THE PHOTOS ARE GONE

Supporting a comp on the new report when its listing photos disappear.

THE ONE IDEA

The front photo is the easy part. The ratings need support. Save what you relied on the day you pull it.

WHAT HAPPENED

HousingWire reported on October 23, 2026 that many MLSs are restricting the interior photos of sold listings sent to the real estate portals, while keeping the images inside the MLS for agents and appraisers. It named CRMLS, Canopy MLS and Flexmls among the MLSs with photo privacy controls, as more listings go private. CRMLS (February 23, 2026): for closed listings, every photo except the primary photo comes off IDX syndication; the photos stay in the MLS.

WHAT THE RULES SAY

Required	Sales Comparison Approach: "Property Photo (Subject and Comparables)." GSE UAD 3.6 Photo and Image Job Aid, v1.0, June 23, 2026
Typically the front	"Photo of the property, typically the front." Appendix F-1, URAR Reference Guide v1.4, p. 221
Fatal	UAD1275: "Provide a photo of each sales comparable used in the valuation." Appendix H-1, UAD Compliance Rules v1.5, 1400.0628
Drive-by retired	Fannie Mae retired the street inspection of comps for UAD 3.6 reports: appraisers "will be at liberty to source the required comparable photos at their own discretion." Fannie Mae, Appraiser Update, Q3 2025
Ratings	Every comp: Overall Quality (Q1 to Q6) and Overall Condition (C1 to C6), plus an interior condition rating. Appendix F-1 v1.4, 22.11 and 22.09
Data Source	Required for every comp; choose one or more. If the source is MLS, the MLS number is required. Appendix F-1 v1.4, 22.01.18
Workfile	The workfile must contain "all other data, information, and documentation necessary to support the appraiser's opinions and conclusions and to show compliance with USPAP, or references to the location(s) of such other data, information, and documentation." USPAP Record Keeping Rule, as quoted in Advisory Opinion 41

SCORE YOUR CALLS

Call 1: B. A photo of every comp, typically the front, and its quality and condition ratings. Interior comp photos are not on the required list, and the drive-by is no longer required by Fannie Mae for the new report.

Call 2: B. Verify a private-listing comp from other sources, get the photo, and report every data source you used. A missing comp photo is a Fatal.

THE COMP PHOTO CHECKLIST

One row per comp. Fill it in the day you pull your comps.

COMP	MLS #	FRONT PHOTO FROM	INTERIOR EVIDENCE	SECOND SOURCE	DATA SOURCE	SAVED (DATE)
1						
2						
3						
4						
5						
6						

Front photo from: MLS, your own photo, agent, other. Interior evidence: MLS photos inside your login, agent, previous appraisal file, none. Data Source: every source you actually used.

AN EMAIL FOR THE LISTING AGENT ON A SOLD COMP

Subject: Your sale at [comp address]

Hi [agent name],

I'm an appraiser, and your sale at [comp address], closed [date], is a comparable on an assignment I'm working on. Could you help me confirm a few details?

1. What was updated before the sale, and about when? (kitchen, baths, flooring, roof, systems)
2. How would you describe the condition of the kitchen and bathrooms at the sale?
3. Anything about the sale I should know, like concessions or an unusual situation?

Thank you,
[your name], [license]

Keep the subject property and your client out of it. Save the reply to your workfile.

THIS WEEK

- [ ] Look up your MLS's photo policy for sold listings, and what your login can see.
- [ ] Save every comp's MLS sheet and photos to your workfile the day you pull them (good practice).
- [ ] Put a second source behind every comp's condition and quality (good practice, not a GSE rule).
- [ ] Fill in Data Source with every source you used, and the MLS number when it's MLS.

SOURCES

Fannie Mae and Freddie Mac, UAD 3.6 Job Aid: Photo and Image Requirements, v1.0 (June 23, 2026).
Appendix F-1, URAR Reference Guide v1.4: p. 221; 22.01.18; 22.09; 22.11. Appendix H-1, UAD Compliance Rules v1.5: UAD1275.
Fannie Mae, Appraiser Update, Q3 2025: "Comp driveby not required for UAD 3.6."
USPAP 2024, Record Keeping Rule; Advisory Opinion 41.
HousingWire, "Appraisers warn of risks as more real estate listings go private" (October 23, 2026). CRMLS, "Safety First: Why CRMLS Is Removing Most Images of Closed Listings from IDX Syndication" (February 23, 2026).