

QUESTIONS & ANSWERS

APPRAISER QUALIFICATIONS BOARD



THE APPRAISAL FOUNDATION

Authorized by Congress as the Source of Appraisal Standards and Appraiser Qualifications

The Appraiser Qualifications Board (AQB) of The Appraisal Foundation establishes the minimum education, experience, and examination requirements for real property appraisers to obtain a state license or certification. The AQB Q&As are a form of guidance issued by the AQB to respond to questions raised by appraisers, enforcement officials, users of appraisal services, and the public to illustrate the applicability of the Real Property Appraiser Qualification Criteria (Criteria) and Interpretations of the Criteria in specific situations and to offer advice from the AQB for the resolution of appraisal issues and problems. The AQB Q&As may not represent the only possible solution to the issues discussed nor may the advice provided be applied equally to seemingly similar situations. AQB Q&As do not establish new Criteria. AQB Q&As are not part of the Criteria. AQB Q&As are approved by the AQB without public exposure and comment.

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May 1, 2018 IMPLEMENTATION Q&AS

GENERAL IMPLEMENTATION QUESTIONS

Question #1:

Can states implement the new *Criteria* prior to the effective date of May 1, 2018?

Answer:

No, a state cannot implement the new *Criteria* prior to its effective date because the requirements are less than what is currently required. Therefore, states must wait to implement the new requirements until the effective date.

Question #2:

I am a credentialed appraiser in State A, and am moving to State B. State A adopted the May 2018 *Criteria* but State B did not, and will not grant me a reciprocal credential. Does the AQB consider the May 2018 *Criteria* equal or equivalent to the pre-May 2018 *Criteria*?

Answer:

Over the years the *Criteria* has changed many times. It is not the position of the AQB that a credential obtained under one version of the *Criteria* is different than one obtained under a different version. From the AQB's perspective, an individual holding a certain credential is equally qualified to another holding the same credential, regardless of when the credentials were issued and which version of the *Criteria* applied at the time. Therefore, the AQB encourages states to view all credentials issued for a classification as equivalent.

ALTERNATIVE TRACK TO QUALIFY FOR A CERTIFIED RESIDENTIAL CREDENTIAL

Question #1:

I've held a Licensed Residential credential for five years and plan to upgrade to a Certified Residential credential. What do I need to do to get a Certified Residential credential?

Answer:

Provided you have held a Licensed Residential credential for a minimum of five (5) years and have not had any adverse, final and non-appealable adjudicated disciplinary action affecting your legal eligibility to engage in appraisal practice within the five (5) years immediately preceding the date of application for a Certified Residential credential, you would need to document the following:

- An additional 50 hours of qualifying education, including the following courses: Statistics, Modeling & Finance (15 hours), Advanced Residential Applications and Case Studies (15 hours) and Appraisal Subject Matter Electives (20 hours);
- One thousand five hundred (1,500) hours of experience in no fewer than twelve (12) months (experience used to obtain your Licensed Residential credential may apply to this requirement);
- Successful completion of the Certified Residential Real Property Appraiser examination.

If you have not held a Licensed Residential credential according to the requirements stated above, in addition to the above requirements, you must also have:

1. Possession of a Bachelor's Degree in any field of study; or
2. Possession of an Associate's Degree in a field of study related to:
 - Business Administration;
 - Accounting;
 - Finance;
 - Economics; or
 - Real Estate

or

3. Successful completion of 30 semester hours of college-level courses that cover each of the following specific topic areas and hours:
 - English Composition (3 semester hours);
 - Micro Economics (3 semester hours);
 - Macro Economics (3 semester hours);
 - Finance (3 semester hours);
 - Algebra, Geometry, or higher mathematics (3 semester hours);
 - Statistics (3 semester hours);
 - Computer Science (3 semester hours);
 - Business or Real Estate Law (3 semester hours); and
 - Two elective courses in any of the topics listed above or in accounting, geography, agricultural economics, business management, or real estate (3 semester hours each)

or

4. Successful completion of at least 30 semester hours of College Level Examination Program® (CLEP®) examinations from each of the following subject matter areas:
 - College Algebra (3 semester hours);
 - College Composition (6 semester hours);
 - College Composition Modular (3 semester hours);
 - College Mathematics (6 semester hours);
 - Principles of Macroeconomics (3 semester hours);

- Principles of Microeconomics (3 semester hours);
- Introductory Business Law (3 semester hours); and
- Information Systems (3 semester hours).

or

5. Any combination of option 3 and 4 above that includes all of the topics identified that ensures coverage of all topics identified in option #3.

As some states may have requirements that exceed AQB *Criteria*, it is important to check with the state regulatory agencies to determine what their requirements are.

Question #2:

What is a final and non-appealable adjudicated disciplinary action?

Answer:

A final and non-appealable adjudicated disciplinary action is one in which all appeals available under due process have been exhausted, or which the time period in which to request an appeal has expired.

Question #3:

I have been a Licensed Residential appraiser for more than five years, but my state has placed a restriction on my credential, which limits the types of assignments I am allowed to appraise. Is this considered a sanction that restricts my “legal eligibility to engage in appraisal practice” and therefore disqualifies me for the alternative track to become a Certified Residential appraiser?

Answer:

Yes. An appraiser would not be able qualify for the alternative track to become a Certified Residential until five years after the date the restriction is lifted.

Question #4:

The *Criteria* that went into effect on May 1, 2018, allow an AQB compliant Licensed Residential Appraiser to change to a Certified Residential Appraiser credential without possessing a college degree. Does this apply to all Licensed Residential credential holders or just those that held the Licensed Residential credential prior to the *Criteria* effective date of May 1, 2018?

Answer:

Per Section III.C. of the Certified Residential Criteria, this applies to any individual who holds (or has held) a Licensed Residential credential for a minimum of five (5) years with no record of any adverse, final, and non-appealable disciplinary action that affected their legal eligibility to engage in appraisal practice within the five (5) years immediately

preceding the date of application *may* be eligible to obtain a Certified Residential credential without a college degree (regardless of when they obtained a Licensed Residential credential).

In addition to satisfying the requirements outlined in Section III.C., the applicant would also need to obtain an additional fifty (50) hours of qualifying education, document 1,500 hours of experience in no fewer than twelve (12) months, and successfully pass the Certified Residential Examination. As some states may have requirements that exceed AQB *Criteria*, it is important to check with the state regulatory agencies to determine what their requirements are.

Question #5:

I have held a Licensed Residential credential for 20 years; however, my credential is currently inactive, and has been for four years. I have completed 14 hours of continuing education during each year the credential has been inactive.

The *Criteria* state that individuals who have held an AQB compliant Licensed Residential credential for a minimum of five (5) years with no record of any adverse, final, and non-appealable disciplinary action affecting the appraisers' legal eligibility to engage in appraisal practice within the five (5) years immediately preceding the date of application for a Certified Residential credential may qualify for a Certified Residential credential by:

- Successfully completing fifty (50) additional specified hours of qualifying education;
- Documenting proof of completing 1,500 hours of experience in no fewer than twelve (12) months; and
- Successfully passing the Certified Residential National Examination

Will the fact that my credential is currently inactive prevent me from qualifying for a Certified Residential credential via the alternative pathway outlined above?

Answer:

No, provided you possessed an active Licensed Residential credential that allowed you to legally engage in appraisal practice for a total period of at least five (5) years and have legal authority to reinstate your inactive credential, the *Criteria* does not prohibit you from qualifying for a Certified Residential credential (please note you must also meet the requirements noted above per Section III.C. in the Certified Residential *Criteria*). However, some states may have requirements that exceed AQB *Criteria*, so it is important to check with your state regulatory agency.

COLLEGE DEGREE REQUIREMENT

Question #1:

I would like to become a Certified Residential appraiser, and noticed that one of the college-level education requirement options is to have an Associate's Degree in a field related to Business Administration, Accounting, Finance, Economics, or Real Estate. How do I know if my Associate's Degree falls into one of these broad categories?

Answer:

The following fields of study may apply, but you will need to double check with your state appraiser regulatory agency as their requirements may differ or be more specific.

Associate's Degrees in Business Administration

Possible alternative degrees related to an Associate's Degree in Business Administration may include, but are not limited to:

- Administrative / Executive Assisting
- Bookkeeping
- Business Information / Office / Office Administration Systems
- Business / Construction / Hospitality / Restaurant / Human Resources / Information Systems / Operations / Project / Small Business / Supply Chain Management
- e-Business
- Economics
- Finance
- International Business
- Logistics
- Marketing / Sales
- Merchandising
- Public Service
- Taxation
- Technical Administration

Associate's Degrees in Accounting

Possible alternative degrees related to an Associate's Degree in Accounting may include, but are not limited to:

- Accounting Systems / Accounting Technology
- Applied Accounting
- Auditing
- Bookkeeping
- Computer Applications
- Financial Management / Financial Services

- Taxation / Tax Specialist

Associate's Degrees in Finance

Possible alternative degrees related to an Associate's Degree in Finance may include, but are not limited to:

- Banking
- Credit Management
- Financial Planning
- International Finance
- Investments and Securities
- Real Estate Finance
- Statistical Methods

Associate's Degrees in Economics

Possible alternative degrees related to an Associate's Degree in Economics may include, but are not limited to:

- Applied / Business / Development / International / Managerial Economics
- Econometrics

Associate's Degrees in Real Estate

Possible alternative degrees related to an Associate's Degree in Real Estate may include, but are not limited to:

- Appraisal
- Property Management
- Real Estate Finance

Question #2:

The *Criteria* provide for alternatives to the Bachelor's Degree requirement for a Certified Residential credential, which includes 30 semester hours of college education in specified topics. How do I know what college courses match these topics?

Answer:

The AQB issued Guide Note (GN-10), which addresses this topic specifically. The topics listed in the Certified Residential *Criteria*, Section III.B.3., are very broad. State regulators can review GN-10 to assist them with determining what college course titles may match the requirements.

Question #3:

The *Criteria* contain a list of college-level courses that applicants may take in lieu of a college degree for the Certified Residential classification. Do I have to complete each of the courses in the list, or may I simply choose courses from among the list to satisfy the 30 semester credit hour requirements?

