NRPAB
Nebraska Real Property Appraiser Board

Guidance Document 26-02

Adopted May 21, 2026

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SUBJECT: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement

LEGAL REFERENCE: Neb. Rev. Stat. § 76-2233.02(1) (Laws 2024, LB992, § 15); Neb. Rev. Stat. § 76-2236(7) (Laws 2024, LB992, § 16); 298 NAC Chapter 4, § 001.01 (2025); 298 NAC Chapter 4, § 001.02 (2025)

SUMMARY OF ACTION

Adopted by the Board at its May 21, 2026 meeting.

BACKGROUND

The Real Property Appraiser Qualifications Criteria effective on January 1, 2026 ("2026 Criteria"), as it relates to the applicability of the 7-hour Valuation Bias and Fair Housing Rules and Regulations Course for new real property appraisers credentialed in Nebraska through reciprocity, is ambiguously written. The 2027-28 real property appraiser renewal cycle will be the first cycle in which the Fair Housing and Valuation Bias Laws and Regulations Course (VB&FH Laws and Regulations Course) may be included in the real property appraiser continuing education submissions in Nebraska. Unlike the 7-Hour USPAP Continuing Education Course, the VB&FH Laws and Regulations Course is not uniform. For example, if an individual applies for credentialing through reciprocity in Nebraska, he or she would already have an established continuing education period in at least one other jurisdiction that requires completion of the 7-Hour USPAP Continuing Education Course. Once the applicant is approved in Nebraska, his or her continuing education period will be established in Nebraska along with a due date for the 7-Hour USPAP Continuing Education Course (based on the date of licensure). This is the same course across all jurisdictions. However, the individual does not need to complete the 7-Hour USPAP Continuing Education Course more than once to meet the CE requirements in the Criteria for each jurisdiction.

This is clearly defined in the Criteria in Section III, F, 9 under the title, "Criteria Applicable to All Appraiser Classifications," which states, "Individuals who are credentialed in more than one jurisdiction shall not have to take more than one 7-Hour National USPAP Continuing Education Course within a two calendar year period for the purposes of meeting AQB Criteria." There is no such language in the Criteria for the VB&FH Laws and Regulations Course. In addition, there are varying levels of requirements for the VB&FH Laws and Regulations Course (8-hour, 7-hour, or 4hour) which complicates establishing continuing education requirements for an appraiser credentialed through reciprocity. In Section III, F, 11 under "Criteria Applicable to All Appraiser Classifications," it states, "Appraisers must successfully complete a course which meets the content requirements of the Valuation Bias and Fair Housing Laws and Regulations Outline, every two calendar years. a. The first time an appraiser completes the continuing education requirement for this course, the course length must be seven (7) hours. If an appraiser successfully completed a seven (7) hour (plus 1 hour exam) course as part of their qualifying education, they have met this requirement." The language in Section III, F, 11 is a requirement that must be enforced by each jurisdiction. Within the traditional continuing education structure in the Criteria, and the plain language of the Criteria, a real property appraiser is required to complete at least the 7-hour VB&FH Laws and Regulations Course for each jurisdiction in which he or she become credentialed as it would be the first time an appraiser (now credentialed in that jurisdiction) completes the continuing education requirement for this course in that jurisdiction (continuing education period does not exist before issuance of a credential).

This issue was brought to the attention of The Appraisal Subcommittee of the Federal Financial Institutions Examination Council ("ASC") on April 7, 2026, which monitors the requirements established by the states, territories, and the District of Columbia and their appraiser regulatory agencies for the certification and licensing of appraisers and reviews each state's compliance with the requirements of Title XI. The ASC is authorized by Title XI to take action against a non-complying state appraiser regulatory program if the policies, practices and procedures in place are inconsistent with the requirements of Title XI. In an email response to the Board's Director Tyler Kohtz on April 27, 2026, Program Manager Tom Lewis stated:

According to Policy Statement 5, the ASC monitors State Appraiser Programs for compliance with the reciprocity provisions found 12 U.S.C. 3351(b). States may be more lenient in the issuance of reciprocal licenses or certifications by implementing a more open-door policy. However, States cannot impose additional impediments to reciprocal licenses or certifications.

