



The Appraisal FOUNDATION

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Standards and Appraiser Qualifications

APPRAISER QUALIFICATIONS BOARD

March 18, 2020

Mr. James R. Park
Executive Director
Appraisal Subcommittee
1325 G Street, NW, Suite 500
Washington, DC 20005

Via e-mail: jim@asc.gov

Dear Jim,

The Appraiser Qualifications Board (AQB) of The Appraisal Foundation appreciates the needs of appraisers during the current COVID-19 national health emergency. As such, the AQB encourages the Appraisal Subcommittee (ASC) to exercise regulatory discretion in the areas identified below.

Continuing Education Offerings

The AQB urges the ASC to allow continuing education offerings that were originally designed to be presented in a traditional classroom setting to be offered remotely via distance education, *without* the delivery mechanism approval set forth in Section III.D.3 "Generic Education Criteria" of the *Real Property Appraiser Qualification Criteria (Criteria)*, subject to the following:

1. The educational offering under consideration is currently approved for traditional classroom presentation;
2. The platform utilized for distance education is live and interactive;
3. The instructor verifies photo identification of the students; and
4. The instructor maintains an attendance roster, which includes verifying 100% classroom attendance by, for example, taking attendance at various established times during the course.

Continuing Education Timeframes

Section III.F.13 "Criteria Specific to Continuing Education" of the *Criteria* includes provisions that allow appraisers impacted by a state- or federally-declared disaster an additional 90 days to complete their required continuing education. The AQB believes the current national health emergency constitutes a similar event, and therefore encourages the ASC to use its discretion to permit rolling 90-day extensions during this crisis.

The AQB greatly appreciates the support of the ASC to assist affected appraisers during this difficult time.

Sincerely,

Mark A. Lewis
Chair, Appraiser Qualifications Board

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