years. I have a more positive opinion of the AI now.*

### **What will happen to the Road to Housing bill?**

Per Scott Dibiasio, "There is no firm timeline as to when (or even if) that will occur. We heard at one-point last week that the ROAD to Housing Act, including the Appraisal Modernization Act and the Appraisal Industry Improvement Act, was going to be further added to the must-pass National Defense Authorization Act that is currently being considered by the Senate. But we're not 100% sure that it is going to happen and it is appearing more and more unlikely."

"Given that the ROAD to Housing Act has strong bipartisan support in the Senate, I think it is likely to pass the Senate sometime before the end of the year. Prospects for its passage in the House are less clear."

"Congressman Flood, Chair of the Housing and Insurance Subcommittee, is working on his own package of housing stimulus legislation. But it is said to be much different than what is in the ROAD Act. We're not sure if any appraisal related provisions will be included in the House housing bill."

### **Appraiser sections in Road to Housing bill**

#### **Section 403 Appraisal Industry Improvement Act**

#### **Section 705 - Appraisal Modernization Act**

#### **IN THIS ISSUE**

New Senate Bill Affecting Appraisers and Appraisals -Road to Housing .....	Page 1
Legislation Would Harass Appraisers to Extinction in rigged mortgage system by Jeremy Bagott .....	Page 6
Bedroom Requirements by Jamie Owen .....	Page 8
MBA Mortgage application volume from 1/19 to 9/25 .....	Page 12

## **The Appraisal Modernization Act Sponsored by Senator Warnock was another related bill - not moving forward**

Per Scott Dibasio, "The standalone Warnock bill - the Appraisal Modernization Act - will not move forward because its provisions codifying the ROV (Reconsideration of Value) process and the GAO (Government Accountability Office) study on the public appraisal database (formerly the database itself) - were added to the ROAD to Housing Act."

"The ROAD Act is awaiting consideration in the full Senate."

## **New Senate Bill with appraisal sections - Road to Housing**

**It is a long bill, about 300 pages. To get a copy of the bill, go to [congress.gov](http://congress.gov) and enter the name or number S.2651. To find the section you want, search for the name of the section, such as Sec. 403 and/or Appraisal Modernization Act.**

*Editor's notes: James Park discussed some of these topics in the article in last month's newsletter, The Future of Appraisal Regulation. The Current Regulatory System is Broken.*

*In this issue. Jeremy Bagott's article on the new Senate bill has an interesting analysis Legislation Would Harass Appraisers to Extinction in Rigged Mortgage System.*

*When taking direct quotes from the bill, I do not put quotes around each paragraph as it makes it too difficult to read.*

## **Comments on the bills from Scott Dibasio, Appraisal Institute, below:**

Section 403 Appraisal Modernization Act Comments By Scott Dibasio, Appraisal Institute and info on Warnock bill, the Appraisal Modernization Act. - a brief history

"The original Appraisal Modernization Act that was introduced by Senator Warnock included two provisions: 1) the creation of a public appraisal database; and 2) the codification of the reconsideration of value process."

"Senator Warnock believes that these two provisions, which emanate from the work of the PAVE Task Force (Property Appraisal and Valuation Equity), will help to address the perceived problem of appraisal bias."

"When Warnock's bill was originally introduced we expressed significant concerns about the database and reluctant acquiescence to the codification of the ROV process."

"There is a litany of issues with the database, and codifying the ROV process makes it nearly impossible to make any changes that are necessary down the road."

"However, Senator Warnock is afraid that FHFA, the GSEs, and the bank regulatory agencies will "pull back" their ROV guidance, much like FHA did several months ago. But, we could live with the codification of the ROV process. We could not live with the public appraisal database."

## **Road to Housing Act Comments by Scott Dibasio**

"Sometime after the introduction of the Appraisal Modernization Act, we learned that Chairman Tim Scott and Ranking Member Elizabeth Warren were working on the ROAD to Housing Act and that it was likely that the AMA (Appraisal Modernization Act) would be rolled into and included in the ROAD to Housing Act. As such, we quickly got to work with Senator Scott's office on the database and ROV matters."

"After listening to our concerns about the database, and talking with Senator Warnock, Senator Scott agreed to remove the appraisal database from the ROAD bill and to substitute in lieu thereof a Government Accountability Office study."

