

Louisiana Real Estate Appraisers Board
State of Louisiana
Office of the Governor

JEFF LANDRY
GOVERNOR



TAYLOR F. BARRAS
COMMISSIONER OF ADMINISTRATION

To: Attorney General Liz Murrill
Attn: Department of Justice, Occupational Licensing Review Program

From: LOUISIANA REAL ESTATE APPRAISERS BOARD
Mr. Thomas E. Devillier, Executive Counsel / Deputy Director

Date: March 26, 2026

Subject: Rule Submission Form; Request for review of proposed rules promulgation initiated in compliance with Governor Landry's April 1, 2025, *Executive Order Number 25-038*.

The Louisiana Real Estate Appraisers Board ("LREAB" / "Board") has proposed to amend its administrative rules (LAC 46:LXVII.10101 *et seq*; LAC 46:LXVII.30101 *et seq*) in consideration of La. R.S. 49:964(D) and 966(K) and Governor Landry's April 1, 2025, *Executive Order Number 25-038*. During open meetings conducted on August 18, 2025 and November 17, 2025, the Board reviewed 100 percent of its current administrative rules and the proposed rules and determined that the proposed rules are necessary, consistent with applicable law, and aligned with its mission and that the benefits of the proposed changes outweigh any potential burdens or costs.

On December 23, 2025, the Board reported to the Office of the Governor and the appropriate members of the Louisiana Legislature in compliance with *Executive Order Number 25-038*.¹ On January 7, 2026, the Legislative Fiscal Office approved the Board's *Fiscal and Economic Impact Statement*.² On January 20, 2026, the Louisiana Register published LREAB's *Notice of Intent* to initiate rulemaking.³

To facilitate the Department of Justice's review of the proposed rule, the Board provides answers to the following questions:

¹ Exhibit A1 - December 23, 2025, *Executive Order Number 25-038, Compliance Reporting*; Ex. A2 - November 17, 2025, *Resolution 2025-003*.

² Ex. B - January 7, 2026, *Fiscal and Economic Impact Statement* (Legislative Fiscal Office Approved).

³ Ex. C1 - January 20, 2026, *Notice of Intent* (Publication); Ex. C2 - Notice of Intent ("Redline"); Ex. C3-C4 - January 6, 2026, delivery of the initial *Notice of Intent Report* to the Office of the Governor and the Louisiana Legislature.

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1. Describe any relevant factual / procedural background to the occupational regulation and the purpose of the occupational regulation.

The Board reviewed 100% of its rules and seeks to reduce its total regulations in both number and overall length in consideration of existing applicable law and Governor Landry’s April 1, 2025, *Executive Order Number 25-038*.

2. Is the occupational regulation within the scope of the occupational licensing board’s general authority to regulate in a given occupation or industry? If so, identify the law that provides the authority for the rule and describe how the occupational regulation is within the scope.

LREAB is authorized to promulgate these rules in accordance with the Administrative Procedure Act (La. R.S. 49:950 *et seq*), the Louisiana Real Estate Appraisers Law (La. R.S. 37:3391 *et seq*), and the Appraisal Management Company Licensing and Regulation Act (La. R.S. 37:3415.1 *et seq*). The proposed amendments are within the scope of the Board’s authority to protect the public interest by reasonably regulating real estate appraisers and appraisal management companies.

3. Check all of the following that apply as reasons the occupational regulation is subject to review:

- Creates a barrier to market competition
- Fixes prices, limits price competition, or results in high prices for a product or service provided by or to a license holder
- Reduces competition or excludes present or potential competitors from the occupation regulated by the board
- Limits output or supply in this state of any good or service provided by the members of the regulated occupation
- Reduces the number of providers that can serve a particular set of customers
- Changes existing requirements for licensure, certification, registration, etc.
- Other activity (please describe)**

The Board is requesting OLRP review of the proposed rule amendments due to the comprehensive nature of reviewing and revising nearly 100% of the agency’s total regulations.

4. Identify the clearly articulated state policy (e.g., health, safety, welfare, or consumer protection) in state statute, or any supporting evidence of the harm the action/proposed action is intended to protect against?

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The Board is authorized by multiple statutes to protect the public health, interest, and welfare to protect Louisiana citizens, their residences, and other property by reasonably regulating the licensure of persons performing real estate appraisers and appraisal management companies, including but not limited to: La. R.S. 37:3395 and 3415.21. Generally, the Board is seeking to decrease its total regulations in both number and overall length to reduce any potential or related burden and cost.

5. Do any less restrictive alternatives to the occupational regulation exist for addressing the same harm? If so, include a comparison of the occupational regulation to the alternatives and a justification for not pursuing a less restrictive alternative. If no less restrictive alternatives exist, explain why.

No. The Board is unaware of any less restrictive alternatives to the proposed amendments. Most of the proposed amendments make only technical changes or otherwise repeal or reduce current rules that are duplicative of existing statutes or other rules.

6. Describe the process that the occupational licensing board followed in developing the proposed rule, including any public hearings held, studies conducted, and data collected or analyzed.

During open meetings conducted on August 18, 2025 and November 17, 2025, the Board reviewed 100 percent of its current rules and the proposed amendments prior to submitting its *Notice of Intent* for publication on January 20, 2026. The Board accepted public comments through March 11, 2026 and held a public hearing on March 16, 2026, in part, to consider any public comments received. The Board had only one relevant, public inquiry, which was received from the executive director of The Real Estate Valuation Advocacy Association (REVAA) <https://revaa.org/>, Mr. Mark Schiffman, who requested a “redline” version of the proposed rule amendments. On January 23, 2026, LREAB staff received an email reply from Mr. Schiffman, stating in part, “...I did not see anything in the changes that should be a concern for REVAA members....”⁴

7. Does the occupational regulation relate to a matter on which there is pending litigation or a final court order?

There is a standing April 1, 2022 final order rendered by the United States Federal Trade Commission (“FTC”), generally affecting LREAB and specifically impacting LAC 46:LXVII.31101. Accordingly, the proposed amendments do not modify LAC 46:LXVII.31101. In an abundance of caution, LREAB notified its standing federal oversight, the Appraisal Subcommittee (“ASC”), Federal Financial Institutions Examination Council (“FFIEC”), of the proposed amendments. On September 29, 2025, the ASC confirmed that it had reviewed the proposed amendments and “...found them to be appropriate and consistent with Title XI [of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (“FIRREA”)] (12 U.S.C.

⁴ Ex. D1 - March 16, 2026, *Meeting Agenda* (Public Comments Hearing); Ex. D2 - January 23, 2026, email with public comments from Mr. Mark Schiffman (REVAA).

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3331 *et seq*]).” Additionally, on March 18, 2026, LREAB notified the FTC of the proposed amendments, has received no reply to date, and reasonably expects no response.⁵

8. Please identify the board members voting in favor of this rule, and state whether the member is an active market participant.

All LREAB members present at the November 17, 2025 meeting unanimously voted to promulgate the proposed amendments, and all such members are active market participants. *See Exhibit A2 - November 17, 2025, Resolution 2025-003.*

9. Is there anything else that the occupational licensing board would like the Department to know about the proposed rule?

N/A

Thank you for your time and consideration of the Board’s proposed rule amendments. Please let me know if you need additional information.

LA REAL ESTATE APPRAISERS BOARD



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⁵ Ex. E1 - April 1, 2022, FTC Decision and Order; Ex. E2 - September 29, 2025 email from Ms. Maria M. Brown, ASC; Ex. E3 - March 18, 2026 email to FTC Compliance.