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June 16, 2016

Joseph C. Traynor
Chair, Appraiser Qualifications Board
The Appraisal Foundation
1155 15th Street, NW, Suite 1111
Washington, DC 20005

Submitted via email: aqbcomments@appraisalfoundation.org

RE: First Exposure Draft – Proposed Changes to the Real Property Appraiser
Qualification Criteria

Dear Mr. Traynor:

On behalf of the over 1.1 million members of the National Association of REALTORS® (NAR), I submit this letter in response to the Appraiser Qualifications Board's (AQB) *Exposure Draft – Proposed Changes to the Real Property Appraiser Qualification Criteria*. NAR is pleased to see that AQB incorporated into this Exposure Draft changes advocated by NAR in our March 2016 and September 2015 letters, written in response to the related AQB Discussion Draft and White Paper.

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 1,300 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.

Alternative Track for Licensed Residential to Certified Residential

NAR agrees with removing the requirement that licensed residential appraisers must have a four-year degree in order to become certified residential appraisers and, instead, requiring a certain level of specific knowledge and skills. AQB's proposed use of College Level Placement Exams (CLEP) is a good way to determine ability and skill in key areas important to the appraisal profession without the financial burden and time demand required to complete a four-year degree. However, NAR also urges the AQB to think outside traditional education models of classes and testing, which 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 should count years of experience in the appraisal profession under a trainee license to qualify for at least part of the knowledge and skills 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.



Documenting Alternative Experience

NAR strongly supports AQB's *Option Three* for documenting alternative experience, in which 50% of the experience required for licensure or certification could be obtained from experience in other fields. In particular, NAR appreciates AQB adopting NAR's suggestion that the skills gained in writing broker price opinions and comparative market analyses are acceptable alternatives to the traditional appraiser experience requirement. NAR also urges AQB to recognize the experience gained from doing other non-USPAP conforming valuations and appraisal compliance reviews.

Trainee Nomenclature

The AQB's intention to issue guidance addressing the role of Trainee Appraisers and their competency requirements in terms of appraisal work is a positive step forward in clarifying the confusion occurring between lenders and appraisers on the allowed scope of Trainee assignments. NAR appreciates AQB's *June 2016 Q&A* release on Trainee requirements as it is similar in form to the fact sheet format advocated by NAR in our previous letter to AQB.

Three-Year Supervisory Residency Requirement

As stated in NAR's previous letter, there is a growing demand for Supervisory Appraisers across many states. Yet, the quality of Trainee Appraiser supervision should not be compromised in order to meet this demand. The competency acquired through at least three years of appraisal work is integral to becoming a successful Supervisory Appraiser. As such, NAR agrees with the AQB proposal that Certified General Appraisers with at least three years of appraisal work have the ability to effectively supervise a trainee in any state in which they are licensed and in good standing.

Thank you for your consideration of these comments. If I may be of any assistance to you, please do not hesitate to contact me or our Regulatory Policy Representative, Sehar Siddiqi, at (202) 383-1176 or SSiddiqi@REALTORS.org.

Sincerely,



Tom Salomone

2016 President, National Association of REALTORS®