"When the proposal for a study was made by Senator Scott, Senator Warnock asked that any GAO study be a broader study of the issue of appraisal bias. The notion of a broad study was obviously of significant concern to us primarily as it would duplicate the already completed work of the PAVE Task Force."

"We were able to convince Chairman Scott and Senator Warnock to make the study one regarding the feasibility and utility of the possible creation of a public appraisal database. Obviously some sort of a study about the pros and cons of a public appraisal database should occur before such a drastic change is made."

"The Appraisal Modernization Act was included in the ROAD to Housing Act that passed the Senate Banking Committee with 1) the GAO study; and 2) codification of the ROV process. We were able to make a significant change to the ROV codification which is that an appraiser must only reimburse a lender for a 2nd appraisal because of alleged discrimination if the appraiser is found by a court or state appraiser regulatory agency to have engaged in discriminatory conduct. That was a big change!!"

"The "thank you" shout out to Senator Warnock was for his agreement to remove the database in lieu of the study and the change to the ROV process that he agreed to."

*Editor's note:*

*Both online bills include the Appraisal Database, which has been removed. The Appraisal Modernization bill has a Reconsideration of Value section which appears to be the same as that part of the Road to Housing Bill. I first read about the National Appraisal Database in the online comment below. The original database section has been removed from the bill.*

*I included it to provide some humor in the somewhat "dry" discussions in this article. I took a required business law class before starting my MBA classes. I did not like it much. I would never become an attorney!*

**Comments by Todd Reddington, July 17, 2025 about National Appraisal Database (This was written before the bill was significantly modified).**

Posted in the National Appraisers Forum about the National Appraisal Database (recently removed from the Act).

The Appraisal Modernization Act Would.....

Increase transparency in the appraisal process to support oversight and enforcement against bias by requiring the Federal Housing Finance Agency (FHFA) to publish an online database of property level appraisal and other home valuation data that lenders collect in connection with a mortgage application.

You read that correctly. They want a publicly searchable database that includes actual appraisal data... from your appraisal.

But Wait there is more..... here are a few highlights.....

"(2) MODERNIZED APPRAISAL DATABASE.-Not later than 2 years after the date of enactment of this section, and on a quarterly basis thereafter, the Director, in consultation with the Secretary of Housing

and Urban Development, the Secretary of Agriculture, and the Secretary of Veterans Affairs, shall make publicly available online a searchable and downloadable appraisal-level public use file of the data shared pursuant to subsection (c)(2).

and what is the "form and manner of the data....."

"(e) FORM AND MANNER OF VALUATION DATA.-

"(1) IN GENERAL.-Any appraisal data required to be disclosed under subsection (d) shall be itemized at the appraisal level to clearly and conspicuously disclose-

"(A) the assignment data, including the assignment reason, property valuation method, client or lender name, appraisal management company name, appraiser company name, appraiser credential level, appraiser identification number, and State, exterior scope of inspection, interior scope of inspection, and the inspection date;

"(B) the subject property data, including the physical address, zip code, county, State, neighborhood name, attachment type, number of units excluding accessory dwelling units, number of accessory dwelling units, special tax assessments, whether the subject property is a planned unit development, condominium, cooperative, property on Native American lands, subject site owned in common, homeowner responsible for all exterior maintenance of dwelling, or new construction, the property rights appraised, whether all rights are included in the appraisal, and the legal description; '

"(C) the market data, including the market area boundary, search criteria description, number of active listings and their median days on market, lowest list price, median list price, and highest list price, the number of pending sales, the number of sales in the past 24 months and their lowest sale price, median sale price, and

highest sale price, whether there is distressed market competition, the price trend source, the demand and supply trend, the marketing time, and the market commentary.

And You thought that the appraisal ranks were thinning at a strikingly rapid pace.....

Do I think this will get close to passing. No, and especially not with all the personal disclosure things, but hey, HB1110 never had a chance. So let us make sure it does not have a chance, pay attention and notify any and all affiliated organizations you work with lest they don't already know..... I mean it is at least 5 hours old, so why wouldn't they.....

