



THE APPRAISAL FOUNDATION

Authorized by Congress as the Source of Appraisal
Standards and Appraiser Qualifications

October 1, 2019

Mr. James Park
Executive Director
Appraisal Subcommittee
Federal Financial Institutions Examination Council
1325 G Street, N.W.
Suite 500
Washington, DC 20005

Dear Jim:

Enclosed is The Appraisal Foundation 2019-20 Federal Grant Proposal for your review and consideration. We are requesting support in the amount of \$1,412,400 for the period October 1, 2019 through September 30, 2020. Of this total, \$1,099,400 is for Title XI related expenses of the Appraisal Standards Board (ASB) and Appraiser Qualifications Board (AQB) and \$313,000 is for state investigator training.

Key points of our request include:

Appraiser Qualifications Board: The AQB continues to work with state appraiser regulators to ensure smooth implementation of the revisions to the *Criteria* which became effective on May 1, 2018.

The AQB continues to move forward with its simulated training concept, known as the *Practical Applications of Real Estate Appraisal* (PAREA). The first exposure draft of this proposed program was issued in September 2019 and it is envisioned that the board will adopt PAREA changes to the *Criteria* during this grant year. If adopted as it is currently being proposed, PAREA could allow individuals an alternative method to obtain much of the experience required (perhaps up to 100%) to obtain a credential, which has been a significant hurdle under the current supervisor/trainee mentorship model. Through the use of on-line simulated properties and randomization, trainees could be exposed to an almost unlimited number of valuation conditions.

In addition, the AQB will be updating the National Uniform Appraiser Licensing and Certification Examination. The type and number of questions appearing on the exam is based on the AQB-adopted *Exam Content Outlines* (ECOs) which are the result of a professional occupational analysis. These occupational analyses are performed on a periodic basis, and are conducted to ensure the knowledge, skills and abilities necessary for competent appraisal practice are properly represented in the exams. The most recent occupational analysis was performed in 2014, and the AQB's psychometric consultants recommend that a new analysis should be performed. Therefore, the AQB will embark on updating the ECOs with a new occupational analysis in 2020.

Appraisal Standards Board: Due to recent changes in the valuation marketplace, in the summer of 2019 the Board began examining the concept of creating standards for *Evaluations* in USPAP. To that end, the Board published a Concept Paper on the topic on September 3, 2019, and conducted a free webinar on September 10. In addition, a public, livestreamed hearing on the matter will be conducted on October 18, 2019 in Washington, DC. The feedback received will determine how the ASB will continue its examination of the concept. The result could range from the establishment of new standards for appraisers to perform evaluations (likely mirroring the Federal Interagency Guidelines) to revisions in the current reporting requirements to modifications to existing definitions.

In addition to the *Evaluations* topic, the ASB will evaluate other changes to be considered for the next edition of USPAP in late 2019. This will be done through a survey to approximately 500 key stakeholders to identify potential areas for revision for the next edition of USPAP.

State Investigator Training: The current series of Investigator Training courses receives excellent ratings by attendees, with a combined average score of 4.5 out of 5 in post-program surveys. Likewise, the course instructors receive very high marks, averaging 4.81 on a 5-point scale. Due to this continued success, we propose conducting three course offerings during the 2019-20 grant cycle, one for each of the three levels. We intend to hire one material editor and a proofreader from the ASB to update the current courses to include the contents of the 2020-21 edition of USPAP but otherwise have them remain the same. We will hold an in-person meeting of the Steering Committee and Instructors in the Spring of 2020 to review instructor insights, 2019 survey comments, and the 2019 instructional design plan, and develop a plan for future course updates and funding per the new ASC grant application process that is currently being developed.

Mr. James Park
October 1, 2019
Page 3

Finally, we will provide two copies of the 2020-21 version of USPAP to each jurisdiction to ensure that each has it for reference during investigation and enforcement proceedings.

We appreciate the support provided by the Appraisal Subcommittee over the years and look forward to our meeting later this month. In the meantime, please do not hesitate to contact Edna Nkemngu, Vice President of Finance and Administration or me, should you have any questions about our proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "David S. Bunton", with a stylized flourish at the end.

David S. Bunton
President

Enclosure



**The Appraisal
FOUNDATION**

Authorized by Congress as the Source of Appraisal
Standards and Appraiser Qualifications

2019-2020 Grant Proposal

Appraisal Subcommittee
1325 G Street, NW, Suite 500
Washington, DC 20005

October 1, 2019

**THE APPRAISAL FOUNDATION
2019-2020 GRANT PROPOSAL
TO
THE APPRAISAL SUBCOMMITTEE**

TABLE OF CONTENTS	PAGE
<hr/>	
INTRODUCTION	3
2019-20 BUSINESS PLAN – APPRAISER QUALIFICATIONS BOARD	4
2019-20 BUSINESS PLAN – APPRAISAL STANDARDS BOARD	8
PROJECTS TO IMPROVE REGULATORY SYSTEM – GRANTS TO STATES: INVESTIGATOR TRAINING, LEVELS I, II, III	11
KEY PERSONNEL	17
CONCLUSION.....	20
SUMMARY OF PROJECT COSTS	21
APPRAISER QUALIFICATIONS BOARD PROJECT BUDGET.....	22
APPRAISAL STANDARDS BOARD PROJECT BUDGET	24
INVESTIGATOR TRAINING PROJECT BUDGET.....	26
APPENDIX I.....	28
APPENDIX II.....	29
APPENDIX III.....	30

**THE APPRAISAL FOUNDATION
FEDERAL GRANT PROPOSAL
OCTOBER 1, 2019 THROUGH SEPTEMBER 30, 2020**

STATEMENT OF WORK

INTRODUCTION

The Appraisal Foundation (Foundation), a 501(c)(3) educational, non-profit organization, was founded in 1987 as an organization of organizations with an interest in valuation. The Foundation was created to encompass all appraisal disciplines – real property, personal property, and business valuation. Two years later, in 1989, Congress authorized the Foundation, and its boards, the Appraiser Qualifications Board (AQB) and the Appraisal Standards Board (ASB) to set the qualifications and standards of practice for appraisers performing appraisals in real estate transactions with a mortgage backed by the federal government. With this authorization, the Foundation's role in creating the tools for the profession and appraiser regulatory community became its most prominent body of work.

The Foundation is pleased to have been the recipient of Federal grants which have assisted in funding many of the programs of the ASB and the AQB over the past thirty years.

During this time of rapid development and change in the appraisal profession and in appraisal regulation, The Foundation has matured into an objective, representative organization that interacts with all sectors of the market impacted by appraisal.

The Foundation appreciates the opportunity to submit this 2019-2020 grant proposal to the Appraisal Subcommittee.

