PUBLIC MEETING OF THE NEBRASKA REAL PROPERTY APPRAISER BOARD
Thursday, May 21, 2026, 9:00 a.m.
Nebraska Real Property Appraiser Board Office, First Floor, Nebraska State Office Building
301 Centennial Mall South, Lincoln, Nebraska

AGENDA

A. Opening 9:00 a.m.

B. Notice of Meeting (Adopt Agenda)

The Nebraska Real Property Appraiser Board will meet in executive session for the purpose of reviewing applicants for credentialing; applicants for appraisal management company registration; investigations; pending litigation, or litigation that is imminent as evidenced by communication of a claim or threat of litigation; and employee performance evaluation. The Board will exit executive session at 9:45 a.m. If needed, the Board will re-enter executive session at the conclusion of the public agenda items discussion to complete review of the above-mentioned items. The Board will not take action on agenda items C, D, E, and F until executive session is completed.

C. Credentialing as a Nebraska Real Property Appraiser 1-4
1. Pending Applications
    a. CG26001

D. Registration as an Appraisal Management Company 1-5
1. Applicants for Renewal of Appraisal Management Company Registration
    a. NE2012075

E. Compliance Matters

F. Other Executive Session Items 1
1. General
    a. 2026.05
2. Personnel Matters

G. Welcome and Chair's Remarks (Public Agenda 9:45 a.m.)

H. Board Meeting Minutes
1. Approval of April 16, 2026 Meeting Minutes 1-11

I. Director's Report
1. Real Property Appraiser and AMC Counts and Trends
    a. Real Property Appraiser Report 1-4
    b. Temporary Real Property Appraiser Report 5
    c. Supervisory Real Property Appraiser Report 6
    d. Appraisal Management Company Report 7
2. Director Approval of Applicants
    a. Real Property Appraiser Report 8
    b. Education Activity and Instructor(s) Report 9-10
3. 2025-26 NRPAB Goals and Objectives + SWOT Analysis 11-12

J. Financial Report and Considerations

1. April Financial Report
   a. Agency Budget Status Report 1-3
   b. Appraiser Program Budget Status Report 4-6
   c. AMC Program Budget Status Report 7-9
   d. MTD General Ledger Detail Report 10-15
   e. Financial Charts 16-19
2. ASC SARAS Grant Report
   a. Budget Status Report 20
   b. MTD General Ledger Detail Report 21
3. Approval of FY2026-27 Fee Schedule and Director Authorization to Amend all Applications 22
4. Adobe Acrobat Pro and Adobe InDesign Licenses 23-24
5. Per Diems

K. General Public Comments

L. Education 1-37

1. New Continuing Education Activities
   a. 2262220.02: Appraisal Institute – "Online Valuation Bias and Fair Housing Laws and Regulations"
   b. 2261430.01: ASFMRA – "Mastering the Consultant and Expert Witness Role"

M. Unfinished Business

1. 500 South 16th Street DOL Building Relocation

N. New Business

1. Review of Nebraska Community College Real Estate Degree Programs for Potential AQB Approval 1-8

O. Legislative Report and Business

1. Proposed changes to Title 298 of the Administrative Code
2. Other Legislative Matters

P. Administrative Business

1. Guidance Documents
   a. 26-02: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement 1-7
   b. 26-02: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement Amendment 8-22
2. Internal Procedural Documents
3. Forms, Applications, and Procedures
   a. 2027-28 Application for Two-Year Renewal of Nebraska Trainee Real Property Appraiser Credential 23-18
   b. 2027-28 Application for Renewal of Nebraska Real Property Appraiser Credential 29-34
   c. 2027-28 Real Property Appraiser Credential Renewal Application Procedures 35-43

Q. Other Business

1. Board Meetings
2. Conferences/Education
   a. Kohtz Spring AARO Conference Report 1-10
3. Memos from the Board
4. Quarterly Newsletter
   a. Spring 2026 Edition of The Nebraska Appraiser 11-20
5. Appraisal Subcommittee
   a. ASC Quarterly Meeting: June 18, 2026 (Online)
6. The Appraisal Foundation
   a. TAF May Newsletter 21-25
   b. TAF Verification of Practice Readiness Prior to Independent Licensure – A Research Brief 26-72
   c. The Appraisal Foundation Announces McKissock as Host of Foundation Asynchronous Courses_March 17, 2026 73
   d. The Appraisal Foundation Statement on Promoting Access to Mortgage Credit Executive Order_March 14, 2026 74
7. Association of Appraiser Regulatory Officials
8. Government-Sponsored Enterprises
   a. Fannie Mae
      i. UAD Timeline 75
      ii. UAD 3.6 FAQs_May 5, 2026 76-81
   b. Freddie Mac
9. In the News

R. Adjourn

DRAFT – Subject to Board review and approval at its regular meeting on May 21, 2026

NEBRASKA REAL PROPERTY APPRAISER BOARD
NRPAB OFFICE MEETING ROOM, FIRST FLOOR
NEBRASKA STATE OFFICE BUILDING
301 CENTENNIAL MALL SOUTH, LINCOLN, NE

April 16, 2026 Meeting Minutes

A. OPENING

Chairperson Hermsen called to order the April 16, 2026 meeting of the Nebraska Real Property Appraiser Board at 9:00 a.m. in the Nebraska Real Property Appraiser Board meeting room located on the first floor of the Nebraska State Office Building, 301 Centennial Mall South, Lincoln, Nebraska.

B. NOTICE OF MEETING

Chairperson Hermsen announced the notice of the meeting was duly given, posted, published, and tendered in compliance with the Open Meetings Act, and all board members received notice simultaneously by email. Publication of official notice of the meeting appeared on the State of Nebraska Public Calendar found at www.nebraska.gov on April 8, 2026. The agenda was kept current in the Nebraska Real Property Appraiser Board office and on the Board's website. In accordance with the Open Meetings Act, at least one copy of all reproducible written material for this meeting, either in paper or electronic form, was available for examination and copying by members of the public. The material in paper form was available on the table in a public folder, and the material in electronic form was available on the Board's website in Public Meeting Material (https://appraiser.ne.gov/board_meetings/). A copy of the Open Meetings Act was available for the duration of the meeting. For the record, Board Members Kevin Hermsen of Gretna, Nebraska; Rodney Johnson of Norfolk, Nebraska; Derek Minshull of North Platte, Nebraska; Adam Batie of Kearney, Nebraska; and Lori Johnson of Lincoln, Nebraska were present. Also present were Director Tyler Kohtz, Licensing Programs Manager Karen Loll, Education Program Manager Kashinda Sims, and Business Programs Manager Colby Falls, who are headquartered in Lincoln, Nebraska.

ADOPTION OF THE AGENDA

Chairperson Hermsen reminded those present for the meeting that the agenda cannot be altered twenty-four hours prior to the meeting except for emergency items in accordance with the Open Meetings Act. Board Member Minshull moved to adopt the agenda as presented. Board Member Batie seconded the motion. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

Board Member Minshull moved that the Board enter executive session for the purpose of reviewing applicants for credentialing; applications for appraisal management company registration; investigations; pending litigation, or litigation which is imminent as evidenced by communication of claim or threat of litigation; and employee performance evaluation. A closed session is clearly necessary to prevent needless injury to the reputation of those involved. Board Member L. Johnson seconded the motion. The time on the meeting clock was 9:02 a.m. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

Board Member R. Johnson moved to exit executive session at 9:34 a.m. Board Member Minshull seconded the motion. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

G. WELCOME AND CHAIR'S REMARKS

Chairperson Hermsen welcomed all to the April 16, 2026 meeting of the Nebraska Real Property Appraiser Board. Hermsen acknowledged Roger Morrissey as the only member of the public in attendance.

H. BOARD MEETING MINUTES

1. APPROVAL OF MARCH 19, 2026 MEETING MINUTES

Chairperson Hermsen asked for any additions or corrections to the March 19, 2026 regular meeting minutes. With no discussion, Chairperson Hermsen called for a motion. Board Member Minshull moved to approve the March 19, 2026 regular meeting minutes as presented. Board Member R. Johnson seconded the motion. Chairperson Hermsen recognized the motion and asked for any discussion. With no discussion, Chairperson Hermsen called for a vote. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

I. DIRECTOR'S REPORT

1. REAL PROPERTY APPRAISER AND AMC COUNTS AND TRENDS

a. Real Property Appraiser Report

Director Kohtz presented seven charts outlining the number of real property appraisers as of April 16, 2026 to the Board for review. The Director reported that trends remain stable and indicated that he had no specific comments. Director Kohtz then asked for any questions or comments. There was no further discussion.

b. Temporary Real Property Appraiser Report

Director Kohtz presented three charts outlining the number of temporary credentials issued as of March 31, 2026 to the Board for review. The Director noted that the number of temporary real property appraiser credentials issued through March 31, 2026 is on pace with the number issued during the previous four years. Director Kohtz then asked for any questions or comments. There was no further discussion.

c. Supervisory Real Property Appraiser Report

Director Kohtz presented two charts outlining the number of registered supervisory real property appraisers as of April 16, 2026 to the Board for review. The Director reported a slight increase from 42 to 45 registered supervisory real property appraisers. Director Kohtz then asked for any questions or comments. Board Member Minshull questioned if the increase was the result of new supervisory real property appraiser applications, or previous supervisory real property appraisers that take on new trainee real property appraisers. Licensing Programs Manager Loll stated the increase was due to previous supervisory real property appraisers that have applied with new trainee real property appraisers. Director Kohtz added that this is the most common scenario. Board Member Minshull thanked staff for the information. There was no further discussion.

d. Appraisal Management Company Report

Director Kohtz presented two charts outlining the number of AMCs as of April 16, 2026 to the Board for review. The Director reported that trends remain stable and indicated that he had no specific comments. Director Kohtz then asked for any questions or comments. There was no further discussion.

2. DIRECTOR APPROVAL OF APPLICANTS

a. Real Property Appraiser Report

Director Kohtz presented the Real Property Appraiser Report to the Board for review, showing real property appraiser applicants approved for credentialing by the Director for the period between March 11, 2026 and April 7, 2026. The Director indicated that he had no specific comments and asked for any questions or comments. There was no further discussion.

b. Education Activity and Instructors Report

Director Kohtz presented the Education Activities and Instructors Report to the Board for review, showing education activities and instructors approved by the Director for the period between March 11, 2026 and April 7, 2026. The Director asked for any questions or comments. There was no further discussion.

3. 2025-26 NRPAB GOALS AND OBJECTIVES + SWOT ANALYSIS

Director Kohtz presented the 2025-26 NRPAB Goals and Objectives and SWOT Analysis to the Board for review. The Director brought attention to the goal to reach out to Nebraska community colleges with real estate degree programs to gauge interest in obtaining AQB CAP Approval under the Education section and reported that this goal is in progress; Education Program Manager Kashinda Sims is currently researching Nebraska degree programs to contact.

J. FINANCIAL REPORT AND CONSIDERATIONS

1. MARCH FINANCIAL REPORT

The receipts and expenditures for March were presented to the Board for review in the Budget Status Report. The Director brought attention to the "CIO Charges" expense in the amount of $3,053.35 and informed the Board that this expenditure included database cleanup work and adding functionality developed within the SARAS grant projects to already existing areas of the database. Board Member Minshull asked if the database and online applications have been working well and improving staff efficiency. LPM Loll confirmed the database enhancements have greatly increased operational efficiency. Director Kohtz noted that development of automated emails, along with the automated email history logs, has reduced one to three days of work down to seconds. The Director added that as OCIO's technology improves, he intends to push as many efficiencies as possible through various improvements. An example is the ability to send and log automated messages that are triggered by staff or real property appraiser action, or by meeting specific database criteria. Until a couple of years ago, this option was not available to the Board. Automated emails used to have to be written and sent by staff through email or mail. Minshull recognized the database enhancements and indicated that, from a board member perspective, the database has improved greatly since his first year on the Board. The Board agreed with Board Member Minshull. Director Kohtz thanked the Board for recognition of the staff's work.

(Continued on page 4)

(Continued from page 3)
The Director then reported that the overall expenditures for the month of March were $34,069.55, and the year-to-date overall expenditures for the fiscal year are $332,888.77, which amounts to 65.81 percent of the budgeted expenditures for the fiscal year; 75.07 percent of the fiscal year has elapsed.

Next, Director Kohtz brought the Board's attention to revenues and indicated that he had no comments on any specific revenues for the month. The Director then reported that the overall revenues for the month of March totaled $20,038.32, and year-to-date revenues for the fiscal year are $360,893.02, which amounts to 94.29 percent of the projected revenues for the fiscal year. The Director reiterated that 75.07 percent of the fiscal year has passed.

Director Kohtz continued to the Budget Status Report for the Real Property Appraiser Fund and AMC Fund and reported that the Real Property Appraiser Fund expenditures for the month of March totaled $21,694.56, and the year-to-date expenditures for the fiscal year are $221,402.92, which amounts to 64.07 percent of the budgeted expenditures for the fiscal year. The Real Property Appraiser Fund revenues were $6,934.29 for March, and the year-to-date revenues for the fiscal year are $249,181.59, which amounts to 97.28 percent of the projected revenues for the fiscal year. Director Kohtz then reported that AMC Fund expenditures for the month of March totaled $12,374.99, and the year-to-date expenditures for the fiscal year are $111,485.85, which is 69.56 percent of the budgeted expenditures. The AMC Fund revenues totaled $13,104.03 for March, and the year-to-date revenues for the fiscal year are $111,711.43, which amounts to 86 percent of the projected revenues for the fiscal year. The Director asked if there were any questions or comments regarding the Budget Status Report. There was no further discussion.

Director Kohtz presented the MTD General Ledger Detail Report for the month of March and reported that he had no specific comments. Director Kohtz asked for any questions or comments. There was no further discussion.

Director Kohtz presented four graphs illustrating expenses, revenues, and cash balances. The Director noted overall expenditures of $34,069.55 and revenues of $20,038.32 for the month of March for the Real Property Appraiser Program, which includes both the Appraiser Fund and the AMC Fund. Director Kohtz then brought the Board's attention to the NRPAB Twenty-Five Month Expenses/Revenues by Program graph and reiterated that Real Property Appraiser Fund expenditures totaled $21,694.56, Real Property Appraiser Fund revenues totaled $6,934.29, AMC Fund expenditures totaled $12,374.99, and AMC Fund revenues totaled $13,104.03 for March. The Director finished by reporting that the cash balance for the AMC Fund is $199,907.94, the cash balance for the Appraiser Fund is $239,750.49, and the overall cash balance for both funds is $439,658.43. Director Kohtz reminded the Board that the AMC Fund balance will be reduced by another $100,000.00 before the end of the fiscal year.

Chairperson Hermsen asked for a motion on the March financial reports. Board Member Minshull moved to file the March financial reports for audit. Board Member Batie seconded the motion. Chairperson Hermsen recognized the motion and asked for any discussion. With no discussion, Chairperson Hermsen called for a vote. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

2. ASC SARAS GRANT REPORT

Director Kohtz presented the Budget Status Report for the SARAS Grant Fund to the Board for review and reported that the SARAS Grant Fund expenditures for the month of March totaled $3,042.25, and the year-to-date expenditures for the fiscal year are $61,204.33, which amounts to 49.96 percent of the budgeted expenditures for the fiscal year. Director Kohtz informed the Board that there was little SARAS Grant spending while the Online Application for Nebraska Real Property Appraiser Credential by Reciprocity and NRPAB Database Interface Project was transitioning to production and the start of the online education applications and NRPAB Database Interface Project. The Director then noted that staff had met with OCIO the day before the Board meeting to discuss the conceptual design and preliminary setup work for online education applications and NRPAB Database Interface Project. Director Kohtz asked for any questions or comments. There was no further discussion.

Director Kohtz presented the General Ledger Detail Report for the SARAS Grant Fund. The Director indicated that he had no specific comments and asked for any questions or comments. There was no further discussion.

Chairperson Hermsen asked for a motion on the March SARAS Grant Fund financial reports. Board Member Batie moved to file the March SARAS Grant Fund financial reports for audit. Board Member Minshull seconded the motion. Chairperson Hermsen recognized the motion and asked for any discussion. With no discussion, Chairperson Hermsen called for a vote. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

3. 2025-26 BUDGET AMENDMENT

Director Kohtz presented a proposed amendment to the FY 2025-2026 budget to the Board for consideration. Approval for funding in the amount of $219.89 is requested to be transferred from Lodging Expense, 571100, to Personal Computing Equipment, 532200, for the purchase of one HP OfficeJet Pro 9125e Wireless All-in-One Color Inkjet Printer for the Director's office. DAS Buildings Division indicated that the Director’s current printer will not fit the area designated for access to printer port as the maximum height is exceeded. Board Member Minshull asked the Director if this model would meet his printing demands. The Director responded that it would be a little faster than his current printer, which has been in place since before his time with the Board. Board Member R. Johnson asked how the Board will pay for the relocation. Director Kohtz responded that all relocation costs, along with the cost of the new Director’s Office desk are covered by DAS Buildings Division. The Director reminded the Board that the current desk setup is too large for the new office space. As for the additional purchases not already paid for through other budget amendments, the original plan was to utilize the rent and depreciation savings to pay for the new items as the Board was originally scheduled to relocate shortly after the first of the year. Because construction is so far behind schedule, and the CSI purchase order had to be stopped and amended because of a chair change; the new items will be paid with carryover funds during the next fiscal year. Director Kohtz then informed the Board that he has had some back trouble and the doctor at Nebraska Spine and Pain recommended that he move to an ergonomic chair, which was the cause of the CSI purchase order holdup. The Director added that the ergonomic chair was a bit more expensive than the standard chairs ordered and that DAS Buildings Division needed to get the purchase order resubmitted as soon as possible to get the items in time for the move, so Chairperson Hermsen gave approval for the change. The Board thanked Director Kohtz for the update.

(Continued on page 6)

(Continued from page 5)

Chairperson Hermsen asked for discussion. With none, Chairperson Hermsen called for a motion. Board Member Minshull moved to approve funding in the amount of $219.89 as requested to be transferred from Lodging Expense, 571100, to Personal Computing Equipment, 532200, for the purchase of one HP OfficeJet Pro 9125e Wireless All-in-One Color Inkjet Printer for Director's office. Board Member R. Johnson seconded the motion. Chairperson Hermsen recognized the motion and asked for any discussion. With no discussion, Chairperson Hermsen called for a vote. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

4. **PER DIEMS:** No discussion.

K. GENERAL PUBLIC COMMENTS

Chairperson Hermsen asked for any public comments. With none, Chairperson Hermsen moved on to Education.

L. EDUCATION: No discussion.

M. UNFINISHED BUSINESS

1. **500 SOUTH 16TH STREET DOL BUILDING RELOCATION**

Director Kohtz informed the Board that he was invited to tour the unfinished construction of the 500 South 16th Street office but was given a one-day's notice to attend on a day that he was off. The Director authorized EPM Sims and BPM Falls to attend. EPM Sims took photos of the office and did an excellent job documenting the photos. Director Kohtz then presented the captioned photos and informed the Board that on July 17, 2026, staff will begin to work remotely and return to the new office on July 27, 2026. During the remote work period, LPM Loll will change the NRPAB mailing address listed on the Board's website and online applications. In addition, during this time, the address on all paper documents will be updated. Board Member R. Johnson asked what the reason for the move was. The Director reminded the Board that multiple agencies are being vacated for DHHS to be consolidated in the Nebraska State Office Building (NSOB). A discussion occurred regarding the construction of the 500 South 16th Street building. Board Member Minshull noted the parking lot behind the building and asked if board-member reserved parking is still planned. Director Kohtz confirmed that board members will have parking in the 1501 M Street parking garage. Board Member R. Johnson asked how board members will gain access to the parking garage. The Director indicated that this must still be worked out, but that he anticipates that each board member will receive a key code to enter. Chairperson Hermsen thanked EPM Sims for the photos and Director Kohtz for the information. There was no further discussion.

N. NEW BUSINESS

1. Promoting Access to Mortgage Credit Executive Order_March 13, 2026

Director Kohtz presented the Presidential Executive Order titled, "Promoting Access to Mortgage Credit" to the Board for review. The Director guided the Board to page N.3 and indicated that Section 6: Appraisal Modernization requires that the Vice Chairman for Supervision of the Federal Reserve, the Director of the CFPB, the Chairman of the NCUA Board, the Chairperson of Board of Directors of the FDIC, the Comptroller of the Currency, and the Director of the FHFA consider, as appropriate and consistent with applicable law and their statutory authorities, modernizing appraisal regulations and guidance to expand the use of alternative valuation models, desktop and hybrid appraisals, and artificial intelligence valuation tools; simplifying appraiser qualification requirements; and reducing appraisal requirements for low-risk transactions, including low loan-to-value refinancing and small balance loans and setting clear appraisal timelines. The Secretary of Housing and Urban Development (HUD) and the Secretary of Veterans Affairs (VA) shall consider, as appropriate and consistent with applicable law, aligning appraisal standards between the Federal Housing Administration and VA Home Loan Program where risk is comparable; clarifying the distinction in an appraisal inspection between safety and habitability concerns that necessitate pre-closing repairs versus cosmetic concerns; and expanding post-closing repair flexibility. Board Member Minshull asked for the Director's opinion. Director Kohtz indicated that he does not expect much in the way of results coming from the Executive Order. Board Member Minshull then indicated that the Executive Order could push Federal agencies to use alternate valuation tools to streamline the home valuation process to promote affordability for rural America, which is currently an important topic for the administration. Minshull added that cost reduction is an important part of that. The Director acknowledged Minshull's observation. The question was asked where real property appraisers fit into this equation. Both Board Member Minshull and Director Kohtz agreed that real property appraisers would still be required on high-risk transactions. The Board held a discussion pertaining to the future of real property appraisers. Public Member Rodger Morrissey requested permission to address the Board. Chairperson Hermsen granted Roger Morrissey permission. Morrissey brought attention to Fannie Mae and Freddie Mac's UAD 3.6 form and indicated that GSE's are requiring more information than what is typically utilized in an appraisal to build a very robust database. The Board resumed its discussion pertaining to the future of real property appraisers; specifically, the effects that artificial intelligence may have on the future of the industry.

O. LEGISLATIVE REPORT AND BUSINESS

1. 109TH LEGISLATURE (2ND REGULAR SESSION) BILLS OF NRPAB INTEREST

Director Kohtz presented the fourth and final legislative report for the current session to the Board for review and reported that the legislative session will end tomorrow, April 17, 2026. The Director informed the Board that he would provide a summary for bills in the legislative report that have seen movement since the Board's last meeting, and asked Board Members to let him know if any discussion is needed on any bills. The following bills were discussed:

LB878 – The Director reported that LB878 would require paid maternity leave for state employees and informed the Board that this bill has passed on Final Reading.

LB1048 – The Director reported that LB1048, which would change and eliminate reporting requirements for certain government agencies and preparation of the state executive budget, and eliminate the Small Business Advisory Council, the Suggestion Award Board, and the state employee suggestion system, passed on Final Reading.

LB1071 – The Director reported that LB1071 provides, changes, and eliminates provisions related to appropriations for the expenses of Nebraska State Government for the biennium ending June 30, 2027. Director Kohtz informed the Board that this bill has passed on Final Reading and was approved by the Governor.

LB1072 – The Director reported that LB1072 provides for and changes transfers from the Cash Reserve Fund and provides, changes, and eliminates provisions relating to fees, funds, fund transfers, agency powers and duties, and various statutory programs. Director Kohtz informed the Board that this bill passed on Final Reading and was approved by the Governor.