Signing off -  
Chairman of the Conspiracy Theory Watchdog Group Tasked to identify movements to Eradicate Appraisers from the planet  
Todd Tin Hat Redington, SRA AI-RRS AGA

**Road to Housing Comments from Jim Park (From the September 2025 issue of Appraisal Today): The Future of Appraisal Regulation**

"The banking bill came out of the Senate Banking Committee on August 1, 2025. It's the first bill of any sort. It's a big housing bill as you're probably aware with some appraisal components. In my view, some good, some bad."

"This banking bill is more forward looking, although it doesn't address any of the real problems I've just discussed with the system that I've just described. But it would add some improvement."

"I think it's the first bill to pass out of the Senate Banking Committee in 10 years or more. So, it's kind of a monumental change. It passed out of the banking committee with a vote of 24 to nothing. It's a bipartisan bill."

"That tells me it's very likely to make its way out of the Senate probably before the end of this year and then it'll go to the House. And once it goes to the House, who knows?"

## Road To Housing Act

September 2025 all the stages of the bill in the Senate: Introduced, Pass Senate, Pass House, To President, Beome Law.

This bill was introduced 8/1/25. As of mid-September, no changes since the bill was introduced in 8/1/25.

8/1/25 Sponsor: Scott, Tim [Sen.-R-SC] Introduced 08/01/2025  
Committees: Senate - Banking, Housing, and Urban Affairs  
Long, over 300 pages with two appraiser sections:

## Appraiser sections

### Section 403 Appraisal Industry Improvement Act

### Section 705 - Appraisal Modernization Act

To get a copy of the bill, go to congress.gov and enter the name or number S.2651. Below the status section, you can read the bill, listen to the bill, print the text or get a PDF.

The bill includes two key appraisal-related provisions: the Appraisal Modernization Act (AMA) and the Appraisal Industry Improvement Act (AIIA).

### Comments from Scott Dibiasio, Appraisal Institute, Appraisal Industry Improvement Act

"...included in the ROAD to Housing Act was the Appraisal Industry Improvement Act (AIIA). " (modified from Warnock Bill)

"The AIIA does the following, most of which we support: 1) once again allows Licensed appraisers to perform FHA appraisals so long as they complete verifiable education on the FHA appraisal process; 2) allows the ASC to adjust the AMC National Registry Fees; 3) adds USDA, VA, and HUD representatives to the ASC; 4) allows the ASC to give grants to non-profits and institutions of higher learning for the purposes of appraiser workforce development."

*Editor's note on bill excerpts below: search the bill to read the excerpts and nearby related excerpts. No quotes are included to make the excerpts easier to read. They are copied and pasted from the bill.*

### Section 403 Appraisal Industry Improvement Act excerpts.

#### Certification and Licensing - direct quotes from the bill

(A) be certified or licensed by the State in which the property to be appraised is located, except that a Federal employee who has as their primary duty conducting appraisal-related activities and who chooses to become a State-licensed or certified real estate appraiser need only to be licensed or certified in 1 State or territory to perform appraisals on mortgages insured by the Federal Housing Administration in all States and territories;

(B) meet the requirements under the competency rule set forth in the Uniform Standards of Professional Appraisal Practice before accepting an assignment; and

(C) have demonstrated verifiable education in the appraisal requirements established by the Federal Housing Administration under this subsection, which shall include the completion of a course or seminar that educates appraisers on those appraisal requirements, which shall be provided by-

- (i) the Federal Housing Administration; or
- (ii) a third party, so long as the course is approved by the Secretary or a State appraiser certifying or licensing agency."

### Appraisal Management Company Registry Fees

Section (b) Annual registry fees for appraisal management companies.- Section 1109(a) of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (12 U.S.C. 3338(a)) is amended, in the matter following clause (ii) of paragraph (4)(B), by adding at the end the following: "Subject to the approval of the Council, the Appraisal Subcommittee may adjust fees established under clause (i) or (ii) to carry out its functions under this Act."

### Trainees in Registry

...inserting "and State credentialed trainee appraisers" after "licensed appraisers"  
... striking "or licensed" and inserting ", licensed, and credentialed trainee"  
... in the case of a State with a supervisory or trainee program, a roster listing individuals who have received a State trainee credential

### State Credentialed Trainee Appraiser

(3) Transactions requiring the services of a state certified appraiser. Section 1113 of the Financial Institutions Reform, Recovery, and Enforcement Act FIRREA)of 1989 (12 U.S.C. 3342) is amended-

**(12) State credentialed Trainee Appraiser -The term 'State credentialed trainee appraiser' means an individual who-**

(A) meets the minimum criteria established by the Appraiser Qualification Board for a trainee appraiser credential; and

(B) is credentialed by a State appraiser certifying and licensing agency.