Answer:

Applicants who do not possess the requisite college degree must complete college-level courses covering three semester hours in each of the topic areas listed to satisfy the in-lieu requirements for the Certified Residential classification. (Note: completion can be satisfied with a combination of topics in Section III.B.3. and III.B.4.).

Question #4:

The *Criteria* require a “Business or Real Estate Law” course (among other courses) in-lieu of a college degree as college education for the Certified Residential credential. Does this mean any course in “Business” or a course in “Real Estate Law” or does this mean a course in “Business Law” or a course in “Real Estate Law?”

Answer:

The in-lieu education must include successful completion of a course in “Business Law” or a course in “Real Estate Law” from an accredited degree-granting college or university for which you receive credit or successfully complete the CLEP examination “Introductory Business Law.”

Question #5:

The *Criteria* allow for an Associate’s Degree in Business Administration, in the field of “Hospitality.” How is this pertinent for appraisers?

Answer:

There are appraisers who specialize in the valuation of hotels and motels. A degree with an emphasis in how these facilities operate could be a foundational basis when performing assignments of this type.

Question #6:

What information do I need to submit to my state to help them evaluate the college courses I took to meet the Certified Residential college education requirements or the qualifying education required toward all classification levels?

Answer:

Your state may require copies of your college transcript, syllabi, and course materials used in your college courses. Additionally, the AQB has developed a Guide for How to Apply University/College Courses to the AQB’s Real Property Appraiser Core Curriculum Matrix, which is available for download [here](#).

Please double check with your state appraiser regulatory agency as their requirements may differ or be more specific.

EXPERIENCE

Question #1:

The *Criteria* require successful completion of three items: education, experience, and examination. The revised *Criteria* now recognize an appraiser who has held the Licensed Residential credential for five (5) years without any disciplinary action affecting the appraiser's legal eligibility to practice may obtain a Certified Residential credential by completing 50-additiinal hours of specified qualifying education and successful completion of the national examination.

Does an applicant in the above scenario need to provide a log to document 1,500 experience hours?

Answer:

Yes, a Licensed Residential appraiser will have to document proof of completion of 1,500 hours in no fewer than twelve (12) months. (Note: some of the experience used to qualify for the Licensed Residential credential may apply towards this requirement).

Q&As (MODIFIED TO COMPLY WITH MAY 1, 2018 CRITERIA)

GENERAL REQUIREMENTS

Question #1:

I would like to get a Certified General appraiser credential. I am from another country and have a student visa, but don't have a Social Security card or Taxpayer ID Number. If I fulfill the education and experience requirements, can I get a Certified General appraiser credential without possessing a Social Security card or similar document?

Answer:

The *Criteria* do not specifically address residency, citizenship or identification issues. However, be sure to check with the state appraiser regulatory agency in the jurisdiction where you plan to seek the credential to confirm the requirements for licensure, as states may have their own residency or citizenship requirements.

Question #2:

I am currently a real property appraiser seeking a credential in my jurisdiction. I do not have a high school diploma, but have obtained the other education requirements in the *Real Property Appraiser Qualification Criteria (Criteria)*. Will I be able to obtain my real property credential without having a high school diploma?

Answer:

Yes, the *Criteria* do not require a high school diploma or equivalent. However, please note that individual states or credentialing jurisdictions may adopt more stringent requirements. It is incumbent on candidates to check with the state appraiser regulatory agency in which they plan to seek a credential.

Question #3:

I have a degree from a university that was conferred prior to the university becoming accredited. Will I be able to use that degree to satisfy the college degree requirement in the *Criteria*?

Answer:

No, the college or university must have been accredited at the time the degree was conferred.

BACKGROUND CHECKS

Question #1:

I understand the *Criteria* require applicants for new credentials to undergo a background check. Does this apply to credential holders from other states seeking reciprocal licensure and/or temporary practice permits in my state?

Answer:

The *Criteria* encourage states to grant reciprocity and/or allow temporary practice to those who hold valid credentials in other states. As such, the *Criteria* do not require a state to examine the specifics of the original application in the credential holder's existing jurisdiction (e.g., what and/or how much education they completed and when, when the examination was completed, whether the applicant holds a college degree, what level of experience the applicant was required to complete, and/or whether the credential was issued with or without a background check).

However, as with all AQB *Criteria*, a state may adopt more stringent requirements with regard to background checks.

Question #2:

It appears states are prohibited from issuing a credential to applicants that have convictions in certain areas. One of these areas includes an applicant's "general fitness" for licensure. What exactly does this mean?

Answer:

Section VI(C) of the *Criteria* states:

An applicant shall not be eligible for a real property appraiser credential if, during at least the five(5) year period preceding the date of the application for licensing or certification, the applicant has been convicted of, or plead guilty or nolo contendere to a crime that would call into question the applicant's fitness for licensure.

It is impractical, and likely impossible, to compile a list of every specific circumstance where an applicant must be denied a credential. Section VI(C) is intended to provide states with the ability to deny a credential based on "public trust." States have latitude to determine, based on their own guidelines, whether or not an applicant falls into this category and should be denied a credential.

Question #3:

Are states also required to decline a credential when an applicant is found to have any of the background issues listed in Guide Note 9?

Answer:

No. The language in Guide Note 9 is meant to offer guidance to jurisdictions.

Guide Note 9 provides information on the types of background issues a state appraiser regulatory agency might consider. This is not intended to be a comprehensive list; a state may consider other issues.

Question #4:

I am very interested in a career in real estate appraisal. However, I have one problem...I have a felony conviction on my criminal record. Can I still become a credentialed appraiser?

Answer:

Depending upon the nature of your felony conviction, you may be prohibited from obtaining a real property appraiser credential. The *Criteria* states:

An applicant shall not be eligible for a real property appraiser credential if, during at least the five (5) year period immediately preceding the date of the application for licensing or certification, the applicant has been convicted of, or plead guilty or nolo contendere to a crime that would call into question the applicant's fitness for licensure.

Additionally, Guide Note 9 provides guidance to state regulatory agencies by indicating those offenses that might be considered objectionable, as well as guidance on possible evidence of rehabilitation. The Guide Note is intended to be guidance and you will need to check with your state agency to determine which offenses could prevent an applicant from obtaining a license or certification.

SCOPE OF PRACTICE

Question #1:

I am a Certified Residential appraiser and I have been asked to appraise a home on 40 acres, which includes a "hobby farm" that is not used for commercial purposes. The zoning requires a minimum lot size of 40 acres, so the lot cannot be subdivided and used for other purposes. Does my Certified Residential credential permit me to appraise this property?

Answer:

Yes, as long as you can do so in compliance with the COMPETENCY RULE and all other applicable provisions in USPAP.

Question #2:

I am a Certified Residential appraiser and I have been asked to appraise a home on 40 acres. The zoning requires a minimum lot size of 5 acres, and I have confirmed with the local planning department that the lot could be subdivided into eight 5-acre parcels. In addition, my preliminary research confirms the highest and best use of the property would

be for an eight-lot subdivision. Does my Certified Residential credential permit me to appraise this property?

Answer:

If the appraisal report will be utilized to support a real estate related financial transaction, then you may not appraise this property with your Certified Residential credential. Since the highest and best use of the site is for something greater than a 1-4 unit residential property, the appraisal must be prepared by (or, at a minimum, co-signed by) a Certified General appraiser. If the appraisal is not for a real estate related financial transaction, and you can do so in compliance with the COMPETENCY RULE and all other provisions of USPAP, then check with your state appraiser regulatory agency to see if the state permits you to value a property with these characteristics.

Question #3:

I am a Licensed Residential appraiser and I have been asked to appraise a home on 40 acres in a marketplace where there are no other home sites larger than 5 acres. The appraisal is being requested by a federally-regulated bank in order to evaluate the subject property as collateral for a \$1.5 million mortgage loan. Does my Licensed Residential credential permit me to appraise this property?

Answer:

No. The scope of practice for the Licensed Residential classification allows for appraisals of “complex” 1-4 unit residential properties up to a transaction value of \$250,000, and it appears this assignment would qualify as “complex.” However, even if it does not qualify as “complex,” the Licensed Residential classification only allows for appraisals of “non-complex” 1-4 unit residential properties up to a transaction value of \$1 million. Therefore, this property could not be appraised by a Licensed Residential appraiser to support a real estate related financial transaction. If this appraisal was not being performed for a real estate related financial transaction, and you could do so in compliance with the COMPETENCY RULE and all other provisions of USPAP, then check with your state appraiser regulatory agency to see if the state permits you to value a property with these characteristics.

Question #4:

I was asked to appraise a “condotel,” which is defined as:

A hotel in which an investor takes title to a specific hotel room (unit), which remains in the pool to be rented to transient guests whenever the investor is not using the unit.¹

Is the appraisal of an individual condotel unit a residential or non-residential assignment?

¹ *Dictionary of Real Estate Appraisal*, 6th ed. Chicago: Appraisal Institute, 2015.

Answer:

If the marketplace recognizes the units individually as residential units, the appraisal would be considered a residential assignment. If the marketplace does not recognize the units individually but rather as a part of the overall hotel operation, then the assignment would be non-residential. In either case, appraisers performing such assignments must fully understand the ownership rights associated, as well as the interest(s) being appraised.

As with all assignments, appraisers must comply with USPAP, including the COMPETENCY RULE.

SUPERVISORY APPRAISER / TRAINEE APPRAISER EDUCATION

Question #1:

I am currently a credentialed Trainee Appraiser. Am I required to take a Supervisory Appraiser/Trainee Appraiser course?

Answer:

If you were a credentialed Trainee Appraiser prior to January 1, 2015, the AQB encourages you to take the course; however, the *Criteria* would not require you to do so. Nonetheless, check with your state appraiser regulatory agency, since it may adopt more stringent requirements.

For individuals who have sought a new Supervisory Appraiser after January 1, 2015 you must fulfill all of the current *Criteria* requirements, which includes taking the Supervisory Appraiser/Trainee Appraiser Course.

Question #2:

I began supervising a credentialed Trainee Appraiser prior to January 1, 2015. Am I required to take the Supervisory Appraiser/Trainee Appraiser Course?

Answer:

If you began supervising a credentialed Trainee Appraiser prior to January 1, 2015, the AQB encourages you to take the course; however, the *Criteria* would not require you to do so. Nonetheless, check with your state appraiser regulatory agency, since it may adopt more stringent requirements.

