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## Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

August 13, 2021

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

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

Dear Chairman Lewis:

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

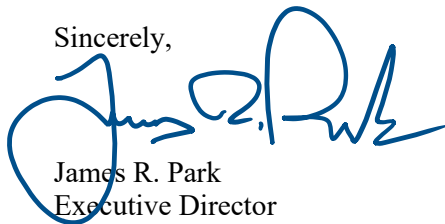
The Criteria requires that education and experience must be completed prior to taking the National Uniform Licensing and Certification Examination (National Exam). The Criteria further requires the applicant to provide reports, certifications or file memoranda, or, if such reports or memoranda are unavailable for good cause, other evidence at the credentialing authority's discretion that the work is compliant with USPAP as part of the State experience verification process. The Criteria does not direct the States as to when and how they verify the applicant's claimed prerequisites.

The proposed interpretation appears to direct States on implementation of the Criteria. This interpretation, if adopted, could prove to be unnecessarily burdensome for States and could impose an additional barrier to entry into the profession by adding time and expense for both the appraiser applicant and the State. States have limited resources and face the challenge of using their resources in ways that best fit their programs. Adding additional barriers to entry into the profession is contrary to current efforts underway to encourage an expanded and more diverse appraiser population.

At the very least, it appears that the proposed interpretation sets new Criteria requirements for States rather than interpreting current minimum Criteria for appraisers, and therefore, would need to be developed as an exposure draft for new Criteria, including an analysis of what the issue/problem is and the impact of the proposed new minimum requirement would be for States and appraiser applicants.

Please contact us if you have any questions.

Sincerely,



James R. Park  
Executive Director