Chairperson Hermsen asked when funds will be transferred out of the AMC Fund. Director Kohtz informed the Board that the transfer will be before the end of the current fiscal year. Chairperson Hermsen thanked Director Kohtz for the updates. There was no further discussion.

2. **PROPOSED CHANGES TO TITLE 298 OF THE ADMINISTRATIVE CODE**
   Director Kohtz informed the Board that the adopted changes to Title 298 of the Nebraska Administrative Code are still under the Governor's Policy and Research Office's review. There was no further discussion.

3. **OTHER LEGISLATIVE MATTERS:** No discussion.

P. ADMINISTRATIVE BUSINESS: No discussion.

Q. OTHER BUSINESS

1. **BOARD MEETINGS**: No discussion.

2. **CONFERENCES/EDUCATION:** No discussion.

3. **MEMOS FROM THE BOARD:** No discussion.

4. **QUARTERLY NEWSLETTER:** No discussion.

5. **APPRAISAL SUBCOMMITTEE**
   a. **ASC December 10, 2025 Meeting Minutes**
      Director Kohtz presented the Appraisal Subcommittee December 10, 2025 Meeting Minutes to the Board for review and reported that he had no specific comments. The Director asked for any questions or comments. There was no further discussion.

6. THE APPRAISAL FOUNDATION

a. TAF April Newsletter

Director Kohtz presented The Appraisal Foundation's April Newsletter to the Board for review and reported that he had no specific comments. The Director asked for any questions or comments. There was no further discussion.

b. AQB National Uniform Licensing and Certification Examinations Job Analysis Technical Report

Director Kohtz presented the AQB National Uniform Licensing and Certification Examinations Job Analysis Technical Report to the Board for review. The Director provided the highlights of the report, which includes a summary of the new job analysis methodology and results; updated examination content specifications based on the new job analysis results, including topic areas, cognitive levels, and relative weights; SME review of new and existing test questions to ensure job relevancy, identified cognitive levels, and assigned items to appropriate topic areas; construction of equivalent test forms; and a description of PSI's passing score study for all exams based upon the new specifications including the methodology and results. Director Kohtz informed the Board that the Survey Demographics found in Appendix B, the Survey Results found in Appendix C, and the Content Outlines found in Appendix E contain interesting information if any Board Members are intrigued enough to read outside of the meeting. The Director added that the definitions for the "Cog. Level" in Appendix E can be found on page Q.29. The Director asked for any questions or comments. There was no further discussion.

7. ASSOCIATION OF APPRAISER REGULATORY OFFICIALS

8. GOVERNMENT-SPONSORED ENTERPRISES

a. Fannie Mae

i. Fannie Mae Appraisal Update_March 2026

Director Kohtz presented the Fannie Mae document titled, "Appraiser Update 2026" to the Board for review. The Director reported that the majority of the update pertained to UAD 3.6. Fannie Mae also reported that a letter is being sent to real property appraisers whose reports exhibit patterns of non-compliance. Those identified by Fannie Mae include, 1) the real property appraiser performs a market conditions analysis, but the date of comparable sale falls outside the time span encompassed by the analysis; 2) the real property appraiser's analysis suggest a particular adjustment rate, but the appraiser does not follow their own analysis and provides no evidence in support of the decision; and 3) the real property appraiser relies on the 1004 MC form as the support for the time adjustment decision, which is problematic because the fixed time frames do not necessarily align with the date of sale of the comp. The 1004MC form does not exist in UAD 3.6. Finally, Fannie Mae reported an accessory dwelling unit policy change for loans with UAD 3.6 appraisals. The Director asked for any questions or comments. There was no further discussion.

b. Freddie Mac

i. GSE Appraiser Capacity_March 2026

Director Kohtz presented the Freddie Mac document titled, "GSE Appraiser Capacity" to the Board for review and reported that he had no specific comments. The Director asked for any questions or comments. There was no further discussion.

9. IN THE NEWS: No discussion.

C. CREDENTIALING AS A NEBRASKA REAL PROPERTY APPRAISER

The Board reviewed applicants CG26001 and CG26005. Chairperson Hermsen asked for a motion on CG26001 and CG26005.

Board Member R. Johnson moved to take the following action:

CG26001 / Provide redacted copy of UPSAP Compliance Review Report pertaining to the Lincoln, Nebraska report to the applicant and request that applicant provide a written response to the USPAP Compliance Review Report with emphasis on what property rights were appraised and justification for selection and use of the comparable properties.

Board Member Batie seconded the motion. Chairperson Hermsen recognized the motion and called for a vote. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

Board Member R. Johnson moved to take the following action:

CG26005 / Approve applicant to sit for exam and authorize director to issue credential as a certified general real property appraiser upon applicant providing evidence of successful completion of the national uniform licensing and certification examination and the necessary fees, and provide redacted copy of UPSAP Compliance Review Report pertaining to the Buffalo County, Nebraska report and issue a written advisory for applicant to take notice of Standards Rule 1-5 in the Uniform Standards of Professional Appraisal Practice requiring appraiser to analyze all sales and other transfers of the subject property that occurred within the three years prior to the effective date of the appraisal.

Board Member Batie seconded the motion. Chairperson Hermsen recognized the motion and called for a vote. The motion carried with R. Johnson, Batie, and Hermsen voting aye. Minshull and L. Johnson abstained.

D. REGISTRATION AS AN APPRAISAL MANAGEMENT COMPANY

The Board reviewed applicant NE2012075. No action was taken.

E. COMPLIANCE MATTERS

The Board reviewed compliance matter 25-01. Chairperson Hermsen asked for a motion on 25-01.

Board Member R. Johnson moved to take the following action:

25-01 / Close.

Board Member Batie seconded the motion. Chairperson Hermsen recognized the motion and called for a vote. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye.

F. OTHER EXECUTIVE SESSION ITEMS: No discussion.

R. ADJOURNMENT

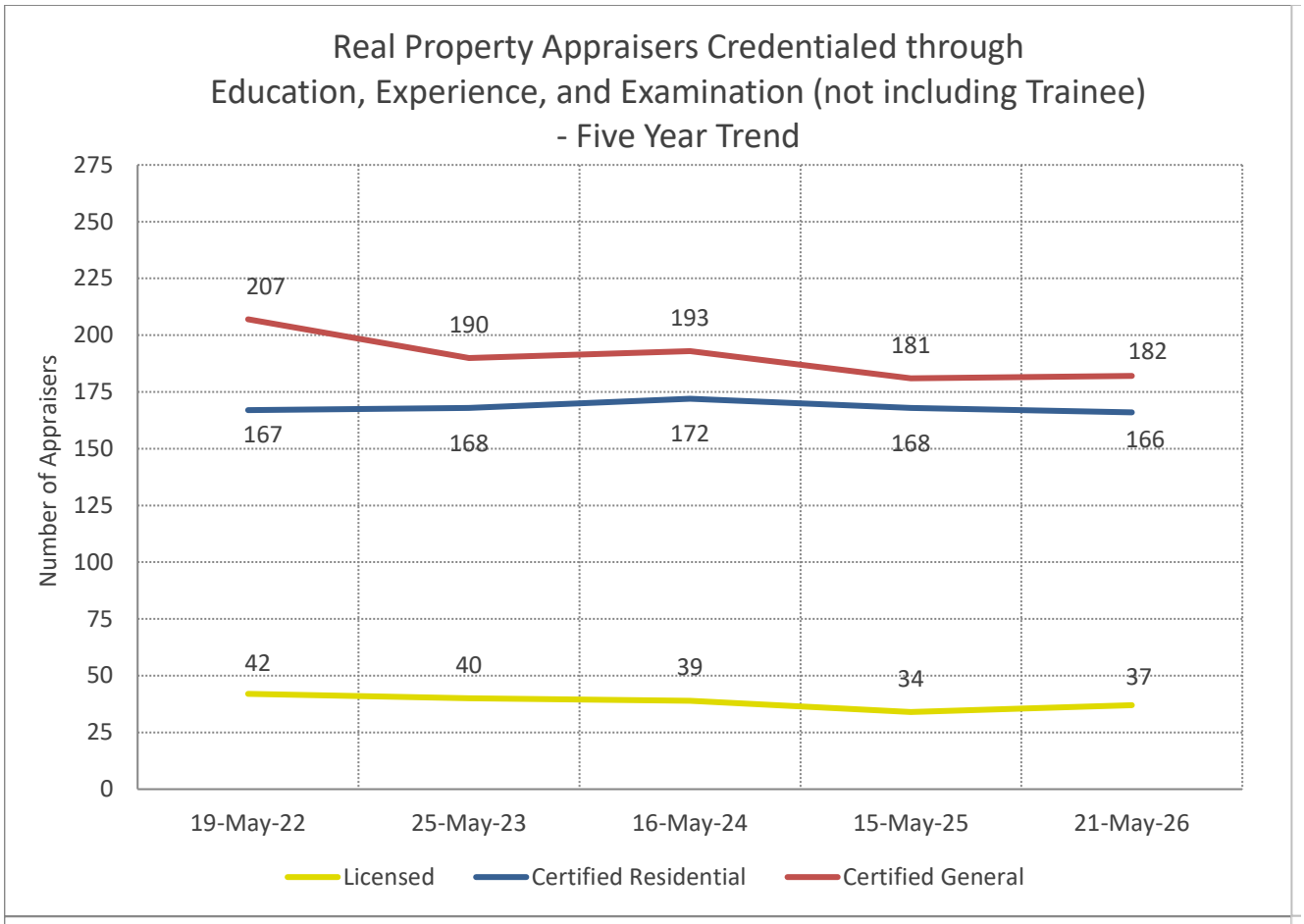
Board Member Minshull moved to adjourn the meeting. Board Member Batie seconded the motion. The motion carried with R. Johnson, Minshull, Batie, L. Johnson, and Hermsen voting aye. At 10:24 a.m., Chairperson Hermsen adjourned the April 16, 2026 meeting of the Nebraska Real Property Appraiser Board.

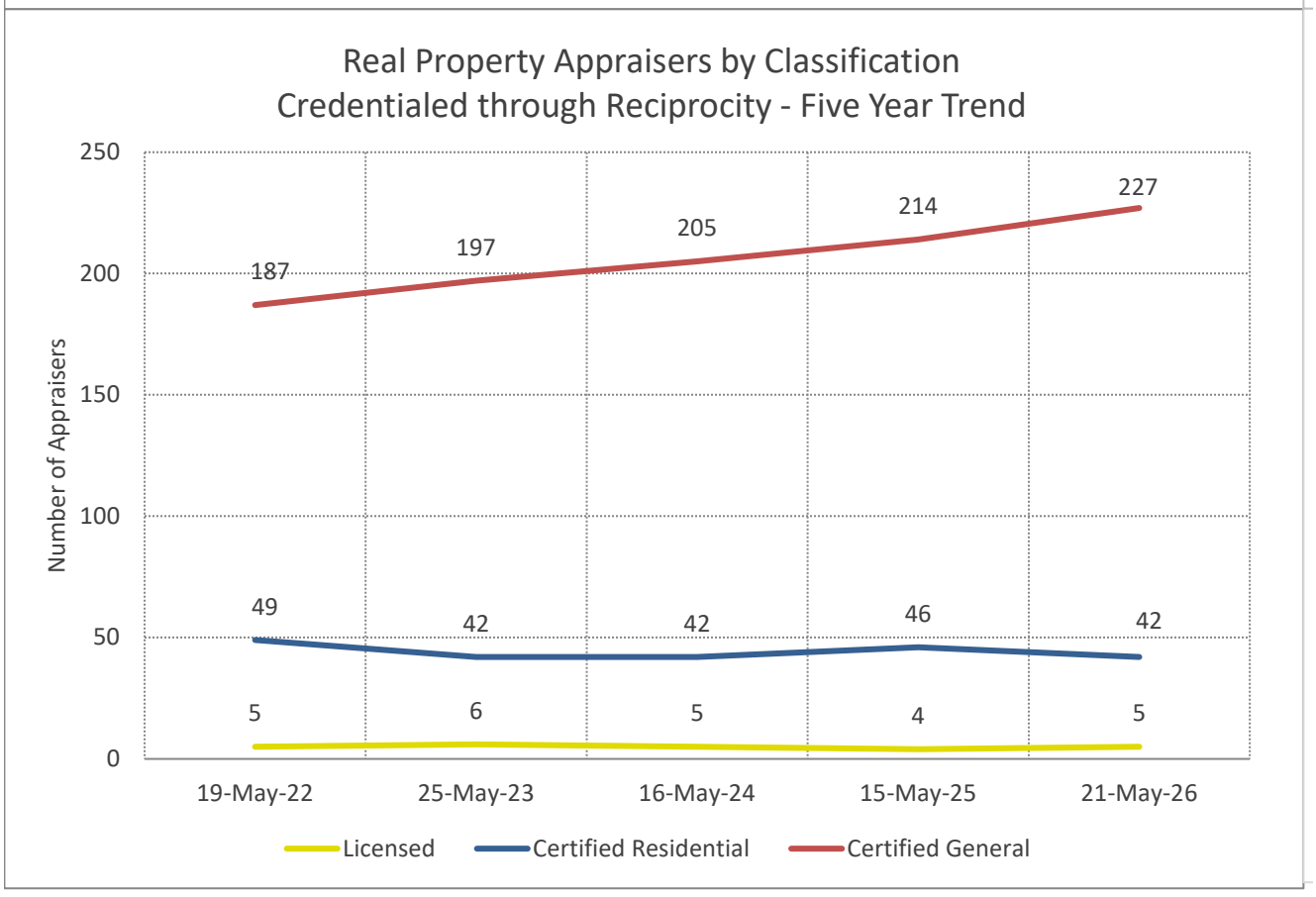
Respectfully submitted,

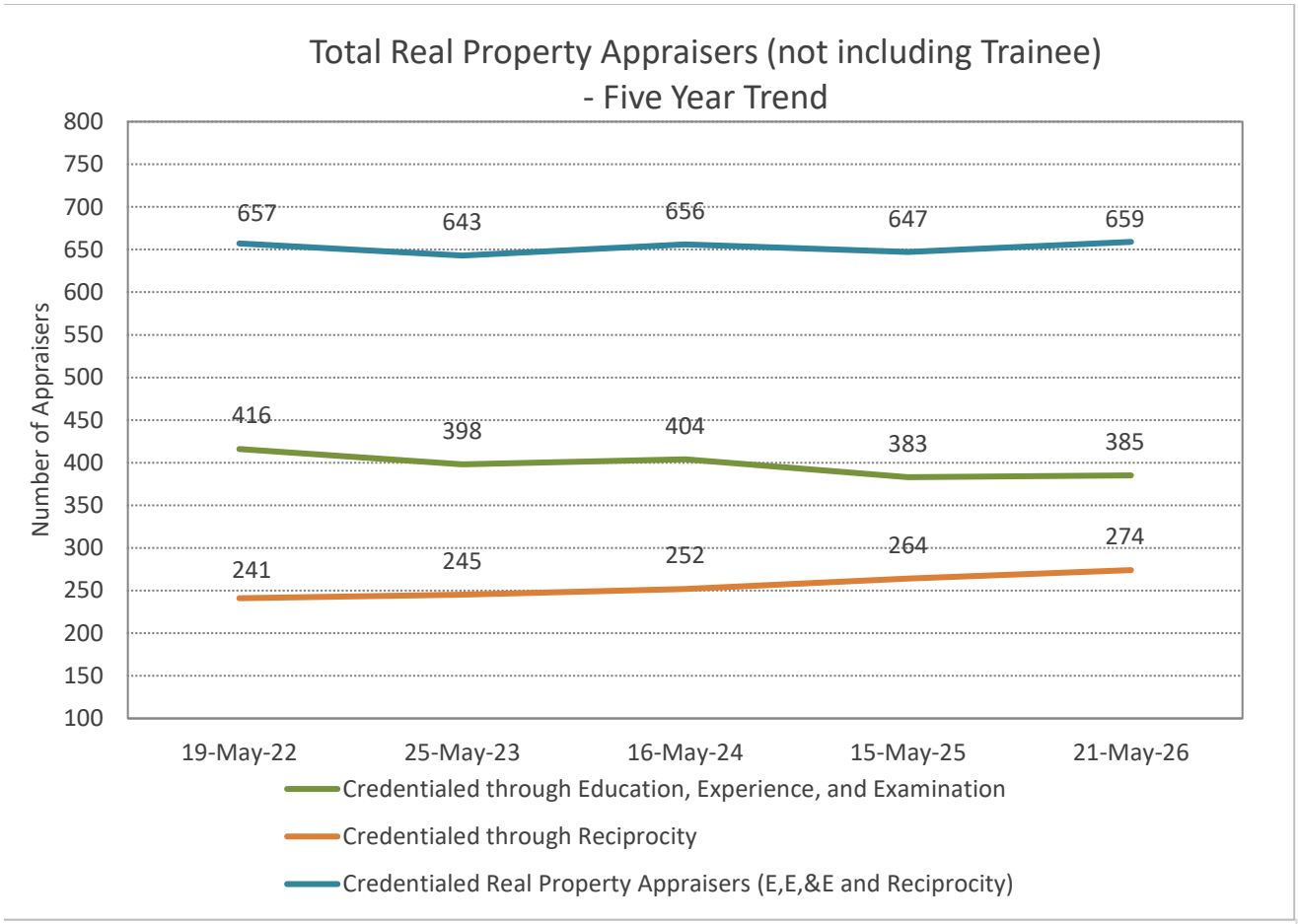
Tyler N. Kohtz
Director

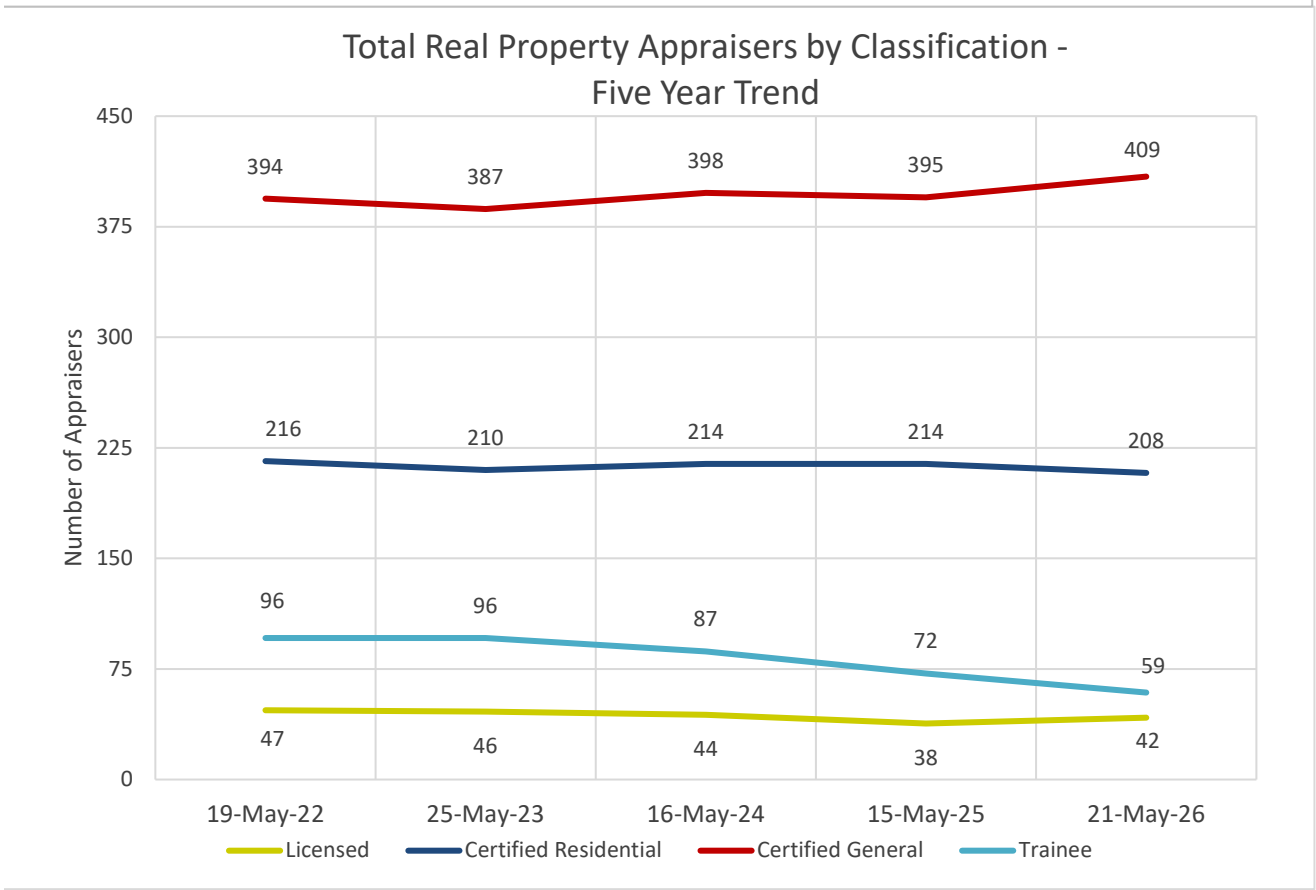
These minutes have been made available for public inspection on April 23, 2026, in compliance with Nebraska Revised Statue § 84-1413(5).