**2019-2020 BUSINESS PLAN
FOR THE
APPRAISER QUALIFICATIONS BOARD**

Executive Summary:

Under the provisions of Title XI of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA), the AQB establishes the minimum education, experience and examination requirements for real property appraisers to obtain a state license or certification.

The AQB also performs a number of ancillary duties related to real property and personal property appraiser qualifications. The AQB is currently engaged in the implementation and monitoring of the following endeavors:

- I. *Real Property Appraiser Qualification Criteria*
- II. *Personal Property Appraiser Qualification Criteria*
- III. *National Uniform Licensing and Certification Examinations*
- IV. *Program to Improve USPAP Education*
- V. *Course Approval Program*
- VI. *University Degree Review Program*

Following is the AQB business plan for the 2019-2020 timeframe.

Outline of Board Agenda

I. *Real Property Appraiser Qualification Criteria (Criteria)*

The AQB continues its examination of the *Practical Applications of Real Estate Appraisal* (PAREA) concept. If adopted, PAREA would provide the parameters for an alternative method to obtain the experience required to obtain a credential. Once made available in the marketplace, this alternative experience pathway would overcome the obstacles under the current supervisor/trainee mentorship model.

To that end, the AQB published a First Exposure Draft document containing the proposed content for PAREA on September 5, 2019. Based on the feedback received from that document, the AQB envisions at least one more exposure draft prior to adopting the PAREA content into the *Criteria*. At this time, the AQB foresees the earliest possible adoption of PAREA in the first half of 2020. As an aside, the AQB will conduct a free webinar shortly after issuing any document that seeks public comment to explain the rationale for issuing the document as well as summarizing the proposed changes.

In addition to PAREA, the AQB continues examining how disciplinary sanctions levied by state appraiser regulatory agencies relate to the qualification requirements for Supervisory Appraisers in the *Criteria*.

The AQB issued a Second Exposure Draft on the topic on September 17, 2019. Based on the feedback from that document, the AQB will either continue the exposure process, or adopt the proposed revisions to the *Criteria* at its public meeting on November 1, 2019.

II. The Personal Property Appraiser Qualification Criteria

The *Personal Property Appraiser Qualification Criteria* is a voluntary set of criteria, except for personal property appraisers who are members of sponsoring organizations of The Appraisal Foundation.

The *Personal Property Criteria* became effective on January 1, 2018. The Board continues to be responsive to any questions or issues that arise as a result.

III. National Uniform Licensing and Certification Examinations

As described in prior business plans, the *National Uniform Licensing and Certification Examinations* were implemented on January 1, 2008, in conjunction with the updated (2008) *Criteria*.

In August 2019, the Board held face-to-face meetings to draft additional exam questions with the assistance of its ongoing groups of Subject Matter Experts (SMEs). New forms of the exam for each classification are put into use on January 1 each year.

The type and number of questions appearing on the exams is based on the AQB-adopted *Exam Content Outlines* (ECOs) which are the result of a professional occupational analysis. These occupational analyses are performed on a periodic basis, and are conducted to ensure the knowledge, skills and abilities necessary for competent appraisal practice are properly represented in the exams. The most recent occupational analysis was performed in 2014, and the AQB's psychometric consultants recommend that a new analysis should be performed. Therefore, the AQB will embark on updating the ECOs with a new occupational analysis in 2020.

On a related note, the AQB is pleased that the number of first-time test takers continues to increase, with a projected increase of over 20 percent for 2019 over 2018. Attached (Appendix I) is a chart which shows the number of first-time test takers in recent years.

IV. Program to Improve USPAP Education

To improve the quality and uniformity of USPAP education, the AQB requires the following:

- All applicants for a credential are required to successfully complete the 15-hour *National USPAP Course* (or its equivalent), taught by an AQB Certified USPAP Instructor who is also a state-certified appraiser in good standing.
- All currently licensed and certified appraisers are required to complete the 7-hour *National USPAP Update Course* (or its equivalent) every two years. This course

must also be taught by an AQB Certified USPAP Instructor who is also a state-certified appraiser in good standing.

As in prior years, the AQB continues to monitor and improve this program. The focus of the Board for 2019-20 will include the following:

- Continue to monitor and improve procedures that ensure AQB Certified USPAP Instructors are meeting contractual commitments. Understanding and complying with these commitments is a common theme among the complaints received about Instructors.
- Continue activities as *The Program to Improve USPAP Education's* controlling authority. This includes making policy decisions and serving as the appellate body for any disputes that arise regarding instructor applications, instructor conduct, examination issues, and other administrative issues.
- The Appraisal Standards Board (ASB) adopted the 2020-21 changes to USPAP on April 5, 2019. The AQB worked with the ASB to update the Instructor Recertification Course, available on October 1, 2019. In addition, the Instructor Certification Course will be updated and available by spring 2020.

V. Course Approval Program

The AQB will continue to administer the Course Approval Program in 2020-21. This program reviews and approves USPAP equivalent courses as well as appraisal courses and seminars for both qualifying and continuing education. There are currently 315 qualifying and continuing education real property courses approved through CAP, including 12 equivalent USPAP courses.

VI. University Degree Review Program

The AQB continues to evaluate graduate, undergraduate and associate degree programs related to real estate to determine the applicability of the courses towards the Required Core Curriculum contained in the *Real Property Appraiser Qualification Criteria*.

To date, the Board has evaluated and approved a total of 13 Bachelor's programs, six Master's programs, and one Associate program. Additional colleges and universities are currently being reviewed. A list of programs approved to date is attached for your reference (Appendix II).

2019-20 MEETING SCHEDULE (All public meetings to be livestreamed)

October 31-November 1, 2019	St. Petersburg, FL
February 6-7, 2020	San Diego, CA
May 14-15, 2020	TBD
October 15-16, 2020	Washington, DC (in conjunction with AARO)

In addition to the meetings identified above, the Board will conduct monthly conference call meetings in the months where it does not meet in person. Depending on the responses to the Exposure Drafts, the Board may also hold a mid- to late-summer public meeting. The Board will also conduct webinars when publishing documents requesting public comment. The Board may also conduct other webinars or online briefings when appropriate.

2019/2020 AQB DELIVERABLES

The following deliverables will be made available to the Appraisal Subcommittee as the result of the Appraiser Qualifications Board's efforts:

- Meeting announcements and preliminary agendas
- Approved minutes of all meetings of the Board
- AQB Q & A's
- Executive Summaries of all meetings of the Board
- Exposure drafts of proposed Interpretations
- Exposure drafts and any adopted changes to the *Real Property Appraiser Qualification Criteria*.
- Documents associated with the development and administration of the state examinations.

**2019-2020 BUSINESS PLAN
FOR THE
APPRAISAL STANDARDS BOARD**

Executive Summary:

The ASB is charged with two main functions:

1. Write, edit, publish, and interpret the *Uniform Standards of Professional Appraisal Practice* (USPAP); and
2. Provide education for practitioners, users of appraisal services, regulators and the public on USPAP.