If you have sought to serve as a Supervisory Appraiser of any additional Trainee Appraiser(s) after January 1, 2015, you must fulfill all of the current *Criteria* requirements, which includes taking the Supervisory Appraiser/Trainee Appraiser Course.

Question #3:

I am a state appraiser regulatory official and I have reviewed the AQB course content outline for the required Supervisory Appraiser/Trainee Appraiser Course. Does the AQB require a minimum or maximum length for this course?

Answer:

The AQB has not established a minimum or maximum time frame for this course offering. The intent of the course is to cover areas of general applicability to all Supervisory Appraiser/Trainee Appraiser relationships, and to allow each state to consider including material specific to the local jurisdiction regarding state law and/or areas of practice eliciting the highest number of disciplinary actions/complaints.

If an education provider is seeking continuing education credit for the course, it must be a minimum of two classroom hours, per the *Criteria* requirements.

Question #4:

I am a state appraiser regulatory official. A course provider submitted a Supervisory Appraiser/Trainee Appraiser course for Continuing Education (CE) approval. Does the AQB allow this course to be utilized for appraiser CE?

Answer:

Yes, upon review and approval by the state appraiser regulatory agency, a Supervisory Appraiser/Trainee Appraiser course may be utilized for CE for existing credential holders, provided the course meets the other requirements for a CE course as specified in the *Criteria*. However, the *Criteria* prohibit the course from being counted toward Qualifying Education (QE).

Question #5:

I am an education provider and noticed that the majority of the course content in Section III of the Supervisory Appraiser/Trainee Appraiser Course Outline, Individual State or Territory Credentialing Entities, is currently contained within the first section of The Appraisal Foundation's *15-Hour National USPAP Course*.

If I incorporate a large portion of the *15-Hour National USPAP Course* material into my Supervisor Appraiser/Trainee Appraiser Course, am I violating any USPAP course copyright?

Answer:

No, provided proper attribution to the *15-Hour National USPAP Course* is provided in the Supervisory Appraiser/Trainee Appraiser Course, there is not a problem incorporating material from the *15-Hour National USPAP Course* into the Supervisory Appraiser/Trainee Appraiser Course.

Question #6:

I am a state appraiser regulatory official and I was recently reviewing the AQB's Supervisory Appraiser/Trainee Appraiser Course Objectives and Outline document. I note that item III.C.1 requires an "Overview of a jurisdiction's role in issuing appraiser credentials and disciplining appraisers," while it is optional to include item III.C.2, "Specific information regarding the regulatory structure of the individual jurisdiction."

In addition, item IV.B.1 requires an "Overview explaining how AQB sets minimum qualifications, but states may have qualifications that exceed AQB *Criteria*," and item IV.B.2 requires the course to "Outline and explain the specific steps/requirements to becoming licensed or certified in the particular jurisdiction in which the course is being provided."

Our jurisdiction does not require anything more than the AQB *Criteria*; therefore, must we include jurisdiction-specific requirements, given that they are the same as the AQB *Criteria*?

Answer:

Yes. Even if a jurisdiction does not have any requirements greater than the AQB *Criteria*, the course must include material addressing all of the required topic areas as identified in the Supervisory Appraiser/Trainee Appraiser Course Objectives and Outline document. Any items identified as optional are not required.

If a jurisdiction's requirements are identical to those established by the AQB, course developers must include that criteria under the jurisdiction-specific portions of the course.

I am an education provider planning to create a course that meets the minimum requirements in the Criteria for the Supervisory Appraiser/Trainee Appraiser Course. I would like to submit the base course (that includes the national minimum requirements, not the state rules/regulations) to the AQB's Course Approval Program (CAP for approval for use in multiple jurisdictions), and then allow states to write add-on modules covering any state-specific requirements. I have three questions:

Question #1:

Will the AQB, through its Course Approval Program, review and approve the above scenario as meeting the minimum base requirements?

Answer:

Yes, the AQB recognizes that a Supervisory Appraiser/Trainee Appraiser Course must cover the required elements of the Course Content Outline. As such, a course that earns CAP approval will have an additional statement to this effect.

Question #2:

In prior Q&As on this topic, the AQB affirmed there is no minimum or maximum course length for the Supervisory Appraiser/Trainee Appraiser Course. If my base course is approved through CAP for 6 hours, and I offer the course in a state that has adopted a 3-hour course requirement, can my course be presented in a 3-hour format in that state?

Answer:

No, not if you utilize CAP approval. CAP approval requires a course to be presented as submitted; therefore, material cannot be added or omitted from the presentation of the course. In this case, you would have to create a 3-hour course for that particular state and seek separate approval from CAP or approval from that state appraiser regulatory agency.

Question #3:

Are education providers required to submit Supervisory Appraiser/Trainee Appraiser courses to CAP for approval?

Answer:

No, states can approve courses directly, provided the state verifies the course includes all of the required elements of the course content outline developed by the AQB.

SUPERVISORY APPRAISER ELIGIBILITY

Question #1:

I am a state-certified appraiser who is also a Supervisory Appraiser. My appraiser credential has been suspended. Is this considered a sanction that restricts the Supervisory Appraiser's "legal eligibility to engage in appraisal practice?"

Answer:

Yes. An appraiser would not be able to act as a Supervisory Appraiser for the length of the suspension plus an additional three years beyond the date the suspension is lifted.

Question #2:

I am a state-certified appraiser who is also a Supervisory Appraiser. My state has placed a restriction on my credential, limiting the types of assignments they will allow me to appraise. Is this considered a sanction that restricts the Supervisory Appraiser's "legal eligibility to engage in appraisal practice?"

Answer:

Yes. An appraiser would not be able to act as a Supervisory Appraiser for the length of the "probation" plus an additional three years beyond the date the "probation" is lifted.

Question #3:

I am a state-certified appraiser who is also a Supervisory Appraiser. My state appraiser regulatory agency has levied a fine against me and required me to take additional education. Is this considered a sanction that restricts the Supervisory Appraiser's "legal eligibility to engage in appraisal practice?"

Answer:

No. As long as the fine is paid and remedial education is completed and no further action is taken (suspension), the Supervisory Appraiser could continue to supervise Trainee Appraisers. However, please check with your state appraiser regulatory agency, since it may adopt more stringent requirements.

Question #4:

Is a Supervisory Appraiser's eligibility to supervise Trainee Appraisers only evaluated when they initially become a Supervisory Appraiser, or is the Supervisory Appraiser's eligibility evaluated on an ongoing basis?

Answer:

The Supervisory Appraiser's eligibility is evaluated on an ongoing basis. Thus, if any sanction is levied against a Supervisory Appraiser during the term of supervision that affects the Supervisory Appraiser's eligibility to practice, the Supervisory Appraiser would immediately lose the right to supervise Trainee Appraisers for the length of the sanction, plus an additional three years beyond the date the sanction is lifted.

Question #5:

I have been a Certified Residential appraiser for the past five (5) years. Last month, I was issued a Certified General credential in the same jurisdiction. Am I able to supervise a Trainee Appraiser working on commercial properties?

Answer:

The *Criteria* state Supervisory Appraisers shall be state-certified and in "good standing" for a period of at least three (3) years prior to being eligible to become a Supervisory Appraiser. The *Criteria* do not specify that a Supervisory Appraiser possess a specified Certified Residential or Certified General credential, so you may be eligible to supervise a Trainee Appraiser performing commercial appraisals. However, the Supervisory Appraiser must comply with the COMPETENCY RULE of USPAP for the property type and geographic location in which the Trainee Appraiser is being supervised.

Question #6:

I am a state-certified real property appraiser and I am supervising a Trainee Appraiser. I notice the *Criteria* specifies Supervisory Appraisers shall not have been subject to any disciplinary action within any jurisdiction within the last three (3) years that affects the Supervisory Appraiser's legal eligibility to engage in appraisal practice. Can you provide

examples of disciplinary actions that **would** affect my legal eligibility to engage in appraisal practice?

Answer:

The AQB has interpreted a disciplinary action to mean any adverse, final, and non-appealable decision by a state regulatory, administrative, or judicial authority of competent jurisdiction, which affects an individual's ability to practice. Sanctions imposed may vary between jurisdictions **and** may consist of those that do and do not affect an appraiser's legal eligibility to practice.

Sanctions that **would** affect an appraiser's legal eligibility to engage in appraisal practice may include, but are not limited to:

- Any limitation preventing or restricting an appraiser from engaging in appraisal practice until a specified condition has been met.
- Any limitation preventing or restricting an appraiser from engaging in appraisal practice of specific property types for any duration of time.
- Suspension of a Certified General or Certified Residential credential in any jurisdiction.
- Revocation of a Certified General or Certified Residential credential in any jurisdiction.

However, be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #7:

Can you provide examples of disciplinary actions that **would not** affect my legal eligibility to engage in appraisal practice?

Answer:

Sanctions that **would not** affect an appraiser's legal eligibility to engage in appraisal practice may include, but are not limited to:

- A monetary fine or penalty (without additional sanctions limiting the appraiser's legal eligibility to engage in appraisal practice).
- A letter of warning or reprimand.
- An educational requirement.

However, be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #8:

I am a state-certified real property appraiser and I am supervising a Trainee Appraiser. I was recently investigated by my state board for an alleged violation of USPAP. The case

was subsequently dismissed without merit and no violations were substantiated. Does an investigation by a state board or other duly authorized entity preclude my continued supervision of the Trainee Appraiser?

Answer:

No, the *Criteria* specify Supervisory Appraisers shall not have been subject to any disciplinary action within any jurisdiction within the last three (3) years that affects the Supervisory Appraiser's **legal eligibility** to engage in appraisal practice. Although an investigation has occurred in your case, there has been no disciplinary action taken that would preclude your continued supervision of your Trainee Appraiser. However, be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #9:

I am a state-certified real property appraiser and I am supervising a Trainee Appraiser. I also carry a designation issued by a professional appraiser organization. I was recently investigated by my organization for an alleged violation of the organization's professional ethics requirements, and subsequently, my professional designation was revoked. Does a revocation of my designation by the professional organization preclude my continued supervision of the Trainee Appraiser?

