Appraisal Institute

200 W. Madison
Suite 2630
Chicago, IL 60606

(888) 756-4624
www.appraisalinstitute.org

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Via Posting to Survey Monkey

Appraiser Qualifications Board
The Appraisal Foundation
1155 15th Street NW, Suite 1111
Washington, DC 20005

Re: Comments on the Second Exposure Draft of Proposed Changes to the Real Property Appraiser Qualification Criteria

Dear Chair Yurek and Members of the Appraiser Qualifications Board:

The Appraisal Institute appreciates the opportunity to comment on the Appraiser Qualifications Board's Second Exposure Draft of Proposed Revisions to the Real Property Appraiser Qualification Criteria.

The Appraisal Institute is the nation's largest professional association of real estate appraisers, representing nearly 13,000 valuation professionals. We commend the AQB for undertaking this comprehensive reassessment of the Criteria and for its willingness to modernize qualification requirements while maintaining public trust. Overall, we support the Board's efforts to remove unnecessary barriers to entry that are unrelated to competency while preserving rigorous standards for licensure and certification.

Our comments below highlight the proposals we support as well as several areas where we believe additional refinement is warranted.

1. General Comments

The Appraisal Institute appreciates the Appraiser Qualifications Board's continued efforts to modernize the *Real Property Appraiser Qualification Criteria* while maintaining the high standards necessary to protect public trust. The Institute supports thoughtful reforms that improve access to the profession, increase flexibility, and better align qualification requirements with the competencies required of today's appraisers. At the same time, any changes to the Qualification Criteria should preserve the credibility of the appraisal profession and ensure that newly credentialed appraisers possess the knowledge, analytical ability, and professional judgment necessary to perform credible appraisal assignments.

The appraisal profession continues to evolve in response to changing market conditions, technological advancements, and expanding client expectations. The growing use of desktop and hybrid appraisals, automated valuation technologies, and increasingly sophisticated market data requires appraisers to possess stronger analytical, communication, and problem-solving skills than ever before. As a result, modernization of the Qualification Criteria would focus not simply on reducing barriers to entry, but on ensuring that qualification standards appropriately prepare appraisers for the complexities of modern valuation practice.

Public trust and appraisal quality must remain the guiding principles of any revisions to the Qualification Criteria. Existing appraisal quality concerns already exist throughout the profession, and lenders, appraisal reviewers, and secondary market participants continue to identify deficiencies in market analysis, written communication, support for opinions and conclusions, and compliance with GSE and other client requirements, even among reports prepared by experienced appraisers. These existing challenges demonstrate the importance of maintaining rigorous qualification standards and ensuring that new entrants possess the analytical, technical, and communication skills necessary to produce credible appraisal results.

The Institute is concerned that reducing educational or competency requirements without equivalent safeguards could exacerbate these quality issues. Introducing additional practitioners without adequate preparation may increase the number of credentialed appraisers without increasing the number of qualified appraisers capable of producing credible, well-supported appraisal reports. Poorly trained appraisers ultimately undermine confidence in valuation services, increase the burden on lenders and reviewers, and diminish public trust in the profession. Accordingly, any revisions to the Qualification Criteria should enhance, not weaken, the competencies expected of credentialed appraisers.

The Appraisal Institute also believes that workforce challenges should be addressed through comprehensive recruitment and professional development strategies rather than simply lowering qualification standards. While reducing unnecessary barriers to entry is an important objective, the profession's workforce challenges are driven by a variety of factors, including limited public awareness of appraisal as a career, underdeveloped career pathways, and challenges attracting and retaining new entrants. Expanding outreach, strengthening career-development pipelines, and providing additional educational and experiential pathways into the profession are more likely to produce a larger and more highly qualified appraisal workforce than reducing qualification requirements alone.

Throughout these comments, the Appraisal Institute offers recommendations intended to preserve the integrity of the appraisal profession while providing greater flexibility in how applicants acquire the competencies necessary for credentialing. The Institute encourages the AQB to continue emphasizing competency-based qualifications that are directly tied to appraisal practice while ensuring that any alternative pathways maintain standards that are at least equivalent to those currently required. By balancing innovation with rigor, the AQB can continue to strengthen public confidence in the appraisal profession while promoting a sustainable and well-qualified future workforce.

