



7113 San Pedro Ave, Suite 508  
San Antonio, TX 78216  
(210) 570-4950  
[info@naappraisers.org](mailto:info@naappraisers.org)  
[www.naappraisers.org](http://www.naappraisers.org)

March 10, 2023

TO: Appraiser Qualifications Board  
The Appraisal Foundation  
1155 15th Street, NW, Suite 1111  
Washington, DC 20005  
<https://www.surveymonkey.com/r/ASBComments>  
[AQBcomments@appraisalfoundation.org](mailto:AQBcomments@appraisalfoundation.org)

**RE: First Exposure Draft – Real Property Appraiser Qualification Criteria**

Dear Chair Swinney and members of the AQB-

The National Association of Appraisers (NAA) has reviewed the first exposure draft dated January 31, 2023, for the Real Property Appraiser Qualifications Criteria and respectfully submits the following comments for your consideration.

- NAA agrees that mandatory education on the topics of valuation bias and fair housing laws should be required for all appraisers. However;
  - The current USPAP update course already has a 90-minute segment dedicated to appraisal bias and illegal discrimination
    - Does the AQB recommend removal of these topics from the USPAP update course in lieu of dedicated coursework?
    - If so, what topic(s) shall be addressed during this 90-minute segment or would the current 7- hour requirement be reduced by 90 minutes?
- The exposure draft states *“The number of hours chosen for each course (the initial 7-hour course and the ongoing 4-hour course) are based on existing requirements from several states’ appraiser regulatory agencies, and from the actions and input of individuals from other professions, who are education providers and who are interested stakeholders.”*
  - 7 hours of initial/4 hours of continuing training on this topic(s) appears to far exceed that which is required of those in similar/parallel professions such as real estate agents, mortgage loan originators, underwriters, etc. We therefore request clarification of how the number of hours was derived and/or reconsideration of the number of hours being proposed.
  - NAA strongly believes that 4 hours of initial training and 2 hours of ongoing training is more than sufficient time to cover the material thoroughly.
- NAA agrees that the Instructor Recertification Course can be (and often is) completed in less than 7 hours and a name change is therefore logical.
  - It also stands to reason that the number of hours should also be reconsidered for the National USPAP update course.

- Referring to our first point, if 90 minutes currently dedicated to the topic of bias and discrimination is removed, it is only sensible that the number of hours should be reduced.
- Additionally, if USPAP changes no longer occur every two years, is it still appropriate to require a 7-hour course at the same interval?

NAA sincerely appreciates the opportunity to provide feedback on this exposure draft and for your consideration of our input.

Sincerely,

Laurie Egan, MNAA on Behalf of NAA  
Association Manager/Chair, Government Affairs Committee  
National Association of Appraisers