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September 30, 2015

Mr. Wayne Miller
Chair
Appraiser Qualifications Board
The Appraisal Foundation
1155 15th Street, NW, Suite 1111
Washington, DC 20005

Dear Mr. Miller:

On behalf of the over 1.1 million members of the National Association of REALTORS® (NAR), I am writing in response to the Appraiser Qualifications Board's (AQB) Concept Paper – Alternative Track to the Experience Requirements in the Real Property Appraiser Qualification Criteria. NAR believes that there should be alternatives to fulfilling the residential appraisal experience component of the Criteria in addition to the traditional supervisor/trainee model currently in place.

The National Association of REALTORS® is America's largest trade association, including our eight affiliated Institutes, Societies and Councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,400 local associations or boards, and 54 state and territory associations of REALTORS®. NAR represents a wide variety of housing industry professionals, including approximately 30,000 licensed and certified appraisers, committed to the development and preservation of the nation's housing stock and making it available to the widest range of potential homebuyers.

College Coursework Should Count Toward Fulfilling Appraisal Experience

NAR agrees with the AQB that many college graduates will be unwilling to invest the required three or more years in an internship-type role before having the opportunity to sit for the Certified Residential or General Licensing Exam. NAR recommends that college intern programs associated with college business or real estate degree programs be developed to allow appraisal experience to be obtained while working toward a four-year degree. The internship could include a series of demonstration reports that count for up to 500 hours of experience. This would allow trainees to obtain professional appraisal experience as part of the education experience. Upon graduation from college, a student who has completed an appraisal internship program should be allowed to sit for the Certified Residential or Certified General Licensing Exam. After successfully completing the exam, the college graduate will obtain a trainee's license and be allowed a reduced time frame for experience.

Field Work Is Imperative to Appraiser Training

NAR continues to believe that an appraiser trainee should have on-the-job training by an experienced appraiser before being granted a license. This is vital to becoming a qualified appraiser. However, NAR recommends that field work in related professions count toward fulfilling a portion of the required appraisal experience. Related professional experience may include a bank employee doing valuations (that do not meet USPAP standards as an appraisal), an appraisal management company employee or mortgage lender employee doing appraisal compliance reviews, or a real estate agent with several years of experience selling real estate and writing BPOs or CMAs (with appropriate records retained for review).



Four-Year College Degree Requirement Should Be Re-Evaluated

In December 2011, the Appraiser Qualifications Board adopted revisions to the Criteria to require a Bachelor's degree or higher for Certified General and Certified Residential classifications. The new education requirement went into place on January 1, 2015. While this requirement was adopted to raise appraiser professionalism, we are concerned that the wages earned as an appraiser are not an incentive for an individual to enter the profession after paying for a four-year college degree, especially when a graduate must do a multi-year internship that is often unpaid. The degree requirement also disadvantages workers who already have thousands of hours of appropriate on-the-job training and could be great candidates to take the certified general or certified residential exam without completing a four-year degree. The AQB may want to consider counting years of experience in the appraisal profession under a trainee license to qualify for at least part of the four-year college degree requirement. Many very good existing Certified General and Certified Residential appraisers do not have four-year degrees. These same appraisers have successfully mentored many others to follow in the profession with the highest standards.

We look forward to attending the Appraisal Qualifications Board's public hearing on this issue on October 16, 2015. NAR is committed to maintaining the success of the appraisal profession and preserving access to homeownership. If I may be of any assistance to you, please do not hesitate to contact me or Sarah Young at scyoung@realtors.org or 202-383-1233.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Polychron", with a stylized, flowing script.

Chris Polychron
2015 President, National Association of REALTORS®