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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: Second 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 Second Exposure Draft of Proposed Changes to the Real Property Appraiser Qualification Criteria, and we applaud efforts outlined in the proposed Criteria to improve clarity, organization, and consistency. The improved readability is central to an NAA core objective of reducing interpretive disputes which supports more uniform state adoption and consistent enforcement. We respectfully submit the following comments for your consideration.

Adding PAREA pathway for Certified General Credential

- NAA fully supports adding a PAREA pathway for the Certified General Credential which is the natural progression of a program that has already demonstrated its effectiveness in preparing candidates for credentialing.

Removal of college degree requirements, removing requirements to take elective courses and adding new required course teaching analytic skills directly through appraisal instruction

- NAA continues to support eliminating the college degree requirement for the Certified Residential and Certified General classifications. Competency is best developed through appraisal-specific education, practical application, and experience rather than unrelated academic coursework. Removing the degree requirement also advances the important goal of reducing unnecessary barriers to entry into the profession.

NAA likewise supports replacing elective coursework with a strengthened Required Core Curriculum, provided the required coursework fully addresses the essential competencies for each credential level. Increasing appraisal-specific qualifying education, including the addition of instruction focused on analytical skills, better prepares applicants for professional practice while promoting greater consistency and uniformity in qualifying education.

As previously stated, NAA encourages continued emphasis on the practical application of analytical skills rather than purely academic instruction. NAA believes these changes appropriately shift the focus from general academic achievement to appraisal-specific education that is directly tied to professional competency and public trust.

Removing the minimum timeframe for accumulating experience hours

- NAA has historically supported minimum experience timeframes as one component of professional development and continues to believe they serve an important purpose. While experience hours measure the quantity of appraisal work performed, the minimum timeframe helps ensure that experience is gained over a period sufficient to expose applicants to a broader range of market conditions, assignment complexities, and professional judgment. NAA recognizes that the AQB has already significantly reduced the minimum experience timeframes in previous revisions to the Criteria, thereby addressing many of the concerns regarding unnecessary delays in credentialing. NAA does not believe sufficient justification has been presented to support eliminating the minimum timeframe altogether. Accordingly, NAA encourages the AQB to retain the current minimum experience timeframes as an appropriate component of demonstrating competency and protecting the public trust.

Allowing PAREA programs to be approved with Program Segments that allow partial experience credit

- NAA strongly supports allowing AQB-approved PAREA providers the option of offering Program Segments that provide partial experience credit. The current "all-or-nothing" structure may unnecessarily discourage participation or penalize applicants who are unable to complete an entire program despite successfully completing substantial portions of it. Recognizing incremental experience better reflects the progressive nature of competency development and provides applicants with greater flexibility to combine PAREA and traditional supervised experience in a manner that best meets their individual circumstances. NAA believes this proposal expands access to the profession while maintaining appropriate competency standards and public trust.

Removing requirement that a Trainee Appraiser's coursework must have been completed in the past five years

- NAA supports eliminating the five-year qualifying education recency requirement for the Trainee Appraiser classification. This proposal appropriately aligns the Trainee classification with the other appraiser credential levels and removes an unnecessary barrier that does not appear to be directly related to competency or public trust. The required qualifying education itself remains unchanged, ensuring applicants continue to possess the foundational knowledge necessary to begin gaining supervised appraisal experience.

Resequencing qualifying education, examination and experience and extending the validity period for a passing exam score to "never expiring"

- NAA supports resequencing the qualification process to allow applicants to complete the AQB-approved National Examination upon successful completion of the required qualifying education, rather than requiring completion of the experience requirement beforehand. Completing the examination while the qualifying education is current better aligns the examination with its intended purpose of assessing the applicant's mastery of appraisal-specific education.

NAA likewise supports eliminating the expiration period for a passing examination score. Once an applicant has successfully demonstrated the knowledge required by the AQB-approved National Examination, there appears to be little public benefit in requiring that knowledge to be demonstrated again solely because the applicant completes the experience requirement over a longer period. The required experience component remains an independent qualification that must still be successfully

completed before a credential may be issued. Together, these changes remove unnecessary administrative barriers while maintaining the education, examination, and experience requirements necessary to support competency and public trust.