2. Demonstration Appraisal Report Pathway

The Appraisal Institute appreciates the AQB's efforts to create an additional pathway into the profession. The proposed Demonstration Appraisal Report Pathway may provide a viable alternative for certain candidates if it includes appropriate eligibility standards, structured education and guidance, and meaningful competency assessment.

Qualifying education alone may not adequately prepare an individual to independently perform every aspect of an appraisal assignment. Qualifying education generally focuses on appraisal theory, valuation methodology, and USPAP requirements, while practical skills are typically developed through supervised experience or structured experiential learning.
For example, candidates may need additional instruction and guidance on performing competent property inspections, using appraisal software, accessing and analyzing Multiple Listing Service (MLS) data, verifying market information, developing USPAP-compliant work files, and efficiently completing appraisal reports under real-world conditions.

Candidates may also encounter barriers to accessing the professional resources needed to complete credible appraisal reports. Unlike trainees working under supervisory appraisers or participants in PAREA programs, applicants may have limited access to MLS systems, appraisal software, proprietary market data, public records, and other necessary resources. Any approved pathway should ensure that candidates have adequate access to the data, technology, and professional tools required to complete the demonstration assignments.

If the AQB adopts this pathway, the Appraisal Institute recommends limiting eligibility to individuals entering from clearly defined "adjacent professions" in which they have developed a fundamental understanding of real estate markets. The Appendix, "Rationale for Proposed Changes," recognizes at 1.C. that the pathway may be appropriate for such candidates; this principle should be incorporated directly into the Criteria. The Criteria should expressly identify qualifying professions—such as real estate brokerage, property assessment, real estate finance, property management, land-use planning, construction, and other closely related fields—and establish objective standards for determining whether an applicant possesses sufficient relevant education and experience to enter the pathway. This would provide needed clarity and help ensure that the pathway is reserved for candidates with an appropriate foundation of relevant real estate knowledge.

The pathway should also include a structured capstone program incorporating appropriate instructional and experiential elements of PAREA while remaining more limited in scope. The capstone program could provide instruction, access to necessary data and professional tools, structured guidance, feedback, and competency assessment culminating in completion of the required demonstration reports. This approach could provide a credible and potentially lower-cost alternative to full PAREA for candidates with relevant professional backgrounds.

The AQB should also establish clear standards governing the responsibilities, qualifications, oversight, and accountability of the entities approved to administer the pathway. These standards should address curriculum requirements, assignment progression, evaluation methods, instructor and reviewer qualifications, quality assurance, and record retention.

3. Expansion of PAREA to the Certified General Credential

The Appraisal Institute recognizes the potential value of establishing a Practical Applications of Real Estate Appraisal (PAREA) pathway for applicants seeking the Certified General credential. Such a pathway could provide an additional option for candidates who are unable to secure sufficient experience through the traditional supervisor-trainee model. However, the feasibility of developing a comprehensive Certified General PAREA program requires careful consideration.

The shortage of available supervisory appraisers remains a significant barrier to entry in many markets. Although the traditional supervisor-trainee model continues to play an important role, it may not provide sufficient capacity to meet workforce needs or offer candidates exposure to the range of assignments necessary for professional development. A well-designed Certified General PAREA program could help address some of these limitations through structured practical application, mentor oversight, progressive assignments, and competency assessments.

At the same time, developing PAREA for the Certified General credential would be considerably more complex than developing a residential program. Commercial valuation encompasses a broad and diverse range of property types, including office, retail, industrial, multifamily, hospitality, healthcare, agricultural, mixed-use, and special-purpose properties. These properties involve different markets, valuation methodologies, data sources, lease structures, income and expense analyses, and assignment conditions. The sheer number and complexity of property types may make it difficult, if not impossible, to structure a single PAREA program that provides meaningful exposure to the full scope of practice authorized by the Certified General credential.

The AQB would therefore need to determine which property types and competencies should be included, the appropriate depth and progression of assignments, and how a program could adequately assess a participant’s readiness for independent practice. It should also consider whether a Certified General PAREA program should focus on a defined set of foundational commercial property types and competencies, with additional competency developed after credentialing, or whether the pathway should incorporate specialized modules covering different property types.