Answer:

No, the *Criteria* specify Supervisory Appraisers shall not have been subject to any disciplinary action within any jurisdiction within the last three (3) years that affects the Supervisory Appraiser's *legal eligibility* to engage in appraisal practice. Although your appraiser organization has imposed a disciplinary sanction by revoking your designation, this action does not, in and of itself, affect your legal eligibility to engage in appraisal practice in your credentialing jurisdiction. However, be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #10:

I am a state-certified appraiser and am considering supervising a Trainee Appraiser. I was recently suspended from the HUD appraisal roster but have not been sanctioned by my state appraiser regulatory agency. Am I considered to be "in good standing" under the *Criteria* and therefore eligible to supervise a Trainee Appraiser?

Answer:

Yes. The *Criteria* specify Supervisory Appraisers shall not have been subject to any disciplinary action within any jurisdiction within the last three (3) years that affects the Supervisory Appraiser's legal eligibility to engage in appraisal practice. Although HUD has suspended you from their approved panel, this action does not, in and of itself, affect your legal eligibility to engage in appraisal practice in your credentialing jurisdiction.

However, be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #11:

I am a state-certified real property appraiser in States A and B. I am also supervising a Trainee Appraiser in State A. I was recently investigated by the state board in State B for an alleged violation of USPAP and it was determined a violation was found to exist. Subsequently, State B suspended my appraiser certification for a period of one (1) year. Does this action preclude my continued supervision of the Trainee Appraiser in State A?

Answer:

Yes, the *Criteria* specify Supervisory Appraisers shall not have been subject to any disciplinary action **within any jurisdiction** within the last three (3) years that affects the Supervisory Appraiser's legal eligibility to engage in appraisal practice. Although you may currently be in "good standing" in State A, your legal eligibility to engage in appraisal practice in State B has been suspended and you are no longer able to act as a Supervisory Appraiser in any jurisdiction until a minimum of three (3) years after the successful completion/termination of the sanction imposed against you. However, be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #12:

I am a Trainee Appraiser seeking a Supervisory Appraiser. I live in a state where appraisers are not required to be state-licensed or certified for appraisal assignments that do not involve federally related transactions. I have found an appraiser that is willing to supervise my work and sign my appraisal experience log, but he does not possess a state license or certification. Would this individual qualify as my Supervisory Appraiser?

Answer:

No, the *Criteria* specify Supervisory Appraisers shall be state-certified and in "good standing" for a period of at least three (3) years prior to being eligible to become a Supervisory Appraiser. The fact this individual is not a state-certified appraiser precludes this appraiser from acting as your Supervisory Appraiser and signing your appraisal experience log. Be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #13:

I am a practicing real property appraiser and I was disciplined by my state regulatory agency five (5) years ago. I am currently in good standing in that jurisdiction and want to know if I am eligible to become a supervisor or supervise a new Trainee Appraiser.

Answer:

If an individual wishes to either become a supervisor or supervise a new Trainee, the *Criteria* require a state to review the three-year period immediately preceding the individual's application/request to become a supervisor. The *Criteria* require Supervisory Appraisers to be "state-certified and in 'good standing' for a period of at least three (3) years prior to being eligible to become a Supervisory Appraiser. Supervisory Appraisers shall not have been subject to any disciplinary action within any jurisdiction within the last three (3) years that affects the Supervisory appraiser's legal eligibility to engage in appraisal practice. A Supervisory Appraiser subject to a disciplinary action would be considered to be in 'good standing' three (3) years after the successful completion/termination of the sanction imposed against the appraiser."

Example: An individual wishes to become a Supervisory Appraiser (or supervise a new Trainee) on July 1, 2017. However, this individual had a 60-day suspension, ending on March 31, 2016. This individual would not be able to become a Supervisory Appraiser (or supervise a new Trainee) until March 31, 2019 (three years after the end date of the disciplinary action).

An individual who is already a supervisor but receives a disciplinary sanction prior to January 1, 2015, would not automatically lose his or her ability to supervise the Trainee(s). However, if a jurisdiction precludes an individual from supervising due to the sanction (that affects the appraiser's legal eligibility to appraise), the individual would have to comply with all Supervisory Appraiser criteria.

If a state issues a sanction that is essentially a "lifetime" action, that individual would be precluded from being a supervisor for any new Trainees.

Please note that individual states or credentialing jurisdictions may adopt more stringent requirements. It is incumbent on candidates to check with the state appraiser regulatory agency in which they plan to supervise a trainee.

Question #14:

I am a Supervisory Appraiser who has recently upgraded from Certified Residential to Certified General. Am I allowed to continue to supervise my Trainee Appraisers or do I need to wait until I have held the Certified General credential for three years?

Answer:

Yes. You are allowed to continue to supervise your current Trainee Appraisers. However, you must be competent in the property type and the geographic location of your practice. You may supervise the Trainee Appraiser in both residential and non-residential assignments that you are competent to appraise.

Question #15:

I am a Supervisory Appraiser who has recently upgraded from Certified Residential to Certified General and plan on employing Trainee Appraisers. Do I have to take the Supervisor/Trainee course or am I grandfathered because I had trainees prior to January 1, 2015?

Answer:

Yes. If you have not already taken the AQB-required Supervisor/Trainee course, you will be required to take the Supervisor/Trainee course if you are going to supervise any new/additional Trainee Appraisers.

Question #16:

I am a certified appraiser who has recently obtained a reciprocal license in another state. I have taken the required course for Supervisory Appraisers/Trainee Appraisers and have been certified for more than three years. Can I supervise Trainee Appraisers in the state where I recently obtained my reciprocal license?

Answer:

Yes, provided you have been certified for a period of at least three years and are in good standing.

Question #17:

I'm a state certified appraiser and I'm considering supervising one or more Trainee Appraisers. I know the AQB revised requirements for Supervisory Appraisers on July 1, 2016, but I have a few questions:

- 1) Is a Supervisory Appraiser required to have three years' experience *immediately prior* to taking on a Trainee Appraiser?
- 2) Does a Supervisory Appraiser have to be state certified in the same state as the Trainee Appraiser?
- 3) Must a Supervisory Appraiser accompany the Trainee Appraiser on all physical inspections of properties?

Answer:

On July 1, 2016, the AQB removed the requirement for a state-certified appraiser to be credentialed for three years *in a specific jurisdiction* prior to acting as a Supervisory Appraiser. Supervisory Appraisers are still required to be state-certified for a minimum of three years, and must also be credentialed in the jurisdiction where the Trainee Appraiser practices. With that background, the responses to the questions are:

- 1) No. The AQB does not specify that an individual be state-certified for the three years immediately preceding acting as a Supervisory Appraiser. State-certified appraisers cannot have been the subject of any disciplinary action in any jurisdiction affecting their legal eligibility to practice within the immediate three

years preceding acting as a Supervisory Appraiser, but the requirement to be state- certified for three years could have been satisfied at any time.

- 2) Yes. In the *Criteria*, Section V.E. in the Trainee Real Property Appraiser classification states:

The state-certified Supervisory Appraiser shall be in good standing in the training jurisdiction and not subject to any disciplinary action within the last three (3) years that affects the Supervisory Appraiser's legal eligibility to engage in appraisal practice.

- 3) No. In the *Criteria*, Section V.B.3. in the Trainee Real Property Appraiser classification requires the Supervisory Appraiser to be responsible for the training, guidance, and direct control and supervision of the Trainee Appraiser by:

Personally inspecting each appraised property with the Trainee Appraiser until the Supervisory Appraiser determines the Trainee Appraiser is competent to inspect the property, in accordance with the COMPETENCY RULE of USPAP for the property type.

It is important to note that although the AQB does not mandate a minimum number of assignments or period of time for a Supervisory Appraiser to accompany a Trainee Appraiser on physical inspections of properties, some states do have such additional requirements. Therefore, the AQB strongly suggests all potential Supervisory Appraisers check with the applicable jurisdiction(s).

Question #18:

The *Criteria* restricts supervisory appraisers to a maximum of three trainee appraisers “at one time” (unless the state has a program that would allow for more under the *Criteria*). The phrase “at one time” can be somewhat ambiguous. In what context is the phrase intended in this application?

Answer:

It is the intent of the *Criteria* for supervisory appraisers to have no more than three trainee appraisers under his or her direct control and supervision at any specific time. For example, if a supervisory appraiser wished to bring on a fourth trainee appraiser, the supervisory appraiser would have to discontinue the supervision of at least one of the three trainee appraisers currently being supervised.

It is not the intention of the *Criteria* for supervisory appraisers to “supervise” only on a daily, or assignment-by-assignment basis. Supervision is intended to be more long-term, and ongoing. However, there are appraisal firms that perform assignments for a wide variety of property types and intended uses, and may employ different appraisers who specialize in these differing property types. In such cases, it's possible that the “lead appraiser” for a particular assignment might not be the trainee appraiser's identified

supervisory appraiser. This is permissible as long as the trainee appraiser continues to work under the overall supervision of the assigned supervisory appraiser, and the supervisory appraiser complies with the requirements set forth in the *Criteria*.

It's important to remember that to be eligible for experience credit, the supervisory appraiser must sign the trainee appraiser's USPAP-compliant appraisal report, taking full responsibility for its contents. In addition, if the trainee appraiser does not sign the appraisal report, the supervisory appraiser must identify the trainee appraiser in the appraisal report's certification, and the tasks performed by the trainee must be stated within the appraisal report (as also required by USPAP).

The supervisory appraiser is also responsible, along with the trainee appraiser, to maintain a log of the trainee appraiser's assignments as specified in the *Criteria*.

“SUPERVISION” OF LICENSED RESIDENTIAL AND CERTIFIED RESIDENTIAL APPRAISERS

Question #1:

I am currently a Licensed Residential Appraiser pursuing a Certified General appraiser credential. I work for a Certified General appraiser who mentors me, and reviews and signs my commercial and complex residential work. Do we have to attend a Supervisory Appraiser/Trainee Appraiser course and do I need to keep a Trainee Appraiser log (and does my boss need to keep a Supervisory Appraiser log) for my experience to count toward earning the Certified General credential?

Answer:

The *Criteria* only requires a formal Supervisory Appraiser for Trainee Appraisers. Even though you may be “supervised” in the generic sense of the word, because you hold a Licensed Residential credential, the *Criteria* would NOT require a Supervisory Appraiser in this case. A state appraiser regulatory agency may require the use of the Trainee Appraiser log and/or a similar log in order to demonstrate experience gained toward the Certified Residential or Certified General credential. Please check with your state appraiser regulatory agency, since it may adopt more stringent requirements than those outlined in the *Criteria*.