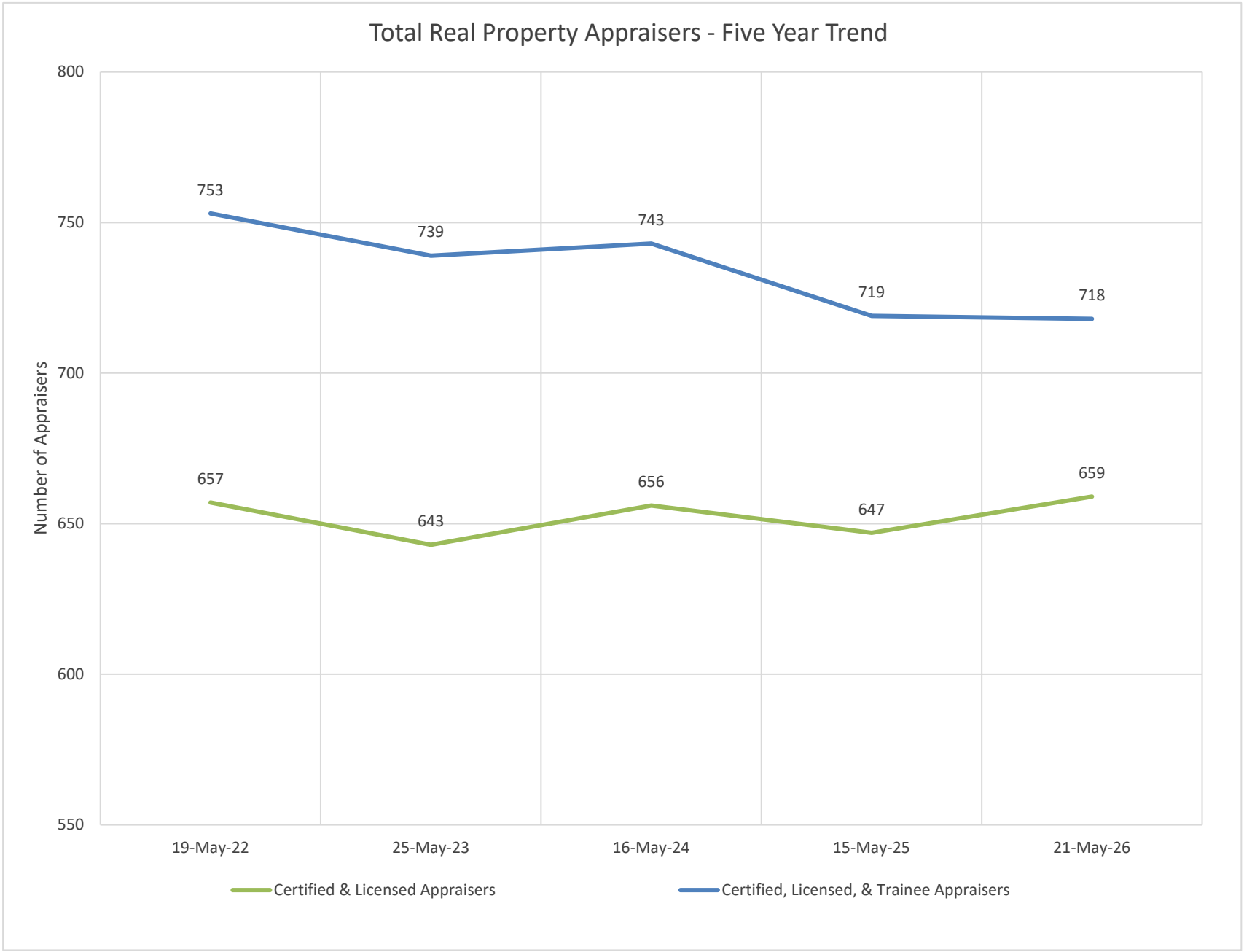
Real Property Appraiser Report

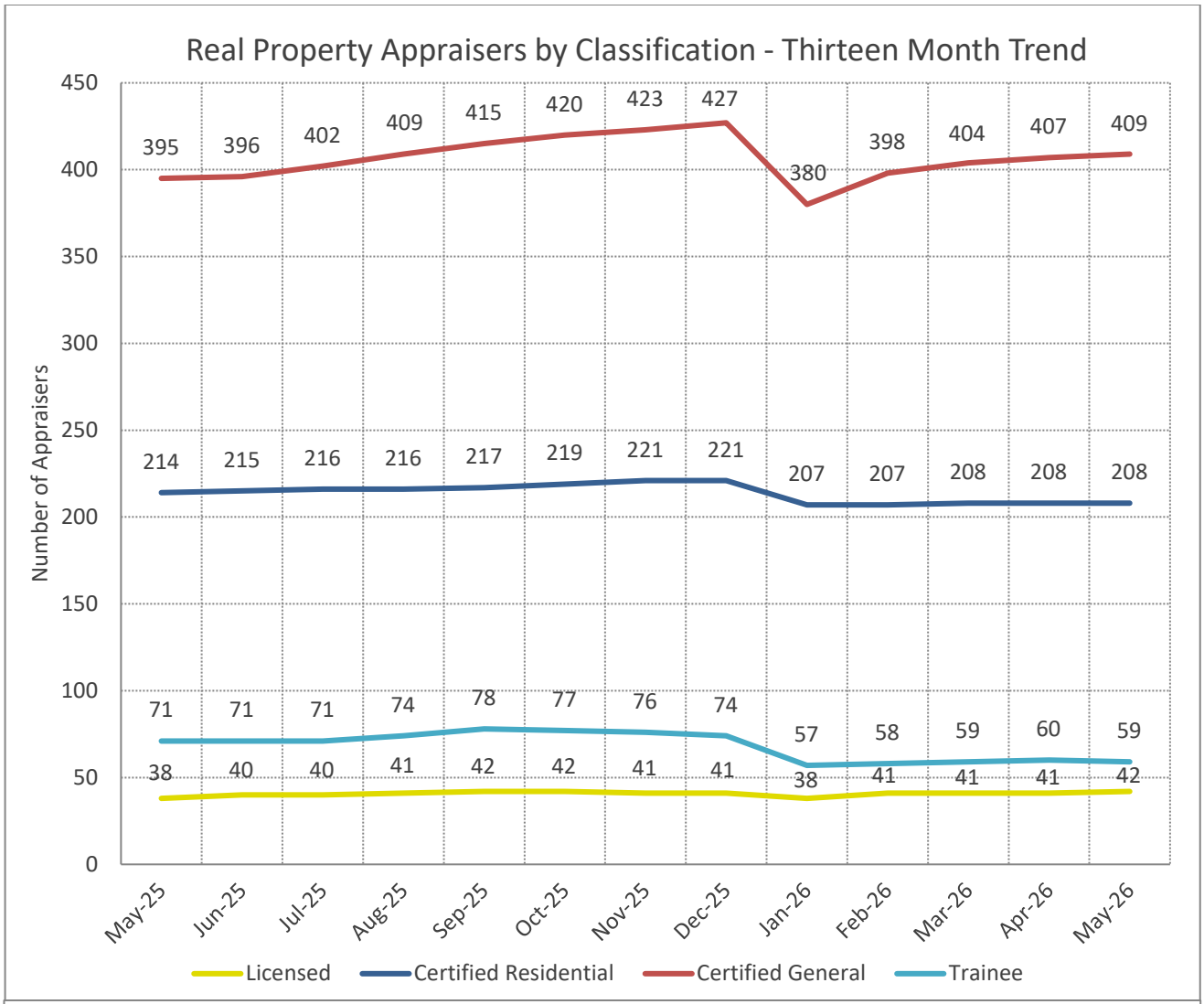


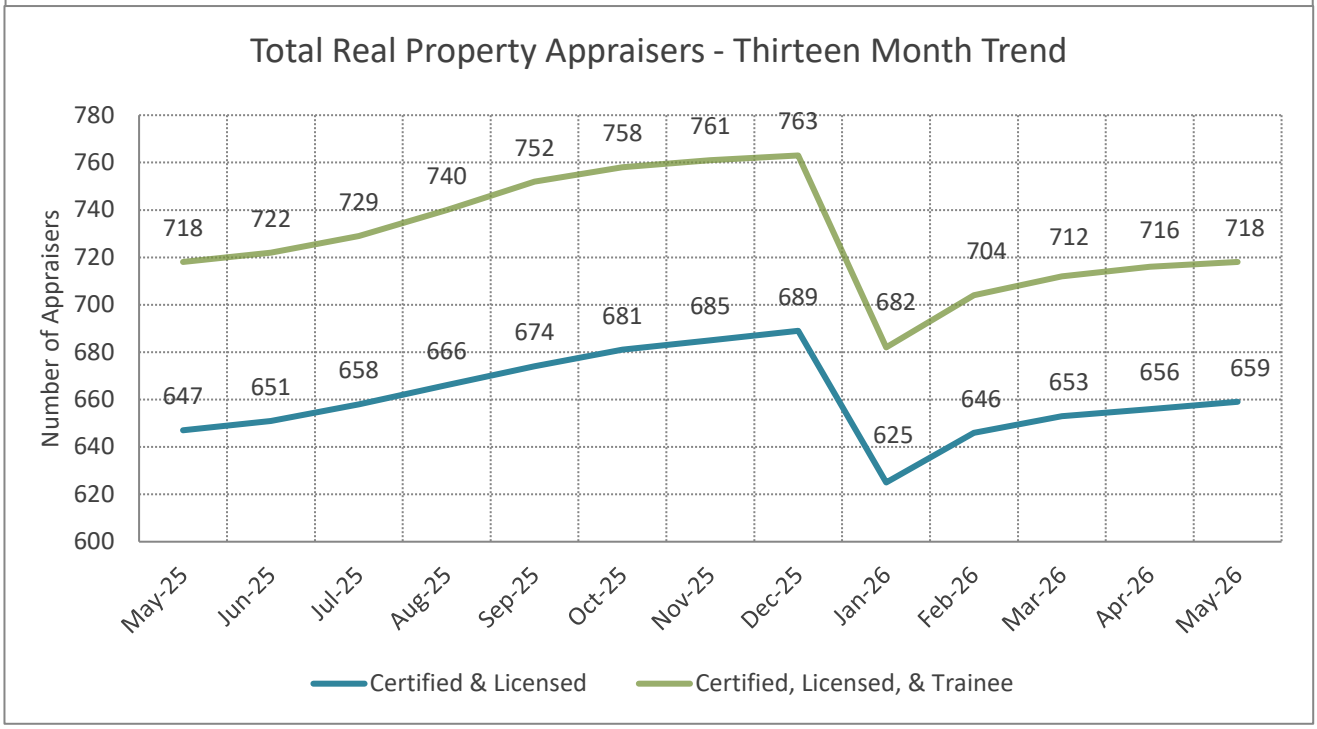



Total Real Property Appraisers (not including Trainee) - Five Year Trend
Number of Appraisers
800
750
700
650
600
550
500
450
400
350
300
250
200
150
100
657
643
656
647
659
416
398
404
383
385
241
245
252
264
274
19-May-22
25-May-23
16-May-24
15-May-25
21-May-26
Credentialed through Education, Experience, and Examination
Credentialed through Reciprocity
Credentialed Real Property Appraisers (E,E,&E and Reciprocity)

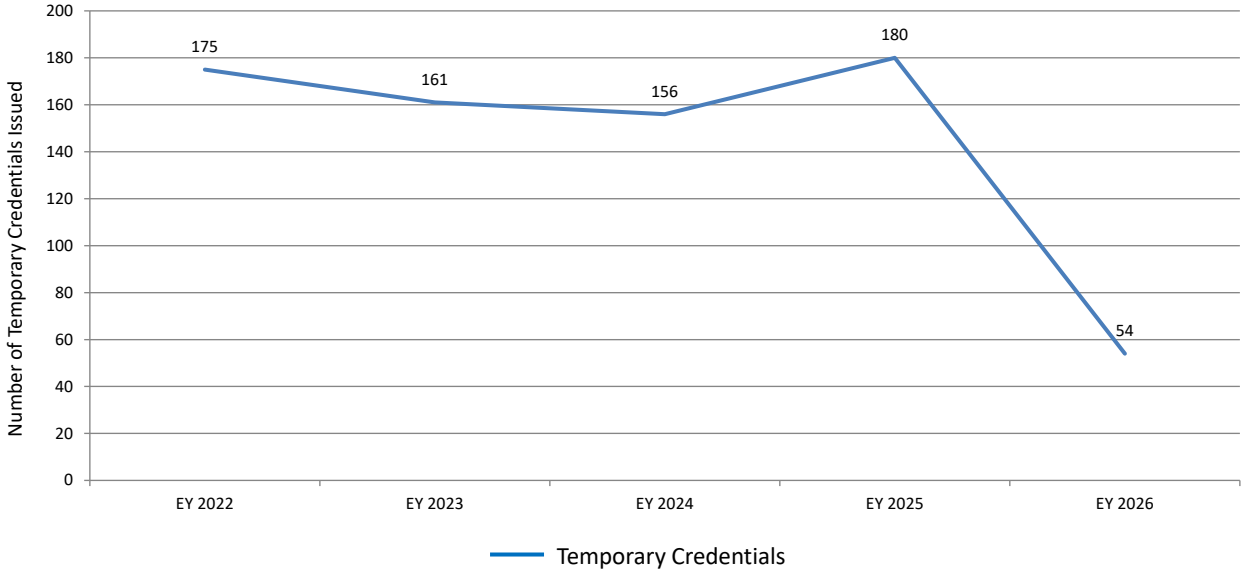

Total Real Property Appraisers by Classification - Five Year Trend
Number of Appraisers
450
375
300
225
150
75
0
394
387
398
395
409
216
210
214
214
208
96
96
87
72
59
47
46
44
38
42
19-May-22
25-May-23
16-May-24
15-May-25
21-May-26
Licensed
Certified Residential
Certified General
Trainee


Total Real Property Appraisers - Five Year Trend
Number of Appraisers
800
750
700
650
600
550
753
739
743
719
718
657
643
656
647
659
19-May-22
25-May-23
16-May-24
15-May-25
21-May-26
Certified & Licensed Appraisers
Certified, Licensed, & Trainee Appraisers

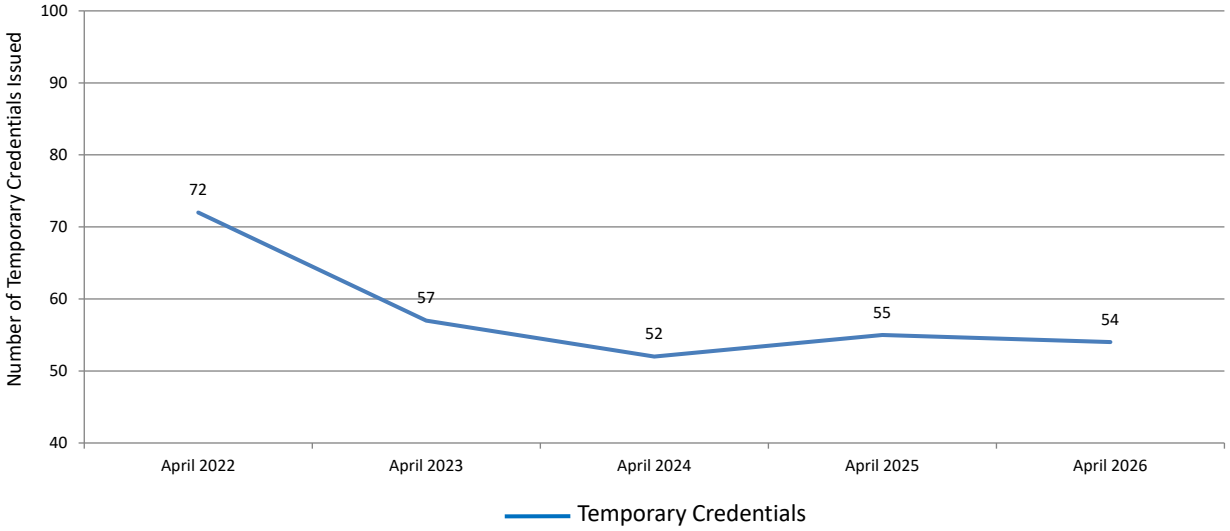

Real Property Appraisers by Classification - Thirteen Month Trend
Number of Appraisers
450
400
350
300
250
200
150
100
50
0
395 396 402 409 415 420 423 427 380 398 404 407 409
214 215 216 216 217 219 221 221 207 207 208 208 208
71 71 71 74 78 77 76 74 57 58 59 60 59
38 40 40 41 42 42 41 41 38 41 41 41 42
May-25 Jun-25 Jul-25 Aug-25 Sep-25 Oct-25 Nov-25 Dec-25 Jan-26 Feb-26 Mar-26 Apr-26 May-26
Licensed
Certified Residential
Certified General
Trainee


Total Real Property Appraisers - Thirteen Month Trend
Number of Appraisers
780
760
740
720
700
680
660
640
620
600
718 722 729 740 752 758 761 763 682 704 712 716 718
647 651 658 666 674 681 685 689 625 646 653 656 659
May-25 Jun-25 Jul-25 Aug-25 Sep-25 Oct-25 Nov-25 Dec-25 Jan-26 Feb-26 Mar-26 Apr-26 May-26
Certified & Licensed
Certified, Licensed, & Trainee

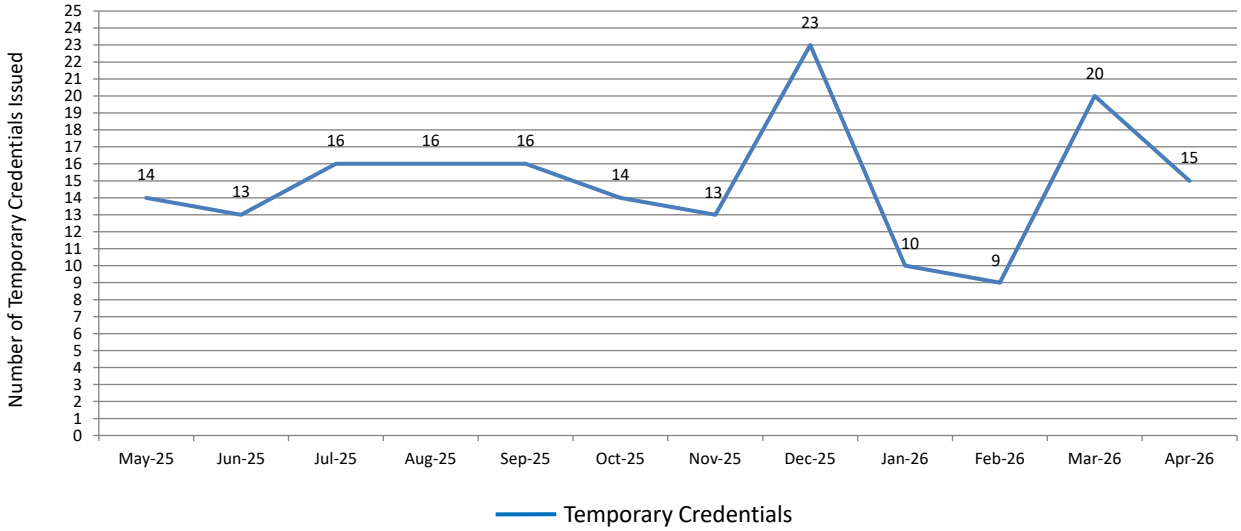
Temporary Real Property Appraiser Credentials Issued by Calendar Year - Five Year Trend



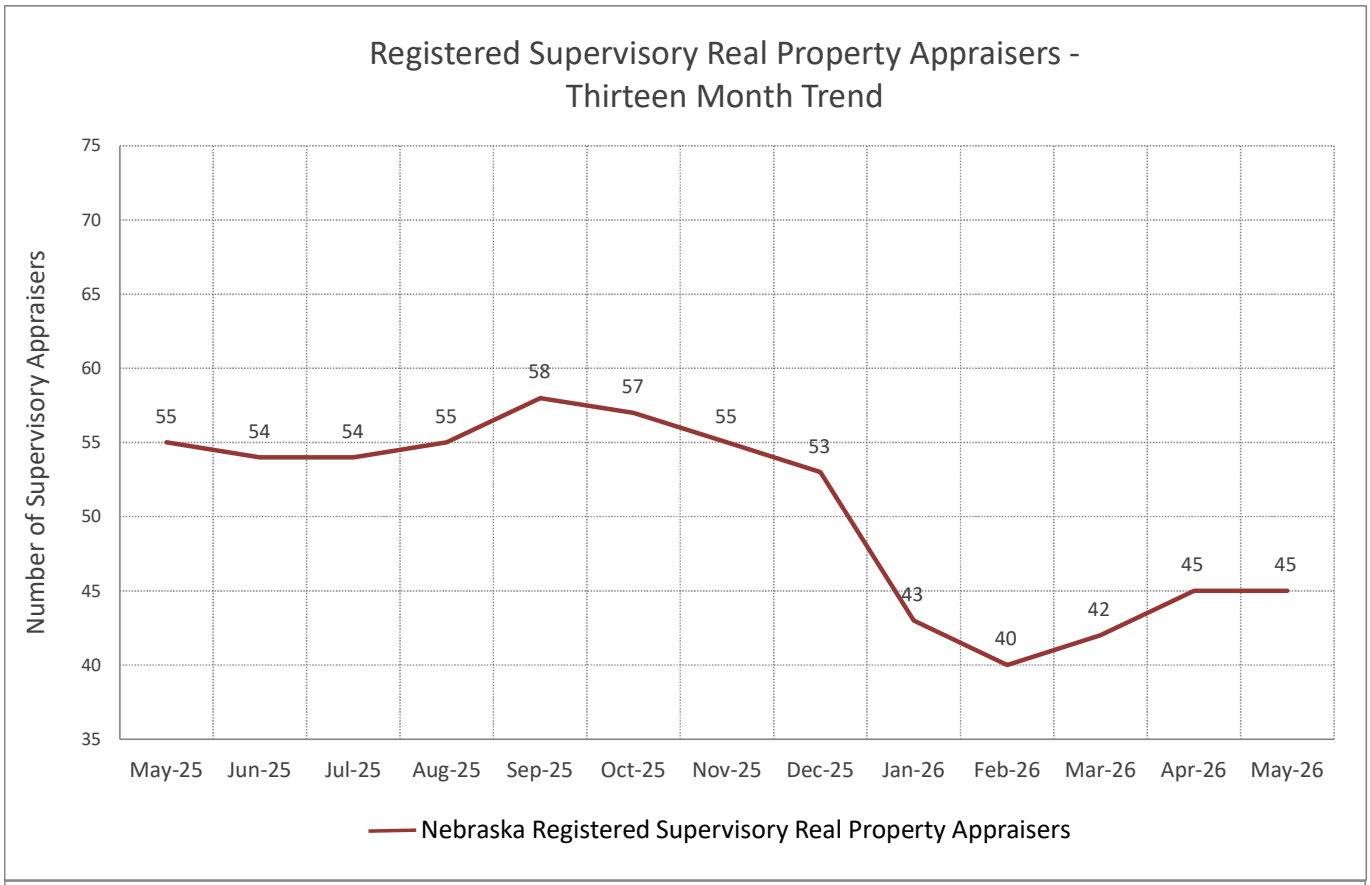
Year-to-date Temporary Real Property Appraiser Credentials Issued - Five Year Trend

