NATIONAL ASSOCIATION OF REALTORS®

ADVOCACY GROUP
Shannon McGahn
Chief Advocacy Officer

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The Appraisal Foundation
Attn: Jerry Yurek
Chair, Appraiser Qualifications Board
1155 15th Street NW, Suite 1111
Washington, DC 20005

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

Dear Mr. Yurek:

On behalf of the National Association of REALTORS® (NAR), we thank the Appraisal Foundation for the opportunity to comment on the Appraiser Qualifications Board's (AQB) *First Exposure Draft of Proposed Changes to the Real Property Appraiser Qualification Criteria*. Appraisals are the bedrock of the housing finance system, and credible independent valuations of real property are critical to the health of the overall real estate industry. The Criteria define the minimum qualifications to enter the profession and are critical to defining and maintaining the industry's professionalism.

The National Association of REALTORS® is America's largest trade association, including NAR's five commercial real estate institutes and its 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 1,200 local associations or boards, and 54 state and territory associations of REALTORS®. NAR represents a wide variety of housing industry professionals, including over 20,000 licensed and certified appraisers, who are committed to the development of credible independent valuations of real property, which are critical to the health of the overall real estate industry.

NAR is encouraged by the First Exposure Draft of the Proposed Criteria, as it represents a significant philosophical shift away from the rigid, time-based, and supervisor-dependent framework of the existing Criteria, and towards a competency-driven, multi-pathway model. This includes broadened experience concepts, greater flexibility in education delivery, and a more modernized approach to workforce entry.

**A Needed Change Towards Modernization**

NAR strongly supports modernizing the Criteria. Many of the proposed changes reflect long standing NAR priorities, especially those seeking to expand pathways into the profession, reduce bottlenecks created by the supervisory model, and recognize the diversity of valuation activities performed across the real estate industry.

However, several areas fall short of full alignment with NAR policy, and others would benefit from additional clarification to support implementation and regulator understanding.

**Opportunities Remain for Parallel Experience and Education**

The National Association of REALTORS® has long encouraged broader pathways to the appraisal profession that reduce unnecessary barriers while maintaining competency and public trust. NAR supports the Criteria's providing broader avenues into the profession, with attempts to expand access and reduce structural bottlenecks by recognizing alternative experience environments and loosening experience sequencing.

The proposed Criteria eliminates the requirement for college degrees for all incoming appraisers. While NAR has no direct policy on the college degree requirement, members have commented that a college degree is not the deciding factor for any person regarding public trust or professional competency. NAR believes that competency is a key factor in quality appraisals of real estate, and supports the enhanced focus on competency, with the draft's emphasis on modernization techniques that demonstrate ability rather than mere accumulation of hours. NAR is also pleased to see the retention of required Fair Housing courses recognizing the importance of federal nondiscrimination knowledge.

However, NAR is disappointed that the AQB did not take the opportunity to explicitly recognize the parallel valuation experience that real estate agents and brokers gain every day. The AQB should consider parallel professional, non-appraiser experience including, but not limited to experience in:

* Real estate market analysis

* Real estate brokerage including:

A) Evaluating and pricing residential real estate

B) Counseling buyers, sellers, owners, and tenants on inspections and remediations, improvements, and the appraisal process

C) Counseling buyers, sellers, owners, and tenants about listing and offering prices, and market rent

D) Completing broker price opinions and Competitive Market Analyses

E) Completing Evaluations in compliance with the Interagency Appraisal and Evaluation Guidelines

F) Compliance with Fair Housing laws, rules and regulations

G) Compliance with the Equal Credit Opportunity Act

The Draft widens acceptable experience philosophically but explicitly recognizing these activities would modernize pathways.

In addition, the AQB should allow state real estate licensing coursework to satisfy clearly defined portions of the Required Core Curriculum where learning objectives overlap would streamline entrance to the profession by experienced real estate agents and brokers.

**Conclusion**

NAR commends the AQB for proposing meaningful modernization of the Criteria. The exposure draft successfully reflects the philosophy of previous NAR recommendations of expanding pathways, reducing bottlenecks, and focusing on competency. However, the Draft stops short of formally adopting a full framework for parallel experience and education. NAR encourages the AQB to incorporate the recommendations above to strengthen clarity, promote consistency for state agencies, and fully realize the potential of a competency based, modern appraisal qualification system.

If you have any questions or comments, please feel free to reach out to Keisha Wilkinson, NAR's Senior Policy Representative for Valuation Policy, at KWilkinson@NAR.Realtor.

Sincerely,

Kevin Brown
2026 President, National Association of REALTORS®