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

RE: First Exposure Draft of Proposed Changes to the Real Property Appraiser Qualification Criteria (*Criteria*)

Dear Chair Yurek and members of the AQB,

The National Association of Appraisers (NAA) has reviewed the First Exposure Draft of Proposed Changes to the Real Property Appraiser Qualification. We appreciate the time, effort and deliberation involved in composing this exposure draft and generally agree that the proposed changes represent minimum qualifications for today's real property appraisal practice. The following comments are respectfully submitted for your consideration. For ease of reading, our comments correspond with the proposals in the introduction of the exposure draft.

- Eliminate all college-course and college-degree requirements for the Certified Residential and Certified General classifications, replacing them with enhanced qualifying-education expectations and a more detailed Examination Content Outline.
 - As stated in prior comments, NAA is supportive of removing college degree requirements provided they are replaced with strengthened, appraisal-specific qualifying education. Competency is best gained through specific valuation education and experience rather than unrelated academic coursework. Eliminating the college degree requirement also supports the goal of removing unnecessary barriers to entry into the profession.
- Increase qualifying education requirements for all credentials, except for the Trainee Appraiser, to strengthen analytical skills.
 - If the college degree requirement is eliminated, NAA supports increasing qualifying education hours for licensed and certified appraisers. Strengthening appraisal-specific analytical skills enhances competency and public trust. As stated in the past, NAA encourages emphasis on practical application of analytical skills rather than purely academic instruction.

- Remove elective coursework from the Required Core Curriculum to reduce administrative burdens, ensure uniformity, and focus on essential minimum competencies.
 - NAA supports replacing elective coursework from the Required Core Curriculum if the required coursework truly contains essential competencies for each credential level. Required coursework promotes uniformity and removes variability in education.
- Revise experience requirements to allow Licensed and Certified credential experience to be earned before, during, or after completing qualifying education and the national examination (with Trainee Appraisers continuing to be allowed to earn experience only after completing their required qualifying education).
 - NAA strongly supports increased flexibility in the timing of experience acquisition for Licensed and Certified classifications. Allowing experience to be earned before, during or after qualifying education (QE) better reflects how professional competency develops in actual practice. We support retaining the current minimum QE requirements for trainees which provides minimum foundational knowledge necessary to gain meaningful experience.

NAA also supports eliminating the 2-year timing restriction on exams and allowing exams to be taken immediately after completing QE. Currently exams are often taken years after QE is obtained which likely contributes to low exam passage rates.

NAA respectfully requests that the AQB reconsider reducing the CR experience timeframe. The current 12-month timeframe is already a huge reduction from the original criteria, and we are dubious that adequate training to receive a CR credential can be obtained in 9 months.

- Refine definitions of Practicum and supervision, distinguishing Practicum from PAREA and clarifying supervisory authority and limits.
 - NAA supports clearer distinctions between Practicum and PAREA. Clear terminology reduces misinterpretation, promotes consistent state implementation, and helps both trainees and supervisors understand expectations.
- Affirm that Trainee Appraisers are not required to complete continuing education while holding the Trainee Appraiser classification.
 - NAA holds differing views on this topic. While it is true that many trainees are already engaged in qualifying education and act under the supervision of a supervisor, it has been our experience that many individuals remain in the trainee classification for many years before becoming credentialed. It seems prudent that at some point, continuing education should be required of trainees.
- Clarify the three-Trainee Appraiser supervision limit, explaining the circumstances under which states may authorize a higher number of Trainee Appraisers under one Supervisory Appraiser.
 - NAA supports clarification of the three-Trainee supervision limit and the conditions under which states may permit higher limits.

- Add two new experience allowances: (1) for appraisers working within legally confidential environments such as the IRS, and (2) for appraisers performing work under recognized International Valuation Standards.
 - NAA supports recognition of qualifying experience earned in legally confidential environments and under recognized International Valuation Standards, provided documentation and verification safeguards are maintained. We would, however, like to express concern about regulators’ ability to confirm legally confidential experience in compliance with ASC requirements. As stated in the past, we do not believe unsupervised experience from outside of the appraisal profession should count toward qualifications, however, the additions proposed appropriately recognize legitimate valuation work while preserving experience credibility.
- Add new Guide Note 12, providing guidance on signatures and supervisory documentation requirements in experience logs, including how those requirements apply in mass appraisal.
 - NAA supports the guidance in Guide Note 12 regarding the distinction between “Supervisory Appraiser” and an “appraiser providing supervision” in addition to outlining the flexibility States have in granting experience hours when a traditional Supervisory Appraiser – Trainee relationship does not exist or is not applicable.
- Update language and structure throughout the Criteria to improve readability, consistency, and usability.
 - NAA supports efforts outlined in the proposed Criteria to improve clarity, organization, and consistency throughout the Criteria. The improved readability is central to an NAA core objective of reducing interpretive disputes which supports more uniform state adoption and consistent enforcement.

Regarding the Concept Papers on Examination Only and Skills Based Pathways, as stated in previous comment letters, NAA supports the AQB in tabling these topics at this time and in the interest of brevity, will not restate our opinions in this letter.

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

Respectfully,

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