Shortening the required course on Fair Housing Laws, Impartiality, and Objective Valuation Practice to five hours and making repeated CE on the topic optional

- NAA strongly supports shortening the Fair Housing Laws, Impartiality, and Objective Valuation Practice qualifying education course and eliminating the mandatory continuing education requirement. NAA has consistently supported education in these important subject areas while questioning whether repeated mandatory instruction provides meaningful additional benefit after initial competency has been established. The proposed revisions appropriately incorporate these topics into qualifying education while allowing continuing education to remain available for appraisers who choose to pursue additional instruction or where warranted by future changes in law or policy.

Eliminating the signature requirement on experience logs for mass appraisal work for assessment offices that operate under USPAP Standards 5 & 6

- NAA supports eliminating the supervisory signature requirement on experience logs for mass appraisal work performed in assessment offices operating under USPAP Standards 5 and 6. The proposal appropriately recognizes that these environments often utilize structured supervisory and quality control systems that differ from the traditional supervisor-trainee model while still providing meaningful oversight and verification of appraisal experience. Allowing alternative verification methods in these limited circumstances expands opportunities for individuals pursuing credentialing without reducing competency standards or public trust.

Removing the CE requirement for the Trainee Appraiser classification

- Consistent with our prior comments on this topic, while many Trainee Appraisers are actively engaged in qualifying education and gain experience under the direct supervision of a Supervisory Appraiser, it has been our experience that some individuals remain in the Trainee classification for extended periods before becoming credentialed. In those circumstances, continuing education may serve an important role in maintaining competency and familiarity with evolving standards and professional practice.

NAA encourages the AQB explicitly allow QE courses to be used to satisfy CE requirements and/or to consider whether the continuing education requirement should instead be tied to the length of time an individual remains in the Trainee classification rather than eliminated entirely.

Allowing State appraiser regulators to extend deadlines for substantive reasons

- NAA supports allowing State Appraiser Regulatory Agencies to extend qualification deadlines when applicants or credential holders experience qualifying circumstances beyond their control. This proposal provides regulators with appropriate flexibility to address individual situations while preserving each state's discretion to establish and administer such extensions. NAA believes this change promotes fairness without diminishing qualification standards or public trust.

Encouraging regulators to recognize CE completed in another jurisdiction

- NAA supports encouraging State Appraiser Regulatory Agencies to recognize qualifying continuing education completed and approved in another jurisdiction. Greater reciprocity promotes consistency, reduces unnecessary administrative burdens, and benefits appraisers practicing in multiple jurisdictions while maintaining the AQB's continuing education requirements and competency standards.

Standardizing the definition of transaction value to match the federal definition

- NAA supports standardizing the definition of "transaction value" to align with the federal definition. Consistent terminology promotes uniform interpretation and application of the Criteria while reducing confusion among credential holders, regulators, educators and users of appraisal services.

Demonstration Appraisal Report Pathway

- NAA strongly supports the AQB's stated objective of broadening access to the appraisal profession without lowering qualification standards. Throughout these proposed revisions, the AQB has introduced numerous changes that reduce unnecessary barriers while preserving the fundamental qualification components of appraisal-specific education, examination, and *experience*. The proposed Demonstration Appraisal Report Pathway is unique among the proposed revisions because it appears to eliminate the experience component entirely, rather than modernize how that experience is documented or verified.

NAA recognizes that this proposal may be intended to provide an avenue for individuals who possess substantial valuation experience but are unable to document that experience through a traditional supervisory relationship, such as appraisers working in legally confidential environments or under recognized International Valuation Standards. However, as drafted, the pathway appears equally available to applicants who possess little or no practical appraisal experience beyond preparation of the required demonstration reports.

NAA is also concerned that the proposed pathway provides little guidance regarding the administration of the program. The proposal does not establish minimum qualifications for report reviewers, standardized scoring criteria, or procedures designed to ensure consistency among AQB-approved entities. Likewise, the proposal does not explain how reviewers can reasonably verify that the applicant independently prepared the demonstration reports.

Rather than creating a pathway that dispenses with documented experience entirely, NAA encourages the AQB to consider additional alternatives that preserve an experience requirement while expanding acceptable methods of documenting or verifying that experience. For example, the concepts underlying the proposed mass appraisal verification process or the recognition of alternative supervisory environments could be expanded to accommodate applicants whose *appraisal* experience cannot readily be documented under the traditional supervisory model.

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