(7) **To make grants** to State appraiser certifying and licensing agencies, nonprofit organizations, and institutions of higher education to support the carrying out of education and training activities or other activities related to addressing appraiser industry workforce needs, including recruiting and retaining workforce talent, such as through scholarship assistance and career pipeline development."

(e) Appraisal Subcommittee.-Section 1011 of the Federal Financial Institutions Examination Council Act of 1978 (12 U.S.C. 3310) is amended, in the first sentence, by inserting "the Department of Veterans Affairs, the Rural Housing Service of the Department of Agriculture, the Department of Housing and Urban Development," after "Financial Protection,".

**Section 705 - Appraisal Modernization Act Excerpts**

**Reconsideration of value.**

*Editor's comments: Each topic is long. I have included a small excerpt. To read the full topic, search the bill for the Section name or one of the topics below .*

**(A) Unacceptable appraisal practice.** This is very long.

Two of the practices:

"(ii) uses inaccurate or incomplete data about the subject property, the neighborhood, the market area, or any comparable property;

"(iii) includes references, statements or comparisons about crime rates or crime statistics, whether objective or subjective;

**(3) Subsequent Appraisal And Referral**

"(i) at the request of the consumer, order a subsequent appraisal at the creditor's own expense; and

"(ii) forward the appraisal report and the creditor's summary of findings to the appropriate appraisal licensing agency or regulatory board.

"(B) **Discrimination.**-If the creditor has reason to believe that an appraisal report reflects discrimination, the creditor shall-

"(i) order a subsequent appraisal, at the creditor's own expense;

"(ii) forward the appraisal report and the creditor's summary of findings to the appropriate local, State, or Federal enforcement agency; and

"(iii) upon a final determination of discrimination by the appropriate local, State, or Federal enforcement

agency, receive a reimbursement from the appraiser covering the cost of the subsequent appraisal ordered by the creditor.

**What does this mean for you?**

This article discusses the new bill with some comments on the short Warnock bill which is included in the Road to Housing bill.

In last month's newsletter I focused on the current appraisal regulatory chaos. I did not have enough room to include the bills in this article. Also, I wanted to wait another month to see if there were any changes. There were some.

There are not many recent bills that include anything about appraisal or appraisers. This article discusses the only recent bill with appraisal sections.

I may write more about the "political" side of appraisal now that I have a Most Excellent source of explanations, Scott Dibiasio.

**About Scott Dibiasio**

Director, Government Affairs-Appraisal Institute, July 2024-current

Manager, State and Industry Affairs - Appraisal Institute, 2008 - 2024

American University, BA Political Science

**Many thanks to Scott Dibasio**

Without his Most Excellent comments this article would have been very, very boring and not easy to read.

He has worked for the Appraisal Institute for 17 years in government affairs and was promoted in 2024.

# Legislation would harass appraisers to extinction in rigged mortgage system

**By Jeremy Bagott**

**August 8, 2025**

**Ventura, Calif.**

*Editor's comments: This was written on August 8, 2025. There have been changes since then. Discussed in this article is the New Senate Bill Affecting Appraisers and Appraisals - Road to Housing*

*. I wrote the articles in this newsletter if Mid-September, 2025.*

*Some of The Warnock Bill has been included in the Road To Housing Act. The Public Appraisal Database has been removed from both bills.. A study by GAO is now recommended..*

Two bills moving forward in the U.S. Senate should send chills down the spines of taxpayers old enough to remember the "liar loan" craze preceding the 2007-2008 financial crisis.

With all the subtlety of the Molotov-Ribbentrop Pact, the bills are a backroom carve-up by "frenemies" of a \$9 trillion federally backed mortgage system.

The groups behind the legislation: the housing lobby (the lenders, homebuilders and Realtors) and dead-enders in the fading racial-grievance industry. The goal is to eliminate the final remaining guardrail - state-licensed appraisers - in the federally sponsored mortgage game. Both groups want to rig the system and divide the spoils.