If Nebraska grants a license or certification by reciprocity, under the requirements of 12 U.S.C. 3351(b), such individuals must comply with Nebraska's policies, rules and statutes governing appraisers, including requirements for payment of certification and licensing fees, as well as continuing education. An appraiser who was granted a reciprocal license or certification would have to support their Nebraska renewal application with evidence that they completed the Valuation Bias and Fair Housing Laws and Regulations course, every two calendar years.

Please find our responses to the scenarios you provided below in blue font. While we have done our best to address each case, please note that the ASC recognizes multiple scenarios or individual circumstances could influence our response or Nebraska's decisions renewing the reciprocal license or certification. We strongly encourage you to contact us with any unique circumstances as we collaborate on implementing the AQB's Valuation Bias and Fair Housing Laws and Regulations course as part of the continuing education requirement.

(Scenario presented in Director Kohtz's email to P.M. Lewis) If a person credentialed in another jurisdiction before January 1, 2026 applies for reciprocity in Nebraska on March 3, 2026, their CE Period in Nebraska would be 2026-27. The Criteria goes into effect on January 1, 2026, so it would be reasonable for the individual to submit the 7-Hour VB&FH Laws and Regulations Course for CE. As long as the home jurisdiction is verified as in compliance by the ASC and the home jurisdiction's requirements meet the minimum requirements of the Criteria (what Nebraska establishes as meeting the minimum requirements in Nebraska) at the time of credentialing, this course would be accepted as CE without question.

The decision for Nebraska to reciprocally license and [sic] individual credentialed in another jurisdiction rests in the determination that the applicant holds a valid credential from a State that is verified as in compliance by the ASC and meets the minimum requirements of the Criteria at the time of the individual's credentialing. Further, we would not consider Nebraska responsible for determining if the applicant has met their CE requirements to support the renewal of their credential within the jurisdiction or jurisdictions in which the applicant is currently credentialed.

The ASC would not hold Nebraska responsible for the CE status of the person until that person became a Nebraska credentialed appraiser. After which, any decision to renew that Nebraska credential would be linked to compliance with Nebraska's policies, rules and statutes governing appraisers, including requirements for payment of certification and licensing fees, as well as continuing education. Meaning that this licensee would have to support an application for the renewal of their Nebraska appraiser credential with evidence that they at a minimum had completed the 4-Hour valuation bias and fair housing laws and regulations course at least once within the two years from the time the 7-Hour VB&FH Laws and Regulations Course was last completed as required by Nebraska.

Based on your scenario above, an individual who was granted a license or certificate by reciprocity on March 3, 2026, under 12 U.S.C. 3351(b), could submit the 7-hour course certificate as evidence of completing the Valuation Bias and Fair Housing continuing education course requirement for Nebraska's Continuing Education Period of 2026-2027.

(Scenario presented in Director Kohtz's email to P.M. Lewis) If a person credentialed in another jurisdiction before January 1, 2026, applies for reciprocity in Nebraska on March 3, 2026, their CE Period in Nebraska would once again be 2026-27. The Criteria goes into effect on January 1, 2026, so although it would be reasonable for the individual to submit the 7-Hour VB&FH Laws and Regulations Course for CE, the individual submits the 4-Hour VB&FH Laws and Regulation Course. As long as the home jurisdiction is verified as in compliance by the ASC and the home jurisdiction's requirements meet the minimum requirements of the Criteria (what Nebraska establishes as meeting the minimum requirements in Nebraska) when the credential was issued, this course would be accepted as CE with no direct knowledge that the 7-Hour VB&FH Laws and Regulations Course was previously completed.

Again, the decision for Nebraska to reciprocally license and [sic] individual credentialed in another jurisdiction rests in the determination that the jurisdiction in which the applicant holds a valid credential is a State that is verified as in compliance by the ASC and meets the minimum requirements of the Criteria at the time of credentialing. Further, we would not consider Nebraska responsible for determining if the applicant has met their CE requirements to support the renewal of their credential within the jurisdiction or jurisdictions in which the applicant is currently credentialed.

