

November 21, 2022

Mr. David Bunton  
President and Chief Executive Officer  
The Appraisal Foundation  
1155 15th Street, NW  
Suite 1111  
Washington, DC 20005

Dear Mr. Bunton:

On behalf of the 1.5 million members of the National Association of REALTORS® (NAR), I thank you for your efforts to replenish and expand the community of qualified appraisers, while maintaining safety and soundness. NAR believes that candidates from parallel industries may have valuable experience and education that can translate to a successful career as an appraiser. To this end, NAR urges the Appraisal Qualifications Board (AQB) of the Appraisal Foundation (TAF) to establish equivalency credit for education and experience in licensed and regulated fields involving valuation such as licensed real estate salespersons, real estate agents, and real estate brokers.

The National Association of REALTORS® is America's largest trade association, including NAR's five commercial real estate institutes and its societies and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,200 local associations or boards, and 54 state and territory associations of REALTORS®. NAR represents a wide variety of housing industry professionals, including approximately 25,000 licensed and certified appraisers, committed to the development and preservation of the nation's housing stock, along with its availability to the widest range of potential homebuyers.

### **Broadening the Base Will Help to Address Shortage, Bias**

For years there have been reports of the aging appraiser population and potential impact that a looming wave of retirements might have on the market. Furthermore, the refinance boom over the last two years exposed shortages of available appraisers that resulted in higher turn times and fees. Finally, the profile of the average appraiser is highly concentrated and may not reflect the demographics of communities they serve. Cumulatively, these trends demonstrate the need to attract new candidates to the appraiser profession and expand the avenues from which they come.

To this end, REALTORS® urge the AQB to consider changes to the Real Property Appraiser Qualifications Criteria allowing a broader range of education and experience alternatives than that specified in the Required Core Curriculum for the Licensed Residential Real Property Appraiser and Certified Residential Real Property Appraiser classifications.

### **Education to Remove Bias**

Other real estate professions offer training and education that would greatly benefit an appraiser. For instance, NAR's fair housing training *Bias Override: Overcoming Barriers to Fair Housing* and interactive Fairhaven module provide learners with an excellent understanding of bias in the real estate environment and how to manage it.

REALTORS® believe that the AQB should review the minimum education requirements established for real estate licensees by law or regulation in states and territories to determine

how much of the Required Core Curriculum is met, utilizing the existing Appraiser Qualifications Board Real Estate Degree Review Program structure.

### **Count Experience that will Benefit an Appraiser**

Likewise, REALTORS® believe that certain experience in parallel industries would enhance the ability of an appraiser in the field. The AQB should consider parallel professional, non-appraiser experience including, but not limited to experience in real estate market analysis and real estate brokerage including:

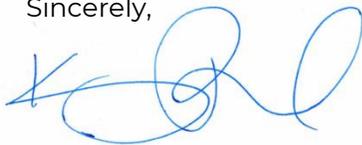
- Evaluating and pricing residential real estate
- Counseling buyers, seller, owners, and tenants on inspections and remediations, improvements, and the appraisal process
- Counseling buyers, sellers, owners, and tenants about listing and offering prices, and market rent
- Completing broker price opinions and Competitive Market Analyses
- Completing Evaluations in compliance with the Interagency Appraisal and Evaluation Guidelines
- Compliance with Fair Housing laws, rules and regulations
- Compliance with the Equal Credit Opportunity Act

The AQB previously considered the option of allowing parallel professional non-appraisal experience. In a July 9, 2015, Concept Paper – *Alternate Track to the Experience Requirements in the Real Property Appraiser Qualification Criteria*, the AQB asked: “Are there practical alternatives for some (or all) of the appraisal experience requirements to include non-appraisal experience?” The National Association of REALTORS® believes there are alternatives to some of the experience requirements that the AQB should consider.

### **Further Collaboration**

Once again, thank you again for your efforts to support the nation’s homeowners and expand the appraiser profession. Expanding experience and education used to qualify appraisers for accreditation to include that from parallel industries will help to reduce barriers to entry into the appraisal industry, while maintaining professional quality and public trust in the valuation profession. We would greatly appreciate the opportunity to discuss the proposed modification to the educational experience requirements detailed in this letter. If you have any questions or comments, please feel free to reach out Ken Fears ([KFears@NAR.REALTOR](mailto:KFears@NAR.REALTOR)), Senior Policy Representative.

Sincerely,



Kenny Parcell  
2023 President, National Association of REALTORS®