QUALIFYING EDUCATION

Question #1:

I understand that as part of the *Required Core Curriculum* for either the 200 hours for a Certified Residential credential or the 300 hours for a Certified General credential, I am required to take Appraisal Subject Matter Electives. What courses qualify as Electives?

Answer:

Any course approved as qualifying education by your state appraiser regulatory agency may be utilized as an Appraisal Subject Matter Elective, provided you have not already used the course toward licensure and certification requirements. As an example, a candidate seeking a Certified Residential credential could fulfill the Appraisal Subject Matter Elective requirement by taking one or more of the courses required for the Certified General credential, or vice versa. In addition, a course could be approved by a state for more than the minimum number of hours required in one of the *Required Core Curriculum* modules. If, for example, you took a 25-hour course on *Residential Appraiser Site Valuation and Cost Approach*, 15 of those hours would satisfy the Core Curriculum Requirement for that topic and the other 10 could be applied toward the Appraisal Subject Matter Elective module.

Refer to Guide Note 1 (GN-1) in the *Criteria* for a complete listing of qualifying education topics and subtopics under the *Required Core Curriculum*.

Question #2:

I was going to become a Certified Residential appraiser but after taking 45 hours of residential classes I decided to go for my Certified General credential instead. How many hours out of the 45 can be utilized in satisfying the 300-hour requirement?

Answer:

You will be able to utilize at least 30 hours, and possibly all 45. Four courses totaling 90 hours are part of the *Required Core Curriculum* for both the Certified Residential and Certified General credentials: *Basic Appraisal Principles* (30 hours), *Basic Appraisal Procedures* (30 hours), the *15-Hour National USPAP Course* or its equivalent (15 hours) and *Statistics, Modeling and Finance* (15 Hours). If your 45 hours were earned among these four courses, all of your hours will apply towards the Certified General credential.

In addition to specific courses required for the Certified General credential, students are required to obtain 30 hours of Appraisal Subject Matter Electives. Thus, if the 45 hours you completed consist of other courses specific to the Certified Residential curriculum, then 30 of these hours can be utilized to satisfy the Appraisal Subject Matter Electives requirement of the Certified General credential.

Question #3:

I am interested in beginning an appraisal career. I found some real estate appraisal courses offered at a local community college, but discovered they are not approved through the AQB's Course Approval Program (CAP). Is it true that the only courses I can take are AQB CAP-approved courses?

Answer:

The *Criteria* do not mandate courses be CAP-approved to be eligible. CAP is a voluntary program to which educational providers may apply for approval of courses. CAP review and approval is designed to assist state appraiser regulatory agencies in approving

courses by eliminating some of the administrative burden of course review; however, states have the final authority/responsibility with regard to approval of coursework. Check with your state appraiser regulatory agency to see whether the specific community college courses you are considering have been approved for qualifying education.

Question #4:

I received my Certified Residential appraiser credential in 2004, and now I would like to get my Certified General credential. According to my state appraiser regulatory agency, I am required to start from the beginning and complete all the qualifying education required for a Certified General credential. I am told this even includes the classes I originally took to get my Certified Residential credential (e.g. *Basic Appraisal Principles* and *Basic Appraisal Procedures*). Is this correct?

Answer:

Per the *Criteria*, appraisers holding a valid Certified Residential appraiser credential may satisfy the educational requirements for the Certified General appraiser credential by completing the following additional educational hours: *General Appraiser Market Analysis and Highest and Best Use* (15 hours); *General Appraiser Sales Comparison Approach* (15 hours); *General Appraiser Site Valuation and Cost Approach* (15 hours); *General Appraiser Income Approach* (45 hours); and *General Appraiser Report Writing and Case Studies* (15 hours).

The noted 100 total hours of additional qualifying education is the minimum that must be completed. In addition, you will need to satisfy the college degree requirement, complete the additional hours of experience, and successfully complete the National Uniform Licensing and Certification exam for the Certified General classification. As with all *Criteria* established by the AQB, states may create requirements that are greater than those established by the AQB. As a result, you will need to check with your state appraiser regulatory agency to determine the exact requirements to change your credential.

Question #5:

I was pursuing a Certified General credential and completed a 30-hour qualifying education course on *General Appraiser Market Analysis and Highest and Best Use* that was approved by my state. I decided to pursue a Certified Residential credential instead, which requires 15 hours of *Residential Market Analysis and Highest and Best Use*. Can I use the General Appraiser course to count as my qualifying education in this category?

Answer:

The *Criteria* sets forth module names of the *Required Core Curriculum* areas which must be covered in a candidate's qualifying education for each appraiser classification sought. Furthermore, Guide Note 1 of the *Criteria* provides guidance on subtopic areas that should be covered under each of the modules of the *Required Core Curriculum*, in order to prepare the candidate to pass the *National Uniform Licensing and Certification Examination* for the specific credential. However, coverage of all the subtopics under

each module is not required in order for a course to be approved by your state appraiser regulatory agency as qualifying education.

Thus, given the commonality between the subtopics covered in the respective General and Residential Highest and Best Use courses, under the *Criteria* a state could approve the General course toward the *Required Core Curriculum* for the Residential classification. However, be sure to check with the specific state appraiser regulatory agency in the jurisdiction in which you are seeking a credential to verify their specific requirements and course approvals, which could be more specific.

Question #6:

I have an appraisal credential and am now seeking to obtain a credential in a new state where I will be relocating. My appraisal coursework was approved in my current state, but I am having difficulty getting my qualifying education approved in my new state. If one state approved my courses doesn't that mean they are automatically accepted by other states?

Answer:

The *Criteria* states, "Existing credential holders (with the exception of Trainee Appraisers) in good standing in any jurisdiction shall be considered in compliance with current *Criteria* if they have passed an AQB-approved qualifying examination for that credential. This applies to reciprocity, temporary practice, renewals, and applications for the same credential (with the exception of Trainee Appraisers) in another jurisdiction."

However, while the above represents the position of the AQB, each state has the right to regulate commerce within its boundaries. Thus, their laws may require an applicant to "start from scratch" and fulfill all of the current requirements for licensure or certification.

Furthermore, each state has the responsibility to approve qualifying education courses for credit toward real property appraiser credentials. Individual course providers (e.g., colleges/universities, proprietary schools, designation organizations) must seek approval of their courses by individual states. As such, it is possible one state may have approved a course, while another has not.

Question #7:

I am a state regulator responsible for evaluating courses submitted for qualifying education for state appraiser licensure and certification. I recently received a submission of a course entitled *Advanced Residential Applications and Case Studies*. I reviewed Guide Note 1 of the *Criteria* and understand one of the subtopics for this course is "Advanced Case Studies." What qualifies a case study as "advanced?"

Answer:

An *Advanced Residential Applications and Case Studies* course should serve to provide the student with practical instruction and demonstrate how to handle complex and high-value residential properties.

Guide Note 1 of the *Criteria* provides curriculum guidance that includes the following subtopics for this course:

- A. Complex Property, Ownership and Market Conditions
- B. Deriving and Supporting Adjustments
- C. Residential Market Analysis
- D. **Advanced Case Studies**

Thus, the case studies in this type of course should include issues dealing with complex and/or high-value residential properties such as:

- Atypical properties in a given market;
- Residences with unique architecture or historic properties;
- Properties which may be stigmatized due to internal or external circumstances; and/or
- Properties of such value and/or unusual characteristics that their competitive market may be regional as opposed to an immediate neighborhood.

Other advanced case study topics could include complex ownership situations, such as the appraisal of fractional interests in a property; material dealing with more complex market conditions such as declining neighborhoods within a generally improving market; properties affected by a government acquisition program; or properties within markets that may be impacted by foreclosure sales or tax sales.

Advanced case studies may involve advanced statistical analysis; appropriate handling of unusual sales concessions; atypical markets; and markets with scarce data.

Please be advised that the above is not meant to be an exhaustive list of possible topics for *Advanced Residential Applications and Case Studies*. Course developers are encouraged to explore a variety of topics relevant to complex residential issues to differentiate an *Advanced Residential Applications and Case Study* course from more basic level course topics.

Question #8:

I am a Trainee Appraiser preparing to get my Certified Residential credential. For my initial qualifying education to become a Trainee Appraiser, I completed 80 hours of *Basic Appraisal Principles and Procedures* from a proprietary school that no longer exists. My state appraiser regulatory agency said any courses taken before the current edition of the *Criteria* were no longer considered valid according to the AQB. Why can't these original hours count toward the qualifying education requirement for my Certified Residential credential?

Answer:

The *Criteria* do not contain any provision that invalidates qualifying education successfully completed. As with all AQB *Criteria*, states may create requirements that are more restrictive; if so, you'll need to clarify this with your state. From the AQB's perspective, completed courses that were eligible for credit remain valid towards the current *Criteria*.

The only *Criteria* that place a "shelf life" on education is found in the following provision affecting *non-credentialed* candidates: "All qualifying education must be completed within the five (5) year period prior to the date of submission of a Trainee Appraiser application." In this case, an appraiser pursuing a Trainee Appraiser credential would not be able to use courses more than 5 years old at the time of submission of the application to become a Trainee Appraiser.

Question #9:

I see that the *Criteria* require all Qualifying Education be taken within five (5) years prior to applying for a Trainee Appraiser credential. I am applying for a Certified Residential credential. Does this requirement apply to me?

Answer:

No. The *Criteria* only require that applicants for a Trainee Appraiser credential complete their education within five (5) years prior to application. This requirement does not apply to individuals applying for a Licensed Residential, Certified Residential or Certified General credential.

However, be sure to check with your state appraiser regulatory agency to confirm the state's requirements, which could be more restrictive.

Question #10:

I hold a real estate degree from a university whose degree program has been reviewed and approved by the AQB. As part of the required curriculum, I completed the required 30 hours in *Basic Appraisal Principles*, and 30 hours in *Basic Appraisal Procedures*. However, I received my degree over five years ago.

I'm interested in becoming a licensed Trainee appraiser. I know the *Criteria* requires all qualifying education courses to be taken within the five (5) years immediately preceding the application for a Trainee License. Does this "5-year" requirement also apply to education obtained as part of a degree from an AQB-approved program? Will I have to retake the 60 hours of qualifying education?