The decision to subsequently renew the Nebraska credential in this above scenario would, again, be linked to compliance with Nebraska's credentialing policies, rules and statutes governing appraisers, including requirements for payment of certification and licensing fees, as well as continuing education. Meaning that this licensee would have to support an application for the renewal of their Nebraska appraiser credential with evidence that they at a minimum had completed the 4-Hour valuation bias and fair housing laws and regulations course at least once within the two years from the time the 7-Hour VB&FH Laws and Regulations Course was last completed in order to be compliant with Nebraska.

Based on your scenario above, an individual who was granted a license or certificate by reciprocity on March 3, 2026, under 12 U.S.C. 3351(b), could submit the 4-hour course certificate as evidence of completing the Valuation Bias and Fair Housing continuing education course requirement for Nebraska's Continuing Education Period of 2026-2027.

(Scenario presented in Director Kohtz's email to P.M. Lewis) If a person credentialed in another jurisdiction before January 1, 2026, applies for reciprocity in Nebraska on March 3, 2029, their CE Period in Nebraska would be 2029-30. It would be reasonable for the individual to submit the 4-Hour VB&FH Laws and Regulation Course. As long as the home jurisdiction is verified as in compliance by the ASC and the home jurisdiction's requirements meet the minimum requirements of the Criteria (what Nebraska establishes as meeting the minimum requirements in Nebraska) when the credential was issued, this course would be accepted as CE with no direct knowledge that the 7-Hour VB&FH Laws and Regulations Course was previously completed.

Yes, and again, we would say that the decision for Nebraska to reciprocally license and [sic] individual credentialed in another jurisdiction relies upon the determination that the jurisdiction in which the applicant is currently credentialed is verified as in compliance by the ASC and meets the minimum requirements of the Criteria at the time of credentialing.

Therefore, upon the issuance of a Nebraska credential, the applicant would then fall under Nebraska's requirements to include meeting the minimum CE requirements necessary to support the eventual renewal of that Nebraska credential.

Based on your scenario above, an individual who was granted a license or certificate by reciprocity on March 3, 2029, under 12 U.S.C. 3351(b), could submit the 4-hour course certificate as evidence of completing the Valuation Bias and Fair Housing continuing education course requirement for Nebraska's Continuing Education Period of 2029-2030.

ANALYSIS

In accordance with Neb. Rev. Stat. 76-223302(1), a credential issued under the Real Property Appraiser Act other than a temporary credential shall remain in effect until December 31 of the designated year unless surrendered, revoked, suspended, or canceled prior to such date. To renew a valid credential, the credential holder shall file an application on a form approved by the board and pay the appropriate renewal fee in an amount established by the board pursuant to section 76-2241. A credential may be renewed for one year or two years. In every second year of the two-year continuing education period, as specified in section 76-2236, evidence of completion of continuing education requirements shall accompany renewal application or be on file with the board prior to renewal.

In addition, per N.R.S. § 76-2236(7), "Beginning January 1, 2026, as prescribed by rules and regulations of the Real Property Appraiser Board and at least once every two years, a successfully completed board-approved valuation bias and fair housing laws course shall be included in the continuing education requirement of each credential holder."

Pursuant to 298 NAC Chapter 4, § 001.01, the VB&FH Laws and Regulations Course must be completed at least once every two calendar years. The two-year period for this course begins one day after the course was last completed, or one day after a new credential is issued by the Board. A document certifying completion shall be submitted by December 31 of the year in which the course is required. The 7-Hour VB&FH Laws and Regulations Course is required for any credential holder who has not successfully completed the 8-Hour VB&FH Laws and Regulations Course required in Chapter 2 of this Title to qualify for a credential as a real property appraiser. The 4-Hour VB&FH Laws and Regulations Course may be completed by any credential holder who has successfully completed an 8-Hour VB&FH Laws and Regulations Course or a 7-Hour VB&FH Laws and Regulations Course (the 7-Hour VB&FH Laws and Regulations Course meets this requirement).

Finally, 298 NAC Chapter 4, § 001.02 states, "Except for the seven-hour National Uniform Standards of Professional Appraisal Practice Continuing Education Course, and the valuation bias and fair housing laws and regulations course, evidence of continuing education completion may be submitted to the Board's office at any time during credential holder's two-year continuing education period."