Changes for the 2020-21 edition of USPAP were adopted on April 5, 2019. The updated USPAP document and applicable courses are available by October 1, 2019.

Outline of Board Agenda

I. USPAP ISSUES TO BE ADDRESSED

On April 5, 2019, the ASB adopted revisions for the 2020-21 edition of USPAP. The Board incorporated those revisions into USPAP, the Advisory Opinions and *Frequently Asked Questions*. A written summary and a free webinar providing an overview of the changes is available on the Foundation's website. The 2020-21 edition of USPAP will be available to the public on October 1, 2019.

Due to recent changes in the valuation marketplace, in the summer of 2019 the Board began examining the concept of creating standards for *Evaluations* in USPAP. To that end, the Board published a Concept Paper on the topic on September 3, 2019, and conducted a free webinar on September 10. In addition, a public, livestreamed hearing on the matter will be conducted on October 18, 2019 in Washington, DC. The feedback received will determine how the ASB will continue its examination of the concept. The result could range from the establishment of new standards for appraisers to perform evaluations (likely mirroring the Federal Interagency Guidelines) to revisions in the current reporting requirements to modifications to existing definitions.

In addition to the *Evaluations* topic, the ASB will evaluate other changes to be considered for the next edition of USPAP in late 2019. This will be done through a survey to approximately 500 key stakeholders to identify potential areas for revision for the next edition of USPAP.

The ASB intends to publish a Discussion Draft or similar document to receive feedback on the areas of USPAP it is considering. Based on the feedback received, the ASB will

progress with exposing potential changes for the next edition of USPAP throughout the remainder of 2020, and into early 2021.

Regarding the publication cycle of valuation standards, the International Valuation Standards Council (IVSC) has recently gone from a four year to a six-month publication cycle. The Board will continue to evaluate this issue.

II. USPAP EDUCATION

In addition to incorporating revisions for the 2020-21 USPAP document, the Board is also updating the USPAP content for various educational offerings. The Board has completed incorporating changes to the 7-hour National USPAP Update Course, which will be available to providers on October 1, 2019. Additionally, the Board will:

- Provide instructors for a Spring 2020 offering of the Instructor Certification Course.
- Ensure reviewers are available for 7- and 15-Hour National USPAP Course equivalency review.
- Provide an ASB representative to participate in the Instructor Disciplinary Review Panel.
- Identify and address other areas where there is a demand for USPAP related education, including webinars hosted by TAF.

Additional Responsibilities

The Board will also continue to perform ancillary services such as:

- *Investigator Training Course*
Continue to review TAF/AARO investigator training courses for USPAP accuracy
- *AQB National Examinations*
Continue to assist the Appraiser Qualifications Board in evaluating USPAP questions for the examination question bank
- *International Valuation Standards Committee (IVSC)*
Continue to work with the IVSC to evaluate international valuation standards

III. 2019-2020 MEETING SCHEDULE (All public meetings will be livestreamed)

The following meetings are currently scheduled for the Board:

- October 17-18, 2019 Washington, DC (in conjunction with AARO)
- April 2-3, 2020 San Antonio, TX (in conjunction with AARO)
- July 9-10, 2020 Torrance, CA
- November 5-6, 2020 Charlotte, NC

In addition to the meetings identified above, the Board will conduct monthly conference call meetings in the months where it does not otherwise meet. The Board will also conduct webinars when documents are published seeking feedback on concepts or proposals. Additional webinars or online briefings may be conducted when appropriate.

IV. 2018/2019 DELIVERABLES

The following deliverables will be made available to the Appraisal Subcommittee as the result of the Appraisal Standards Board's efforts:

- Meeting announcements and preliminary agendas
- Approved minutes of all meetings of the Board
- Executive Summaries of all meetings of the Board
- Position papers and white papers emanating from any "Work Group" process
- Exposure drafts of proposed Standards Revisions and Statements
- Advisory Opinions approved
- Standards Revisions adopted
- USPAP Q&As
- All Documents sent to The Appraisal Foundation Advisory Council and the Industry Advisory Council

PROJECTS TO IMPROVE THE REGULATORY SYSTEM

GRANTS TO STATES INVESTIGATOR TRAINING, LEVELS I, II, III

Training of state regulators has been the cornerstone of a solid working relationship between the Foundation and the Association of Appraiser Regulatory Officials (AARO) for the last decade. Under the leadership of a joint Foundation-AARO steering committee, and with oversight, input, and funding from the Appraisal Subcommittee (ASC) and staff, hundreds of regulators from across the country have been professionally trained and armed with the knowledge needed to increase consistency in enforcement.

Background

Training for state appraiser investigative staff began in the mid-2000's as a session held at an AARO conference. The training materials were developed and program led by state investigators for state investigators. The benefits of such training were immediately recognized by state regulators, and they developed a vision to expand the base of access to it beyond those who could attend AARO conferences. In 2008, AARO leadership approached the ASC and Foundation for program funding, and a relationship ensued under which the ASC would finance the cost of the training via grants administered by the Foundation for the benefit of the entire appraiser regulatory system.

State Investigator Training Today

The Appraisal Foundation (Foundation) and the Association for Appraiser Regulatory Officials (AARO) are committed to continuing joint efforts to train state regulators who are involved in the enforcement process. The organizations operate this joint venture under a Memorandum of Understanding for the *Collaboration for Appraiser Regulator Training (CART)* and the leadership of a joint Foundation-AARO steering committee that regularly receives input and direction from ASC staff.

Participation

Since 2009, there have been 33 State Investigator Training courses offered with 1123 attendees who come from the state appraiser regulatory community (state investigators, attorneys, administrative/ support staff, and board members). Involvement among the states has been strong with 54 of the 55 jurisdictions that regulate appraisers benefiting from these course offerings. All but one jurisdiction has sent participants to the Level I course, 51 have participated in at least one Level II course, and 40 have participated in at least one Level III course (Appendix III). Individuals trained at each level are as follows:

Level I:	560
Level II:	359
Level III:	204

Course Materials and Instructors

Current and former state regulators who also serve as investigator training instructors remain the authors of the course materials which are jointly copyrighted by the Foundation and AARO. Using their first-hand knowledge of the enforcement process, these authors/instructors bring to the classroom best practices gained through years of experience.

What started as a conference seminar more than a decade ago has grown to three levels of progressive, in-depth trainings, each led by a team of two instructors. Updates for the 2019 version of the training courses were authored by Tom Lewis, Deputy Director and Chief Investigator, North Carolina Appraisal Board, and Margaret Hambleton, former chair, Ohio Real Estate Appraisal Board, former Chair, the Appraisal Standards Board and author of the 7- and 15-hour national USPAP Courses. The summary of each course offering is as follows:

Level I: In this entry-level course, participants receive foundational training in the regulatory system for real property appraisers, the application of USPAP to appraiser's work product, and the skills and tools needed for successful investigation of complaints against appraisers.