As both a national professional association and an AQB-approved PAREA provider, the Appraisal Institute recognizes the potential benefits of competency-based experiential education as well as the practical challenges involved in developing and administering such programs. The Institute believes the concept of Certified General PAREA may warrant further exploration, but the AQB should carefully evaluate its feasibility and consult with commercial appraisal practitioners, education providers, regulators, and other stakeholders before establishing detailed program requirements. Any resulting pathway should provide sufficiently rigorous and meaningful experience to protect public trust and prepare candidates for the complex nature of commercial appraisal practice.

4. Elimination of College-Level Education Requirements

The proposal to eliminate the college degree and college-level education requirements represents a significant change to the minimum qualifications for appraiser credentials. If these requirements are eliminated, the AQB should develop a rigorous appraisal-specific educational framework to ensure that candidates acquire the analytical, communication, and problem-solving skills necessary for modern appraisal practice.

The Institute recognizes that a traditional college degree, by itself, is not a direct measure of an individual's ability to perform appraisal assignments competently or ethically. Although higher education can provide valuable instruction in critical thinking, analytical reasoning, written communication, and problem-solving, those competencies can also be developed through education more directly aligned with professional appraisal practice.

Accordingly, the Appraisal Institute recommends that the AQB establish a comprehensive appraisal-related educational pathway designed to develop the knowledge and skills required of appraisers. Appropriate coursework could include statistics and data analytics, critical thinking, report writing and professional communication, market analysis, real estate economics, and specialized residential, commercial, and agricultural valuation topics. The framework should be sufficiently comprehensive and rigorous to maintain the high standards expected of the appraisal profession.

The appraisal profession has evolved significantly since the college education requirement was first adopted. Today's applicants complete comprehensive qualifying education, must successfully pass the National Uniform Licensing Examination, satisfy extensive experience requirements through one or more AQB-approved pathways, and comply with USPAP and applicable state licensing requirements before becoming credentialed. These competency-based requirements, particularly when supplemented by robust appraisal-specific education, can provide a more meaningful measure of an applicant's readiness to serve the public than possession of a college degree that can be in any subject.

Accordingly, if the college degree and college-level education requirements are eliminated, the AQB should establish a comprehensive appraisal-specific educational framework that prepares candidates for the increasingly analytical, data-driven, and complex nature of modern appraisal practice. This approach could remove an unnecessary barrier to entry while maintaining professional competency, protecting the public trust, and supporting the profession’s long-term workforce needs.

5. Market Data Analytics Curriculum

The Appraisal Institute supports incorporating additional market data analytics instruction into the Required Core Curriculum. Modern appraisal practice increasingly relies on data analysis, statistical techniques, technology, and data-driven decision-making, and the curriculum should continue to evolve to reflect these changes. Providing aspiring appraisers with a stronger foundation in market data analytics will better prepare them to analyze increasingly complex market information, appropriately utilize emerging valuation technologies, and produce credible appraisal assignments in a rapidly evolving profession.
The Appraisal Institute also encourages the AQB to consider expanding targeted education in other subject areas that are directly relevant to appraisal practice, including statistics, business writing and professional communication, critical thinking, market analysis, and real estate economics. Strengthening instruction in these disciplines would further enhance an appraiser's ability to analyze market data, effectively communicate complex valuation conclusions, and exercise sound professional judgment. As appraisal assignments become increasingly data-driven and analytical, these competencies are essential to producing credible, well-supported appraisal reports and maintaining public trust in the profession.

We believe these enhancements will improve the relevance of the Required Core Curriculum while helping ensure that newly credentialed appraisers are better equipped to meet the demands of contemporary appraisal practice.

6. Elimination of Calendar-Based Experience Requirements

The Appraisal Institute supports removing the minimum calendar period over which experience must be obtained for licensure or certification.

Competency is measured by the quality, breadth, and diversity of an applicant's experience, not by the length of time over which that experience is accumulated. While the existing month-based requirements were intended to ensure meaningful practical development, the passage of time alone does not necessarily correlate with competence. Applicants who complete the same number of experience hours may develop significantly different levels of proficiency depending on the variety and complexity of assignments they perform.