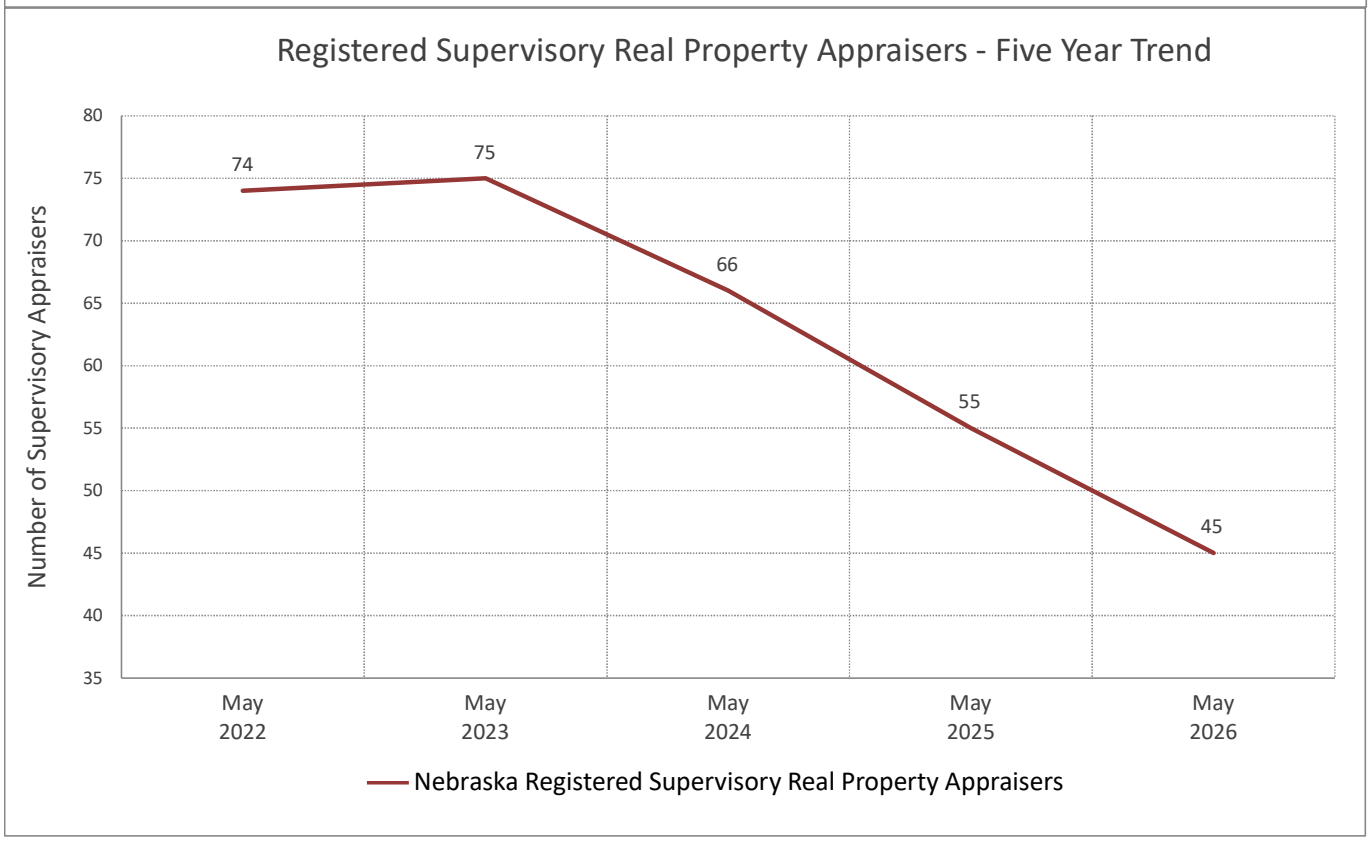


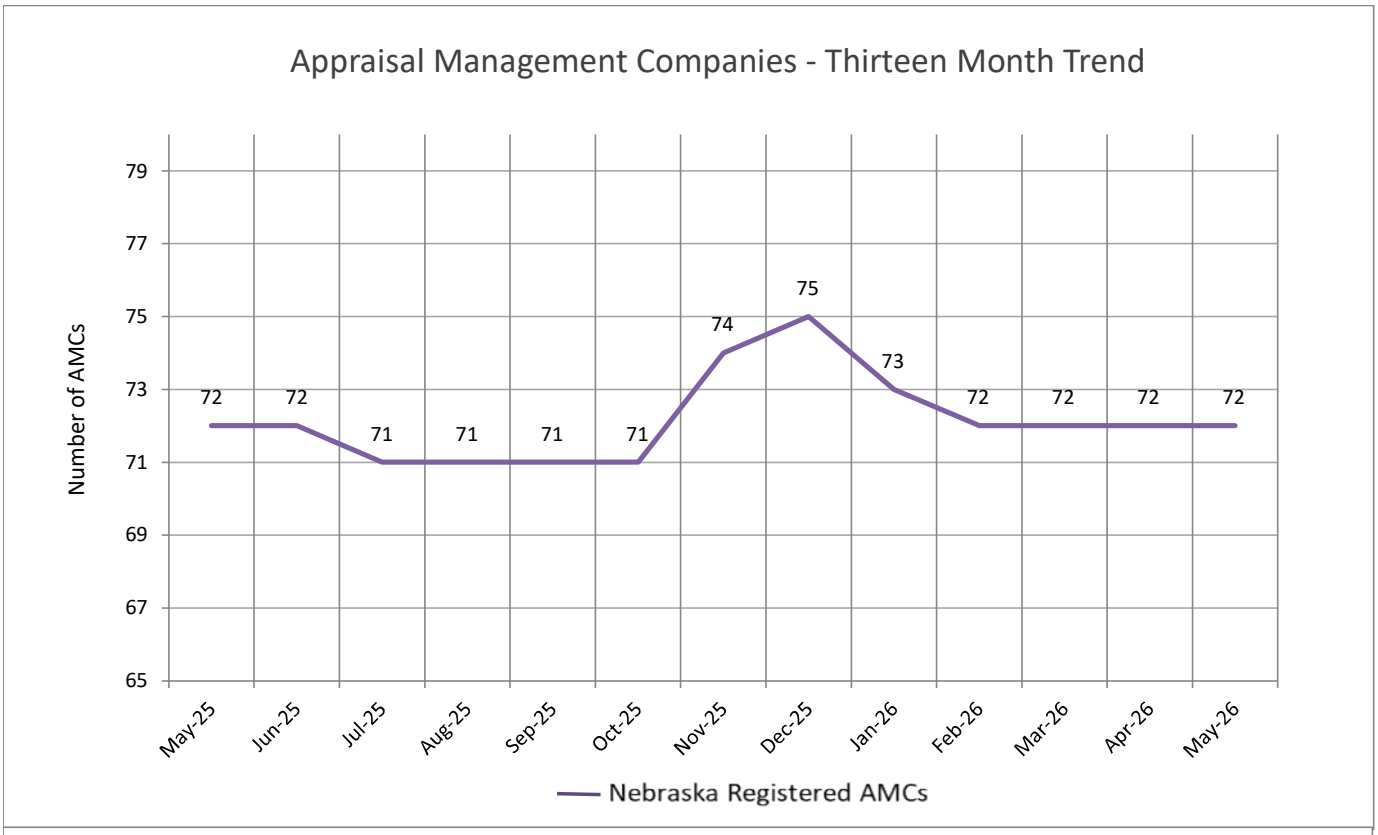
Temporary Real Property Appraiser Credentials Issued by Month - Twelve Month Trend

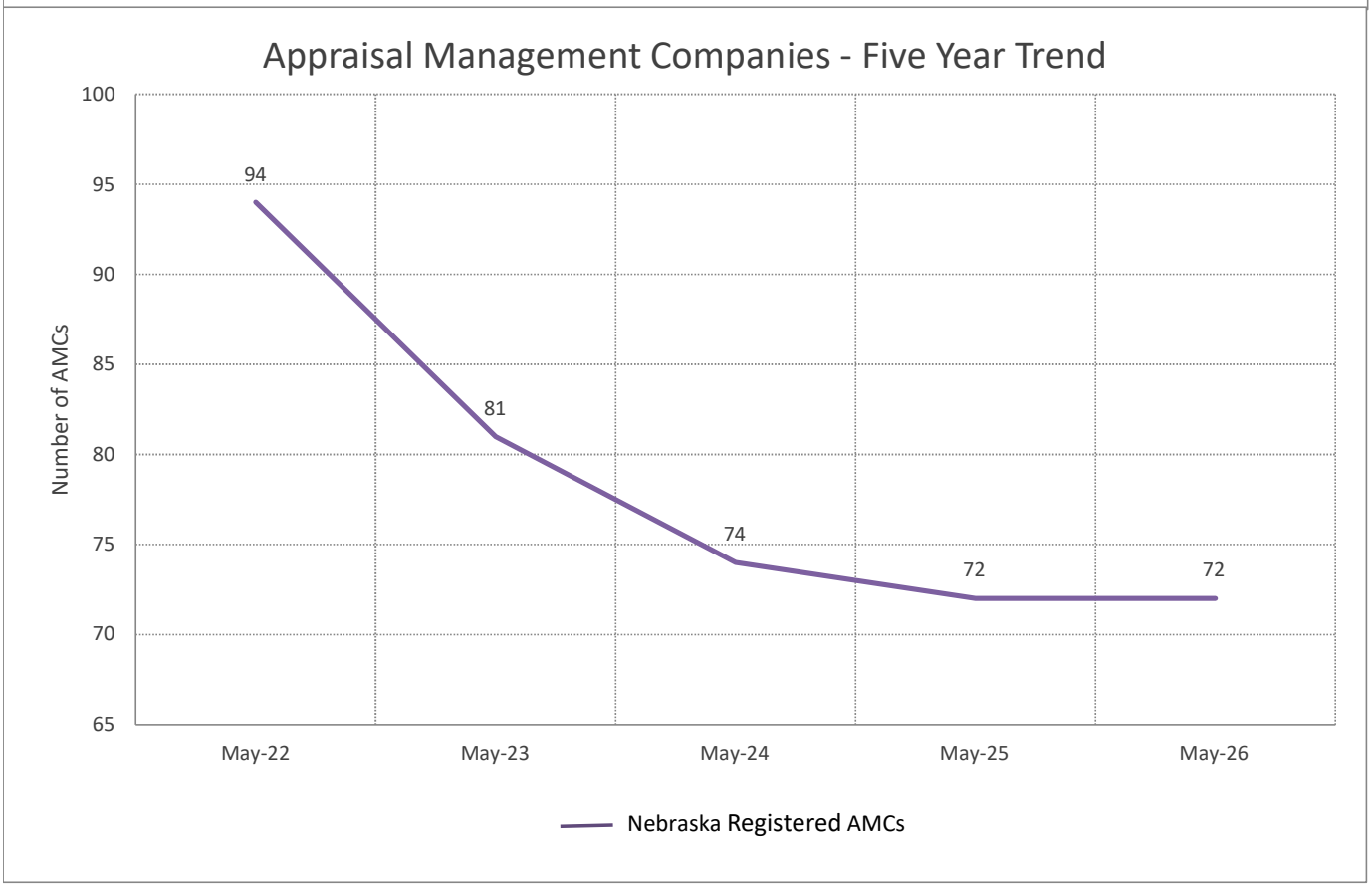


Supervisory Real Property Appraiser Report






Appraisal Management Companies - Thirteen Month Trend
Number of AMCs
79
77
75
73
71
69
67
65
72
72
71
71
71
71
74
75
73
72
72
72
72
May-25
Jun-25
Jul-25
Aug-25
Sep-25
Oct-25
Nov-25
Dec-25
Jan-26
Feb-26
Mar-26
Apr-26
May-26
Nebraska Registered AMCs


Appraisal Management Companies - Five Year Trend
Number of AMCs
100
95
90
85
80
75
70
65
94
81
74
72
72
May-22
May-23
May-24
May-25
May-26
Nebraska Registered AMCs

NEBRASKA REAL PROPERTY APPRAISER BOARD

DIRECTOR APPROVAL OF REAL PROPERTY APPRAISER APPLICANTS

April 8, 2026 – May 12, 2026

New Certified General Real Property Appraisers through Reciprocity		
CGRA260002	Dyslin, Tanner	Approved May 1, 2026

NEBRASKA REAL PROPERTY APPRAISER BOARD

DIRECTOR APPROVAL OF EDUCATION ACTIVITY AND INSTRUCTOR(S) APPLICANTS

April 8, 2026 – May 12, 2026

Provider	Activity Number	Hours	Title	Instructor(s)	Approval Date
New Continuing Education Activities and Instructors					
Appraisal Institute	2262417.02	15.00	Practical Applications in Appraising Green Commercial Properties	Sandra Adomatis, Stacey Thoyre	04/15/2026
Appraiser eLearning	2263429.33	4.00	Grey Matters: Judgement in Residential Appraising	Steven Kahane	04/17/2026
ASFMRA	2261427.01	8.00	Working as an Expert Witness	Sean Minihan, Brian Gatzke	04/21/2026
ASFMRA	2263428.01	8.00	Working as an Expert Witness	Sean Minihan, Brian Gatzke	04/21/2026
Appraisal Institute	2261432.02	4.00	Cost Approach and Site Valuation in the New URAR	Jason Tillema, Sandra Adomatis, Byron Miller, Jared Preisler, James Atwood, Betty Jo Cagle, Jason Ferris, Woody Fincham, Mark Freitag, R Scott Hartman, Alan Hummel, Jennifer Marshall, Lisa Meinczinger-Gulden, Jose Rodriguez, Mark Smeltzer, Maureen Sweeney, Stephen Wagner	05/07/2026
Appraisal Institute	2263433.02	4.00	Cost Approach and Site Valuation in the New URAR	Jason Tillema, Sandra Adomatis, Byron Miller, Jared Preisler, James Atwood, Betty Jo Cagle, Jason Ferris, Woody Fincham, Mark Freitag, R Scott Hartman, Alan Hummel, Jennifer Marshall, Liza Meinczinger-Gulden, Jose Rodriguez, Mark Smeltzer, Maureen Sweeney, Stephen Wagner	05/07/2026

New Qualifying Education Activities and Instructors					
Appraisal Institute	1262131.02	15.00	15-Hour Equivalent USPAP Course	Craig Harrington	05/02/2026

2025-26 Nebraska Real Property Appraiser Board Goals and Objectives
June 17, 2025 Strategic Planning Meeting

	SHORT TERM GOALS / OBJECTIVES	EXPECTED COMPLETION DATE	STATUS/GOAL MET	LONG TERM GOALS / OBJECTIVES	EXPECTED COMPLETION DATE	NOTES
LAWS, RULES, AND GUIDANCE DOCUMENTS	Adopt Title 298 changes to implement the Real Property Appraiser Qualification Criteria Effective January 1, 2026 for real property appraisers credentialed prior to January 1, 2026 that upgrade to a higher classification after January 1, 2026 and to implement the CHRC Fee changes as increased by the Nebraska State Patrol.	6/30/2026	AGO approved January 2, 2026, under GPRO review.	Continue to monitor the effectiveness of regulations to reduce unnecessary regulatory burden, remove barriers to entry into the real property appraiser profession, maintain an effective education program, maintain an effective enforcement program, and provide for better clarification and administration.	Ongoing.	
				Harmonize Title 298 with the changes made to the Nebraska Real Property Appraiser Act and Appraisal Management Company Registration Act as needed.	Ongoing.	
				Address changes to USPAP, Real Property Appraiser Qualifications Criteria, ASC Policy Statements, AQB CAP Program Guidelines, and Title XI as required.	Ongoing.	
				Continue to adopt Guidance Documents for public advisement concerning interpretation of statutes and rules, and retire Guidance Documents that are no longer relevant.	Ongoing.	
				Continue to adopt internal procedures as needed to assist with the Board's administration of its programs, and retire internal procedures that are no longer relevant.	Ongoing.	
COMPLIANCE	None.			None.		
CREDENTIALING AND REGISTRATION	For real property appraiser and AMC applications available online, explore offering paper applications upon request only for processing fee.	12/31/2025	Completed August 21, 2025.	Monitor real property appraiser credential renewal dates.	Ongoing.	
	Explore use of SARAS Grant to increase the number of Nebraska resident real property appraisers.	6/30/2026	Completed February 19, 2026.			
	Explore separate fee structure for credentialing through reciprocity.	12/31/2025	Completed July 17, 2025.			
	Review current AMC fees.	12/31/2025	Completed August 21, 2025.			
EDUCATION	Reach out to Nebraska community colleges with real estate degree programs to gauge interest in obtaining AQB CAP Approval.	6/30/2026	Review completed May 4, 2026.	Encourage trainee real property appraisers who intend to engage in real property appraisal practice pertaining to agricultural real property upon credentialing as a certified general real property appraiser complete agricultural-based qualifying education offered by an education provider with an expertise in agricultural appraisal in approval letter sent to trainee real property appraisers.	Ongoing.	
				Request that supervisory real property appraisers with trainee real property appraisers who intend to engage in real property appraisal practice pertaining to agricultural real property upon credentialing as a certified general real property appraiser encourage their trainee real property appraisers to complete agricultural-based qualifying education offered by an education provider with an expertise in agricultural appraisal in approval letter sent to supervisory real property appraisers.	Ongoing.	
PERSONNEL	None.			Continue updating the policies and procedures documents as needed to ensure compliance with state policy changes, NAPE/ASFCME contract changes, and to address general work environment needs and/or changes.	Ongoing.	
PUBLIC INFORMATION	Populate the Disciplinary History Search with all real property appraiser and AMC disciplinary action history for active credential and registration holders.	6/30/2026	Review in progress.	Encourage development of Memos from the Board and Facebook posts, and The Nebraska Appraiser articles that contain facts of interest to the appraisal business community.	Ongoing.	
				Continue utilizing the NRPAB website, NRPAB Facebook page, The Nebraska Appraiser, and Memos from the Board to disseminate relevant and important information to the appraisal business community and the general public in a timely manner. This includes information related to state and federal regulations, credentialing and registration requirements, renewal information, education information, Board policies and procedures, documents posted to the NRPAB website, meeting information, and other information that affects the industry.	Ongoing.	
				Continue utilization of Memos from the Board to disseminate important information in a timely manner that should not be held for the next release of The Nebraska Appraiser.	Ongoing.	
				Continue releasing new issues of The Nebraska Appraiser on a quarterly basis to disseminate important information to the appraisal business community and the general public in an effective and efficient manner.	Ongoing.	
				Continue utilization of the NRPAB Facebook page to disseminate important information in a timely manner that that appraisal business community and general public would otherwise not be aware of, such as documents posted to the NRPAB website, meeting information, and NRPAB policy and business information.	Ongoing.	
				Continue to monitor the effectiveness of current NRPAB website, and repair bugs and make improvements and add enhancements needed to address functionality or use.	Ongoing.	
ADMINISTRATION	Utilize SARAS Grant for development and implementation of online real property appraiser reciprocity application and NRPAB Database interface, and development and of online education applications and NRPAB Database interface.	6/30/2026	Development of online real property appraiser reciprocity application and NRPAB Database interface completed and moved to production on March 10, 2026. Conceptual design and preliminary setup work for online education applications and NRPAB Database interface completed, initial coding in progress.	Continue to monitor the effectiveness of current processes and procedures, and update processes and procedures as needed to maintain effectiveness and efficiency of the administration of the Board's programs.	Ongoing.	
				Continue to monitor the effectiveness of current NRPAB database, repair bugs, and make improvements and add enhancements needed to address program or use changes.	Ongoing.	
				Explore online real property appraiser through E,E,&E initial applications, AMC initial application, and other services that require payment of a fee.	Ongoing.	
				Explore use of AI for business functions to automate tasks and for data analysis.	Ongoing.	
				Explore use of SARAS Grant to develop application in NRPAB Database to accept credit card payments through credit card vendor for online applications.	Ongoing.	
FINANCIALS	Submit Budget Deficit Request for $12,263.00 deficit to Health Insurance Expenses (515500) for FY2025-26, and for $12,876.00 deficit to Health Insurance Expenses (515500) for FY2026-27, due to 18.5% cost of insurance increase to the agency as notified by DAS on June 13, 2025.	11/1/2025	Completed September 18, 2025.	None.		

2025-26 NRPAB SWOT Analysis			
STRENGTHS: -	**WEAKNESSES:**	**OPPORTUNITIES:**	**THREATS:**
* Customer service	* Industry's inability to grow	* Growth in real property appraiser field	* Agency turnover
* Organization	* Efficiency loss due to database not meeting potential	* Continued evaluation of Board and Agency operations	* Federal agency oversight
* Board member knowledge	* Regulatory and statutory barriers	* Embrace of available technology	* Economic climate
* Staff knowledge		* Agency staff size and cross-training of Agency duties	* Aging appraiser population
* Adaptability		* Board member with residential appraisal expertise	* Inadequate supervisory appraiser knowledge
* Professional diversity of Board		* Utilization of ASC grant funding for technology projects	* Deemphasis on appraisals at the Federal level
* Modernization of accessibility		* Education of users of appraisal reports	* Commodification of appraisal reports
* Authority to enter into contingent dismissal agreements		* Utilization of ASC grant to increase NE appraiser numbers	* Business consolidation
			* Government consolidation

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

ACCOUNT CODE	DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
BUDGETED FUND TYPES - EXPENDITURES							
510000 PERSONAL SERVICES							
511100	PERMANENT SALARIES-WAGES	221,345.91	26,402.55	180,736.25	81.65		40,609.66
511600	PER DIEM PAYMENTS	8,500.00	1,000.00	5,600.00	65.88		2,900.00
511700	EMPLOYEE BONUSES	2,000.00		2,000.00	100.00		
511800	COMPENSATORY TIME PAID		105.73	105.73			105.73-
512100	VACATION LEAVE EXPENSE	17,312.93	1,208.09	10,285.30	59.41		7,027.63
512200	SICK LEAVE EXPENSE	1,964.37	377.41	1,971.90	100.38		7.53-
512300	HOLIDAY LEAVE EXPENSE	12,227.25		12,114.09	99.07		113.16
512500	FUNERAL LEAVE EXPENSE			143.65			143.65-
Personal Services Subtotal		263,350.46	29,093.78	212,956.92	80.86	0.00	50,393.54
515100	RETIREMENT PLANS EXPENSE	19,137.02	2,103.63	15,376.91	80.35		3,760.11
515200	FICA EXPENSE	20,071.09	2,041.74	14,465.67	72.07		5,605.42
515500	HEALTH INSURANCE EXPENSE	78,425.00	6,533.44	65,334.40	83.31		13,090.60
516500	WORKERS COMP PREMIUMS	1,366.00		1,366.00	100.00		
Major Account 510000 Total		382,349.57	39,772.59	309,499.90	80.95	0.00	72,849.67
520000 OPERATING EXPENSES							
521100	POSTAGE EXPENSE	2,654.22	158.45	2,354.47	88.71		299.75
521400	CIO CHARGES	37,636.61	5,777.33	26,877.28	71.41		10,759.33
521500	PUBLICATION & PRINT EXP	3,378.08		2,086.59	61.77		1,291.49
521900	AWARDS EXPENSE	50.00		28.00	56.00		22.00
522100	DUES & SUBSCRIPTION EXP	600.00		600.00	100.00		
524600	RENT EXPENSE-BUILDINGS	13,767.10	1,138.38	11,428.90	83.02		2,338.20
524900	RENT EXP-DEPR SURCHARGE	4,664.00	388.64	3,886.40	83.33		777.60
531100	OFFICE SUPPLIES EXPENSE	1,792.47		1,446.37	80.69		346.10
532100	NON-CAPITALIZED EQUIP PU	150.00		159.98	106.65		9.98-
532200	PERSONAL COMPUTING EQUIPMENT	219.89					219.89
532280	VIDEO EQUIP			229.98			229.98-
541100	ACCTG & AUDITING SERVICES	2,986.00		2,986.00	100.00		
541200	PURCHASING ASSESSMENT	41.00		42.00	102.44		1.00-
541500	LEGAL SERVICES EXPENSE	20,020.00		163.50	.82		19,856.50
541700	LEGAL RELATED EXPENSE	3,031.00		31.00	1.02		3,000.00
547100	EDUCATIONAL SERVICES	51.00		51.00	100.00		

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

	ACCOUNT CODE DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
554900	OTHER CONTRACTUAL SERVICES	31,294.50	2,703.75	13,252.77	42.35		18,041.73
556100	INSURANCE EXPENSE	93.00		14.79	15.90		78.21
559100	OTHER OPERATING EXP	449.44	60.00	459.44	102.22		10.00-
Major Account 520000 Total		122,878.31	10,226.55	66,098.47	53.79	0.00	56,779.84
570000 TRAVEL EXPENSES							
571100	LODGING	2,750.11	110.00	2,090.00	76.00		660.11
571800	MEALS - TRAVEL STATUS	2,142.20	214.20	1,285.20	59.99		857.00
573100	STATE-OWNED TRANSPORT	200.00					200.00
574500	PERSONAL VEHICLE MILEAGE	7,282.40	820.72	4,815.68	66.13		2,466.72
575100	MISC TRAVEL EXPENSE	475.95	46.45	290.03	60.94		185.92
Major Account 570000 Total		12,850.66	1,191.37	8,480.91	66.00	0.00	4,369.75
BUDGETED EXPENDITURES TOTAL		518,078.54	51,190.51	384,079.28	74.14	0.00	133,999.26
SUMMARY BY FUND TYPE - EXPENDITURES							
2	CASH FUNDS	518,078.54	51,190.51	384,079.28	74.14		133,999.26
BUDGETED EXPENDITURES TOTAL		518,078.54	51,190.51	384,079.28	74.14	0.00	133,999.26
BUDGETED FUND TYPES - REVENUES							
470000 REVENUE - SALES AND CHARGES							
471100	SALE OF SERVICES	450.00-		300.00-	66.67		150.00-
471120	QUALIFYING ED COURSE FEES	2,010.00-	70.00-	840.00-	41.79		1,170.00-
471121	CONTINUING ED NEW FEES	6,075.00-	500.00-	4,005.00-	65.93		2,070.00-
471122	CONTINUING ED RENEWAL FEES	225.00-	15.00-	150.00-	66.67		75.00-
475150	CERTIFIED GENERAL NEW FEES	9,600.00-		10,340.00-	107.71		740.00
475151	LICENSED NEW FEES	640.00-	320.00-	1,260.00-	196.88		620.00
475152	FINGERPRINT FEES	2,262.50-	135.75-	2,036.25-	90.00		226.25-
475153	CERTIFIED RESIDENTIAL NEW	2,560.00-		1,240.00-	48.44		1,320.00-
475154	CERTIFIED GENERAL RENEWAL	103,200.00-		109,150.00-	105.77		5,950.00
475155	LICENSED RENEWAL	8,100.00-		10,150.00-	125.31		2,050.00
475157	CERTIFIED RESIDENTIAL RENEWAL	62,100.00-		57,000.00-	91.79		5,100.00-
475161	TEMPORARY CERTIFIED GENERAL	11,200.00-	980.00-	10,620.00-	94.82		580.00-
475163	AMC REGISTERED NEW FEES	6,000.00-		10,000.00-	166.67		4,000.00