Prerequisite: Completion of the 15- Hour National USPAP Course (or its equivalent), OR the 4-hour online course *Intro to Terms & Concepts of USPAP*.

Instructors: Larry Disney, former Executive Director, Kentucky Real Estate Appraisers Board, and Tom Lewis, Deputy Director and Chief Investigator, North Carolina Appraisal Board

Level II: This course builds upon the foundation presented in Level 1 Investigator Training. Topics covered include a deeper review of USPAP, effective case management, the importance of planning for the investigation, evidence collection, general investigative report practices, and beginning concepts for effective presentation of alleged violations. Break-out sessions and case studies provide practical application of lessons learned.

Prerequisite: Completion of Level 1 Investigator Training Course and the 15- Hour National USPAP Course (or its equivalent)

Instructors: Dennis Badger, Investigator, Kentucky Real Estate Appraisers Board, and Don Rodgers, Executive Director, North Carolina Appraisal Board

Level III: This course is the capstone in the Investigator Training series. Participants will have an opportunity to hone their skills in effective, clear, and concise report writing, in the support of allegations with substantiated evidence, and in fact-based testimony. The course uses a combination of lecture and hands-on techniques, and students' experience – and may participate in – the

reenactment of an actual judicial proceeding brought by a state against an appraiser.

Prerequisite: Completion of Level 2 Investigator Training Course, which includes the 15- Hour National USPAP Course (or its equivalent).

Instructors: Larry Disney, former Executive Director, Kentucky Real Estate Appraisers Board, and Tom Lewis, Deputy Director and Chief Investigator, North Carolina Appraisal Board

Although the courses traditionally score above 4.5 on a 5-point scale in post-program surveys, the authors/instructors continually seek to improve them and pay close attention to the input of attendees. As in years past, the 2019 course offerings and instructors received rave reviews from attendees. Comments received on 2019 post-course anonymous surveys include:

Excellent materials and instructors. What I found very informative is the strong need to understand under what authority and what assignment conditions a report is written.

It was a great experience. I appreciated the materials and the conversations within the class. Teachers were very knowledgeable. Thank you.

Good pace to class, and format was flexible enough to allow deeper discussion into areas that came up

Very well constructed and well-run program. Instructors were extremely knowledgeable and really cared about student understanding of the material.

Attendees also provide valuable input on course content and give suggestions for improvement. Recent additions of more case studies and smaller-group breakout sessions, which were added based on student input, have been well-received. Among the 2019 survey responses are additional comments to guide improvement:

The manual contained helpful guidelines for best practices and procedures in an investigation, and the case studies were of particular value to me. However, I may have gained more from the course if more time was spent in the practical application of investigative methods, instead of a page-by-page presentation of the manual. Perhaps Investigator I could focus more on the "book learning" aspects of the principles of investigation, and Investigator II could be geared more toward the active application of those principles.

The course was very well presented. However, I would have appreciated more case studies and attendee interaction than just going over slides that are on the screen, which also appears in the printed material.

Would have liked if the course was a little more structured in what is being covered. Subject matter was a bit repetitive from Level 1. Would have liked a bit more detail on writing reports. Interrogation techniques was great.

Training Location

The Steering Committee considers safety of the location, hotel rooms at government per diem rates, size of meeting spaces, affordable lunch options, close proximity to the airport and restaurants, and attentive hotel staff when choosing sites for the course offerings. For a number of years, all three levels of courses were offered at one location that received high ratings in evaluations from students and instructors. However, the Steering Committee received comments from some state regulators that the distance between their state and the single location was problematic and that they would prefer more geographic balance. Therefore, for 2019 course offerings, the decision was made to space the locations across the country. The dates and locations for each course:

- Level I: April 15-17, 2019; Kansas City, MO
- Level II: July 15-17, 2019; Tampa, FL
- Level III: September 16-18, 2019; Portland, OR

The locations and spacing of course offerings seems to be working well. The Steering Committee will continue to monitor state regulator feedback for insight to optimize the program dates and locations to best serve the needs of state regulatory programs and adjust as necessary.

2020 State Investigator Training Plan

The Foundation proposes to continue to administer the State Investigator Training series, and in collaboration with AARO offer the Investigator Training courses in 2020 under the following parameters:

- Offer three levels of progressive Investigator Training open to those involved in the state appraiser complaint investigation process;
- Hire one material editor and a proofreader from the ASB to update the current courses to include the contents of the 2020-21 edition of USPAP but otherwise have them remain the same;
 - *Note: given the time constraints associated with the 2019-2020 ASC Grant award cycle, a more comprehensive update of the courses is not possible for the 2020 course offerings*
- Space the course offerings at least two months apart;
- Spread course locations across the country, holding one in the eastern, one in the mid-section, and one in the western part of the country;
- Retain the current pool of instructors and hire two instructors to lead each course;
- Fully cover the cost of the training including hotel/meeting and travel expenses for the following number of attendees (based on historical attendance data):

- Level I: up to 50 attendees
- Level II: up to 40 attendees
- Level III: up to 40 attendees; and
- Hold an in-person meeting of the Steering Committee and Instructors in the Spring of 2020 to review instructor insights, 2019 survey comments, and the 2019 Instructional Design Plan, and develop a plan for future course updates and funding per the new ASC grant application process that is currently being developed.
- Provide two copies of the 2020-21 version of USPAP to each jurisdiction to ensure that each has it for reference during investigation and enforcement proceedings.

The Foundation and AARO appreciate the financial support of the ASC in furthering the education of state appraiser investigative staff. We hope that this proposal merits your further consideration for funding.

Additional Efforts to Assist Appraiser Regulators

While not part of this grant request, the following is being provided for informational purposes regarding the Foundation's efforts to assist state appraiser regulators.

Corrective Education

Initially referred to as "remedial" education, a survey of state appraiser regulators indicated that the preferred term is "corrective" education. We have four courses that have been developed:

- *Scope of Work: Appraisals and Inspections*
- *Appraiser Self-Protection: Documentation and Record Keeping*
- *Report Certifications: What Am I Signing and Why?*
- *Residential Report Writing vs Form Filling*

These four-hour online courses are available for purchase via the Foundation website and are not eligible for continuing education credit. Over 350 students have enrolled in the courses to date and about half of the states have used them as a disciplinary option.