The proposal recognizes the realities of today's appraisal profession, where workloads fluctuate based on market conditions and aspiring appraisers may have opportunities to gain substantial experience in a relatively short period. Requiring those individuals to wait an arbitrary minimum number of months does not improve competency or enhance public protection.

Importantly, the proposal does not reduce the required experience hours, education, or examination standards for credentialing. Applicants must still satisfy all applicable requirements before becoming credentialed. The Appraisal Institute believes this revision appropriately shifts the focus from elapsed time to demonstrated competency, reducing unnecessary barriers to entry while maintaining the public trust envisioned by Title XI.

7. Removing the Five-Year Limitation on Trainee Qualifying Education

The Appraisal Institute supports this proposed change. Eliminating the five-year expiration on qualifying education for Trainee Appraisers promotes consistency by aligning the Trainee classification with the Licensed Residential, Certified Residential, and Certified General classifications, which do not impose a similar time limitation. Individuals who have successfully completed AQB-approved qualifying education should retain credit for that education regardless of when it was completed, particularly given that they must still satisfy all current experience, examination, and credentialing requirements before becoming licensed or certified. This change removes an unnecessary barrier to entry while maintaining the integrity of the qualification process.

8. Earlier Examination Eligibility

The Appraisal Institute supports permitting applicants to take the AQB-Approved National Uniform Licensing Examination immediately after completing the required qualifying education.

Candidates are generally best prepared to take the examination while the material remains fresh. Allowing applicants to test earlier also enables them to identify and address any knowledge deficiencies before investing significant time obtaining appraisal experience. Importantly, this proposal does not lower the standards for credentialing. Applicants must still complete all qualifying education, satisfy the applicable experience requirements, and fulfill every other requirement before a credential can be issued. The proposal simply changes the sequence of those requirements.

9. Permanent Validity of National Examination Results

The Appraisal Institute supports eliminating the expiration of passing scores on the AQB-Approved National Uniform Licensing Examination.

The National Uniform Licensing Examination is designed to measure whether an applicant possesses the minimum knowledge necessary to enter the appraisal profession. Once an applicant has demonstrated that knowledge by passing the examination, requiring the individual to retake it solely because a specific amount of time has elapsed provides little additional public protection.

Many aspiring appraisers experience delays in completing the remaining credentialing requirements due to circumstances beyond their control, including difficulty finding a supervisory appraiser, changes in employment, military service, family obligations, or economic conditions. Requiring these individuals to repeat a comprehensive licensing examination despite having already demonstrated the requisite knowledge unnecessarily increases the cost and complexity of the credentialing process without improving competency.

Importantly, this proposal does not reduce the rigor of the credentialing process. Applicants must still complete all qualifying education, satisfy the applicable experience requirements, meet all state licensing requirements, and fulfill every other provision of the Criteria before receiving a credential. Eliminating the examination expiration date simply removes a procedural requirement that is not demonstrably related to public protection.

The Appraisal Institute believes this proposal appropriately recognizes that competency is demonstrated through the credentialing process as a whole—not by repeatedly passing the same examination. Making examination results valid indefinitely removes an unnecessary barrier to entry while maintaining the high standards expected of newly credentialed appraisers.

10. Fair Housing Laws, Impartiality, and Objective Valuation Practice Course

The Appraisal Institute appreciates the AQB's continued evaluation of the qualifying and continuing education requirements addressing fair housing, valuation bias, and impartial valuation practice. Additional information and implementation experience are necessary before conclusions can be drawn regarding the proposal to reduce the qualifying education course from eight hours to five hours and eliminate the mandatory recurring continuing education course.

The existing requirements have not been in place long enough to permit a meaningful evaluation of their effectiveness. There is not yet sufficient information to determine whether the current course length is appropriate, whether recurring instruction meaningfully reinforces these subjects, or whether the requirements result in unnecessary repetition.

