Appraiser Qualifications Board





Ben Henson Executive Director Appraisal Subcommittee 2100 Pennsylvania Avenue, Ste. 200 Washington, DC 20037

Dear Mr. Henson:

This letter is in response to your letters of August 22, 1997 and September 11, 1997 concerning "carryover". The question, contained in your letter of August 22, 1997, is whether carryover would be consistent with the Appraiser Qualifications Board's (AQB's) continuing education criteria. The AQB considered this question at its June 1, 1998 meeting and decided that carryover is inconsistent with its continuing education criteria as set forth in its Real Property Appraiser Qualification Criteria and the Interpretations of the Criteria.

As you will recall, there were originally two issues: carryover and continuing education cycles. In a decision at its November 1997 meeting, the AQB determined that a state may adopt a continuing education cycle different from its recertification cycle. This is clarified in the interpretation adopted November 1997 that states: "The period preceding the renewal is defined to mean the continuing education term established by the state." It is our understanding that this interpretation cleared up a gray area that affected a number of states.

"Carryover" refers to allowing a credential holder to carry over excess continuing education credit from one recertification cycle to the next. After review of the AQB Real Property Qualification Criteria and Interpretations, the AQB could find no evidence of the word "carryover" and no reference to the concept of carryover.

In addition, the language contained in section 4.a (continuing education) states: "The equivalent of fourteen classroom hours of instruction in courses or seminars for each year during the period preceding renewal the renewal is required." Interpretation I under that section clarifies that "The period preceding the renewal is defined to mean the continuing education term established by the state." This language clearly would not permit carryover.

The above analysis does not address the possibility of changing the qualification criteria. It has long been the philosophy of the AQB to consider qualification criteria



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changes only at spaced intervals since criteria changes may require changes in state statues as well as administrative rules. The AQB is mindful of the difficulty these changes may present to states. Consistent with past practice, the AQB decided not to consider criteria changes at this time.

Thank you for your inquiry concerning this issue. The AQB is always pleased to assist the Appraisal Subcommittee with interpretations of AQB documents as the need arises.

Sincerely

Scott Williams

Chair, Appraiser Qualifications Board

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