Answer:

The restriction on qualifying education for the Trainee credential applies to *when* the education was completed, not *where* it was completed. Therefore, even though you satisfied the *Basic Appraisal Principles* and *Basic Appraisal Procedures* courses as part of the curriculum in an AQB-approved degree program, because the courses were

completed over five years before applying for the Trainee credential, they are no longer eligible.

It should be noted that the five-year requirement for qualifying education applies *only* to the Trainee credential. There is no such restriction for the Licensed Residential, Certified Residential, and Certified General classifications.

Question #11:

I have been a commercial real estate professional for over 20 years, have my broker's license, and am a Certified Commercial Investment Member (CCIM). I am interested in pursuing a Certified General real property appraiser credential. I would prefer to do my education on my own time with an online educator. I have my Bachelor's degree in business from a state university. With my licensing, education, and experience, is there a way to "fast track" the required coursework?

Answer:

Many qualifying education (QE) courses required under the *Criteria* are available online. Your state appraiser regulatory agency maintains a list of approved QE courses and providers. Also, it is possible your university may have sought and received QE approval from your state appraiser regulatory agency for some of the courses you took as part of your degree.

Alternatively, some of the education you completed for your other real estate credentials/designations might be approved by your state appraiser regulatory agency as real property appraiser QE. If so, you may already have some of the 300 hours of required QE for the Certified General credential completed.

Question #12:

I am a state regulator responsible for approving distance education to be utilized as qualifying education under the *Criteria*. The *Criteria* requires a written, proctored examination. Can an examination be proctored by the staff at an electronic testing service office?

Answer:

The *Criteria* specify a proctor must be "an official approved by the college or university or by the sponsoring organization" that delivers the course. The AQB does not maintain a list of acceptable proctors. However, a testing service, such as one that delivers the National Uniform Licensure and Certification Examinations and/or examinations for other professions, with staff approved by the course deliverer, would likely be an acceptable means for an examination to be proctored.

Question #13:

What are the qualifications of an acceptable proctor for an examination required under the *Criteria*?

Answer:

The *Criteria* specify a proctor must be “an official approved by the college or university or by the sponsoring organization” that delivers the course. The AQB does not maintain a list of qualifications or requirements to approve acceptable proctors. Each state may adopt specific requirements for an individual to serve as a proctor.

EXPERIENCE

Question #1:

I am a Trainee Appraiser accumulating experience under a Certified Residential Supervisory Appraiser. I understand that for my experience to be eligible for credit it must be performed with a certified appraiser; however, we occasionally receive assignments that I do not intend to use for experience credit. In assignments where I don't intend to claim experience credit, can I perform the assignment under the direction of a Licensed Residential appraiser, or even on my own without a Supervisory Appraiser?

Answer:

No. Regardless of whether an assignment is being claimed for experience credit, a Trainee Appraiser must work under the direct supervision of a Certified Residential or Certified General appraiser. The *Criteria* state, in part:

*The scope of practice for the Trainee Appraiser Classification is the appraisal of those properties which the **supervising Certified appraiser** is permitted by his/her current credential and that the supervising appraiser is qualified to appraise. (Bold added for emphasis.)*

Question #2:

I am pursuing a Certified General credential. The firm I work with has a diverse appraisal practice including the valuation of real property and the valuation of personal property. Can I claim experience for personal property appraisal assignments where I am not appraising the real property interest?

Answer:

No. The *Criteria* require that experience must be gained in the performance of acceptable **real property** appraisal practice. Specifically, an applicant's experience must be in appraisal work conforming to Standards 1, 2, 3, 4, 5 and/or 6.

STANDARD 1 (the Real Property Appraisal Development Standard) allows for the valuation of personal property as a *part of a real property valuation assignment*. Thus, a state may accept personal property valuations that are part of a real property appraisal,

such as the valuation of furniture, fixtures, and equipment (personal property) as part of a hotel going concern valuation. However, always be sure to check with the specific state appraiser regulatory agency in the jurisdiction in which you are seeking a credential to verify their requirements, which could be more restrictive.

Question #3:

Is there an assumption that a typical residential appraisal takes “X” hours to develop and report? If someone submits a log to the state and says they have acquired 3,000 hours of experience by doing ten “URAR” form reports, would they be believed? Or, is there a range that makes sense, like between four and twelve hours for a “typical” assignment?

Answer:

The *Criteria* do not specify an amount of experience hours which may be claimed per assignment. The state appraiser regulatory agency in the jurisdiction where you are seeking a credential is responsible for examining your experience log and must be satisfied there is a reasonable relationship between the amounts of time you claim to have spent on an assignment and your description of work performed. Some states have established typical hours for specific types of appraisal assignments, which they use as a benchmark to identify potentially excessive experience claims. Be sure to check with your Supervisory Appraiser (if applicable) and your state appraiser regulatory agency to make sure you comply with the hourly requirements when claiming experience.

Question #4:

I am employed by a county appraisal district where we value properties for ad valorem tax purposes. My job requirements include valuing real property using the sales comparison approach, performing on-site inspections of properties, using mass appraisal tools to assign real property values, analyzing sales on an annual basis, etc. Our state requires appraisal experience for state licensure or certification to comply with the AQB *Criteria* for acceptable experience. Does my position as a Residential Appraiser at the appraisal district meet the AQB *Criteria* for acceptable experience?

Answer:

Just by serving in a municipal appraisal position, you are not automatically granted credit. Per the *Criteria*, the quantitative experience requirements must be satisfied by time spent on the appraisal process: analyzing factors that affect value; defining the problem; gathering and analyzing data; applying the appropriate analysis and methodology; and arriving at an opinion and correctly reporting the opinion in compliance with USPAP. Based upon the minimum criteria set forth by the AQB, a state could, after review of your work log and work samples, grant you experience credit for work completed in ad valorem, mass appraisal assignments. However, check with the specific state appraiser regulatory agency in the jurisdiction in which you are seeking a credential to verify its requirements, which may be more restrictive.

Question #5:

I am a Certified Residential appraiser and am pursuing a change to Certified General. I realize a Trainee who applies to become Certified General is required to accumulate 3,000 hours of experience (with at least 1,500 being non-residential). However, does this mean that a Certified Residential appraiser would only have to accumulate 1,500 hours of commercial experience to satisfy the experience requirement?

Answer:

The *Criteria* require 3,000 hours of experience accumulated in no fewer than 18 months, of which 1,500 hours must be non-residential. Under the *Criteria*, experience gained in pursuit of a credential is not exclusive to that specific credential. Thus, based upon the minimum criteria set forth by the AQB, a state appraiser regulatory agency could, after review, count the experience earned toward your Certified Residential credential along with additional experience earned toward the 3,000-hour requirement for the Certified General credential. However, be sure to check with the specific state appraiser regulatory agency in the jurisdiction in which you are seeking a credential to verify its requirements, which may be more restrictive.

Question #6:

I have been a Licensed Real Estate Salesperson for several years and also a Trainee Appraiser for over one year. I have a Supervisory Appraiser for whom I perform appraisals and I also get paid by a bank to perform Broker Price Opinions (BPOs) that require very similar information as an appraisal (including providing six comps). I act as a completely unbiased person doing these BPOs and have no interest in the properties. Can these BPOs be counted on my appraisal experience log?

Answer:

If the BPOs do not comply with USPAP, regardless of the level of detail or the scope of work performed, they are ineligible for experience credit. (Refer to USPAP for further information on not misrepresenting your role when acting as an appraiser versus a broker/salesperson/mortgage broker.)

If, however, the development and reporting of the BPO complies with USPAP, and your Supervisory Appraiser provides direct supervision over your preparation thereof and reviews and signs your work product, it is possible a state appraiser regulatory agency might count these as appraisal experience. However, be sure to check with the specific state appraiser regulatory agency in the jurisdiction in which you are seeking a credential to verify its requirements, which may be more restrictive.

Question #7:

I am a licensed forester and a Trainee Appraiser. My Supervisory Appraiser is a forester and a Certified General appraiser. As a part of my company's forestry practice, I often perform timber inventory and valuation reports (timber cruises) to estimate the value of

timber. Can I utilize my timber cruise experience to satisfy the 3,000 hours of required real property appraisal experience toward earning a Certified General credential?

Answer:

Solely developing a timber inventory and valuation report (aka “timber cruise”) does not qualify for real property valuation experience. However, if you develop a timber inventory and valuation report and appropriately utilize this information in an appraisal of real property, it may qualify for real property valuation experience provided the appraisal complies with USPAP. Furthermore, as with other types of appraisal assignments, an individual providing significant real property appraisal assistance in the appraisal may receive credit for these assignments, provided the individual is duly acknowledged in the certification of the report as having provided significant real property appraisal assistance and the description of their assistance is included in the appraisal report. Be sure to check with the specific state appraiser regulatory agency in the jurisdiction in which you are seeking a credential to verify its requirements, which may be more restrictive.

Question #8:

I am a Trainee Appraiser working towards my license. If I do not sign an appraisal report due to my company’s policies or a client’s assignment conditions, what verbiage is required in the report in order for the time I spent on the appraisal to count toward the experience requirements in the *Criteria*?

Answer:

If you provide significant real property appraisal assistance to a Supervisory Appraiser but do not sign the report certification, your Supervisory Appraiser **must** disclose that you provided significant real property appraisal assistance within the certification of the report. In addition, the Supervisory Appraiser must describe the extent of your assistance in the report (refer to the *Uniform Standards of Professional Appraisal Practice* [USPAP], Standards Rules 2-2 and 2-3, as well as Advisory Opinion 31, *Assignments Involving More Than One Appraiser*, for additional details).

Furthermore, the experience log you submit to your state appraiser regulatory agency must describe the work you performed in support of the hours of experience you claim for each assignment. Documentation in the form of reports, certifications, file memoranda, or other evidence that the time you spent on the appraisal process is compliant with USPAP must be provided as part of the state experience verification process to support the experience claimed.

Question #9:

I hold a Certified Residential credential and am pursuing a Certified General credential in the same jurisdiction. Does the AQB require any supervised experience to upgrade from a Certified Residential appraiser to a Certified General appraiser?