As part of its evaluation, the AQB should consider incorporating fair housing, nondiscrimination, valuation bias, impartiality, and compliance with applicable laws into qualifying education. Addressing these subjects in the context of appraisal theory, methodology, data analysis, reporting, and professional responsibilities could help candidates understand how fair housing principles apply throughout the appraisal process. The AQB should examine whether this integrated approach could serve as an effective alternative to a separate course or whether a standalone course remains necessary.

11. Eliminating the Supervisory Signature Requirement for Government Agency Experience Logs

The Appraisal Institute supports this proposed change. Requiring a supervisory appraiser's signature on experience logs has created an unnecessary barrier for individuals employed in state and local assessment offices, as well as other federal, state, and local government agencies, particularly where no supervising appraiser is available to provide the required certification. These organizations often operate within well-established oversight, quality control, and documentation frameworks, and the reported experience remains subject to verification by the applicable state appraiser regulatory agency. As a result, the additional signature requirement provides little incremental value while unnecessarily limiting otherwise qualified candidates from receiving appropriate experience credit. Eliminating this requirement appropriately recognizes the unique nature of government appraisal practice, preserves the ability of states to verify qualifying experience, and removes an unnecessary barrier to entering the appraisal profession without compromising the integrity of the experience qualification process.

12. Removal of Trainee Continuing Education Requirement

The Appraisal Institute recognizes the importance of ensuring that Trainee Appraisers remain current and continue developing their knowledge while working toward a higher credential. However, trainees who are completing additional qualifying education as part of that process should also not be required to complete duplicative continuing education.

The AQB should make clear that additional qualifying education completed by a trainee to upgrade to a Licensed Residential, Certified Residential, or Certified General credential may count toward the trainee's continuing education requirement. This advanced qualifying education promotes professional development and exposes trainees to appraisal principles, methodologies, laws, regulations, and practice areas beyond those covered in their initial trainee education.

Occasionally, however, Trainee Appraisers are employed as "Associate Appraisers" with no expectation that they will upgrade to a higher credential. These individuals may perform property inspections, research, data collection, analysis, and other appraisal-related work under the supervision of a Certified Appraiser who assumes responsibility for and signs the appraisal report. In this type of structure, the trainees continue to perform appraisal work but are not progressing toward a higher credential through additional qualifying education. Therefore, after an extended period, they should be required to complete continuing education to ensure that their knowledge remains current while they continue to perform appraisal-related services.

More generally, a separate continuing education requirement should apply when a trainee is not completing qualifying education toward a higher credential or has remained in trainee status for an extended period without completing additional qualifying education. In those circumstances, continuing education would help ensure that the trainee remains current with changes in USPAP, appraisal methodology, market conditions, and applicable laws and regulations.

Accordingly, the Appraisal Institute recommends that the AQB clarify that additional qualifying education may satisfy a trainee's continuing education obligation. Trainees who are not completing additional qualifying education, including Associate Appraisers who continue to perform appraisal work without pursuing a higher credential, should remain subject to continuing education requirements. This approach would prevent unnecessary duplication while ensuring that individuals who remain in trainee status continue their professional education.

13. Allowing State Agencies to Grant Extensions for Extraordinary Circumstances

The Appraisal Institute supports this proposed change. Providing State Appraiser Regulatory Agencies with the discretion to grant reasonable extensions when candidates or credential holders are unable to meet regulatory deadlines due to circumstances beyond their control is a practical and equitable policy. Serious illness, military deployment, natural disasters, and other unforeseen events can temporarily prevent otherwise qualified individuals from satisfying administrative requirements through no fault of their own. Allowing each state to establish appropriate standards and procedures for granting extensions provides needed flexibility while preserving the integrity of the credentialing process. This approach recognizes that exceptional circumstances warrant reasonable accommodation without compromising professional competency or public trust.

14. Consolidating Interstate Credential Recognition Provisions and Promoting Continuing Education Reciprocity

The Appraisal Institute supports this proposed change. Consolidating the provisions governing interstate credential recognition, including reciprocity, temporary practice, and renewal, into a single, clearly organized section will improve readability, reduce confusion, and promote more consistent application by State Appraiser Regulatory Agencies.

