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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](mailto: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