Answer:

The *Criteria* do not specifically address a formal Supervisory Appraiser relationship for Certified or Licensed appraisers seeking an upgrade to their credential. However, you must comply with the COMPETENCY RULE of USPAP when you obtain your non-residential property experience, which may require that you work with an existing Certified General appraiser who is competent in the property type and geographic area. Be sure to check with the state appraiser regulatory agency in the state where you plan to seek the credential to confirm the state's requirements, as states may implement more stringent requirements.

Question #10:

I am a Supervisory Appraiser and hold a Certified General credential in two states: State A and State B. One of my Trainees has a Trainee Appraiser's credential in State A only. I have an assignment in State B, and plan to take my Trainee with me to work on the assignment. Will State A grant experience to my Trainee Appraiser for work performed in State B?

Answer:

The *Criteria* specify experience must be gained under the supervision of the Supervisory Appraiser and the work must comply with USPAP. Thus, the *Criteria* would not prohibit State A from granting the Trainee Appraiser credit in this case. However, be sure to check with the state appraiser regulatory agency in State A to confirm the state's requirements, which could be more restrictive. Additionally, the Trainee should check with State B to determine if State B requires the Trainee to be credentialed in State B in order to work with the Supervisory Appraiser.

Question #11:

I am a practicing real estate appraiser and develop my appraisals in compliance with USPAP STANDARD 1. However, I am not required to report the results of my appraisals in compliance with USPAP STANDARD 2. Can I still receive credit for experience for the hours I spent in the development process of the appraisals?

Answer:

No. There is no allowance for an appraisal that is prepared in compliance with STANDARD 1 but not reported in accordance with STANDARD 2. The term "partially USPAP compliant" does not exist in the *Criteria*. In order to earn experience credit, appraisals must be prepared and reported in compliance with STANDARDS 1 and 2, as well as the additional requirements in USPAP.

Question #12:

I am a practicing real estate appraiser and my jurisdiction allows me to perform appraisals as an unregistered appraiser. If my appraisals are prepared in conformance with USPAP, will I be able to obtain experience credit?

Answer:

Generally speaking, yes. The *Criteria* do not require an individual to possess a credential in order to obtain eligible experience credit. However, some states require an individual to possess at least a Trainee (or Associate) credential to obtain creditable experience. If that is the case, an individual who is not legally able to obtain experience would not be able to use that time to satisfy the experience requirements even if the reports were USPAP-compliant. In addition, some states do not allow experience obtained outside their state boundaries; therefore, it's critical to check with your specific state.

Question #13:

I currently have two unlicensed trainees who have been working for me for a number of years. I have not required them to obtain a Trainee Appraiser credential, even though they have taken all of the required courses. Are they required to obtain a Trainee Appraiser credential in order to continue to obtain experience credits toward their Certified General credential?

Answer:

No. The *Criteria* do not require an individual to possess a Trainee Appraiser credential in order to obtain experience credit. However, because individual states may implement criteria more stringent than the AQB, it is important to check with your state appraiser regulatory agency.

Question #14:

Is there any requirement within the *Criteria* that would prohibit an appraiser from counting commercial experience toward obtaining a Certified Residential credential?

Answer:

No. The *Criteria* do not specify that the experience hours required for the Certified Residential credential must all be obtained in the appraisal of 1-4 unit residential properties. As a result, experience obtained in the appraisal of non-residential (including 5+ unit residential) properties for use toward a Certified Residential credential is not prohibited by the AQB.

However, as with all AQB *Criteria*, states may establish requirements that are greater than, or more restrictive, than what the AQB requires. As a result, you will need to confirm with your state appraiser regulatory agency whether it has such a requirement.

Question #15:

I am a state appraiser regulatory official who has received an application from a Trainee Appraiser seeking to become a Certified General appraiser. The candidate meets the college degree and qualifying education requirements. The candidate relocated to my state one year ago and some of the experience on the experience log submitted was completed while the candidate was a resident of a neighboring state. What responsibility

do I have to ensure experience earned in another state meets the Supervisory Appraiser/Trainee Appraiser requirements of that state?

Answer:

As the jurisdiction evaluating the Trainee Appraiser's experience, it would be incumbent upon you to obtain sufficient evidence to support that the experience sought from work done in the neighboring state was earned in accordance with appraiser licensing/certification rules of the other state in effect at the time the experience was earned.

Question #16:

The Certified General credential requires 3,000 hours of experience *in no fewer than 18 months*. In the type of appraisals I perform, some assignments may be commenced in one month and completed in another; thus, the log might not reflect "experience" in one or more specific months. Does my log of appraisal experience have to show appraisals completed in 18 different months? Or does it just have to span a total of 18 months?

Answer:

The *Criteria* do not require that experience be obtained in 18 *different* months, but rather over a period of no fewer than 18 months. However, state regulatory agencies can be more restrictive, therefore it is recommended to check with your state for details.

Question #17:

Can a Trainee Appraiser inspect a property without a Supervisory Appraiser?

Answer:

Yes; however, the Trainee Appraiser must be competent to do so. The *Criteria* require Supervisory Appraisers to personally inspect properties along with Trainees until the Trainee is competent to do so without supervision. The *Criteria* mandate such supervision to include:

Personally inspecting each appraised property with the Trainee Appraiser until the Supervisory Appraiser determines the Trainee Appraiser is competent to inspect the property, in accordance with the COMPETENCY RULE of USPAP for the property type.

Competency to inspect without supervision will vary from assignment-to-assignment. For example, after numerous assignments a supervisor may deem a Trainee competent to inspect single-unit residential tract-type homes. However, that does not mean the Trainee is competent to perform inspections without supervision for large custom homes, condominiums, 2-4 unit residential properties, or atypical/complex property types or assignments. Competency to inspect a property is determined by the Supervisory Appraiser on an individual assignment basis.

Question #18:

Can a Trainee Appraiser sign an appraisal report?

Answer:

Yes, and the Supervisory Appraiser must co-sign the appraisal report. This is required regardless of whether the Supervisory Appraiser personally inspected the property.

Question #19:

I am a Trainee Appraiser and originally had Supervisory Appraiser A, who co-signed my appraisal reports. However, I also performed appraisals that were co-signed by a Certified appraiser who was not my designated Supervisory Appraiser. Can I count experience obtained under a Certified appraiser who is not my designated Supervisory Appraiser?

Answer:

No. The *Criteria* state in the Supervisory Appraiser Requirement section I(A)(2): “Supervisory Appraisers shall be responsible for the training, guidance, and direct supervision of the Trainee Appraiser by...reviewing and signing the Trainee Appraiser reports.” Therefore, for experience credit to be awarded, the appraisal must be signed by the Supervisory Appraiser.

Question #20:

I am a state regulator reviewing experience logs from multiple Trainee Appraisers. Supervisory Appraiser C had three Trainees working with her during a specific time period. A fourth Trainee was added during that same time period. May all four of the Trainees in question use the experience gained while working for the Supervisory Appraiser, since she had more than three Trainees and my state does not have a monitoring system in place?

Answer:

The *Criteria* explicitly state that a “Supervisory [Appraiser] may not supervise more than three (3) Trainee Appraisers at one time, *unless a state program in the credentialing jurisdiction provides for progress monitoring, supervisory certified appraiser qualifications, and supervision and oversight requirements for Supervisory Appraisers.*” (emphasis added)

Therefore, because the state did not have a monitoring system in place, the experience gained by all of the Trainees would be ineligible for credit during the period of time the Supervisory Appraiser supervised more than three Trainees.

Question #21:

I am an appraiser in an assessor’s office. I participate in mass appraisal assignments. I also perform complete appraisal assignments on individual properties in response to assessment appeals. I wish to obtain a Certified Residential appraiser credential, but my

state appraiser regulatory office informed me that my experience working for the assessor does not qualify.

When I told my state I understood the AQB allows experience obtained working in an assessor's office, they elaborated that the experience is not eligible because I do not perform USPAP-compliant reports. My appraisals are performed in accordance with assessment standards that, for the most part, are consistent with USPAP. The only difference is in the reporting of our findings: our reports are not in full conformance with STANDARD 2 of USPAP. Does the AQB allow experience working for an assessor? Is there some manner in which I can receive credit for this experience?

Answer:

Yes, the *Criteria* allow experience obtained working for an assessor. However, under "Criteria Applicable to All Classifications" in the *Criteria*, Section V.D. states, in part:

An applicant's experience must be in appraisal work conforming to Standards 1, 2, 3, 4, 5, and/or 6, where the appraiser demonstrates proficiency in appraisal principles, methodology, procedures (development), and reporting conclusions.

Therefore, in order for your appraisals to qualify for experience credit, the individual real property appraisals must comply with STANDARDS 1 and 2, while the mass appraisal assignments would need to comply with STANDARDS 5 and 6. If one of your appraisal assignments on an individual property has been completed in compliance with STANDARD 1 of USPAP but fails to fully comply with STANDARD 2, the assignment is not eligible for experience credit.

In addition, the appraisals performed would need to be individually entered on an experience verification log, be subject to verification, and available for review by the state appraiser regulatory agency. No exceptions to these requirements are permitted.

It is important to note that not all States accept experience from work complying with STANDARDS 5 and 6.

Question #22:

Under *Generic Experience Criteria*, Section V.E. still allows for "appraisal consulting" experience, even though the Appraisal Standards Board removed the Real Property Appraisal Consulting standards from USPAP. Is such experience still acceptable? If so, what is an example of this type of experience, and what standard(s) must be followed to comply with USPAP?

Answer:

Yes, USPAP-compliant experience in appraisal consulting remains allowable towards the experience requirements.

The Appraisal Standards Board removed the standards for Real Property Appraisal Consulting for consistency with the other disciplines (i.e., personal property, business valuation), which did not require adherence to specific standards for development and reporting. Therefore, real property appraisal consulting remains allowed under USPAP, but there are no specific standards that must be followed. Instead, appraisers must comply with the general provisions of USPAP that apply to appraisal practice.

Additional guidance from the ASB on this topic can be found in Advisory Opinion 21, *USPAP Compliance*, which includes the following example:

Jane Doe, an appraiser, accepts an assignment to perform a feasibility analysis for a proposed real estate subdivision. In order to complete the assignment, she develops prospective market value opinions for the potential lots in the subdivision given several different possible configurations. Each configuration may also have different absorption rates and/or absorption periods. The objective of the assignment is to recommend the optimal configuration. With which parts of USPAP must Jane comply in this assignment?