We also support encouraging states to recognize qualifying continuing education that has already been completed and accepted by another jurisdiction. Appraisers who maintain credentials in multiple states often face unnecessary administrative burdens when substantially equivalent continuing education is not recognized across jurisdictions. Greater reciprocity in the acceptance of continuing education will reduce duplicative requirements, lower compliance costs, and facilitate interstate practice while preserving each state's authority to establish and enforce its own licensing standards.

15. Clarification of Practicum Programs

The Appraisal Institute supports the AQB's efforts to clarify the role of Practicum programs within the Qualification Criteria. The proposed revisions appropriately distinguish Practicum programs from log-based experience and clarify that approved Practicum programs receive predetermined experience credit rather than requiring participants to maintain traditional experience logs. These changes should reduce confusion and promote a more consistent implementation of this experience pathway.

At the same time, we reiterate the concern the Appraisal Institute has expressed since the Practicum concept was first introduced. Although the AQB has recognized Practicum as an approved experience pathway, it has not provided sufficiently detailed guidance regarding the minimum content, instructional methodology, assignment progression, or cadence necessary for these programs. As a result, the relatively small number of Practicum programs currently available vary significantly in structure and educational quality, creating inconsistencies in applicant preparation.

Unlike PAREA, which is subject to a comprehensive AQB review and approval process, Practicum programs may be approved by either the AQB or individual State Appraiser Regulatory Agencies. We believe this decentralized approach can lead to inconsistent standards among jurisdictions.

Accordingly, the Appraisal Institute recommends that all Practicum programs be reviewed and approved exclusively by the AQB. A centralized approval process would promote greater consistency in curriculum, instructional quality, experience credit, and competency expectations while allowing states to retain their role in credentialing applicants.

To further strengthen the Practicum pathway, the Appraisal Institute recommends that the AQB establish minimum national standards governing curriculum content, instructor and mentor qualifications, assignment progression, and competency assessment methodologies. Providing this guidance would improve consistency among Practicum programs, enhance confidence in the pathway, and help ensure that all participants receive comparable preparation for independent appraisal practice.

16. Combining Experience Pathways

Allowing applicants to combine multiple experience pathways could provide greater flexibility in satisfying the experience requirements for credentialing. However, additional clarity is needed regarding how combined pathways would operate in practice.

No single pathway into the appraisal profession is appropriate for every applicant. Permitting applicants to combine supervised experience, PAREA, Practicum programs, and other approved pathways would recognize the diversity of today’s workforce while maintaining nationally consistent competency standards.

Combining experience pathways could also help address one of the profession’s most persistent challenges: the limited availability of supervisory appraisers. This flexibility may be particularly beneficial to an applicant who begins gaining experience under a supervisory appraiser but, for any number of reasons, is unable to continue working with that supervisor and has difficulty finding another. Rather than losing the benefit of the experience already completed or being unable to continue progressing toward credentialing, the applicant could transition to PAREA, a Practicum program, or another approved pathway. More broadly, an applicant who begins developing competency through one approved pathway should be able to continue progressing through another pathway if employment, geographic location, supervisory circumstances, or other personal or professional conditions change.

The proposal may also enable applicants to benefit from the unique strengths of multiple experience pathways. Traditional supervision provides exposure to actual client assignments and business practices, while structured programs such as PAREA and Practicum offer standardized instruction, consistent evaluation, and exposure to a broad range of appraisal scenarios. At the same time, combining pathways must account for an applicant's existing experience and competency. For example, an applicant who has already completed 500 of the 1,000 experience hours required for the Licensed Residential classification may be sufficiently advanced that requiring completion of a program's initial and less difficult assignments would be unnecessary or inappropriate. The AQB would therefore need to establish a process for recognizing prior experience and determining the appropriate point at which an applicant may enter a structured program.

Combining pathways may present practical challenges, particularly for PAREA and Practicum programs. These are sequential programs in which assignments become increasingly complex, and participants use the knowledge and skills acquired during earlier portions of the program as they progress. Participants also spend considerable time at the beginning of a program becoming familiar with its platform, processes, available resources, and expectations for completing assignments. Because of this necessary "lead-up" and cumulative learning, it may not be practical or educationally appropriate for an applicant to enter a PAREA or Practicum program midway through the curriculum, for example, by beginning with the fifth assignment, without having completed the foundational work that precedes it. Breaking these programs into discrete pieces could undermine their carefully structured progression and competency-development models.