We surveyed the state appraiser regulators for additional course topics. Based on this input, we are developing the following additional courses:

- *Missing Explanations*
- *Reconciliation of Comparable Sales*
- *Extraordinary Assumptions and Hypothetical Conditions*
- *Competency*

These on-line courses should be available in the first quarter of next year. It is important to note that these courses are intended to fill the gap on topics that are not currently covered by traditional educational offerings

Consistent Enforcement Task Force

In 2009, The Appraisal Foundation established a Consistent Enforcement Task Force. The charge of this Task Force was to consider the need for developing a set of voluntary disciplinary guidelines for use by State Appraiser Regulatory Agencies when enforcing the *Uniform Standards of Professional Appraisal Practice* (USPAP).

A *Voluntary Disciplinary Action Matrix* was developed in August 2010 for use by state appraiser regulatory agencies. A copy of the document is available on our website and has been updated to reflect the 2020 edition of USPAP.

Foundation YouTube Channel

The Appraisal Foundation has produced a series of video training sessions, some designed specifically for state appraiser regulators and others for all appraisers. We have videos entitled “2018-2019 USPAP Update for State Appraiser Regulators” and “A Mock Administrative Law Hearing” which were both recorded at AARO Conferences.

Other videos include:

- Understanding the Real Property Appraiser Regulatory System
- The AQB Real Property Appraiser Qualification Criteria Changes Effective 2015
- The Responsibilities of the Appraisal Practices Board
- An Introduction to Green Buildings and Their Valuation.

KEY PERSONNEL

Ronny Johnson, Chair, Board of Trustees

Ronny Johnson was appointed Chief Collateral Risk Officer of Capital Farm Credit in April 2011 to direct the collateral risk management department. The position includes supervising staff appraisers/evaluators, monitoring collateral risk, education/training and oversight of the valuation processes of both Real Estate and Personal Property collateral as well as collateral audits. In July 1998, he joined Capital Farm Credit as Chief Appraiser after serving as appraiser for 4 years at the Farm Credit Bank of Texas.

Previously Mr. Johnson was a fee appraiser for 14 years specializing in farm and ranch properties. He holds a BS and MA in agricultural economics and real estate from Texas A&M University. Mr. Johnson has served on various Farm Credit System workgroups including the Review, Audit and Appraisal Workgroup. He has served as the Farm Credit Council representative to the Board of Trustees of The Appraisal Foundation. Currently, he is the Chairman of the Board of Trustees of The Appraisal Foundation.

Mark A. Lewis, Chair, Appraiser Qualifications Board

Mark A. Lewis, ARA, RPRA has been engaged in real estate appraisals and consultation since 1984. Mark began his appraisal career as a contract appraiser for Dickerson-Seely & Associates, Inc., a full service appraisal firm in Lufkin, Texas. Today he and Scott Seely own and manage the firm, now known as Lewis & Seely Appraisals, Inc.

Mark joined the American Society of Farm Managers and Rural Appraisers (ASFMRA) in 1996 and earned his ARA designation in 1999 and his RPRA designation in 2014. He has served ASFMRA as President of the Texas Chapter, Chair of the Appraisal Education/Accreditation Committee, and District V Experience Review Chairman. In 2007, he was awarded the H. E. "Bulk" Stalcup Excellence in Education Award by ASFMRA. He is presently Vice-Chair of the Appraiser Qualifications Board (AQB) of The Appraisal Foundation. On a local level, he has also served as President of the Lufkin Multiple Listing Service and Chair of the Grievance Committee for the Lufkin Association of Realtors.

Mark has been lead instructor for many of ASFMRA's core courses and was actively involved in the writing and design of the current Cost, Sales Comparison, and Income Approach courses. He has also taught and authored many seminars on various subjects through the years and is an AQB Certified USPAP Instructor.

Wayne Miller, Chair, Appraisal Standards Board

Wayne Miller is chair of the Appraisal Standards Board of the Appraisal Foundation. He previously served as Chair of the Appraiser Qualifications Board of the Appraisal Foundation, and was a Subject Matter Expert in the development of the inaugural National Uniform Appraisal Licensing and Certification Examinations. Wayne has over 30 years of experience in the real estate finance and commercial real estate valuation sector nationally and internationally.

He currently serves as Chief Appraiser of a large international bank. Wayne holds multiple appraisal designations from domestic and international appraisal organizations. He is also a Certified General Real Estate Appraiser based in Tampa, Florida. Wayne earned a Bachelor of Science in Business Administration from the University of Florida, with a concentration in Real Estate and Urban Analysis.

David S. Bunton, President

Mr. Bunton has served as the senior staff member of The Appraisal Foundation since May of 1990. As President, he is the chief executive officer of the Foundation. Prior to joining The Appraisal Foundation, he served as the Vice President of Government Affairs and Communications for the Federal Asset Disposition Association. He also previously served as a legislative assistant in the United States Senate for eight years and was a Congressional Chief of Staff in the United States House of Representatives for four years. Mr. Bunton holds a BA degree in Government and Politics from the University of Maryland.

Kelly Davids, Senior Vice President

Kelly Davids assists in managing the day-to-day operations of the Foundation, leading special projects and focusing on strategic initiatives. Prior to joining the Foundation, Davids was Superintendent of the Ohio Division of Real Estate & Professional Licensing, the chief regulator for Ohio's appraisers. Her experience includes working in senior-level positions for two Ohio Governors and serving multiple terms in elected office. Davids holds a Master's degree in Public Policy and Management from The Ohio State University.

John Brennan, Vice President of Appraisal Issues

Prior to his current position, John spent 8 years as the Chief of Licensing and Enforcement for the California Office of Real Estate Appraisers (OREA). In that role, John administered the California real estate appraiser licensing program, issuing licenses to applicants that met both federal and state requirements. John was also responsible for the enforcement program; educating and/or disciplining licensees who violated law, regulations or USPAP. John has been in the appraisal profession for over 30 years. Prior to joining OREA in February 1995, he appraised both residential and non-residential real estate, covering a

wide variety of property types. He also previously managed an appraisal department for a major national financial institution. John is a Certified General appraiser and an AQB Certified USPAP Instructor.

A native Californian, John relocated from southern California to the Sacramento area in 1991. He holds a bachelor's degree in business administration from California State University, Long Beach, and an associate degree in business administration from El Camino Community College in Torrance.

Edna Nkemngu, Vice President of Finance and Administration

Ms. Nkemngu has been part of The Appraisal Foundation since 2006 when she started as the Foundation's Staff Accountant. Prior to serving at the Foundation, Ms. Nkemngu worked as an accountant for a sole proprietorship. She holds a bachelor's degree in Accounting from the University of Buea in Cameroon, a master's degree in Accounting and Information Technology from the University of Maryland University College, and is a Certified Public Accountant licensed by the Commonwealth of Virginia.

CONCLUSION

The Appraisal Foundation sincerely appreciates the financial support we have received from the Appraisal Subcommittee. Grant funds supporting the work of the Boards provide invaluable assistance and contribute greatly to the Foundation's ability to effectively serve the public. We are confident that the work of the Foundation supported by the 2019-2020 grant will be well received and will provide important assistance to appraisers, regulators, users of appraisal services and consumers.