The sham bills are known as the Appraisal Modernization Act and the

Appraisal Industry Improvement Act.

The first would badly erode the independence of third-party appraisers by streamlining the way borrowers and commissioned salespeople can harass appraisers when the latter conclude values that send buyers and sellers back to the negotiating table.

The second bill would authorize an obscure, unaccountable federal entity to dole out millions of dollars to agenda-driven nonprofits, cronies and crackpot university professors, all based on whatever politics or social engineering are in vogue at the time of the public gifts.

A July press release by Sen. Raphael Warnock's office reveals more on how the senator coddles and gaslights his constituents than anything else. It faults the nation's state-licensed real property appraisers - the messengers - for America's racial wealth gap.

Warnock cites a discredited Brookings Institution study from 2018 which long ago was refuted by researchers Edward Pinto and Tobias Peter at the AEI Housing Center, as well as NYU Furman Center senior policy fellow Mark Willis.

The Brookings findings were found to have ignored key socio-economic factors. No case alleging appraiser discrimination has ever been successfully brought to trial. Indeed, two such cases were dismissed this year as meritless by federal judges in Ohio and Maryland. Yet, this contrived issue is the central tenet of the Warnock-sponsored bill.

Warnock's "Appraisal Industry Improvement Act" provides the flimsy pretext - the heart - for the "Appraisal Modernization Act" - the muscle. Both tell the world how the

lobbyists who will write every word of the statutes imagine the final guardrail in federally sponsored mortgage lending will be removed.

While incentivizing further tampering with appraisals in federally backed mortgage transactions, the legislation ignores correctives to the following actual problems:

Abuses by Fannie and Freddie: The legislation makes no attempt to rein in the institutional harassment of appraisers by mortgage giants Fannie Mae and Freddie Mac.

Activists and technocrats at the state-sponsored hegemony want to replace independent state-licensed appraisers with the flawed automated systems that routinely overvalue homes nationwide juicing the markets with what Ohio-based appraiser and podcaster Phil Crawford calls "data cancer." This has been a little-examined contributor to the current housing inflation.

For the past five years, Fannie and Freddie have flooded the zone with new burdens on appraisers, keeping them from viewing the properties they appraise, censoring them down to the individual words they are allowed to use to describe the properties they appraise. They've also waived the requirement for many appraisals outright.

Since Covid, the twins have securitized or guaranteed bad loans and then dumped the notes for pennies on the dollar to venture capital firms and crony nonprofits. The buyers are not putting the foreclosed homes back on the market. The homes are instead

being rented out.

The restrictions in fine print placed on the purchasers of Freddie and Fannie's nonperforming loans offer a big clue as to what the twins are up to in hiding botched mortgages. Since Covid, Fannie alone has auctioned off pools of nonperforming and so-called delinquent "reperforming" loans. The twins have been quietly purging the mortgages from their books or holding the loans under misleading labels, such as "reperforming." The biggest pool of concentrated risk is contained in the \$2.2 trillion the U.S. Federal Reserve System owns in mortgage-backed securities created by Fannie and Freddie.

The twins are also promoting a new form of "liar loan." The last time around, the twins securitized mortgages made without proper verification of a borrower's income or employment, relying instead on stated information that was often exaggerated or false. These high-risk loans contributed to the 2007-2008 financial crisis by inflating the housing bubble and leading to widespread defaults when borrowers couldn't repay. It's happening again with "liar valuations."

**Appropriations Loophole:** An obscure federal entity most Americans have never heard of operates with little accountability. It has an outsized influence on the housing market. It is called the Appraisal Subcommittee of the Federal Financial Institutions Examination Council. It has been set up to be insulated from its parent agency and from the congressional appropriations process.

The lack of accountability doesn't stop there. The tiny agency violates its authorizing statute and the federal Administrative Procedure Act. It has enforced 25 different versions of a private publisher's copyrighted stan-

dards on the states without conducting a notice-and-comment rulemaking for a single version of the continually changing standards. This puts the rogue federal entity in violation of a key federal regulation, 1 CFR 51.1(f), and two federal statutes, 12 U.S. Code § 3336 and 5 U.S. Code § 553.

The neglect has provided a monetary benefit for the tiny Beltway publisher that former Consumer Financial Protection Bureau chief Rohit Chopra rightly called a pay-to-play operation.

