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## Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

May 11, 2020

**Via Email: [AQBcomments@appraisalfoundation.org](mailto:AQBcomments@appraisalfoundation.org)**

Mr. Mark A. Lewis, Chair  
Appraiser Qualifications Board  
The Appraisal Foundation  
1155 15<sup>th</sup> Street, NW  
Suite 1111  
Washington, DC 20005

Dear Chair Lewis:

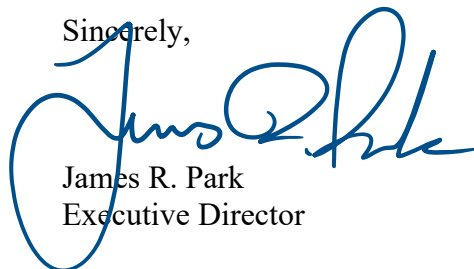
The Appraisal Subcommittee (ASC) staff appreciates the opportunity to comment on the Second Exposure Draft of a Proposed Change to *The Real Property Appraiser Qualification Criteria* (Criteria) – Licensed Residential Scope of Practice (Exposure Draft). These comments reflect the opinions of ASC staff and are not necessarily those of the ASC or its member agencies.

First, we would like to take this opportunity to thank the Appraiser Qualifications Board (AQB) for providing States and appraisers relief during this current national health emergency by recommending temporary timeline extensions for continuing education (CE) courses and deferral of CE during renewals.

We encourage the AQB to consider the need for Criteria changes during a national emergency when some States may find it difficult, if not impossible, to comment on or implement changes for the foreseeable future. States, appraisers and other stakeholders may also find it difficult to prioritize and effectively respond to proposed changes.

The ASC has long recognized that the permitted scope of practice for appraisers must be consistent with State and Federal law, which is subject to change over time. Guide Note 3 puts State regulators on notice that they have the flexibility to make a discretionary call in setting the scope of practice for their credentialed appraisers. Therefore, ASC staff suggests the AQB consider reminding States of this flexibility through guidance until after the national health emergency is lifted.

Sincerely,



James R. Park  
Executive Director