Grant Application Budget Worksheet Summary				
The Appraisal Foundation 1155 15th Street, N.W. Suite 1111 Washington, DC 20005		October 1, 2019 - September 30, 2020		
Budget Category	AQB	ASB	INVESTIGATOR TRAINING	Total Budget Estimate
Personnel (Direct Labor)	\$98,751	\$116,953	\$21,257	\$236,961
Travel	\$220,060	\$115,480	\$230,196	\$565,736
Consultants	\$97,500	\$90,000	\$21,000	\$208,500
Contracts and Sub-Grants	\$92,160	\$0	\$0	\$92,160
Other Direct Costs	\$14,009	\$4,338	\$15,895	\$34,242
Indirect Costs **	\$114,520	\$135,629	\$24,652	\$274,801
Total:	\$637,000	\$462,400	\$313,000	\$1,412,400

Grant Application Detailed Budget Worksheet			
The Appraisal Foundation 1155 15th Street, N.W. Suite 1111 Washington, DC 20005		October 1, 2019 - September 30, 2020	
Category: Appraiser Qualifications Board			
1. Personnel (Direct Labor)	Estimated Hours	Rate per Hour	Estimated Cost
President	90	\$141.03	\$12,693
Vice President of Appraisal Issues	470	\$87.69	\$41,214
Qualifications Board Manager	1,005	\$44.62	\$44,843
Total Direct Labor Cost			\$98,751
2. Travel			
2a. Transportation - Airfare	Trips	Fare	Estimated Cost
October 2019 Board Meeting - 7 Members + 3 Staff	30	\$500.00	\$15,000
February 2020 Board Meeting - 8 Members + 3 Staff	33	\$500.00	\$16,500
May 2020 Board Meeting - 8 Members + 3 Staff	33	\$500.00	\$16,500
Summer Board Meeting - 8 Members + 3 Staff	33	\$500.00	\$16,500
SME Meeting with Exam Consultant, PSI - 12 SME + 2 PSI	14	\$500.00	\$7,000
Chair Travel to two 3-Day BOT Meetings	2	\$500.00	\$1,000
Chair Travel to 1 IAC Meeting (2 included in AQB travel)	1	\$500.00	\$500
Chair Travel to 3 TAFAC Meetings (including 1 joint IAC/TAFAC meeting)	3	\$500.00	\$1,500
Board Member travel for University Degree Program Reviews two for 5 Trips	10	\$500.00	\$5,000
Board Member travel for three Exam Site Visits	3	\$500.00	\$1,500
Subtotal - Transportation - Airfare			\$81,000
2b. Per Diem or Subsistence	Days	Rate per Day	Estimated Cost
October 2019 Board Meeting - 7 Members + 3 Staff	30	\$260.00	\$7,800
February 2020 Board Meeting - 8 Members + 3 Staff	33	\$260.00	\$8,580
May 2020 Board Meeting - 8 Members + 3 Staff	33	\$260.00	\$8,580
Summer Board Meeting - 8 Members + 3 Staff	33	\$260.00	\$8,580
SME Meeting with Exam Consultant, PSI - 12 SME + 2 PSI	42	\$260.00	\$10,920
Chair Travel to two 3-Day BOT Meetings	6	\$260.00	\$1,560
Chair Travel to 1 IAC Meeting (2 included in AQB travel)	1	\$260.00	\$260
Chair Travel to 3 TAFAC Meetings (including 1 joint IAC/TAFAC meeting)	3	\$260.00	\$780
Board Member travel for University Degree Program Reviews two for 3 Trips	6	\$260.00	\$1,560
Board Member travel for three Exam Site Visits	3	\$260.00	\$780
Subtotal - Per Diem or Subsistence			\$47,060
2c. Meeting Costs - Hotel Charges, Audio/Visual	Quantity	Unit Cost	Estimated Cost
October 2019 Board Meeting - 7 Members + 3 Staff	1	\$4,000.00	\$4,000
February 2020 Board Meeting - 8 Members + 3 Staff	1	\$4,000.00	\$4,000
May 2020 Board Meeting - 8 Members + 3 Staff	1	\$4,000.00	\$4,000
Summer Board Meeting - 8 Members + 3 Staff	1	\$4,000.00	\$4,000
SME Meeting with Exam Consultant, PSI - 12 SME + 2 PSI	1	\$4,000.00	\$4,000
Audio/Visual	4	\$18,000.00	\$72,000
Subtotal - Meeting Costs			\$92,000
Total Travel Cost			\$220,060

Grant Application Detailed Budget Worksheet				
The Appraisal Foundation 1155 15th Street, N.W. Suite 1111 Washington, DC 20005			October 1, 2019 - September 30, 2020	
Category: Appraiser Qualifications Board				
3. Consultants	Hours	Rate per Hour	Estimated Cost	
Board Chair	200	\$75.00	\$15,000	
Board Members - Criteria	800	\$75.00	\$60,000	
Board Members - Degree Review Program	150	\$75.00	\$11,250	
Board Members - Exam Meetings	150	\$75.00	\$11,250	
			\$0	
Total Consultants Cost			\$97,500	
4. Contracts and Sub-Grantees (List individually)	Quantity	Unit Cost	Estimated Cost	
Exam Psychometric Consultant			\$50,000	
PSI Job Analysis and Exam Specification Updates			\$42,160	
Total Subcontracts Cost			\$92,160	
5. Other Direct Costs	Quantity	Unit Cost	Estimated Cost	
Office Supplies			\$250	
Postage & Delivery			\$259	
Printing - Criteria Booklets			\$10,000	
Legal			\$3,500	
Total Other Direct Costs			\$14,009	
Subtotal of Direct Costs			\$522,480	
6. Indirect Costs	Type	Rate	Base	Estimated Cost
Calculated on Labor Costs	Fringe	29.40%	\$98,751.10	\$29,033
Calculated on Labor Costs	Overhead	66.90%	\$127,783.92	\$85,487
Total Indirect Costs				\$114,520
Total Estimated Costs (Subtotal Direct + Total Indirect)				\$637,000
Summary of AQB Estimated Costs				Estimated Cost
Personnel (Direct Labor)				\$98,751
Travel				\$220,060
Consultants				\$97,500
Contracts and Sub-Grants				\$92,160
Other Direct Costs				\$14,009
Indirect Costs				\$114,520
Total:				\$637,000