Federal employees with the agency participate in regularly scheduled closed-door meetings with trustees and panelists of the private publisher in violation of the Federal Advisory Committee Act.

State lawbreakers: The federal agency's coercion of state agencies has, in turn, led to scofflaw activities at the state level. It has put Washington State, California, Texas, West Virginia, Tennessee, South Carolina and others in a situation in which state regulators openly violate their respective administrative procedure statutes.

Also, at least two states - California and Washington - play fiscal shell games with funds owed the federal agency. The cost to renew an appraiser license in those states can be as much as \$1,000. This is on top of thousands of dollars required of all state-licensed appraisers in continuing education and materials for license renewal.

The cost of licensing, insurance

and regulatory compliance are driving appraisers out of the profession and keeping young people from ever entering it. These bills, if ever signed into law, would complete the lunacy.

### **My comments on Jeremy Bagott**

I have subscribed to his regular email commentary emails for awhile. Fortunately, they are now posted on X and available for everyone to read there.

His articles are sometimes definitely "out there" and are a welcome break from the usual appraisal news..

### **About the author**

My name is Jeremy Bagott. I'm a licensed real estate appraiser, author, and former newspaper editor. I investigate the shadowy intersection where federal guarantees, sponsorships, and grants meet private enterprise - a space rife with self-dealing, cronyism, and taxpayer exploitation. Each week,

I expose corruption and abuse in the federally backed housing sector - stories often ignored by mainstream media.

I don't hide my reporting behind paywalls or offer exclusive content, but this work requires time, independence, and resources. I rely solely on readers who believe truth-telling still matters.

If you'd like to support this effort, please consider supporting me on Patreon here [patreon.com/jeremy\\_bagott](https://patreon.com/jeremy_bagott) . I accept no support above \$5.00/month from any patron.

###

Readers: Past columns going back to 2020 can be accessed on X here. Each new column will be posted on X prior to noon on the day of release. Please follow me on X.

###

# Bedroom Requirements

**By Jamie Owen**

*Editor's comments: There are many Victorians in my local market, built with no closets, small "nurseries" and other rooms. Over the years additions were made, resulting in "tandem" bedrooms (only access to second bedroom is from the first bedroom). I sometimes tell an agent that these "tandem" rooms are not bedrooms to most buyers. I call them "dens" or some other word. I use the 70 sq.ft. minimum (with adequate width and length) to determine if a*

*room can be a bedroom.*

*I seldom appraise conforming tract homes, where bedrooms are much clearer. If you work in other markets, such as mine, be sure to check for bedroom requirements with the city, county or state.*

**Let's start with a question I often get when giving office presentations about the appraisal process... What is required for a room to be a bedroom?**

## **Origins of a Bedroom**

In ancient times, people didn't have separate bedrooms. Sleeping areas were often multi-purpose rooms. This was also true in medieval Europe, where sleeping areas were often communal.

However, in the Renaissance period and beyond, homes became more sophisticated, and privacy became more important to occupants. That's when the concept of a bedroom really took off. In the 18th and 19th centuries bedrooms became more common.



### A bedroom in the Renaissance period

Today, most homes have bedrooms. The number of bedrooms desired can vary depending on market factors.

### But what makes a room a bedroom? Are there any guidelines for what constitutes a bedroom? After all, a person can sleep in any room, right?

As the name suggests, a bedroom must be large enough for a bed. What size bed? There are some industry standards for bedroom size.

### Bedroom Square Footage

I was recently interviewed on a podcast, and when asked this question, I accidentally said 700 sq. ft. without realizing it. I meant to say 70 square feet. As an appraiser, I just rounded way up! Just kidding. Don't you hate it when what comes out differs from what's in the brain? Unfortunately, it's happening more as I get older. I digress.

According to the 2021 International Residential Code (IRC) <https://codes.iccsafe.org/content/IRC>

2021P1, the minimum required square footage is 70 square feet. It also states, "Habitable rooms must have a minimum horizontal dimension of seven feet in any direction."

The Ohio Code (as of July 12th, 2024) states that the size of a bedroom in "residential care facilities" depends on the number of occupants. A single-occupancy bedroom must be at least 80 square feet, and a multiple-occupancy bedroom must be 70 square feet per person. This area does not include the closet areas. Some have applied that to residential properties in general.