Answer: Jane must comply with the ETHICS RULE, the COMPETENCY RULE, and the JURISDICTIONAL EXCEPTION RULE for the entire assignment.

Because the value opinions are appraisals, the SCOPE OF WORK RULE and the RECORD KEEPING RULE apply to the appraisal portion of the assignment. In addition, she must develop each value opinion in compliance with STANDARD 1 and report the opinions in compliance with STANDARD 2.

NATIONAL UNIFORM LICENSING AND CERTIFICATION EXAMINATIONS

Question #1:

Is there a study guide for the Licensed Residential, Certified Residential, or Certified General examinations?

Answer:

The Appraisal Foundation does not publish a study guide for the *National Uniform Licensing and Certification Examinations*. The questions on the examinations are based upon the body of knowledge covered in the *Required Core Curriculum* as noted in Guide Note 1 (GN-1) of the *Criteria*. Sample questions are available on The Appraisal Foundation website at www.appraisalfoundation.org.

Question #2:

I hold a Certified Residential credential and now I plan to pursue a Certified General credential. The *Criteria* indicate I am required to successfully complete 100 additional

hours of qualifying education. Will these additional hours make me qualified to pass the *National Uniform Licensing and Certification Examination* for the Certified General classification?

Answer:

The *National Uniform Licensing and Certification Examination* for the Certified General classification is based upon the 300 hours of *Required Core Curriculum* coursework as outlined in the *Criteria*. Depending upon when you completed your original education and the nature of your practice, you may be able to pass the Certified General exam. However, the AQB urges you to examine the *Required Core Curriculum* to identify any possible areas of perceived weakness in your education, and prepare yourself by taking additional qualifying education courses in those areas.

Question #3:

I understand that all education and experience must be completed and approved prior to taking the *National Uniform Licensing and Certification Examination*. Once I pass the examination, within what time period must I submit the application for my credential?

Answer:

Examination results are valid for 24 months. If your state appraiser regulatory agency has a separate post-examination application (i.e., you are not awarded the credential “automatically” by virtue of successfully passing the examination) you would need to submit your complete application within 24 months of successful completion of the exam. You should be sure to check with your state appraiser regulatory agency to determine when your application must be submitted.

Question #4:

I am a state regulator responsible for approving distance education courses for qualifying education purposes. Can an education provider utilize a remote proctoring service to electronically monitor an individual taking a final examination?

Answer:

The *Criteria* specify a proctor must be “an official approved by the college or university or by the sponsoring organization” that delivers the course. The Policies and Procedures of the AQB’s Course Approval Program (CAP) (a voluntary program that may be utilized by state regulatory agencies) states that proctoring an examination could “take many forms including but not limited to the physical presence of a proctor, video observation or electronic monitoring.” It is important to note that the AQB does not maintain a list of acceptable proctors.

Question #5:

I am registered to take the National Appraiser Examination. Can I use my own calculator to take the exam?

Answer:

Yes, you can bring a calculator to take the examination provided it is not an alpha programmable calculator. Additionally, you must bring the written instructional manual that came with the calculator, or instructions downloaded from the manufacturer's website, so that examination personnel can ensure that all numeric programs previously stored in the calculator are cleared prior to taking the examination.

CONTINUING EDUCATION

Question #1:

I am a state-certified appraiser and was told by my state appraiser regulatory agency the *15-Hour National USPAP Course* would not satisfy my continuing education requirement to complete the *7-Hour National USPAP Update Course*. Why can't I take the 15-Hour course in lieu of the 7-Hour course?

Answer:

The *Criteria* require the *7-Hour National USPAP Update Course* be taken for continuing education (CE) every two calendar years. The *7-Hour National USPAP Update Course* focuses on the most recent changes to USPAP, common problem areas, and application of USPAP to real world situations. This course is appropriate for practicing appraisers who already have a baseline understanding of USPAP, but need to be apprised of recent developments and updates affecting their appraisal practice.

The *15-Hour National USPAP Course* is geared to the beginning appraiser who has a limited understanding of USPAP. The coverage and treatment of changes or emerging issues is not the focus of this course; thus it does not meet the educational objectives of the 7-Hour course.

Question #2:

I took some courses as qualifying education in order to obtain my appraiser credential. Am I allowed to re-take these same courses again for continuing education (CE) purposes now that I'm credentialed?

Answer:

If a course is approved by your state appraiser regulatory agency as CE you should be able to receive CE credit for taking the course, regardless of whether you previously took the course as qualifying education. However, some states prohibit re-taking the same course for CE purposes. Confirm with your state appraiser regulatory agency whether the course is eligible for CE.

Question #3:

I am a state regulator charged with reviewing and approving courses for continuing education (CE). An education provider submitted CE courses for review that are designed

to prepare candidates for the *National Uniform Licensing and Certification Examinations*. Can the state approve an “exam prep” course for CE?

Answer:

Nothing would prohibit a state from approving a course that prepares individuals for the *National Uniform Licensing and Certification Examinations*, provided the course adheres to the CE requirements as outlined in the *Criteria* (i.e., the course covers applicable appraisal-related topics and is a minimum of 2 hours in length).

Question #4:

I am certified in multiple states. If I attend and successfully complete a continuing education (CE) course in one state, can I use it to count toward my recertification in another state?

Answer:

In the event the course, provider and delivery mechanism (classroom or distance education) are approved in both states, then each state may grant you CE credit for taking the one course. However, each state has a unique method of approving courses. Thus, be sure to check with the specific state appraiser regulatory agency in the jurisdictions in which you are seeking to renew your credentials to verify their requirements.

Question #5:

The *Criteria* require that I take the *7-Hour National USPAP Update Course* every two calendar years. If I do not take the course until 18 months after the new version of USPAP goes into effect, does that mean I can continue to follow the prior version of USPAP until I take the update course?

Answer:

No. You are responsible to comply with the version of USPAP as of the date it becomes effective, regardless of when you complete the *7-Hour National USPAP Update Course*. For this reason, the AQB encourages all credential holders to complete the course as soon as possible to ensure proper understanding of any revisions made to USPAP.

Question #6:

I am an AQB Certified USPAP Instructor and I recently taught the *7-Hour National USPAP Update Course*. Can I be granted continuing education credit toward my credential renewal for successfully completing the *7-Hour National USPAP Update Course* during my current renewal cycle?

Answer:

Per the *Criteria*, a state appraiser regulatory agency may allow you to receive credit for successfully completing the *7-Hour National USPAP Update Course* in this case, provided that you do not receive credit for more than half of your total required continuing education during any one continuing education (CE) cycle by teaching or in any other

manner, other than as a student in a CE course. However, check with your state appraiser regulatory agency to confirm whether any additional restrictions may apply.

Question #7:

I am an instructor of courses approved for qualifying education (QE) and/or continuing education (CE) in the state in which I hold an appraiser credential. Can I obtain CE credit for time I spend preparing to teach courses?

Answer:

No, *preparing to instruct* does not qualify for CE credit. However, in addition to actual course instruction, a jurisdiction may award up to one-half of your required continuing education credit in a CE cycle for your activities during the cycle as a *program or course developer* or for *authorship of an appraisal textbook*.

Question #8:

I am a certified appraiser in a state with a 2-year licensure cycle. As such, I am required to complete 28 hours of approved continuing education (CE) in order to renew my certification. If I complete more than the required 28 hours, can I carryover the extra hours to my next certification renewal?

Answer:

No. The *Criteria* do not provide for any carryover of CE hours from one renewal period to the next. Specifically, under *Section F. Criteria Specific to Continuing Education, Item 11* states that the instruction for which CE is sought for each year must take place "...during the period preceding the renewal...."

Question #9:

I am a certified appraiser and my certification does not need to be renewed until next year. The edition of USPAP just came out and I have not yet taken the latest *7-Hour National USPAP Update Course*. Does this mean that my credential is invalid until I complete the course?

Answer:

The *Uniform Standards of Professional Appraisal Practice (USPAP)* go into effect January 1 of the even year. You are responsible for understanding and complying with the current version of USPAP when you complete an appraisal, whether or not you have taken the relevant 7-Hour course. Under the *Criteria*, you are required to successfully complete the 7-Hour course every two calendar years. The *Criteria* do not otherwise define the timeframe during which you must complete the course. However, please check with your state appraiser regulatory agency as states may implement more stringent requirements.

Question #10:

My appraiser license renewal date is September 3, 2018. Is continuing education (CE) I completed in February 2016 too old? Where can I find the timeframe during which my CE must be completed?

Answer:

Your state appraiser regulatory agency determines the continuing education cycle for credentials within the state. The *Criteria* do not allow carryover of any CE hours from one renewal period to the next.

Question #11:

Does the AQB require successful completion of a final exam in order to receive continuing education (CE) credit for an online appraisal course?

Answer:

The *Criteria* require course providers of distance learning (online) continuing education courses to track students' attendance and measure their comprehension of the material. One way this can be accomplished is via a proctored, final examination. The other, more common method is for the CE course to include embedded quizzes or other exercises to be completed by the student during the course offering.

Please note that some states may have adopted an exam requirement for all continuing education distance learning courses. If you are located in one of these states, you are required to comply with the state's examination requirement in order to obtain your CE credit.

In addition, all synchronous USPAP courses require a proctored final examination.

Question #12:

I understand that to be eligible for continuing education to renew a real property appraiser credential, a course or seminar must be a minimum of two (2) hours in length. However, some courses include material that is not real property-related. For example, if one hour of a two-hour course were designed for personal property appraisers, would the course still be eligible for two hours of continuing education credit for real property appraisers? If not, would the course be eligible for one hour of credit for real property appraisers?

Answer:

Only the real property appraisal-related portion of a continuing education offering is valid towards the renewal of a real property appraiser credential. In the example cited, the two-hour course would not be valid for two hours of continuing education credit, since it did not address real property appraisal-related topics for the entire two hours.

Further, this particular course would not be eligible for *any* real property appraiser continuing education credit, since the real property appraisal-related portion of the course

did not constitute a minimum of two hours in duration. If, alternatively, a three-hour course included two hours devoted to real property appraisal-related topics, that course would be eligible for two hours of continuing education credit.