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

	ACCOUNT CODE DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
475164	AMC APPLICATION FEES	1,050.00-		1,750.00-	166.67		700.00
475165	AMC REGISTERED RENEWAL	110,500.00-	11,900.00-	103,500.00-	93.67		7,000.00-
475166	FED REG AMC RPT FORM PROC FEES	700.00-		700.00-	100.00		
475169	LICENSED INACTIVE			300.00-			300.00
475234	APPLICATION FEES	27,700.00-	2,190.00-	26,010.00-	93.90		1,690.00-
476101	LATE PROCESSING FEES	4,025.00-	50.00-	4,725.00-	117.39		700.00
Major Account 470000 Total		358,397.50-	16,160.75-	354,076.25-	98.79	0.00	4,321.25-
480000 REVENUE - MISCELLANEOUS							
481100	INVESTMENT INCOME	21,000.00-	1,012.95-	14,738.38-	70.18		6,261.62-
484500	REIMB NON-GOVT SOURCES	6,000.00-	54.65-	9,306.74-	155.11		3,306.74
Major Account 480000 Total		27,000.00-	1,067.60-	24,045.12-	89.06	0.00	2,954.88-
490000 REVENUE - OTHER FINANCIAL SOURCES/U							
493200	OPERATING TRANSFERS OUT			250,000.00			250,000.00-
Major Account 490000 Total		0.00	0.00	250,000.00	0.00	0.00	250,000.00-
BUDGETED REVENUE TOTAL		385,397.50-	17,228.35-	128,121.37-	33.24	0.00	257,276.13-

SUMMARY BY FUND TYPE - REVENUE

2	CASH FUNDS	385,397.50-	17,228.35-	128,121.37-	33.24		257,276.13-
BUDGETED REVENUE TOTAL		385,397.50-	17,228.35-	128,121.37-	33.24	0.00	257,276.13-

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

ACCOUNT CODE	DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
BUDGETED FUND TYPES - EXPENDITURES							
510000 PERSONAL SERVICES							
511100	PERMANENT SALARIES-WAGES	143,874.85	17,161.57	117,476.85	81.65		26,398.00
511600	PER DIEM PAYMENTS	5,525.00	650.00	3,640.00	65.88		1,885.00
511700	EMPLOYEE BONUSES	1,300.00		1,300.00	100.00		
511800	COMPENSATORY TIME PAID		68.67	68.67			68.67-
512100	VACATION LEAVE EXPENSE	11,253.40	785.40	6,684.72	59.40		4,568.68
512200	SICK LEAVE EXPENSE	1,276.84	245.08	1,281.12	100.34		4.28-
512300	HOLIDAY LEAVE EXPENSE	7,947.71		7,874.10	99.07		73.61
512500	FUNERAL LEAVE EXPENSE			93.37			93.37-
Personal Services Subtotal		171,177.80	18,910.72	138,418.83	80.86	0.00	32,758.97
515100	RETIREMENT PLANS EXPENSE	12,439.09	1,367.35	9,994.69	80.35		2,444.40
515200	FICA EXPENSE	13,046.20	1,327.08	9,402.22	72.07		3,643.98
515500	HEALTH INSURANCE EXPENSE	50,976.25	4,246.66	42,466.58	83.31		8,509.67
516500	WORKERS COMP PREMIUMS	887.90		887.90	100.00		
Major Account 510000 Total		248,527.24	25,851.81	201,170.22	80.94	0.00	47,357.02
520000 OPERATING EXPENSES							
521100	POSTAGE EXPENSE	2,349.13	100.12	2,130.47	90.69		218.66
521400	CIO CHARGES	24,563.02	1,095.46	15,217.15	61.95		9,345.87
521500	PUBLICATION & PRINT EXP	2,195.75		1,576.10	71.78		619.65
521900	AWARDS EXPENSE	32.50		18.20	56.00		14.30
522100	DUES & SUBSCRIPTION EXP	390.00		390.00	100.00		
524600	RENT EXPENSE-BUILDINGS	8,948.61	739.94	7,428.73	83.02		1,519.88
524900	RENT EXP-DEPR SURCHARGE	3,031.60	252.62	2,526.20	83.33		505.40
531100	OFFICE SUPPLIES EXPENSE	1,173.97		1,342.23	114.33		168.26-
532100	NON-CAPITALIZED EQUIP PU	97.50		103.99	106.66		6.49-
532200	PERSONAL COMPUTING EQUIPMENT	142.93					142.93
532280	VIDEO EQUIP			149.49			149.49-
541100	ACCTG & AUDITING SERVICES	1,940.90		1,940.90	100.00		
541200	PURCHASING ASSESSMENT	26.65		27.30	102.44		.65-
541500	LEGAL SERVICES EXPENSE	18,000.00		143.50	.80		17,856.50
541700	LEGAL RELATED EXPENSE	2,731.00		31.00	1.14		2,700.00
547100	EDUCATIONAL SERVICES	33.15		33.15	100.00		

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

	ACCOUNT CODE DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
554900	OTHER CONTRACTUAL SERVICES	30,644.50	2,703.75	12,810.70	41.80		17,833.80
556100	INSURANCE EXPENSE	60.45		9.61	15.90		50.84
559100	OTHER OPERATING EXP	279.14	20.00	379.44	135.93		100.30-
Major Account 520000 Total		96,640.80	4,911.89	46,258.16	47.87	0.00	50,382.64
570000 TRAVEL EXPENSES							
571100	LODGING	1,787.57	71.50	1,358.50	76.00		429.07
571800	MEALS - TRAVEL STATUS	1,392.43	139.23	835.38	59.99		557.05
573100	STATE-OWNED TRANSPORT	130.00					130.00
574500	PERSONAL VEHICLE MILEAGE	4,733.56	533.45	3,130.17	66.13		1,603.39
575100	MISC TRAVEL EXPENSE	309.37	30.19	188.56	60.95		120.81
Major Account 570000 Total		8,352.93	774.37	5,512.61	66.00	0.00	2,840.32
BUDGETED EXPENDITURES TOTAL		353,520.97	31,538.07	252,940.99	71.55	0.00	100,579.98
SUMMARY BY FUND TYPE - EXPENDITURES							
2	CASH FUNDS	353,520.97	31,538.07	252,940.99	71.55		100,579.98
BUDGETED EXPENDITURES TOTAL		353,520.97	31,538.07	252,940.99	71.55	0.00	100,579.98
BUDGETED FUND TYPES - REVENUES							
470000 REVENUE - SALES AND CHARGES							
471100	SALE OF SERVICES	450.00-		300.00-	66.67		150.00-
471120	QUALIFYING ED COURSE FEES	2,010.00-	70.00-	840.00-	41.79		1,170.00-
471121	CONTINUING ED NEW FEES	6,075.00-	500.00-	4,005.00-	65.93		2,070.00-
471122	CONTINUING ED RENEWAL FEES	225.00-	15.00-	150.00-	66.67		75.00-
475150	CERTIFIED GENERAL NEW FEES	9,600.00-		10,340.00-	107.71		740.00
475151	LICENSED NEW FEES	640.00-	320.00-	1,260.00-	196.88		620.00
475152	FINGERPRINT FEES	2,262.50-	135.75-	2,036.25-	90.00		226.25-
475153	CERTIFIED RESIDENTIAL NEW	2,560.00-		1,240.00-	48.44		1,320.00-
475154	CERTIFIED GENERAL RENEWAL	103,200.00-		109,150.00-	105.77		5,950.00
475155	LICENSED RENEWAL	8,100.00-		10,150.00-	125.31		2,050.00
475157	CERTIFIED RESIDENTIAL RENEWAL	62,100.00-		57,000.00-	91.79		5,100.00-
475161	TEMPORARY CERTIFIED GENERAL	11,200.00-	980.00-	10,620.00-	94.82		580.00-
475169	LICENSED INACTIVE			300.00-			300.00

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

ACCOUNT CODE	DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
475234	APPLICATION FEES	27,700.00-	2,190.00-	26,010.00-	93.90		1,690.00-
476101	LATE PROCESSING FEES	3,750.00-		4,150.00-	110.67		400.00
Major Account 470000 Total		239,872.50-	4,210.75-	237,551.25-	99.03	0.00	2,321.25-
480000 REVENUE - MISCELLANEOUS							
481100	INVESTMENT INCOME	12,000.00-	560.51-	8,180.74-	68.17		3,819.26-
484500	REIMB NON-GOVT SOURCES	5,000.00-	22.52-	8,243.38-	164.87		3,243.38
Major Account 480000 Total		17,000.00-	583.03-	16,424.12-	96.61	0.00	575.88-
490000 REVENUE - OTHER FINANCIAL SOURCES/U							
493200	OPERATING TRANSFERS OUT			150,000.00			150,000.00-
Major Account 490000 Total		0.00	0.00	150,000.00	0.00	0.00	150,000.00-
BUDGETED REVENUE TOTAL		256,872.50-	4,793.78-	103,975.37-	40.48	0.00	152,897.13-

SUMMARY BY FUND TYPE - REVENUE

2	CASH FUNDS	256,872.50-	4,793.78-	103,975.37-	40.48		152,897.13-
BUDGETED REVENUE TOTAL		256,872.50-	4,793.78-	103,975.37-	40.48	0.00	152,897.13-

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

ACCOUNT CODE	DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
BUDGETED FUND TYPES - EXPENDITURES							
510000 PERSONAL SERVICES							
511100	PERMANENT SALARIES-WAGES	77,471.06	9,240.98	63,259.40	81.66		14,211.66
511600	PER DIEM PAYMENTS	2,975.00	350.00	1,960.00	65.88		1,015.00
511700	EMPLOYEE BONUSES	700.00		700.00	100.00		
511800	COMPENSATORY TIME PAID		37.06	37.06			37.06-
512100	VACATION LEAVE EXPENSE	6,059.53	422.69	3,600.58	59.42		2,458.95
512200	SICK LEAVE EXPENSE	687.53	132.33	690.78	100.47		3.25-
512300	HOLIDAY LEAVE EXPENSE	4,279.54		4,239.99	99.08		39.55
512500	FUNERAL LEAVE EXPENSE			50.28			50.28-
Personal Services Subtotal		92,172.66	10,183.06	74,538.09	80.87	0.00	17,634.57
515100	RETIREMENT PLANS EXPENSE	6,697.93	736.28	5,382.22	80.36		1,315.71
515200	FICA EXPENSE	7,024.89	714.66	5,063.45	72.08		1,961.44
515500	HEALTH INSURANCE EXPENSE	27,448.75	2,286.78	22,867.82	83.31		4,580.93
516500	WORKERS COMP PREMIUMS	478.10		478.10	100.00		
Major Account 510000 Total		133,822.33	13,920.78	108,329.68	80.95	0.00	25,492.65
520000 OPERATING EXPENSES							
521100	POSTAGE EXPENSE	305.09	58.33	224.00	73.42		81.09
521400	CIO CHARGES	13,073.59	4,681.87	11,660.13	89.19		1,413.46
521500	PUBLICATION & PRINT EXP	1,182.33		510.49	43.18		671.84
521900	AWARDS EXPENSE	17.50		9.80	56.00		7.70
522100	DUES & SUBSCRIPTION EXP	210.00		210.00	100.00		
524600	RENT EXPENSE-BUILDINGS	4,818.49	398.44	4,000.17	83.02		818.32
524900	RENT EXP-DEPR SURCHARGE	1,632.40	136.02	1,360.20	83.33		272.20
531100	OFFICE SUPPLIES EXPENSE	618.50		104.14	16.84		514.36
532100	NON-CAPITALIZED EQUIP PU	52.50		55.99	106.65		3.49-
532200	PERSONAL COMPUTING EQUIPMENT	76.96					76.96
532280	VIDEO EQUIP			80.49			80.49-
541100	ACCTG & AUDITING SERVICES	1,045.10		1,045.10	100.00		
541200	PURCHASING ASSESSMENT	14.35		14.70	102.44		.35-
541500	LEGAL SERVICES EXPENSE	2,020.00		20.00	.99		2,000.00
541700	LEGAL RELATED EXPENSE	300.00					300.00
547100	EDUCATIONAL SERVICES	17.85		17.85	100.00		

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

	ACCOUNT CODE DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
554900	OTHER CONTRACTUAL SERVICES	650.00		442.07	68.01		207.93
556100	INSURANCE EXPENSE	32.55		5.18	15.91		27.37
559100	OTHER OPERATING EXP	170.30	40.00	80.00	46.98		90.30
Major Account 520000 Total		26,237.51	5,314.66	19,840.31	75.62	0.00	6,397.20
570000 TRAVEL EXPENSES							
571100	LODGING	962.54	38.50	731.50	76.00		231.04
571800	MEALS - TRAVEL STATUS	749.77	74.97	449.82	59.99		299.95
573100	STATE-OWNED TRANSPORT	70.00					70.00
574500	PERSONAL VEHICLE MILEAGE	2,548.84	287.27	1,685.51	66.13		863.33
575100	MISC TRAVEL EXPENSE	166.58	16.26	101.47	60.91		65.11
Major Account 570000 Total		4,497.73	417.00	2,968.30	66.00	0.00	1,529.43
BUDGETED EXPENDITURES TOTAL		164,557.57	19,652.44	131,138.29	79.69	0.00	33,419.28
SUMMARY BY FUND TYPE - EXPENDITURES							
2	CASH FUNDS	164,557.57	19,652.44	131,138.29	79.69		33,419.28
BUDGETED EXPENDITURES TOTAL		164,557.57	19,652.44	131,138.29	79.69	0.00	33,419.28
BUDGETED FUND TYPES - REVENUES							
470000 REVENUE - SALES AND CHARGES							
475163	AMC REGISTERED NEW FEES	6,000.00-		10,000.00-	166.67		4,000.00
475164	AMC APPLICATION FEES	1,050.00-		1,750.00-	166.67		700.00
475165	AMC REGISTERED RENEWAL	110,500.00-	11,900.00-	103,500.00-	93.67		7,000.00-
475166	FED REG AMC RPT FORM PROC FEES	700.00-		700.00-	100.00		
476101	LATE PROCESSING FEES	275.00-	50.00-	575.00-	209.09		300.00
Major Account 470000 Total		118,525.00-	11,950.00-	116,525.00-	98.31	0.00	2,000.00-
480000 REVENUE - MISCELLANEOUS							
481100	INVESTMENT INCOME	9,000.00-	452.44-	6,557.64-	72.86		2,442.36-
484500	REIMB NON-GOVT SOURCES	1,000.00-	32.13-	1,063.36-	106.34		63.36
Major Account 480000 Total		10,000.00-	484.57-	7,621.00-	76.21	0.00	2,379.00-

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

ACCOUNT CODE DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
490000 REVENUE - OTHER FINANCIAL SOURCES/U						
493200 OPERATING TRANSFERS OUT			100,000.00			100,000.00-
Major Account 490000 Total	0.00	0.00	100,000.00	0.00	0.00	100,000.00-
BUDGETED REVENUE TOTAL	128,525.00-	12,434.57-	24,146.00-	18.79	0.00	104,379.00-

SUMMARY BY FUND TYPE - REVENUE

2 CASH FUNDS	128,525.00-	12,434.57-	24,146.00-	18.79		104,379.00-
BUDGETED REVENUE TOTAL	128,525.00-	12,434.57-	24,146.00-	18.79	0.00	104,379.00-

Fund	Program	Sub-Program	Account Number	Sub-ledger	Doc Number	Tran Date	Tran Type	Batch Type	Payee/Explanation	Batch Number	Posted Code	Month to Date
25310	079	000	53105018.471120.		668171	04/01/26	RC	RB	NRPAB DEPOSIT 260401	8193800		70.00-
Total for Object			471120 QUALIFYING ED COURSE FEES									70.00-
25310	079	000	53105018.471121.		668171	04/01/26	RC	RB	NRPAB DEPOSIT 260401	8193800		500.00-
Total for Object			471121 CONTINUING ED NEW FEES									500.00-
25310	079	000	53105018.471122.		669349	04/09/26	RC	RB	NRPAB DEPOSIT 260409	8203590		15.00-
Total for Object			471122 CONTINUING ED RENEWAL FEES									15.00-
25310	079	000	53105018.475151.		671142	04/21/26	RC	RB	NRPAB DEPOSIT 260421	8216617		320.00-
Total for Object			475151 LICENSED NEW FEES									320.00-
25310	079	000	53105018.475152.		668844	04/07/26	RC	RB	NRPAB DEPOSIT 260407	8200485		45.25-
25310	079	000	53105018.475152.		671142	04/21/26	RC	RB	NRPAB DEPOSIT 260421	8216617		45.25-
25310	079	000	53105018.475152.		671099	04/20/26	RC	RB	NRPAB APP EFW DEPOSIT 260420	8216635		45.25-
Total for Object			475152 FINGERPRINT FEES									135.75-
25310	079	000	53105018.475161.		668501	04/02/26	RC	RB	NRPAB APP EFW DEPOSIT 260402	8197073		70.00-
25310	079	000	53105018.475161.		668876	04/06/26	RC	RB	NRPAB APP EFW DEPOSIT 260406	8200325		70.00-
25310	079	000	53105018.475161.		668844	04/07/26	RC	RB	NRPAB DEPOSIT 260407	8200485		140.00-
25310	079	000	53105018.475161.		27775482	04/08/26	JE	G	NRPAB JAN-MAR 2026 ACH RETURNS	8204680		70.00
25310	079	000	53105018.475161.		670012	04/13/26	RC	RB	NRPAB APP EFW DEPOSIT 260413	8208552		70.00-
25310	079	000	53105018.475161.		670334	04/16/26	RC	RB	NRPAB DEPOSIT 260416	8211765		70.00-
25310	079	000	53105018.475161.		671099	04/20/26	RC	RB	NRPAB APP EFW DEPOSIT 260420	8216635		280.00-
25310	079	000	53105018.475161.		672415	04/28/26	RC	RB	NRPAB APP EFW DEPOSIT 260428	8225558		350.00-
Total for Object			475161 TEMPORARY CERTIFIED GENERAL									980.00-
25310	079	000	53105018.475234.		668501	04/02/26	RC	RB	NRPAB APP EFW DEPOSIT 260402	8197073		120.00-
25310	079	000	53105018.475234.		668876	04/06/26	RC	RB	NRPAB APP EFW DEPOSIT 260406	8200325		120.00-
25310	079	000	53105018.475234.		668844	04/07/26	RC	RB	NRPAB DEPOSIT 260407	8200485		410.00-
25310	079	000	53105018.475234.		27775482	04/08/26	JE	G	NRPAB JAN-MAR 2026 ACH RETURNS	8204680		120.00
25310	079	000	53105018.475234.		670012	04/13/26	RC	RB	NRPAB APP EFW DEPOSIT 260413	8208552		120.00-
25310	079	000	53105018.475234.		670334	04/16/26	RC	RB	NRPAB DEPOSIT 260416	8211765		120.00-
25310	079	000	53105018.475234.		671142	04/21/26	RC	RB	NRPAB DEPOSIT 260421	8216617		170.00-
25310	079	000	53105018.475234.		671099	04/20/26	RC	RB	NRPAB APP EFW DEPOSIT 260420	8216635		650.00-
25310	079	000	53105018.475234.		672415	04/28/26	RC	RB	NRPAB APP EFW DEPOSIT 260428	8225558		600.00-
Total for Object			475234 APPLICATION FEES									2,190.00-
25310	079	000	53105018.481100.		27805911	04/13/26	JE	G	OIP Mar 2026 2.69832%	8209397		50.01-

Fund	Program	Sub-Program	Account Number	Sub-ledger	Doc Number	Tran Date	Tran Type	Batch Type	Payee/Explanation	Batch Number	Posted Code	Month to Date
Total for Object			481100 INVESTMENT INCOME									560.51-
25310	079	000	53105018.484500.		27821502	04/14/26	JE	G	Q4 2025 PCARD REBATE	8210365		34.65-
25310	079	000	53105018.484500.		27839553	04/15/26	JE	G	NRPAB PURCH CARD Q4 REBATE	8212330		12.13
Total for Object			484500 REIMB NON-GOVT SOURCES									22.52-
25310	079	000	53105018.511100.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		5,682.03
25310	079	000	53105018.511100.		3196705	04/15/26	T2	7	PAYROLL LABOR DISTRIBUTION	8202831		5,421.97
25310	079	000	53105018.511100.		3196822	04/29/26	T2	7	PAYROLL LABOR DISTRIBUTION	8218319		6,057.57
Total for Object			511100 PERMANENT SALARIES-WAGES									17,161.57
25310	079	000	53105018.511600.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		325.00
25310	079	000	53105018.511600.		3196822	04/29/26	T2	7	PAYROLL LABOR DISTRIBUTION	8218319		325.00
Total for Object			511600 PER DIEM PAYMENTS									650.00
25310	079	000	53105018.511800.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		68.67
Total for Object			511800 COMPENSATORY TIME PAID									68.67
25310	079	000	53105018.512100.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		140.77
25310	079	000	53105018.512100.		3196705	04/15/26	T2	7	PAYROLL LABOR DISTRIBUTION	8202831		615.23
25310	079	000	53105018.512100.		3196822	04/29/26	T2	7	PAYROLL LABOR DISTRIBUTION	8218319		29.40
Total for Object			512100 VACATION LEAVE EXPENSE									785.40
25310	079	000	53105018.512200.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		195.31
25310	079	000	53105018.512200.		3196705	04/15/26	T2	7	PAYROLL LABOR DISTRIBUTION	8202831		49.77
Total for Object			512200 SICK LEAVE EXPENSE									245.08
25310	079	000	53105018.515100.		3196380	04/01/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8186199		455.79
25310	079	000	53105018.515100.		3196706	04/15/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8202831		455.77
25310	079	000	53105018.515100.		3196823	04/29/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8218319		455.79
Total for Object			515100 RETIREMENT PLANS EXPENSE									1,367.35
25310	079	000	53105018.515200.		3196380	04/01/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8186199		430.70
25310	079	000	53105018.515200.		3196706	04/15/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8202831		405.88
25310	079	000	53105018.515200.		3196823	04/29/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8218319		490.50
Total for Object			515200 FICA EXPENSE									1,327.08
25310	079	000	53105018.515500.		3196380	04/01/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8186199		2,123.30
25310	079	000	53105018.515500.		3196706	04/15/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8202831		2,123.86