The AQB should provide substantially greater clarity regarding how it intends to recognize and evaluate combined pathways. For example, will the AQB assign specific experience-hour values to individual components, assignments, or segments of a PAREA or Practicum program, or will each program provider be responsible for determining and documenting those values? The AQB should also clarify how providers are expected to assess an applicant's prior experience, determine the appropriate point of entry into a structured program, and ensure that the applicant has acquired the foundational competencies covered in any omitted portions. Clear and consistent standards will be necessary to prevent differing treatment among programs and jurisdictions.

Any framework permitting combined pathways should not reduce the experience or competency required for credentialing. Applicants must still satisfy all applicable experience requirements and demonstrate competencies before becoming credentialed. The AQB should address these implementation questions before adopting the proposal to ensure that combining pathways preserves the structure and integrity of approved programs and the competency standards necessary to protect public trust.

17. PAREA Program Segments and Assigned Experience Values

Allowing approved PAREA Program Segments to carry predetermined experience credit could provide participants with greater flexibility. However, treating portions of a PAREA program as independently transferable experience raises practical concerns like those associated with combining experience pathways.

Both PAREA and Practicum programs are sequential, with assignments becoming increasingly complex as participants progress and apply knowledge and skills developed earlier in the program. Participants also need time to become familiar with the program's platform, processes, resources, and expectations. Consequently, it may not be educationally appropriate for someone to enter midway through a program without completing the preceding foundational work.

Conversely, an applicant entering PAREA after completing substantial supervised experience may already possess the competencies covered by the program's earlier assignments. For example, an applicant who has completed 500 of the 1,000 hours required for the Licensed Residential classification may not benefit from starting at the beginning. A workable segmentation framework must balance recognition of prior experience with the sequential and cumulative nature of PAREA.

The AQB should establish clear standards governing how PAREA providers structure Program Segments and assign associated experience-hour credit. Those standards should address the documentation and competency measures needed to support assigned credit, the evaluation of prior experience, determination of the appropriate point of entry, and verification that participants possess the competencies associated with any omitted portions. Because these decisions directly affect progress toward credentialing, the standards should promote a transparent, objective, and consistently applied approach.

Program Segments may also have value beyond initial credentialing. State Appraiser Regulatory Agencies could use approved segments as targeted remedial education to address specific competency deficiencies without requiring completion of an entire PAREA program. Segments could also help practicing appraisers develop and demonstrate competency in specialized areas such as vacant land, condominiums, rural properties, agricultural properties, or luxury residential assignments.

Over time, specialized segments could serve as stackable, competency-based credentials. These segments may be particularly well suited to this purpose because they could be designed as complete stand-alone modules rather than portions extracted from the sequential curriculum of a PAREA program.

The AQB should publish minimum standards for Program Segments, including foundational competencies, appropriate entry points, assignment complexity, competency assessments, mentor interaction, and corresponding experience credit. It should also periodically review assigned values using data on participant performance, examination success, and credential attainment. These measures would improve consistency among providers and help ensure that segmented credit reflects demonstrated competency without compromising the integrity of PAREA programs.

Conclusion

The Appraisal Institute believes the Second Exposure Draft represents a significant step toward modernizing the Qualification Criteria. We support reforms that remove unnecessary barriers to entry while preserving rigorous competency standards and public trust. We encourage the AQB to continue emphasizing competency-based qualification pathways, strengthen experiential learning opportunities, promote national consistency in program approval, and provide additional guidance wherever flexibility is introduced. These recommendations will help create a more accessible, sustainable, and credible pathway into the appraisal profession while maintaining the confidence of clients, regulators, and the public.

Thank you again for this opportunity to comment on the Appraiser Qualifications Board's Second Exposure Draft of Proposed Revisions to the Real Property Appraiser Qualification Criteria.

Respectfully submitted,

Michael J. Acquaro-Mignogna, MAI, SRA, AI-GRS
2026 President
Appraisal Institute