As established in the paragraphs above, except for VB&FH Laws and Regulations Course, evidence of completion of continuing education requirements shall accompany renewal application or be on file with the board prior to renewal. The VB&FH Laws and Regulations Course must be submitted in the year in which it is completed. As to which version of the VB&HF Laws and Regulations Course must be submitted, it is more complex. The Appraisal Foundation's Appraiser Qualifications Board further complicated this matter when the following Q&A was issued on January 30, 2024:

> Course Completion Date
> My state has approved the 7-hour VB-FH course for both qualifying education (QE) and continuing education (CE) before the requirement to take the course goes into effect on January 1, 2026. If I take the course before that date, can that course count towards meeting that requirement when it becomes effective?
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> Yes. Based on the Criteria, any approved 7-hour course, plus a 1-hour exam for QE, or the 7-hour course for CE, successfully completed before the requirement goes into effect, meets the January 1, 2026, requirement. If you take an approved course at any time before it is required, then on January 1, 2026, you have satisfied the requirement to take the 7-hour course. If the state didn't approve the course, it won't fulfill the requirement, as is true for any other course.
>
> Then, every two calendar years thereafter, (and each CE cycle thereafter), you will need to take an approved version of the course that is at least 4 hours in length.
>
> However, check with your state for any additional requirements.

The above guidance by TAF AQB creates an unbalanced approach to implementation of the 2026 Criteria between jurisdictions. In theory, the 7-Hour VB&FH Laws and Regulations Course may legally be completed and accepted as continuing education in another jurisdiction in 2025, prior to the effective date of the 2026 Criteria, which would make 2027 the year which the 4-Hour VB&FH Laws and Regulations Course may be completed; this would still be within the initial two-year period for Nebraska credential holders. In P.M. Lewis' response above, under the requirements of 12 U.S.C. 3351(b), a Nebraska real property appraiser awarded a credential through reciprocity must meet Nebraska continuing education requirements. Furthermore, the State of Nebraska is not required to evaluate the continuing education requirements and approvals in another jurisdiction; however, for acceptance of the 4-Hour VB&FH Laws and Regulations Course, a real property appraiser must first complete the 8-Hour VB&FH Laws and Regulations Course or the 7-Hour VB&FH Laws and Regulations Course, which is established under 298 NAC Chapter 4, § 001.01 to meet the requirements in the 2026 Criteria. In regards acceptance of the 4-Hour VB&FH Laws and Regulations Course, P.M. Lewis also stated, "…this licensee to would have to support an application for the renewal of their Nebraska appraiser credential with evidence that they at a minimum had completed the 4-Hour valuation bias and fair housing laws and regulations course at least once within the two years from the time the 7-Hour VB&FH Laws and Regulations Course was last completed in order to be compliant with Nebraska." A similar scenario continues to infinitely repeat as every real property appraiser awarded a credential through reciprocity must meet the continuing education requirements in place.

Implementing the plain language of the 2026 Criteria creates a significant burden for real property appraisers credentialed through reciprocity and impedes the free movement of appraisers. As the ASC is less concerned with the plain language of the Criteria, and more concerned with the administration of continuing education requirements by each jurisdiction, interpretation of the 2026 Criteria is mostly deferred to each jurisdiction as long as federal and state requirements are met. In the case of the VB&FH Laws and Regulations Course, the Board requires that each real property appraiser must complete the 8-Hour VB&FH Laws and Regulations Course or the 7-Hour VB&FH Laws and Regulations Course to be eligible to complete and be awarded credit for the 4-Hour VB&FH Laws and Regulations Course. The point at which the 8-Hour VB&FH Laws and Regulations Course or the 7-Hour VB&FH Laws and Regulations Course is completed is not relevant to N.R.S. § 76-2236(7) or 298 NAC Chapter 4, § 001.01; therefore, the least restrictive approach is to be applied by the Board.

GUIDANCE

Any real property appraiser who submits a document certifying completion of the 4-Hour VB&FH Laws and Regulations Course before January 1, 2028 to meet the requirements for the VB&FH Laws and Regulations Course under N.R.S. § 76-2236(7) and 298 NAC Chapter 4, § 001.01B.2, must also provide a document certifying completion that the 8-Hour VB&FH Laws and Regulations Course or the 7-Hour VB&FH Laws and Regulations Course has been completed to meet the requirement under 298 NAC Chapter 4, 001.01B.1.