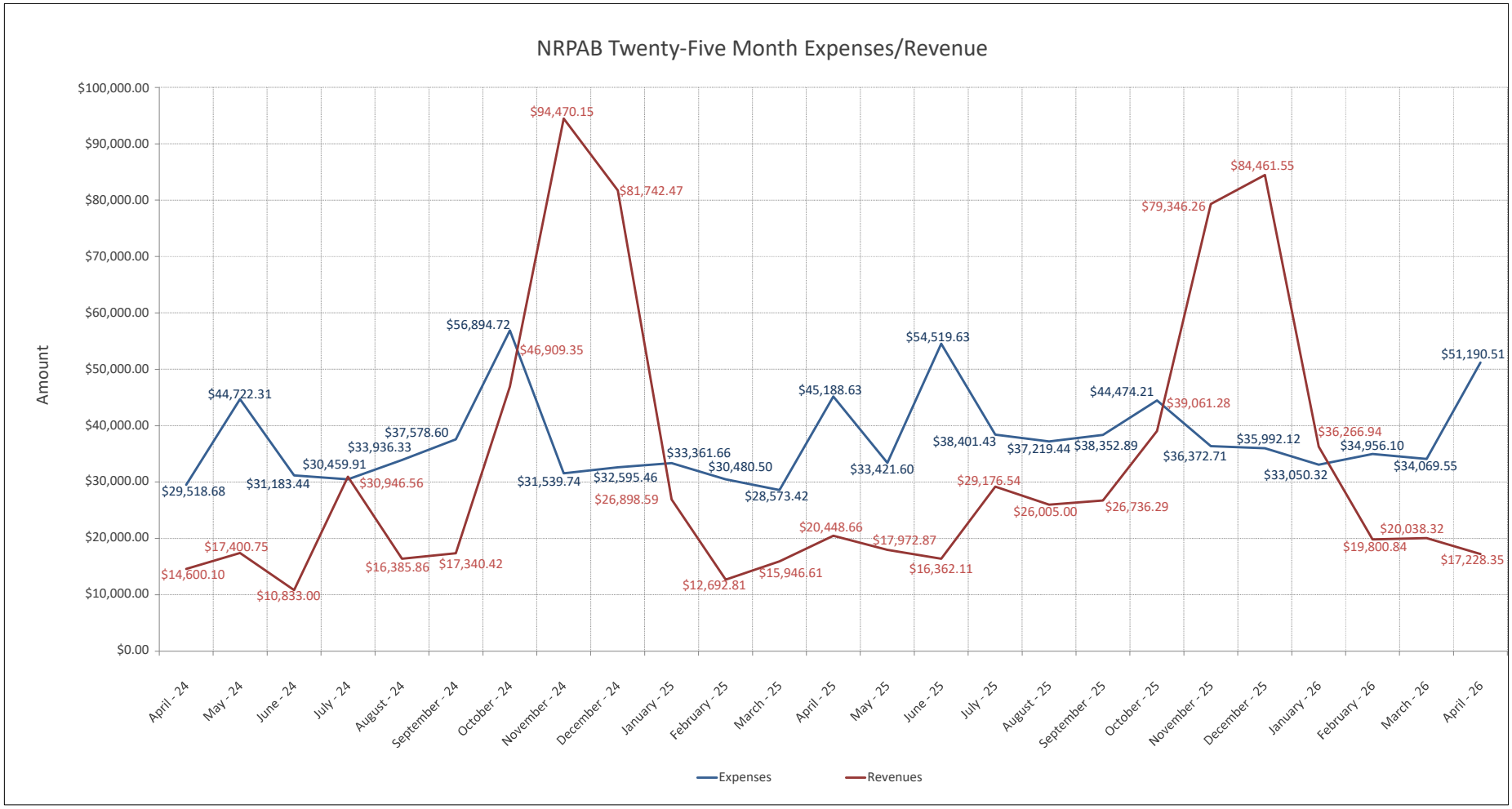
Fund	Program	Sub-Program	Account Number	Sub-ledger	Doc Number	Tran Date	Tran Type	Batch Type	Payee/Explanation	Batch Number	Posted Code	Month to Date
Total for Object			515500 HEALTH INSURANCE EXPENSE									4,246.66
25310	079	000	53105018.521100.		27687414	04/01/26	JE	G	NRPAB POSTAGE FEB 2026	8185684		41.28-
25310	079	000	53105018.521100.		27805916	04/13/26	JE	G	POSTAGE DUE MAR 2026	8209459		158.45
25310	079	000	53105018.521100.		27876087	04/21/26	JE	G	NRPAB POSTAGE MAR 2026	8219120		17.05-
Total for Object			521100 POSTAGE EXPENSE									100.12
25310	079	000	53105018.521400.		60126538	04/01/26	PV	V	AS - OCIO - COMMUNICATIONS	8188620		144.44
25310	079	000	53105018.521400.		60437006	04/15/26	PV	V	AS - OCIO - IMSERVICES	8212339		951.02
Total for Object			521400 CIO CHARGES									1,095.46
25310	079	000	53105018.524600.		27704768	04/07/26	JE	G	RENT & LB530 APR 2026-OTHER	8190410		1,112.53
25310	079	000	53105018.524600.		60289813	04/06/26	PV	V	SECRETARY OF STATE	8201557		16.80
25310	079	000	53105018.524600.		27775483	04/08/26	JE	G	NRPAB RENT APR 2026	8204693		389.39-
Total for Object			524600 RENT EXPENSE-BUILDINGS									739.94
25310	079	000	53105018.524900.		27704768	04/07/26	JE	G	RENT & LB530 APR 2026-OTHER	8190410		388.64
25310	079	000	53105018.524900.		27775483	04/08/26	JE	G	NRPAB RENT APR 2026	8204693		136.02-
Total for Object			524900 RENT EXP-DEPR SURCHARGE									252.62
25310	079	000	53105018.554900.		60289805	04/06/26	PV	V	VALUATION SERVICES INC	8201549		875.00
25310	079	000	53105018.554900.		60329774	04/08/26	PV	V	NEBRASKA STATE PATROL	8204667		110.00
25310	079	000	53105018.554900.		60364513	04/10/26	PV	V	KEENEY, JOHN	8207539		843.75
25310	079	000	53105018.554900.		60398546	04/14/26	PV	V	PROFESSIONAL PROPERTY VALUATIO	8210180		875.00
Total for Object			554900 OTHER CONTRACTUAL SERVICES									2,703.75
25310	079	000	53105018.559100.		60329796	04/08/26	PV	V	TREASURER, STATE	8204676		20.00
Total for Object			559100 OTHER OPERATING EXP									20.00
25310	079	000	53105018.571100.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		71.50
Total for Object			571100 LODGING									71.50
25310	079	000	53105018.571800.		60539900	04/21/26	PV	V	JOHNSON, RODNEY D	8219089		46.41
25310	079	000	53105018.571800.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		46.41
25310	079	000	53105018.571800.		60548740	04/22/26	PV	V	BATIE, ADAM	8220045		46.41
Total for Object			571800 MEALS - TRAVEL STATUS									139.23
25310	079	000	53105018.574500.		60089991	04/01/26	PV	V	HERMSEN, KEVIN P	8185677		40.53
25310	079	000	53105018.574500.		60539891	04/21/26	PV	V	HERMSEN, KEVIN P	8219078		40.53

Fund	Program	Sub-Program	Account Number	Sub-ledger	Doc Number	Tran Date	Tran Type	Batch Type	Payee/Explanation	Batch Number	Posted Code	Month to Date
25310	079	000	53105018.574500.		60539900	04/21/26	PV	V	JOHNSON, RODNEY D	8219089		116.87
25310	079	000	53105018.574500.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		213.00
25310	079	000	53105018.574500.		60548740	04/22/26	PV	V	BATIE, ADAM	8220045		122.52
Total for Object			574500 PERSONAL VEHICLE MILEAGE									533.45
25310	079	000	53105018.575100.		60089991	04/01/26	PV	V	HERMSEN, KEVIN P	8185677		3.15
25310	079	000	53105018.575100.		60539891	04/21/26	PV	V	HERMSEN, KEVIN P	8219078		2.66
25310	079	000	53105018.575100.		60539900	04/21/26	PV	V	JOHNSON, RODNEY D	8219089		7.80
25310	079	000	53105018.575100.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		8.78
25310	079	000	53105018.575100.		60548740	04/22/26	PV	V	BATIE, ADAM	8220045		7.80
Total for Object			575100 MISC TRAVEL EXPENSE									30.19
Total for Business Unit		53105018	NE REAL PROPERTY APPRAISER									26,744.29
25320	079	000	53105200.475165.		668502	04/02/26	RC	RB	NRPAB AMC REN EFW DEP 260402	8197081		1,700.00-
25320	079	000	53105200.475165.		668464	04/03/26	RC	RB	NRPAB AMC DEPOSIT 260403	8197091		1,700.00-
25320	079	000	53105200.475165.		668877	04/06/26	RC	RB	NRPAB AMC REN EFW DEP 260406	8200349		3,400.00-
25320	079	000	53105200.475165.		27775482	04/08/26	JE	G	NRPAB JAN-MAR 2026 ACH RETURNS	8204680		3,400.00
25320	079	000	53105200.475165.		670013	04/13/26	RC	RB	NRPAB AMC REN EFW DEP 260413	8208569		3,400.00-
25320	079	000	53105200.475165.		672405	04/28/26	RC	RB	NRPAB AMC REN EFW DEP 260428	8225571		3,400.00-
25320	079	000	53105200.475165.		672304	04/29/26	RC	RB	NRPAB AMC DEPOSIT 260429	8225586		1,700.00-
Total for Object			475165 AMC REGISTERED RENEWAL									11,900.00-
25320	079	000	53105200.476101.		668464	04/03/26	RC	RB	NRPAB AMC DEPOSIT 260403	8197091		50.00-
25320	079	000	53105200.476101.		27775482	04/08/26	JE	G	NRPAB JAN-MAR 2026 ACH RETURNS	8204680		50.00
25320	079	000	53105200.476101.		672405	04/28/26	RC	RB	NRPAB AMC REN EFW DEP 260428	8225571		50.00-
Total for Object			476101 LATE PROCESSING FEES									50.00-
25320	079	000	53105200.481100.		27805911	04/13/26	JE	G	OIP Mar 2026 2.69832%	8209397		452.44-
Total for Object			481100 INVESTMENT INCOME									452.44-
25320	079	000	53105200.484500.		668464	04/03/26	RC	RB	NRPAB AMC DEPOSIT 260403	8197091		20.00-
25320	079	000	53105200.484500.		27839553	04/15/26	JE	G	NRPAB PURCH CARD Q4 REBATE	8212330		12.13-
Total for Object			484500 REIMB NON-GOVT SOURCES									32.13-
25320	079	000	53105200.511100.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		3,059.72
25320	079	000	53105200.511100.		3196705	04/15/26	T2	7	PAYROLL LABOR DISTRIBUTION	8202831		2,919.55
25320	079	000	53105200.511100.		3196822	04/29/26	T2	7	PAYROLL LABOR DISTRIBUTION	8218319		3,261.71
Total for Object			511100 PERMANENT SALARIES-WAGES									9,240.98

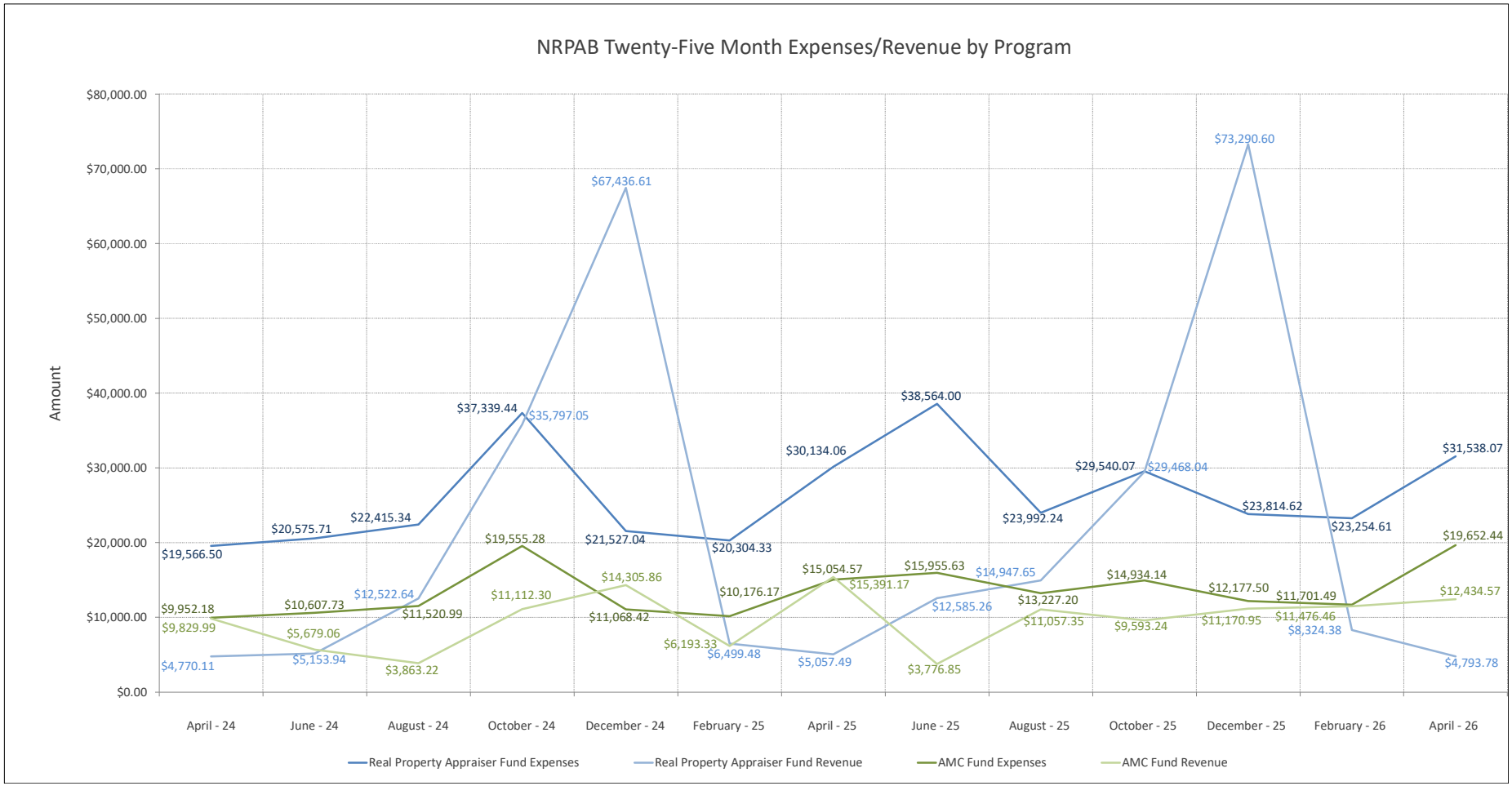
Fund	Program	Sub-Program	Account Number	Sub-ledger	Doc Number	Tran Date	Tran Type	Batch Type	Payee/Explanation	Batch Number	Posted Code	Month to Date
25320	079	000	53105200.511600.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		175.00
25320	079	000	53105200.511600.		3196822	04/29/26	T2	7	PAYROLL LABOR DISTRIBUTION	8218319		175.00
Total for Object			511600 PER DIEM PAYMENTS									350.00
25320	079	000	53105200.511800.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		37.06
Total for Object			511800 COMPENSATORY TIME PAID									37.06
25320	079	000	53105200.512100.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		75.72
25320	079	000	53105200.512100.		3196705	04/15/26	T2	7	PAYROLL LABOR DISTRIBUTION	8202831		331.06
25320	079	000	53105200.512100.		3196822	04/29/26	T2	7	PAYROLL LABOR DISTRIBUTION	8218319		15.91
Total for Object			512100 VACATION LEAVE EXPENSE									422.69
25320	079	000	53105200.512200.		3196379	04/01/26	T2	7	PAYROLL LABOR DISTRIBUTION	8186199		105.30
25320	079	000	53105200.512200.		3196705	04/15/26	T2	7	PAYROLL LABOR DISTRIBUTION	8202831		27.03
Total for Object			512200 SICK LEAVE EXPENSE									132.33
25320	079	000	53105200.515100.		3196380	04/01/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8186199		245.42
25320	079	000	53105200.515100.		3196706	04/15/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8202831		245.44
25320	079	000	53105200.515100.		3196823	04/29/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8218319		245.42
Total for Object			515100 RETIREMENT PLANS EXPENSE									736.28
25320	079	000	53105200.515200.		3196380	04/01/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8186199		231.96
25320	079	000	53105200.515200.		3196706	04/15/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8202831		218.57
25320	079	000	53105200.515200.		3196823	04/29/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8218319		264.13
Total for Object			515200 FICA EXPENSE									714.66
25320	079	000	53105200.515500.		3196380	04/01/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8186199		1,143.42
25320	079	000	53105200.515500.		3196706	04/15/26	T3	7	ACTUAL BURDEN JOURNAL ENTRIES	8202831		1,143.36
Total for Object			515500 HEALTH INSURANCE EXPENSE									2,286.78
25320	079	000	53105200.521100.		27687414	04/01/26	JE	G	NRPAB POSTAGE FEB 2026	8185684		41.28
25320	079	000	53105200.521100.		27876087	04/21/26	JE	G	NRPAB POSTAGE MAR 2026	8219120		17.05
Total for Object			521100 POSTAGE EXPENSE									58.33
25320	079	000	53105200.521400.		60126538	04/01/26	PV	V	AS - OCIO - COMMUNICATIONS	8188620		77.78
25320	079	000	53105200.521400.		60437006	04/15/26	PV	V	AS - OCIO - IMSERVICES	8212339		4,604.09
Total for Object			521400 CIO CHARGES									4,681.87

Fund	Program	Sub-Program	Account Number	Sub-ledger	Doc Number	Tran Date	Tran Type	Batch Type	Payee/Explanation	Batch Number	Posted Code	Month to Date
25320	079	000	53105200.524600.		60289813	04/06/26	PV	V	SECRETARY OF STATE	8201557		9.05
25320	079	000	53105200.524600.		27775483	04/08/26	JE	G	NRPAB RENT APR 2026	8204693		389.39
Total for Object			524600 RENT EXPENSE-BUILDINGS									398.44
25320	079	000	53105200.524900.		27775483	04/08/26	JE	G	NRPAB RENT APR 2026	8204693		136.02
Total for Object			524900 RENT EXP-DEPR SURCHARGE									136.02
25320	079	000	53105200.559100.		60329796	04/08/26	PV	V	TREASURER, STATE	8204676		40.00
Total for Object			559100 OTHER OPERATING EXP									40.00
25320	079	000	53105200.571100.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		38.50
Total for Object			571100 LODGING									38.50
25320	079	000	53105200.571800.		60539900	04/21/26	PV	V	JOHNSON, RODNEY D	8219089		24.99
25320	079	000	53105200.571800.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		24.99
25320	079	000	53105200.571800.		60548740	04/22/26	PV	V	BATIE, ADAM	8220045		24.99
Total for Object			571800 MEALS - TRAVEL STATUS									74.97
25320	079	000	53105200.574500.		60089991	04/01/26	PV	V	HERMSEN, KEVIN P	8185677		21.83
25320	079	000	53105200.574500.		60539891	04/21/26	PV	V	HERMSEN, KEVIN P	8219078		21.83
25320	079	000	53105200.574500.		60539900	04/21/26	PV	V	JOHNSON, RODNEY D	8219089		62.93
25320	079	000	53105200.574500.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		114.70
25320	079	000	53105200.574500.		60548740	04/22/26	PV	V	BATIE, ADAM	8220045		65.98
Total for Object			574500 PERSONAL VEHICLE MILEAGE									287.27
25320	079	000	53105200.575100.		60089991	04/01/26	PV	V	HERMSEN, KEVIN P	8185677		1.70
25320	079	000	53105200.575100.		60539891	04/21/26	PV	V	HERMSEN, KEVIN P	8219078		1.44
25320	079	000	53105200.575100.		60539900	04/21/26	PV	V	JOHNSON, RODNEY D	8219089		4.20
25320	079	000	53105200.575100.		60539922	04/21/26	PV	V	MINSHULL, DEREK	8219109		4.72
25320	079	000	53105200.575100.		60548740	04/22/26	PV	V	BATIE, ADAM	8220045		4.20
Total for Object			575100 MISC TRAVEL EXPENSE									16.26
Total for Business Unit		53105200	AMC LICENSING									7,217.87
Total for Division		000										33,962.16
Total for Agency		053	REAL PROPERTY APPRAISER BD									33,962.16

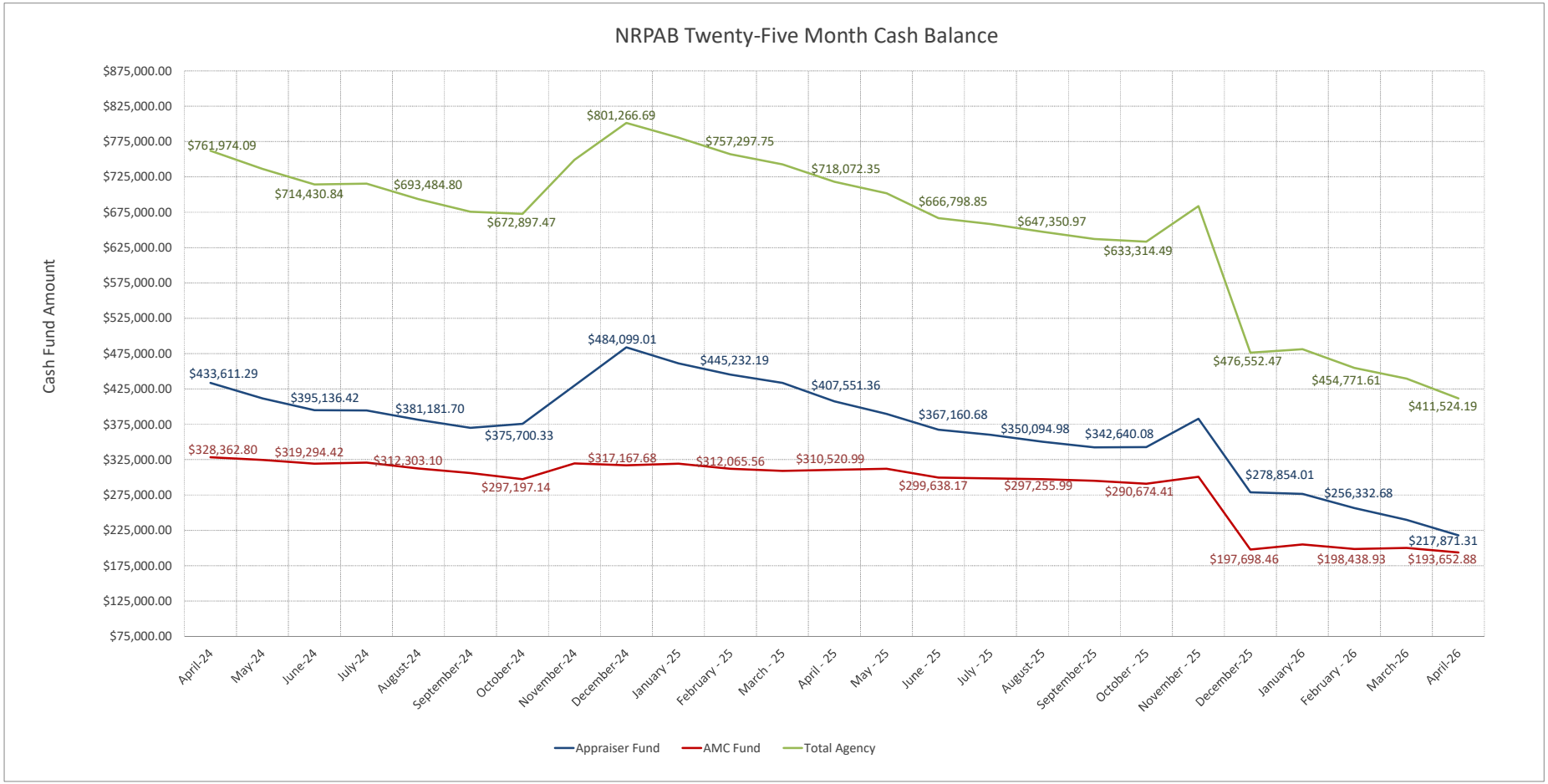
Financial Report and Considerations - Financial Charts



