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Appraisal Subcommittee

Federal Financial Institutions Examination Council

August 13, 2021

Via Email: AQB@appraisalfoundation.org

Mr. Mark A. Lewis, Chairman
Appraiser Qualifications Board
1155 15th Street NW, Suite 1111
Washington, DC 20005

Dear Chairman Lewis:

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

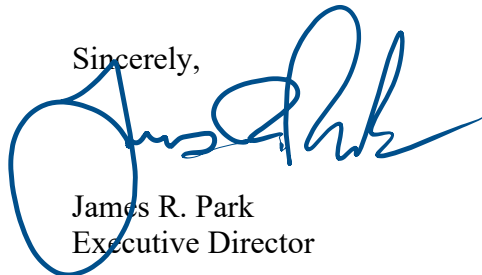
ASC staff generally supports the Second Exposure Draft subject to the following comments and concerns. We support the proposal for States to determine the extent of experience gained while working for a non-traditional client, and the proposal to add Valuation Bias, Fair Housing and/or Equal Opportunity for both Qualifying and Continuing Education.

ASC staff supports expanding independent asynchronous course delivery mechanism approval. Moreover, maintaining an independent third-party review of the delivery mechanism of approved courses avoids any potential appearance of a conflict of interest for courses approved by the Foundation or an affiliate.

Course delivery mechanism review and approval for asynchronous education is complex. It would be useful if the AQB developed written requirements for organizations seeking to qualify for review and approval authority, including procedures to audit and revoke/suspend approved course delivery mechanisms, analogous to the practices of the International Distance Education Certification Center (IDECC).

Please contact us if you have any questions.

Sincerely,



James R. Park
Executive Director