Grant Application Detailed Budget Worksheet			
The Appraisal Foundation 1155 15th Street, N.W. Suite 1111 Washington, DC 20005		October 1, 2019 - September 30, 2020	
Category: Appraisal Standards Board			
1. Personnel (Direct Labor)	Estimated Hours	Rate per Hour	Estimated Cost
President	80	\$141.03	\$11,282
Vice President of Appraisal Issues	650	\$87.69	\$56,999
Standards Board Manager	1,300	\$37.44	\$48,672
Total Direct Labor Cost			\$116,953
2. Travel			
2a. Transportation - Airfare	Trips	Fare	Estimated Cost
October 2019 Board Meeting - 6 Members + 3 Staff	9	\$500.00	\$4,500
April 2020 Board Meeting - 7 Members + 3 Staff	10	\$500.00	\$5,000
July 2020 Board Meeting - 7 Members + 3 Staff	10	\$500.00	\$5,000
Chair Travel to two 3-Day BOT Meetings	2	\$500.00	\$1,000
Chair Travel to 2 IAC Meetings (1 included in ASB travel)	2	\$500.00	\$1,000
Chair Travel to 3 TAFAC Meetings (including 1 joint IAC/TAFAC meeting)	3	\$500.00	\$1,500
Subtotal - Transportation - Airfare			\$18,000
2b. Per Diem or Subsistence	Days	Rate per Day	Estimated Cost
October 2019 Board Meeting - 6 Members + 3 Staff	27	\$260.00	\$7,020
April 2020 Board Meeting - 7 Members + 3 Staff	30	\$260.00	\$7,800
July 2020 Board Meeting - 7 Members + 3 Staff	30	\$260.00	\$7,800
Chair Travel to two 3-Day BOT Meetings	6	\$260.00	\$1,560
Chair Travel to 2 IAC Meetings (1 included in ASB travel)	2	\$260.00	\$520
Chair Travel to 3 TAFAC Meetings (including 1 joint IAC/TAFAC meeting)	3	\$260.00	\$780
Subtotal - Per Diem or Subsistence			\$25,480
2c. Meeting Costs - Hotel Charges, Audio/Visual	Quantity	Unit Cost	Estimated Cost
October 2019 Board Meeting - 6 Members + 3 Staff	1	\$6,000.00	\$6,000
April 2020 Board Meeting - 7 Members + 3 Staff	1	\$6,000.00	\$6,000
July 2020 Board Meeting - 7 Members + 3 Staff	1	\$6,000.00	\$6,000
Audio/Visual	3	\$18,000.00	\$54,000
Subtotal - Meeting Costs			\$72,000
Total Travel Cost			\$115,480

Grant Application Detailed Budget Worksheet				
The Appraisal Foundation 1155 15th Street, N.W. Suite 1111 Washington, DC 20005			October 1, 2019 - September 30, 2020	
Category: Appraisal Standards Board				
3. Consultants	Hours	Rate per Hour	Estimated Cost	
Board Chair	300	\$75.00	\$22,500	
Board Members	900	\$75.00	\$67,500	
Total Consultants Cost			\$90,000	
4. Contracts and Sub-Grantees (List individually)	Quantity	Unit Cost	Estimated Cost	
Total Subcontracts Cost			\$0	
5. Other Direct Costs	Quantity	Unit Cost	Estimated Cost	
Legal			\$2,500	
Postage & Delivery			\$1,000	
Printing			\$300	
Office Supplies			\$538	
Total Other Direct Costs			\$4,338	
Subtotal of Direct Costs			\$326,771	
6. Indirect Costs	Type	Rate	Base	Estimated Cost
Calculated on Labor Costs	Fringe	29.40%	\$116,952.90	\$34,384
Calculated on Labor Costs	Overhead	66.90%	\$151,337.05	\$101,244
Total Indirect Costs				\$135,629
Total Estimated Costs (Subtotal Direct + Total Indirect)				\$462,400
Summary of ASB Estimated Costs				Estimated Cost
Personnel (Direct Labor)				\$116,953
Travel				\$115,480
Consultants				\$90,000
Contracts and Sub-Grants				\$0
Other Direct Costs				\$4,338
Indirect Costs				\$135,629
Total:				\$462,400

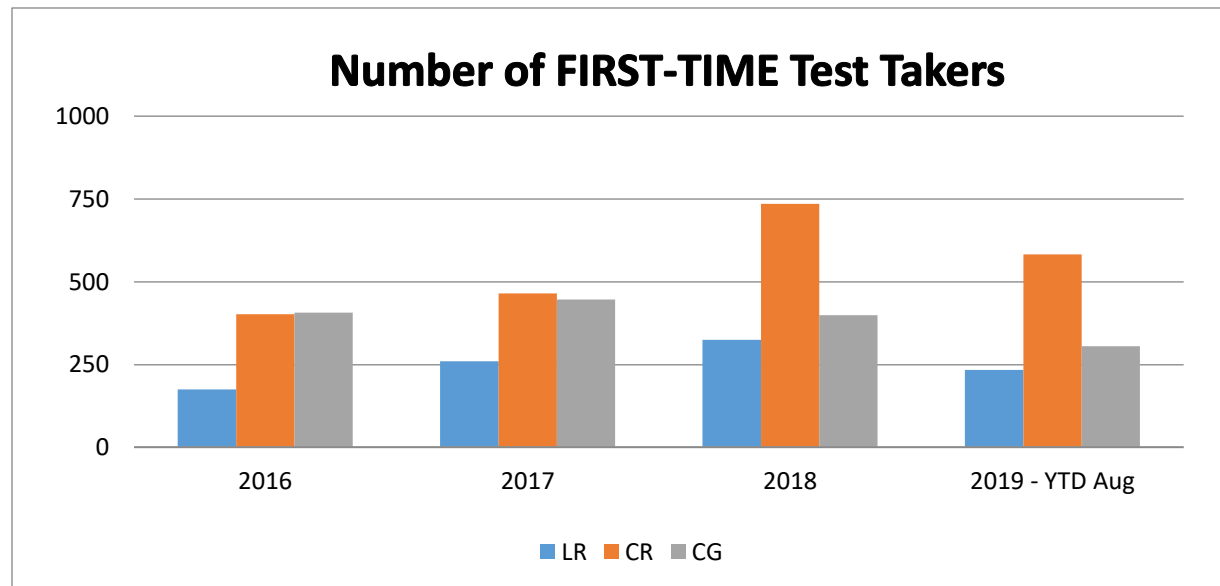
Grant Application Detailed Budget Worksheet			
The Appraisal Foundation 1155 15th Street, N.W. Suite 1111 Washington, DC 20005		October 1, 2019 - September 30, 2020	
Category: Investigator Training			
1. Personnel (Direct Labor)	Estimated Hours	Rate per Hour	Estimated Cost
President	30	\$141.03	\$4,231
Steering Committee/Oversight (SVP)	50	\$89.74	\$4,487
Steering Committee/Oversight (VP, Appraisal Issues)	10	\$87.69	\$877
Director of Publications	30	\$51.79	\$1,554
Standards Board Program Manager	270	\$37.44	\$10,109
Total Direct Labor Cost			\$21,257
2. Travel			
2a. Transportation - Airfare	Trips	Fare	Estimated Cost
Investigator Training Session	53	\$600.00	\$31,800
Investigator Training Session	43	\$600.00	\$25,800
Investigator Training Session (50 students level I, 40 students Levels II and III, 2 instructors and 1 staff person)	43	\$600.00	\$25,800
4 Steering Committee, 2 Author/Facilitator, 3 Instructors (Spring Meeting)	9	\$600.00	\$5,400
Subtotal - Transportation - Airfare			\$88,800
2b. Per Diem or Subsistence	Quantity	Rate per Day	Estimated Cost
Investigator Training Session (3 days)	53	\$260.00	\$13,780
Investigator Training Session (3 days)	43	\$260.00	\$11,180
Investigator Training Session (3 days) (50 students level I, 40 students Levels II and III, 2 instructors and 1 staff person)	43	\$260.00	\$11,180
4 Steering Committee, 2 Author/Facilitator, 3 Instructors (Spring Meeting)	9	\$260.00	\$2,340
Subtotal - Per Diem or Subsistence			\$38,480
2c. Meeting Costs - Hotel Charges, Audio/Visual	Quantity	Unit Cost	Estimated Cost
Investigator Training Session	1	\$36,220.00	\$36,220
Investigator Training Session	1	\$23,359.00	\$23,359
Investigator Training Session	1	\$28,820.00	\$28,820
Audio/Visual Rental for 3 Sessions	3	\$3,000.00	\$9,000
4 Steering Committee, 2 Author/Facilitator, 3 Instructors (Spring Meeting)	1	\$5,517.00	\$5,517
Subtotal - Meeting Costs			\$102,916
Total Travel Cost			\$230,196