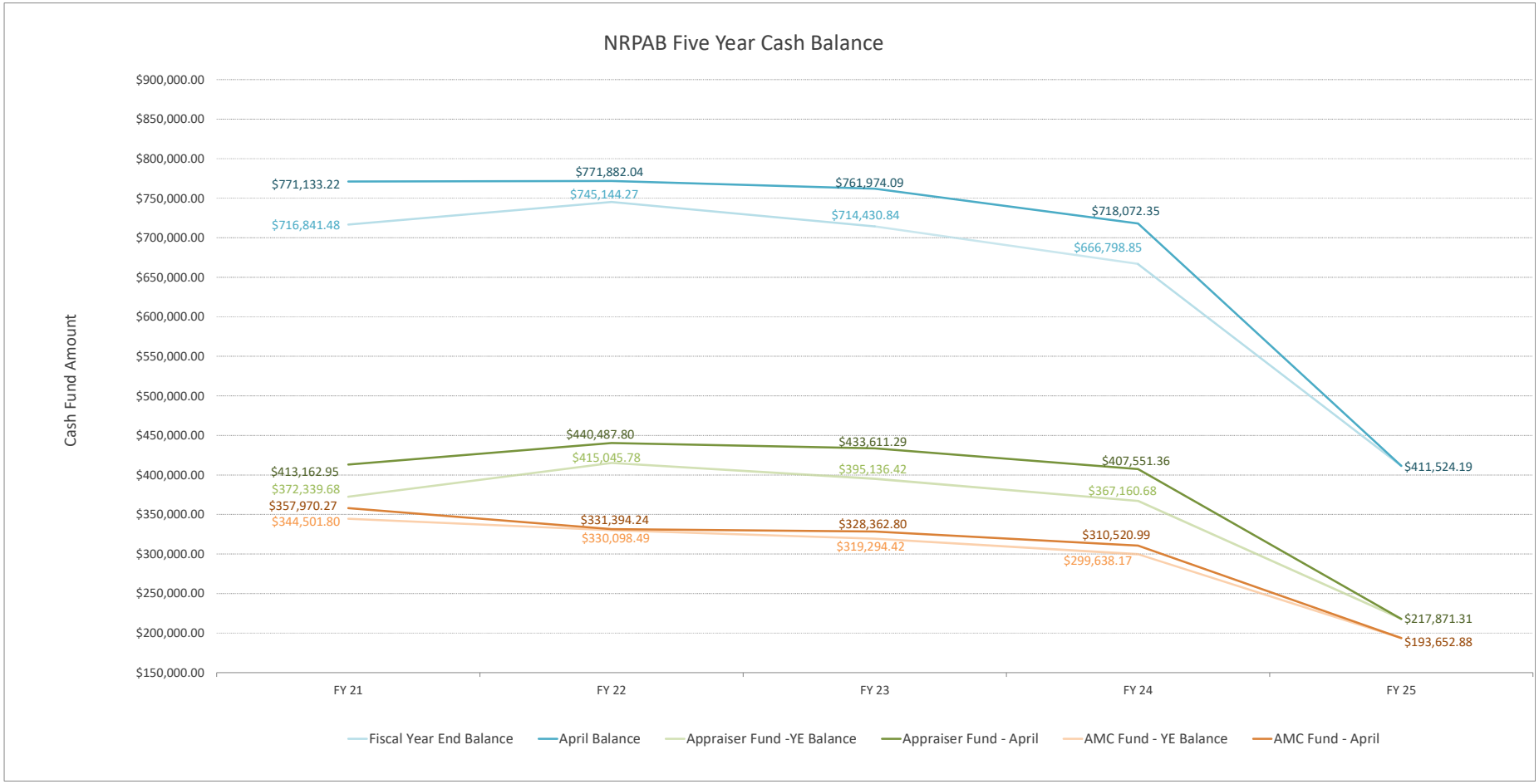
Financial Report and Considerations - Financial Charts



Financial Report and Considerations - Financial Charts



Financial Report and Considerations - Financial Charts



Agency 053 REAL PROPERTY APPRAISER BD
Division 000 Real Property App Bd
Program 079 APPRAISER LICENSING

Percent of Time Elapsed = 83.29

ACCOUNT CODE	DESCRIPTION	BUDGETED AMOUNT	CURRENT MONTH ACTIVITY	YEAR-TO-DATE ACTUALS	PERCENT OF BUDGET	ENCUMBERANCES	VARIANCE
BUDGETED FUND TYPES - EXPENDITURES							
520000	**OPERATING EXPENSES**						
521400	CIO CHARGES	116,777.25	3,789.75	61,450.25	52.62		55,327.00
522200	CONFERENCE REGISTRATION	1,300.00		1,350.00	103.85		50.00-
Major Account 520000 Total		118,077.25	3,789.75	62,800.25	53.19	0.00	55,277.00
570000	**TRAVEL EXPENSES**						
571100	LODGING	2,538.00		1,041.28	41.03		1,496.72
571800	MEALS - TRAVEL STATUS	510.00		197.05	38.64		312.95
574500	PERSONAL VEHICLE MILEAGE	1,377.00		955.50	69.39		421.50
Major Account 570000 Total		4,425.00	0.00	2,193.83	49.58	0.00	2,231.17
BUDGETED EXPENDITURES TOTAL		122,502.25	3,789.75	64,994.08	53.06	0.00	57,508.17
SUMMARY BY FUND TYPE - EXPENDITURES							
4	FEDERAL FUNDS	122,502.25	3,789.75	64,994.08	53.06		57,508.17
BUDGETED EXPENDITURES TOTAL		122,502.25	3,789.75	64,994.08	53.06	0.00	57,508.17

Agency 053 REAL PROPERTY APPRAISER BD
Division 000 AGENCY DEFINED DIVISION
Grant SSG2024NE01

All Objects
As of 04/30/26

Fund	Program	Sub-Program	Account Number	Sub-ledger	Doc Number	Tran Date	Tran Type	Batch Type	Payee/Explanation	Batch Number	Posted Code	Month to Date
40000	079	000	53105400.521400.		60437006	04/15/26	PV	V	AS - OCIO - IMSERVICES	8212339		3,789.75
Total for Object			521400 CIO CHARGES									3,789.75
Total for Business Unit			53105400 ASC GRANT									3,789.75
Total for Division			000									3,789.75
Total for Agency			053 REAL PROPERTY APPRAISER BD									3,789.75

NRPAB
Nebraska Real Property Appraiser Board

Fee Schedule Draft

Effective July 1, 2026

Real Property Appraiser Credential Fees	
Real Property Appraiser Credential Application Fee	$185.00
Real Property Appraiser Criminal History Record Check Fee	$55.00
Licensed/ Certified Residential/ Certified General Real Property Appraiser Credentialing Fee	$335.00
Annual Licensed/ Certified Residential/ Certified General Real Property Appraiser Federal Registry Fee	$40.00
Annual Licensed/ Certified Residential/ Certified General Real Property Appraiser Renewal Fee	$325.00
Real Property Appraiser Renewal Late Processing Fee (For each month or portion of month application is late)	$25.00
Licensed/ Certified Residential/ Certified General Real Property Appraiser Inactive Credential Application Fee	$100.00
Licensed/ Certified Residential/ Certified General Real Property Appraiser Inactive Credentialing Fee	$300.00
Licensed/ Certified Residential/ Certified General Real Property Appraiser Examination Fee (Paid to testing service Provider)	
Temporary Real Property Appraiser Credential Fees	
Licensed/ Certified Residential/ Certified General Real Property Appraiser Temporary Credential Application Fee	$135.00
Licensed/ Certified Residential/ Certified General Real Property Appraiser Temporary Credentialing Fee	$85.00
Appraisal Management Company Registration Fees	
Appraisal Management Company Application Fee	$350.00
Appraisal Management Company Registration Fee	$2000.00
Appraisal Management Company Registration Renewal Fee	$1850.00
Appraisal Management Company Registration Renewal Late Processing Fee (For each month or portion of month application is late)	$25.00
Real Property Appraiser Education Fees	
New/Resubmission Qualifying Education Activity Fee (For activity(s) approved by The AQB of TAF through its Course Approval Program)	$90.00
New/Resubmission Qualifying Education Activity Fee (For activity(s) not approved by The AQB of TAF through its Course Approval Program)	$350.00
New/Resubmission Continuing Education Activity Fee (For activity(s) approved by The AQB of TAF through its Course Approval Program)	$45.00
New/Resubmission Continuing Education Activity Fee (For activity(s) not approved by The AQB of TAF through its Course Approval Program)	$175.00
Continuing Education Activity Renewal Fee	$20.00
New/Resubmission Supervisory Appraiser and Trainee Course Fee	$175.00
Miscellaneous Fees	
Appraiser Corporate Certificate Request/Duplicate Proof of Credentialing Fee	$25.00
Federally Regulated AMC Reporting Form Processing Fee	$350.00

Pricing Proposal
Quotation #: 27429543
Created On: 4/17/2026
Valid Until: 4/30/2026

NE-Division of Communications

Amanda Krushenisky
CIO-Division of Comm
501 S 14th St
Lincoln, NE 68508
United States
Phone: (000) 000-0000
Email: amanda.krushenisky@nebraska.gov

Client Solutions Manager

Emily Zhang
290 Davidson Ave
Somerset, NJ 08873
Phone: 732-868-8807
Email: emily_zhang@shi.com

All Prices are in US Dollar (USD)

	Product	Qty	Your Price	Total
1	Adobe Dreamweaver - Edition 4 for enterprise, Subscription New, Annual, 1 User, Large Government Agencies - Level 8 5000-9999 (VIP # Req.) 12 Month Term Adobe - Part#: 30002265CC08A12 Contract Name: NASPO SOFTWARE VALUE ADDED RESELLER (SVAR) Contract #: CTR060028 Subcontract #: 15765 OC Coverage Term: - 4/5/2027 **Note:** Renewal license // LGA#: C3555EF82805E0697F5A; Marketplace ID: 1005579175	1	$406.88	$406.88
2	Adobe Acrobat Pro for enterprise, Subscription New, Annual, 1 User, Large Government Agencies - Level 8 5000-9999 (VIP # Req.) 12 Month Term Adobe - Part#: 30002125CC08A12 Contract Name: NASPO SOFTWARE VALUE ADDED RESELLER (SVAR) Contract #: CTR060028 Subcontract #: 15765 OC Coverage Term: - 4/5/2027 **Note:** New license // LGA#: C3555EF82805E0697F5A; Marketplace ID: 1005579175	1	$101.06	$101.06
3	Adobe Creative Cloud All Apps - Edition 4 for enterprise, Subscription New, Annual, 1 User, Large Government Agencies - Level 8 5000-9999 (VIP # Req.) 12 Month Term Adobe - Part#: 30002230CC08A12 Contract Name: NASPO SOFTWARE VALUE ADDED RESELLER (SVAR) Contract #: CTR060028 Subcontract #: 15765 OC Coverage Term: - 4/5/2027 **Note:** New license // LGA#: C3555EF82805E0697F5A; Marketplace ID: 1005579175	1	$979.23	$979.23
4	Adobe InDesign - Edition 4 for enterprise, Subscription New, Annual, 1 User, Large Government Agencies - Level 8 5000-9999 (VIP # Req.) 12 Month Term	1	$406.88	$406.88

Adobe - Part#: 30002377CC08A12
Contract Name: NASPO SOFTWARE VALUE ADDED RESELLER (SVAR)
Contract #: CTR060028
Subcontract #: 15765 OC
Coverage Term: - 4/5/2027
Note: New license // LGA#: C3555EF82805E0697F5A; Marketplace ID: 1005579175

Subtotal	$1,894.05
Shipping	$0.00
Total	$1,894.05

Additional Comments

Thank you for choosing SHI International Corp! The pricing offered on this quote proposal is valid through the expiration date listed above. To ensure the best level of service, please provide End User Name, Phone Number, Email Address and applicable Contract Number when submitting a Purchase Order. For any additional information including Hardware, Software and Services Contracts, please contact an SHI Inside Sales Representative at (888) 744-4084. SHI International Corp. is 100% Minority Owned, Woman Owned Business. TAX ID# 22-3009648; DUNS# 61-1429481; CCR# 61-243957G; CAGE 1HTF0

The products offered under this proposal are resold in accordance with the terms and conditions of the Contract referenced under that applicable line item.

NEBRASKA REAL PROPERTY APPRAISER BOARD

EDUCATION APPLICANTS

TABLE OF CONTENTS

May 21, 2026

New Continuing Education Activity Applications				
2262220.02	Appraisal Institute	Online Valuation Bias and Fair Housing Laws and Regulations	Asynchronous Delivery	2-19
2261430.01	ASFMRA	Mastering the Consultant and Expert Witness Role	Classroom Delivery	20-37

NRPAB
Nebraska Real Property Appraiser Board

Agenda Item Summary

Prepared By: Kashinda Sims **Title:** Education Program Manager **Date:** May 21, 2026

Agenda Section: L. Education

Agenda Item Identification Number: 2262220.02

Subject: Appraisal Institute Deficient Application

Description: Appraisal Institute's Application for Approval as a Continuing Education Activity for, "Online Valuation Bias and Fair Housing Laws and Regulations" is deficient the requirements for approval in accordance with 298 NAC Chapter 6.

SUMMARY

An Application for Approval as a Continuing Education Activity ("Application") for, "Online Valuation Bias and Fair Housing Laws and Regulations" was received at the Board office on February 17, 2026. Upon review of the Application, the education provider requested that the activity be submitted for approval as 'Other'. Additionally, the Application states that evidence of delivery mechanism approval is received through The Appraiser Qualifications Board of The Appraisal Foundation ("AQB") [Exhibit 1]. Upon review of the AQB document, there is no statement evidencing that the document contains delivery mechanism approval [Exhibit 2]. Finally, the IDECC document included with the Application appears to contain evidence of delivery mechanism approval [Exhibit 3].

Staff notified the provider of the Application's deficiencies in an April 2, 2026 email, requesting that the deficient material be corrected on or before the end of the day on Monday, April 6, 2026, or the Application would be considered deficient and prepared for the Board's review [Exhibit 4]. The deficiency regarding the Application being submitted as 'Other' was addressed and resolved as of April 3, 2026. On April 10, 2026, staff formally notified Appraisal Institute of the Application's deficiencies and requested updated material by the end of the day, May 1, 2026, or the Application will go before the Board for consideration at its next scheduled meeting on May 21, 2026 [Exhibit 5]. There was no further communication with Appraisal Institute. On May 7, 2026, staff notified Appraisal Institute that the Application remains deficient and would be presented to the Board at its regular meeting on May 21, 2026 [Exhibit 6]. The Application is deficient as there is no statement evidencing that the AQB document contains delivery mechanism approval as selected on the Application.

RELEVANT LAWS/RULES/GUIDANCE DOCUMENTS/INTERNAL PROCEDURES

298 NAC Chapter 6, § 001.15I - For an asynchronous distance education activity or a hybrid distance education activity in which the learning environment includes asynchronous interaction, an education provider must provide documentation evidencing delivery mechanism approval by the Appraiser Qualifications Board of The Appraisal Foundation; an organization approved by the Appraiser Qualifications Board of The Appraisal Foundation that provides approval of activity design and delivery; or an accredited degree-awarding community college, college, or university. Acceptable documentation includes the official standard documentation issued to the education provider by the entity that approves the delivery mechanism, or in the case of an accredited dagree-awarding community college, college, or university that offers distance education programs and awards academic credit for the distance education courses, a written description evidencing that the delivery mechanism provides interaction in a reciprocal environment where the student has verbal or written communication with the instructor.

DISCIPLINARY/WRITTEN ADVISORY HISTORY

There are no known disciplinary actions taken or written advisories issued by the Board.

EXHIBITS

[Exhibit 1] - "Appraisal Institute (Online 7Hr VBFH Laws and Regs) Application_February 17, 2026" located in Database under Education (Search Education/ Enter Activity Number '2262220'/Select 'Online Valuation Bias and Fair Housing Laws and Regulations'/ Communication and Documentation Log dated 05/13/2026)

[Exhibit 2] - "Appraisal Institute (Online 7Hr VBFH Laws and Regs) AQB_February 17, 2026" located in Database under Education (Search Education/ Enter Activity Number '2262220'/Select 'Online Valuation Bias and Fair Housing Laws and Regulations'/ Communication and Documentation Log dated 05/13/2026)

[Exhibit 3] - "Appraisal Institute (Online 7Hr VBFH Laws and Regs) IDECC_February 17, 2026" located in Database under Education (Search Education/ Enter Activity Number '2262220'/Select 'Online Valuation Bias and Fair Housing Laws and Regulations'/ Communication and Documentation Log dated 05/13/2026)

[Exhibit 4] - "Sims-de Kanter Email Chain (Online 7Hr VBFH Course)_April 2-10, 2026" located in Database under Education (Search Education/ Enter Activity Number '2262220'/Select 'Online Valuation Bias and Fair Housing Laws and Regulations'/ Communication and Documentation Log dated 05/13/2026)

[Exhibit 5] - "Appraisal Institute (Online 7-Hr VBFH Course) Application Deficient_April 10, 2026" located in Database under Education (Search Education/ Enter Activity Number '2262220'/Select 'Online Valuation Bias and Fair Housing Laws and Regulations'/ Communication and Documentation Log dated 05/13/2026)

[Exhibit 6] - "Appraisal Institute (Online 7Hr VBFH Laws and Regs) Application on Board's Agenda_May 7, 2026" located in Database under Education (Search Education/ Enter Activity Number '2262220'/Select 'Online Valuation Bias and Fair Housing Laws and Regulations'/ Communication and Documentation Log dated 05/13/2026)

Exhibit #1

2262220.02

NRPAB
Nebraska Real Property Appraiser Board

301 Centennial Mall South, First Floor
PO Box 94963
Lincoln, NE 68509-4963
https://appraiser.ne.gov/
402-471-9015

Board Number: 226
Date Received:

IR2 2 min
Flashdrive #2

RECEIVED
FEB 17 2026
BY: CF

For Board Use Only

APPLICATION FOR APPROVAL AS A CONTINUING EDUCATION ACTIVITY IN NEBRASKA

This application is to be used by an education provider applying for approval of a continuing education activity or resubmission of an active approved continuing education activity. A separate application form must be filed for each continuing education activity submitted for approval. Applicants should carefully read Chapter 6 of Title 298 of the Nebraska Administrative Code before completing the information below. Any application deemed to be incomplete may be returned.

Education Provider Information

Education Provider Name: Appraisal Institute

Contact Person Name: de Kanter (Last) Liz (First) (Middle)

Address: 200 W. Madison Street, Suite 2630 (PO Box or Street Number) Chicago (City) IL (State) 60606 (Zip Code + 4)

edekanter@appraisalinstitute.org (Email Address) (312) 335-4191 (Area Code + Phone Number)

Continuing Education Activity Information

Activity Title: Online Valuation Bias and Fair Housing Laws an d Regulations

Activity Length (Hours): 7

Each continuing education activity shall be at least two (2) hours in length, not to exceed eight (8) hours of instruction in any day. At least a one-half hour break shall be given to credential holder(s) by no later than the end of four (4) hours of instruction in any day. Except for semester hours received from an accredited college or university, education activity hours are determined as follows (exam included if applicable):

- *For a timed outline in a schedule format, where sixty (60) minutes equals one (1) hour in Coordinated Universal Time, the start time and the end time is utilized to determine the total minutes engaged in instruction. Breaks, meal periods, and time not engaged in instruction are removed. Fifty (50) minutes engaged in instruction out of each sixty (60) minute segment equals one (1) hour.*
- *For a timed outline in a non-schedule format, where each topic is assigned a specific duration, each minute engaged in instruction is utilized to determine the total minutes engaged in instruction. Fifty (50) minutes engaged in instruction equals one (1) hour.*

Activity Setting: ☐ Classroom ☐ Synchronous ● Asynchronous ☐ Hybrid

Synchronous educational offering means, the instructor and students interact simultaneously online, similar to a phone call, video chat or live webinar, or web-based meeting. Asynchronous educational offering means the instructor and students' interaction is non-simultaneous, and the student progresses at their own pace and follows a structured course content and quiz/exam schedule.

The activity is being submitted for approval as a:

☐ Seven-hour National USPAP Continuing Education Course

☐ Four-hour Valuation Bias and Fair Housing Laws and Regulations Course

☐ Seven-hour Valuation Bias and Fair Housing Laws and Regulations Course

● Other

L.4

Exhibit #1

AQB CAP Approval: ● Yes ☐ No

The seven-hour Uniform Standards of Professional Appraisal Practice Continuing Education Course, the four-hour valuation bias and fair housing laws and regulations course, and the seven-hour valuation bias housing laws and regulations course shall be approved by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program.

This submission is a: ● New Continuing Education Activity ☐ Resubmission of an Active Approved Continuing Education Activity

Continuing Education Activity Secondary Provider: ☐ Yes ● No

Secondary provider means any education provider that purchases rights to, or otherwise lawfully acquires from another education provider, activity material to deliver.

Application Submission Requirements

All materials submitted to the Board related to an Application for Approval as a Continuing Education Activity in Nebraska are for Board use only and shall be retained by the Board.

If *New Continuing Education Activity* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, the following items are required:

● Completed application.

● For an AQB CAP approved activity, a non-refundable continuing education application fee of $35.00.
OR

☐ For a non-AQB CAP approved activity, a non-refundable continuing education application fee of $100.00.

☐ A document certifying completion issued to each attendee upon completion of any continuing education activity that includes the name of education provider, signature of education provider and/or instructor, name of activity as approved, location at which activity was conducted or presentation method, date(s) activity was conducted, number of hours, pass or fail statement, and name of attendee, or be an official transcript from a university or college that includes the name of activity as approved, the number of credit hours awarded, and the name of the attendee.

If *Yes* is selected for Education Provider is a Secondary Provider of the Continuing Education Activity Material is selected under CONTINUING EDUCATION ACTIVITY INFORMATION:

☐ Evidence that the rights to the continuing education activity have been purchased or lawfully acquired from the education provider that owns the rights to the activity materials.

If *Resubmission of an Approved Continuing Education Activity* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, the following items are required:

☐ Completed application.

☐ For an AQB CAP approved activity, a non-refundable continuing education application fee of $35.00.
OR

☐ For a non-AQB CAP approved activity, a non-refundable continuing education application fee of $100.00.

☐ A document certifying completion issued to each attendee upon completion of any continuing education activity. The document includes the name of education provider, signature of education provider and/or instructor, name of activity as approved, location at which activity was conducted or presentation method, date(s) activity was conducted, number of hours, pass or fail statement, and name of attendee, or be an official transcript from a university or college that includes the name of activity as approved, the number of credit hours awarded, and the name of the attendee.
OR

☐ The name of education provider, signature of education provider and/or instructor, name of activity as approved, location at which activity was conducted or presentation method, date(s) activity was conducted, number of hours, pass or fail statement, name of attendee, or format have not changed on the document certifying completion since the Board's approval of the continuing education activity.