<https://codes.ohio.gov/ohio-administrative-code/rule-3701-16-14>

### Doors and windows

Industry standards also require a door to enter the room and at least one window or door to the exterior that can be used to escape in an emergency.

A bedroom window is required to be able to open. The window must be large enough for someone to go through it. That being said, we all come in different shapes and sizes. Is there a standard for window size? Yes!

According to the aforementioned International Residential Code (IRC), the minimum window size must have a width of 20" and a minimum opening height of 24". The window must provide a "net clear opening of 5.7 square feet of clearance area for a person to escape. So, this is not just the size of the window. Instead, it's the size of how much it opens. Furthermore, a window on the ground floor can have a minimum opening size of 5 Square feet.

The minimum sill height, the distance from the floor to the bottom of the window sill, is 44" above the



floor.

In my area, especially with mid-century ranch-style homes, I have seen bedrooms with windows closer to the ceiling and higher than 44" from the floor. While that is the case, there is market acceptance for this window configuration.

### Ceiling Height

Is there a minimum ceiling height? It depends. ANSI STANDARDS Z765 requires a ceiling height of at least 7' in at least 50% of the area. However, some older homes have a ceiling height of just under 7'.

Especially in Cape Cod and bungalow-style homes, would buyers not use a room as a bedroom just because

the ceiling height was 6'10"?

If this room has a ceiling height of 6'10", will buyers not consider it a bedroom?

Appraisers must consider this and value it accordingly. If the market views the room as a bedroom, and we can demonstrate this with other comparable sales, we must address this in our appraisals. But these situations can get tricky.

The other two sources cited do not state this requirement. Just because an area does not qualify as a finished living area with ANSI does not necessarily mean it cannot be valued as a bedroom or finished living area.

An appraiser must also consider what most buyers require for a room to be used as a bedroom.

### Closets

Interestingly, none of these sources indicate that a closet is required for a room to be considered a bedroom. However, if buyers of a particular type of home expect a bedroom to have a closet, I would also consider this when appraising a property and deciding what to consider a room as.

Some older homes were built at a time when closets were not a big deal. Some houses were not built with bedrooms.



In my experience, some lenders require a bedroom to have a closet. I think this is generally a reasonable expectation because most buyers usually expect this. But not always!

### Heating and Ventilation

A bedroom must have a permanent heat source so the area can be used comfortably all year. Granted, staying "comfortable" in summer is not always easy without air conditioning. But cooling is not a requirement for a living area. While cooling is not a requirement, proper ventilation is necessary for safety and comfort.

### Which Standards Apply

It's important to note that the IRC and other standards mentioned in this article may not apply in your area. I highly recommend researching your state and local jurisdiction's requirements since they may differ.

Here's a link to the IRC's adoption-by-state list as of January 2024.  
<https://codes.ohio.gov/ohio-administrative-code/rule-3701-16-14>

You can click on your state from that list to obtain more information.

At times, professional judgment also has to be used. Some things are unclear, and every situation is addressed in differing codes.

### About the author

Independent Real Property Appraiser and Market Analyst  
Independent, Objective, and Unbiased  
Aspen Appraisal Services  
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Vacant Land / Immigration & Bail Bonds

Cleveland Area Divorce Appraiser  
Probate Appraiser

### Home Measurements & Floor Plans

I am a state-certified residential Real Estate Appraiser in the Greater Cleveland area. Since 1998, I have performed over 9,100 appraisals. I work full-time as an independent fee appraiser for banks, attorneys, lenders, investors, and homeowners. I have experience appraising vacant land, residential properties, two-to four-family properties, and complex properties like luxury homes.

I have experience in expert witness testimony in both divorce and tax appeal cases, including tax appeal cases at the state level.

I am a member of the National Association of Appraisers (NAA). I am also a proud member of OCAP (Ohio Coalition of Appraisal Professionals), and an active member of the National Association of REALTORS (NAR), the Ohio Association of REALTORS (OAR), and the Akron/Cleveland Association of REALTORS (ACAR).

I am a Certified Home Measurement Specialist with the Institute of Housing Technologies. This international designation certifies that I have specialized training in measuring homes using the American National Standards Institute's (ANSI) standards for home measurement.

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