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## Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

**Via Email**

TO: State Appraiser Regulatory Officials

FROM: Jim Park, Executive Director 

DATE: July 8, 2022

RE: 2022-2023 7-Hour National USPAP Update Course

In May 2021, the Appraisal Subcommittee (ASC) commissioned a comprehensive and independent review of the *Uniform Standards of Professional Appraisal Practice* (USPAP) and the *Real Property Appraiser Qualification Criteria* (AQB Criteria). The review was intended to focus on whether USPAP, the Criteria, and related courses ensure and promote fairness, equity, objectivity, and diversity, in both appraisals and in the training and credentialing of appraisers. The Council on Licensure, Enforcement and Regulation (CLEAR) managed the review and contracted with a consortium led by the National Fair Housing Alliance to conduct the review. The findings and recommendations from this review were published in January 2022, in a report entitled [\*Identifying Bias and Barriers, Promoting Equity: An Analysis of the USPAP Standards and Appraiser Qualifications Criteria\*](#) (Report).

One set of findings and recommendations in the Report focused on the fair housing module of the 2022-2023 7-Hour National USPAP Update Course. On pages 58-59, the Report states:

The new fair housing module contained in the 7-hour continuing education course reflects welcome effort, but fails to provide accurate and effective guidance to appraisers. The module provides an inaccurate summary of fair housing law, while failing to include any content from the applicable statutes themselves (namely, the federal Fair Housing Act) or its implementing regulations. It also fails to provide specific guidance and examples of what is prohibited by law. This outcome is consistent with views expressed in interviews conducted with members of national appraisal organizations. They observed that The Appraisal Foundation has not produced accurate and effective guidance with respect to fair housing issues (and other topics of a legal nature, such as privacy laws).

Based on this independent analysis, the ASC has requested that the Appraisal Foundation address the concerns raised. The Foundation has indicated it anticipates having this completed by September 30<sup>th</sup>, including distribution of revised course content to appraisers who have already taken the course.

Therefore, in connection with the ASC's authority to monitor State appraiser certifying and licensing agencies pursuant to Title XI, the ASC does not intend to criticize States based on their determination as to whether their credentialed appraisers will be required to take the *2022-2023 7-Hour National USPAP Update Course* until the concerns raised in the Report are addressed and new course content available. This would not affect the minimum continuing education hours required in the AQB Criteria. If States choose not to require the *2022-2023 7-Hour National USPAP Update Course*, appraisers would need to fulfill the required continuing education hours with other continuing education offerings, and States would need to document the file accordingly.

If you have any questions, please contact your assigned ASC Policy Manager.

cc: Randall Kopfer, Chair, Appraisal Foundation Board of Trustees  
Michelle Bradley, Chair, Appraisal Standards Board  
Brad Swinney, Acting Chair, Appraiser Qualifications Board  
David Bunton, President, Appraisal Foundation