Grant Application Detailed Budget Worksheet				
<div> <div>The Appraisal Foundation</div> <div>1155 15th Street, N.W. Suite 1111</div> <div>Washington, DC 20005</div> </div>			October 1, 2019 - September 30, 2020	
Category: Investigator Training				
3. Consultants		Days	Rate per Day	Estimated Cost
Instructors for 3 Classes		6	\$3,000.00	\$18,000
Updates to existing courses				\$3,000
Total Consultants Cost				\$21,000
4. Contracts and Sub-Grantees (List individually)		Quantity	Unit Cost	Estimated Cost
Total Subcontracts Cost				\$0
5. Other Direct Costs		Quantity	Unit Cost	Estimated Cost
Postage - Training Materials		140	10	\$1,400
Printing - Training Materials		140		\$9,000
Printing - USPAP to States		140		\$5,000
Office Supplies				\$495
Total Other Direct Costs				\$15,895
Subtotal of Direct Costs				\$288,348
6. Indirect Costs		Type	Rate	Base
				Estimated Cost
Calculated on Labor Costs		Fringe	29.40%	\$21,257.30
Calculated on Labor Costs		Overhead	66.90%	\$27,506.95
Total Indirect Costs				\$24,652
Total Estimated Costs (Subtotal Direct + Total Indirect)				\$313,000
Summary of Investigator Training Estimated Costs				Estimated Cost
Personnel (Direct Labor)				\$21,257
Travel				\$230,196
Consultants				\$21,000
Contracts and Sub-Grants				\$0
Other Direct Costs				\$15,895
Indirect Costs				\$24,652
Total:				\$313,000

APPENDIX I

AQB NATIONAL UNIFORM LICENSING AND CERTIFICATION EXAMINATIONS*												
	2016		2017		2018		2019 - YTD Aug		2018 - YTD Aug		% Change 2018-2019	
	#	Pass Rate	#	Pass Rate	#	Pass Rate	#	Pass Rate	#	Pass Rate	First-Time Test Takers	Pass Rate
	Passed		Passed		Passed		Passed		Passed			
Licensed Residential	175	62%	260	67%	325	62%	234	59%	202	66%	16%	-12%
	108		173		203		137		134			
Certified Residential	402	66%	465	73%	735	68%	583	63%	418	69%	39%	-9%
	267		338		498		366		289			
Certified General	407	71%	447	71%	399	63%	306	57%	274	64%	12%	-11%
	287		319		250		173		174			
Total	984	67%	1,172	71%	1,459	65%	1,123	60%	894	67%	26%	-10%
	662		830		951		676		597			

*Data Applies to First-Time Test Takers Only



APPENDIX II

AQB Approved Degrees in Real Estate	
Type	Institution
Graduate Degrees	Florida International University Texas A&M University University of Denver University of Florida University of Wisconsin - Madison Virginia Commonwealth University
Undergraduate Degrees	Colorado State University Indiana University Lehigh University Oklahoma State University South Dakota State University Texas A&M University Texas Christian University University of Central Florida University of Denver University of Nebraska - Omaha University of Northern Iowa University of Wisconsin - Madison Virginia Commonwealth University
Associate Degrees	Hondros College of Business

APPENDIX III

Numbers updated through 2019 Level 3 Training (Last updated on 9.17.2019)			
	Level 1	Level 2	Level 3
Alabama	10	5	4
Alaska	6	4	2
Arizona	27	17	6
Arkansas	6	3	2
California	21	20	11
Colorado	15	13	7
Connecticut	3	2	2
Delaware	13	5	1
District of Columbia (DC)	5	1	
Florida	29	25	19
Guam	6	1	1
Georgia	8	4	3
Hawaii	7	4	
Idaho	15		
Illinois	20	11	7
Indiana	18	10	3
Iowa	9	6	6
Kansas	12	8	4
Kentucky	14	10	4
Louisiana	10	9	4
Maine			
Maryland	5	4	4
Massachusetts	7	4	1
Michigan	12	3	1
Minnesota	13	11	3
Mississippi	10	6	4
Missouri	3	4	3
Montana	14	4	1
Nebraska	12	7	3
Nevada	4	2	1
New Hampshire	21	16	10
New Jersey	4	5	3
New Mexico	8	2	1
New York	11	8	6
North Carolina	5	4	3
North Dakota	10	8	7
Ohio	18	11	6
Oklahoma	7	4	3

Oregon	10	8	6
Pennsylvania	11	3	2
Puerto Rico	5	5	3
Rhode Island	1		
Mariana Islands	1		
South Carolina	5	3	3
South Dakota	8	7	6
Tennessee	11	8	4
Texas	18	16	8
U.S. Virgin Islands	4	3	
Utah	6	5	2
Vermont	9	6	
Virginia	16	11	7
Washington	16	14	12
West Virginia	10	4	3
Wisconsin	7	1	1
Wyoming	4	4	1
TOTAL	560	359	204
Unique States or Territories	54	51	40