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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: Concept Paper – Additional Experience Options: Should They Have a Place in Appraiser Qualifications?

Dear Chair Yurek and members of the AQB,

The National Association of Appraisers (NAA) has reviewed the Concept Paper - Additional Experience Options: Should They Have a Place in Appraiser Qualifications? dated March 13, 2025, and respectfully submits the following comments for your consideration.

Questions on Additional Experience

1) Value of Additional Experience - *Should all qualifying experience for appraiser credentials be limited to completing USPAP-compliant appraisal reports, or should certain types of appraisal-related or non-appraisal-specific experience also be considered?*

1. If you believe certain appraisal-practice related experience—such as developing a scope of work, conducting market analysis, performing highest and best use studies, inspection (physical or visual) or researching depreciation—should count, even if it does not result in a final appraisal report or is not part of an appraisal or appraisal review assignment, please explain why and what safeguards should apply.

NAA Response: It is reasonable that completing USPAP compliant appraisal-practice related experience should count toward a candidate's experience hours even if it does not result in a completed appraisal report provided such experience is gained and documented under the supervision of a certified appraiser.

2. If you believe that relevant experience from outside the appraisal profession—such as market analysis performed by real estate brokers, site selection by engineers or urban planners, or other valuation-related work—should count toward qualifications, please explain your rationale and what types of experience should be considered.

NAA Response: We do not believe unsupervised experience from outside of the appraisal profession should count toward qualifications. Please see response to question 5 below.

3. If you believe that only direct USPAP-compliant appraisal work should qualify, explain why.

NAA Response: Please see response to question 5 below.

2) Safeguards and Risks - *What safeguards should be in place to ensure any additional experience enhances preparation for appraisal work without lowering standards?*

NAA Response: Please see response to question 4.

3) Balancing Standards and Flexibility - *What are the key benefits or risks of allowing additional experience to count toward qualification?*

NAA Response: The only benefit to allowing Foundational Knowledge to account for experience hours is a shorter path to licensure/certification; however, the standards have already been lowered. To lower them further compromises competency of candidates and the public trust. Please see response to question 4 below.

Questions on “Foundational Knowledge and “Standards Equivalency” Concepts

4) Viability of “Foundational Knowledge”

- *Do you see the “Foundational Knowledge” option included in the appendices of this concept paper as viable? If so, what changes or safeguards would you suggest?*

NAA Response: NAA does not believe the Foundational Knowledge option is viable or necessary. The criteria has already been reduced to (for example) 1,000 hours of experience in only six months for a Licensed Residential credential which is a very short period of time compared to the previous requirements. Including Foundational Knowledge credit further reduces this already low threshold to a degree we believe is imprudent.

- *Do you see the “Standards Equivalency” option included in the appendices of this concept paper as viable? If so, what changes or safeguards would you suggest?*

NAA Response: The Standards Equivalency option certainly appears viable. IVS reports converted to USPAP-compliant reports demonstrate understanding of USPAP compliance and, as proposed, resolves any issue for state appraiser regulators who are already well-versed in USPAP. It seems reasonable that experience hours gained under IVS standards would equate 1:1 with USPAP hours if converted reports are found to be USPAP compliant.

5) Practical Considerations

- *How might incorporating “Foundational Knowledge” or “Standards Equivalency” supplemental experience impact the pathway to becoming an appraiser, both positively and negatively?*

NAA Response: Please see responses to question 4.

- *What portion of the total required experience hours (e.g., a percentage or specific number of hours) do you think should be allowed to count as ‘Foundational Knowledge’ experience, and why? Please explain your reasoning, considering how this balance might affect competency, public trust, and accessibility to the appraisal profession.*

NAA Response: Foundational Knowledge has always been an excellent starting point for those entering the field but should account for minimal (if any) hours toward required experience. Our members have trained many aspiring appraisers with backgrounds in real estate sales, home inspection, loan origination, and other related fields who have had exposure to the appraisal profession. It has been our collective experience that their perceptions of an appraiser’s role is vastly different than reality and, in many cases, it takes more training for those with pre-conceived notions than candidates with no Foundational Knowledge.

Final, General Question

6) Experience Hours

- *Do you consider the total number of experience hours required for any (or all) of the credential levels to be too many or too few? If yes, why and what rationale do you have for increasing or decreasing the required number of experience hours? If no, please provide your rationale.*

NAA Response: This topic has been well-vetted over the years and the current requirements appear reasonable.

NAA sincerely appreciates the opportunity to provide feedback on this concept paper 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