☐ A written explanation of the reason for resubmission.

Exhibit #1

Purpose for Resubmission of an Active Approved Continuing Education Activity

If *Resubmission of an Active Approved Continuing Education Activity* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, the reason for resubmission is:

- ☐ There is a change in the status of approval by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program.
- ☐ There is a change in the status of 298 NAC Chapter 6, § 001.15 qualifications under which a distance education activity was approved.
- ☐ There is a substantial change to the materials, presentation, or policies.
- ☐ There is a change in the qualifications as specified in 298 NAC Chapter 6, § 005 for any instructor.
- ☐ One or more instructors are added or removed by the education provider.
- ☐ The materials, theories, and/or methodologies are no longer current.
- ☐ The activity content and/or policies are no longer communicated or administered as approved.
- ☐ There is a change to a secondary provider's rights to the activity.

Non-AQB CAP Approved Continuing Education Activities

For an activity not approved by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program for continuing education, submit the following (If *Resubmission of an Active Approved Continuing Education Activity* is selected under CONTINING EDUCATION ACTIVITY INFORMATION, only information that has changed since the Board's approval of the continuing education activity is required):

- ☐ An activity description that clearly describes the content.
- ☐ All learning objectives that meet the requirements of 298 NAC Chapter 6, § 003.02A.2d.
- ☐ An instructor policy that requires the use of instructors who meet the requirements of NAC Chapter 6, § 005.
- ☐ All student and instructor materials that meet the requirements of 298 NAC Chapter 6, § 003.02A.2e.
- ☐ A timed outline/activity matrix that accounts for the general flow and recommended time spent on topics contained within the activity and reflects hours of credit per topic.
- ☐ A record retention policy that requires that a record of attendance for each activity is maintained for a period of at least five (5) years.
- ☐ An attendance policy that meets the requirements of 298 NAC Chapter 6, § 003.02A.2h.
- ☐ If applicable, a closed-book final examination proctored in person or remotely by an official approved by the education provider that meets the requirements of 298 NAC Chapter 6, § 003.02A.2f. Bio-metric proctoring is acceptable. The examination may be written on paper or administered electronically on a computer workstation or other device. Oral exams are not acceptable.

Distance Education Continuing Education Activities

If *Asynchronous, or Hybrid (in which the learning environment includes Asynchronous interaction)* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, education activity includes:

- ☐ A closed-book final examination.

OR

- ● Prescribed activity mechanisms required to demonstrate knowledge of the subject matter.

If *Asynchronous* or *Hybrid (in which the learning environment includes asynchronous interaction)* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, evidence of delivery mechanism approval from one of the following sources:

- ● The Appraiser Qualifications Board of The Appraisal Foundation.

OR

- ☐ An organization approved by the Appraiser Qualifications Board of The Appraisal Foundation that provides approval of activity design and delivery (Secondary providers must have approval under own name). IDECC/ARELLO are acceptable.

OR

- ☐ Is conducted by an accredited college, community college, or university that offers distance education programs and is approved or accredited by the Commission on Colleges, a regional or national accreditation association, or by an accrediting agency that is recognized by the U.S. Secretary of Education, that awards academic credit for the distance education courses or that maintains an education delivery program that approves activity design and delivery that incorporate interactivity (If no closed-book final examination is included, evidence of prescribed activity mechanisms must be submitted with the application) **AND**
- ☐ The activity provides interaction in a reciprocal environment where the student has verbal or written communication with the instructor.

Exhibit #1

Instructor Information

An instructor is an individual who is responsible for ensuring that the activity content is communicated to the activity's audience as presented to the Board for approval, and that the activity contributes to the quality of valuation services provided to the public. An individual who communicates assigned materials or a portion of activity content under the authorization of the education provider, but is not responsible for the activity content, is not an instructor.

If reporting more than two instructors for the activity, submit the form titled, "Supplemental Instructor Information for Education Activity Application" at https://appraiser.ne.gov/Education/

Instructor Name: Freitag (Last) Mark (First) (Middle)

mark@freitagappraisals.com (Email Address) (316) 264-3922 (Area Code + Phone Number)

Is the instructor a Nebraska real property appraiser or hold an appraiser license, registration, or certification in any other jurisdiction? ● Yes ☐ No

Is the instructor an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation? *Required if the activity is a seven-hour National USPAP Continuing Education Course* ☐ Yes ● No

An instructor for any continuing education activity must satisfy at least one of the following qualifications: *Select one option only*

● Hold a bachelor's degree in any field and have at least three years of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in any field and have at least one year of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in a field that is directly related to the subject matter to be taught;

☐ Have five years of real property appraisal practice teaching experience directly related to the subject matter to be taught; or

☐ Have seven years of real property appraisal practice experience directly related to the subject matter to be taught.

Instructor Name: _____ (Last) _____ (First) _____ (Middle)

_____ (Email Address) _____ (Area Code + Phone Number)

Is the instructor a Nebraska real property appraiser or hold an appraiser license, registration, or certification in any other jurisdiction? ☐ Yes ☐ No

Is the instructor an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation? *Required if the activity is a seven-hour National USPAP Continuing Education Course* ☐ Yes ☐ No

An instructor for any continuing education activity must satisfy at least one of the following qualifications: *Select one option only*

☐ Hold a bachelor's degree in any field and have at least three years of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in any field and have at least one year of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in a field that is directly related to the subject matter to be taught;

☐ Have five years of real property appraisal practice teaching experience directly related to the subject matter to be taught; or

☐ Have seven years of real property appraisal practice experience directly related to the subject matter to be taught.

Exhibit #1

General Requirements

1. The Board may at any time conduct an audit of any approved education activity to verify that the activity is being conducted in accordance with the Real Property Appraiser Act and Title 298 as approved. If requested, electronic access will be provided to the Board for any approved distance education activity. The electronic access must provide administrative rights that allow for access to the activity, quizzes, and examinations, without having to take the distance education activity in sequential order and without having to take quizzes to examinations to proceed with the activity. In addition, at the Board's request, a transcript of the distance education activity must be provided to the Board.

2. The Board may at any time review activity and instructor materials approved by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program to verify that the activity and/or instructor(s) meets the requirements of the Real Property Appraiser Act and Title 298 as approved.

3. Approval of activities does not transfer from one education provider to another, unless one education provider obtains the legal rights to all activities of another education provider. The expiration date of any continuing education activity will remain the same as approved under the previous education provider.

4. Education providers and instructors will comply with the Nebraska Private Postsecondary Career Schools Act, NEB. REV. STAT § 85-1601, et seq. as applicable.

5. Knowingly offering or attempting to offer a qualifying or continuing education activity as being approved to a real property appraiser or an applicant, without first obtaining approval of the activity, except for activities required by an accredited degree-awarding college or university for completion of a degree in real estate, if the college or university had its curriculum approved by the Appraiser Qualifications Board as qualifying education is a violation of Neb. Rev. Stat. § 76-2238(21).

6. Any continuing education activity must contribute to a credential holder's development of real property appraiser related skill, knowledge, and competency in any one or more of the following subjects:
   (1) Real property appraisal practice,
   (2) Valuation methodology and/or techniques,
   (3) Market fundamentals, characteristics, conditions, and analysis,
   (4) Real property concepts, characteristics, and analysis,
   (5) Real property appraiser client communication,
   (6) Arbitration, dispute resolution
   (7) Ethics and standards of professional practice, USPAP
   (8) Valuation bias and fair housing laws and regulations,
   (9) Land use, planning, zoning
   (10) Management, leasing, timesharing,
   (11) Property development, partial interests,
   (12) Real Estate law, easements, and legal interests,
   (13) Real estate litigation, damages, condemnation,
   (14) Real estate financing and investment,
   (15) Real property appraisal-related computer applications,
   (16) Real estate securities and syndication,
   (17) Seller concessions and impact on value, and/or
   (18) Energy-efficient items and "green building" appraisals.

7. An activity in which the primary purpose is training in the use of a specific software, and not utilization of a software to improve competency in any of the previously listed subjects does not meet the requirements for approval as a continuing education activity.

8. No activity may rely upon a textbook as the primary instructional material. Textbooks are permitted to be used as a background reference for an activity; however, textbooks will not be reviewed as the activity. All activities must contain sufficient stand-alone instructional material supporting the specific activity learning objectives.

9. An instructor for any qualifying education activity, continuing education activity, or supervisory real property appraiser and trainee course, must meet qualifications established pursuant to any other applicable law.

10. An instructor for any qualifying education activity, continuing education activity, or supervisory real property appraiser and trainee course, who holds a credential as a real property appraiser in Nebraska or any other jurisdiction shall maintain each credential in good standing in accordance with the laws of the jurisdiction in which each credential is held, not have had a credential revoked, suspended, or have surrendered a credential in lieu of disciplinary action within five (5) years; and not have had disciplinary action taken against his or her credential that may constitute a violation of NEB. REV. STAT. § 76-2238 within five (5) years.

11. The standing of an instructor identified on an education provider's application submitted for approval, who holds a credential as a real property appraiser in Nebraska or an appraiser credential any other jurisdiction, may be verified through the Appraiser Registry of the Appraisal Subcommittee for the Federal Financial Institutions Examination Council.

12. Any instructor of the qualifying education fifteen-hour National Uniform Standards of Professional Appraisal Practice Course, the continuing education seven-hour National Uniform Standards of Professional Appraisal Practice Continuing Education Course, and/or the supervisory real property appraiser and trainee course, must be an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation.

13. An instructor for any qualifying education activity, continuing education activity, or supervisory real property appraiser and trainee course must satisfy the education provider's instructor policy that requires the use of instructors who meet the requirements of the Nebraska Real Property Appraiser Act and Title 298.

Exhibit #1

I hereby attest that I have included all required materials, complied with all the listed requirements, completed the submitted application in its entirety, and that all statements and materials are true and correct to the best of my knowledge and belief. I understand that, should this application be found to be incomplete, that it may be considered invalid and be returned. Furthermore, I understand that if the Board finds that one or more statements made in this application, or materials submitted with this application, are not true and correct, the Board may deny the application.

Print Name: de Kanter (Last) Liz (First) _____ (Middle)

Liz de Kanter (Signature) 2/12/2026 (Date)

Expiration Date and Rescinding Approval

1. Except for the seven-hour Uniform Standards of Professional Practice Continuing Education Course, the seven-hour valuation bias and fair housing laws and regulations course, and the four-hour valuation bias and fair housing laws and regulations course, which expire on the date on which the approval by the Appraiser Qualifications Board expires, a continuing education activity shall expire on the date five years after the date of approval.
2. The Board may rescind approval of a continuing education activity if the Board finds:
    1) Falsification of information submitted for activity approval,
    2) A change in approval by Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program,
    3) A change in status of 298 NAC Chapter 6, § 001.15 qualifications under which a distance education activity was approved,
    4) Substantial errors and/or deficiencies in the materials or presentation,
    5) The materials, theories, and/or methodologies are not current and/or practical,
    6) The instructor(s) responsible for the activity content and presentation do not meet the qualification specified in 298 NAC Chapter 6, § 005,
    7) The activity content and/or policies are not communicated or administered as approved,
    8) A material violation of Real Property Appraiser Act or Title 298 by the education provider or instructor for the activity, or
    9) There is a change in the secondary provider's rights to the activity.
3. If reason to rescind approval of an activity is found, a written notice shall be made to the education provider that includes a description of the reason(s) for rescinding approval. The education provider has sixty (60) days from the date of notice to provide a written response. If the response is satisfactory to the Board, the Board will not rescind its approval. If the response is not satisfactory to the Board, or no response is received, the Board may rescind approval of the activity. If approval is rescinded, the education provider may file a new application for approval of the qualifying education activity, and if so, meet the requirements in place at the time a new application is submitted to the Board.
4. Nothing in 298 NAC Chapter 6 may be construed to preclude education providers from surrendering approval of education activities.

Directions

1. Complete entire application. If required information is not provided, application will be considered incomplete and may be returned.
2. Along with the application, all information requested must be included.
3. Mail application, fee, and supporting documentation to:
    NEBRASKA REAL PROPERTY APPRAISER BOARD
    PO BOX 94963
    LINCOLN NE 68509-4963

    Deliver to (FedEx of UPS):
    NEBRASKA REAL PROPERTY APPRAISER BOARD
    301 CENTENNIAL MALL SOUTH, FIRST FLOOR
    LINCOLN NE 68508
4. Questions or concerns may be directed to Board staff at 402-471-9015 or nrpab.education@nebraska.gov.

Exhibit #1

RECEIPT

NEBRASKA REAL PROPERTY APPRAISER BOARD

No.: 23638 Date: 02/17/2026

Received from: Appraisal Institute

For: 1 CE New App (AQB approved)

Check # 200167

Application Fee	$	
AMC Registration Fee: ___ new ___ renewal		
AMC ASC National Registry Fee: _____ appraisers @ $25		
Reporting Year ___/___/_____ to ___/___/_____		
Review of Courses: ___ QE 1 CE ___ CE renewal		35.00
Penalty Fees/Fines		
Fingerprint Processing		
Late Processing: _____ months @ $25		
Other: _____		
TOTAL	$	35.00

Received by: [signature]

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM.

FRAUD ARMOR

200167

Appraisal Institute

Appraisal Institute
200 W Madison St, Ste 2630
Chicago, IL 60606

JPMorgan Chase Bank NA
www.Chase.com
2-1/710

02/11/2026

PAY TO THE ORDER OF Nebraska Real Estate Appraiser Board $ **35.00**

Thirty Five Dollars DOLLARS

Nebraska Real Estate Appraiser Board
301 Centennial Mall South
Lincoln, NE 68508
United States

VALID VALID
VALID VALID
VALID VALID
VALID VALID

VOID AFTER 180 DAYS

AUTHORIZED SIGNATURE

MEMO

Details on Back. Security Features Included

Exhibit #2

The Appraisal FOUNDATION
Authorized by Congress as the Source of Appraisal Standards and Appraiser Qualifications
APPRAISER QUALIFICATIONS BOARD

AQB Course Approval Program
Approved Course

Sent to: Liz de Kanter

QE	CE/E	CE
8.00	8.00	7.00

Tuesday, October 7, 2025

200 W. Madison St., Ste. 2000
Chicago IL 60606

Dear Liz de Kanter,

We are pleased to inform you that your course has been approved under the Course Approval Program (CAP) of the Appraiser Qualifications Board (AQB) of The Appraisal Foundation.

Course Provider:	Appraisal Institute
Course Title:	Online Valuation Bias and Fair Housing Laws and Regulations
Synchronous Course Title: (if applicable and different than above)	
Instructional Hours:	7.00
Exam Hours:	1.00
Total Hours:	8.00
Delivery Method:	Asynchronous
Approval Period & Type:	October 7, 2025 – July 24, 2028 (Initial)
Course ID:	93157

The content of this course is in compliance with the *Real Property Appraiser Qualification Criteria* and Course Approval Program Policies and Procedures established by the AQB. Course approval does not mean that every statement or item in the course has been checked for accuracy. Opinions in the course material or by instructors do not necessarily reflect the viewpoint of the AQB or The Appraisal Foundation. Neither the AQB nor The Appraisal Foundation is responsible for any errors, omissions, or misstatements in the course material or by instructors.

Please feel free to contact us if you have any questions or if we can be of further assistance.

Appraiser Qualifications Board

Exhibit #3

The number one credential for quality design and delivery of distance education in the world.

Administrative Information

Course Title: Online Valuation Bias and Fair Housing Laws and Regulations

Course Number: 11327
Certified: 07/24/2025
Expires: 07/24/2028
Status: Approved

Provider: Appraisal Institute
Address: 200 W. Madison St - Ste 2000
Chicago , Illinois 60606
Phone: 312-335-4100
Contact: Susana Ochoa-Sobieszek <statecert@appraisalinstitute.org>

Course Information

Provider Type: Primary
Delivery Method: Asynchronous
Final Exam: Yes
Proctored Exam: Yes
***Clock Hours:** 8.0
†Clock Hour Enforcement Mechanism: Yes
Difficulty Rating: Basic

Description: This online course trains appraisers in topics related to valuation bias and fair housing laws and regulations and fulfills specifications provided by the Appraisal Qualifications Board (AQB). It will enable all appraisers, both residential and non-residential, to learn more about civil rights protections and best practices for report writing so they can maintain compliance with federal agency rules. The course also provides in-depth information about the civil rights complaint process. Filled with Supreme Court cases and discussion prompts, this program provides ample opportunities for participants to consider both historic and contemporary fair housing topics. Ultimately, Valuation Bias and Fair Housing Laws and Regulations is a comprehensive guide covering recent discourse about valuation bias and best practices related to federal fair housing laws.

Course Notes: This course has been certified with and without a mechanism that mandates students spend precisely the stated number of hours in the course. However, the course may be facilitated without the timing mechanism in jurisdictions that do not require such without compromising certification.

Instructors: Mr. Mark Freitag (CDEI)

**Course Approval Information

This course may not be approved in any jurisdiction or the provider has chosen not to include which jurisdictions the course is approved in.

Disclaimers

* Professional reviewers have determined that the amount of content to be presented in this course, as specified in the provider's timed outline, should take the stated time to complete. This certification does not suggest the course will take the hours listed if implemented into a distance education learning system that uses an inferior instructional design. In addition, ARELLO does not guarantee or audit the performance of classroom instructors to ensure the appropriate clock hours of instruction are presented to students.

** Regarding course approval information, the course provider may list here the jurisdictions that have approved this course for professional credit. Information in regard to jurisdictional course approval is not maintained by ARELLO but by course providers. If no jurisdictions appear in the course approval area, the provider may not yet be approved by a regulatory agency to offer the course. Please contact the provider if you have a question in regard to course approval information.

† A "Clock Hour Enforcement Mechanism" is course feature that mandates students spend X amount of time in the course. This mechanism is not required for certification but is required in certain jurisdictions. The absence of a clock hour enforcement mechanism does not compromise certification and the typical student taking the course can still be expected to take the appropriate amount of time to complete the course.

Exhibit #4

From: Sims, Kashinda
To: de Kanter, Elizabeth
Subject: RE: Nebraska Application Request
Date: Friday, April 10, 2026 2:03:00 PM
Attachments: Appraisal Institute (Online 7-Hr VBFH Course) Application Deficient April 10, 2026.pdf
image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image008.png

Good afternoon,

Please see the attached notice; a hard copy will follow via the US Postal Service.

Genuinely,
Kashinda Sims
Education Program Manager
Nebraska Real Property Appraiser Board



From: de Kanter, Elizabeth <edekanter@appraisalinstitute.org>
Sent: Wednesday, April 8, 2026 10:27 AM
To: Sims, Kashinda <Kashinda.Sims@nebraska.gov>
Subject: Re: Nebraska Application Request

Good morning, Kashinda,

My supervisor, Maggie Vasquez, Sr. Manager, Compliance & Government Affairs, has reached out to IDECC in regard to this issue. She is waiting to hear from them, and once she does, she will let me know. She may reach out to you directly when she gets a response from IDECC.

Thank you!
Liz



Liz de Kanter
Operations Assistant
312-335-4191
appraisalinstitute.org



From: Sims, Kashinda <Kashinda.Sims@nebraska.gov>

Exhibit #4

Sent: Wednesday, April 8, 2026 9:35 AM
To: de Kanter, Elizabeth <edekanter@appraisalinstitute.org>
Subject: RE: Nebraska Application Request

Good morning, Liz,

I'd like to follow up on this matter. An updated page 1 was received, however, there was never clarity on the distance education section of the Application or an updated IDECC document. Please provide deficient material on or before the end of the day, today, April 8, 2026, or the Application will be prepared for the Board's consideration.

In accordance with 298 NAC Chapter 6, § 003.02D, The application may be denied by the Board at any time during the process if the education provider, submitted activity, or instructor(s) for the submitted activity fail to meet the requirements in the Act and this Title. If an application is denied, the Board will provide written notice of denial to the education provider that includes a description of the deficiencies found by the Board. The education provider has 60 days from the date of denial to rectify the deficiencies. If the deficiencies are not rectified within 60 days, the education provider may file a new application for approval of a continuing education activity, and if so, meet the requirements in place at the time a new application is submitted to the Board.

Genuinely,
Kashinda Sims
Education Program Manager
Nebraska Real Property Appraiser Board



From: Sims, Kashinda
Sent: Friday, April 3, 2026 10:07 AM
To: de Kanter, Elizabeth <edekanter@appraisalinstitute.org>
Subject: RE: Nebraska Application Request

Good morning, Liz,

This updated page has been received, thank you. If Appraisal Institute is requesting seven-hours, then the supporting documentation is required to match.

Genuinely,
Kashinda Sims
Education Program Manager
Nebraska Real Property Appraiser Board

Exhibit #4

From: de Kanter, Elizabeth <edekanter@appraisalinstitute.org>
Sent: Friday, April 3, 2026 7:57 AM
To: Sims, Kashinda <Kashinda.Sims@nebraska.gov>
Subject: Re: Nebraska Application Request

Hi Kashinda,
I've updated page one of the application.
Would you need the IDECC if the AQB shows we are approved for 7 hours as well as the 8?

Thank you,
Liz

Liz de Kanter
Operations Assistant
312-335-4191
appraisalinstitute.org

From: Sims, Kashinda <Kashinda.Sims@nebraska.gov>
Sent: Thursday, April 2, 2026 1:37 PM
To: de Kanter, Elizabeth <edekanter@appraisalinstitute.org>
Subject: Nebraska Application Request

Good afternoon,

The Nebraska Real Property Appraiser Board ("Board") is reviewing the Application for Approval as a Continuing Education Activity ("Application") for, "Online Valuation Bias and Fair Housing Laws and Regulations."

The Application requests that the activity is being submitted for approval as "Other." It appears that the activity may have been submitted for approval as the seven-hour valuation bias and fair housing laws and regulations course.

Additionally, In accordance with 298 NAC Chapter 6, § 001.15.I, For asynchronous distance education activity or a hybrid distance education activity in which the learning environment includes asynchronous interaction, an education provider must provide documentation evidencing delivery mechanism approved by the Appraiser Qualifications Board of The

Appraisal Foundation; an organization approved by the Appraiser Qualifications Board of The Appraisal Foundation that provides approval of activity design and delivery; or an accredited degree-awarding community college, college, or university. Acceptable documentation includes the official standard documentation issued to the education provider by the entity that approves the delivery mechanism.

The Application states that evidence of delivery mechanism approval is through The Appraiser Qualifications Board of The Appraisal Foundation. Upon review of the AQB approval document, there is no statement evidencing that the AQB document contains delivery mechanism approval. Therefore, staff cannot assign evidence of delivery mechanism approval to the AQB document.

Finally, the IDECC document included in the Application, lists that the total number of hours for the activity as eight hours, and the Application requests seven hours for approval.

Please correct the Application, addressing the deficiencies, on or before the end of the day on Monday, April 6, 2026 or the Application will be considered deficient and prepared for the Board's review.

Genuinely,

Kashinda Sims
Education Program Manager
Nebraska Real Property Appraiser Board
301 Centennial Mall South, First Floor
Lincoln, NE 68509-4963
Phone: (402) 471-9022
Email: kashinda.sims@nebraska.gov
Website: appraiser.ne.gov



Visit NRPAB on Facebook

Exhibit #5

NRPAB
Nebraska Real Property Appraiser Board
301 Centennial Mall South, First Floor
PO Box 94963
Lincoln, NE 68509-4963

Jim Pillen, Governor
Tyler N. Kohtz, Director
Tyler.kohtz@nebraska.gov

Website: https://appraiser.ne.gov/
Facebook: www.facebook.com/nrpab
Phone: 402-471-9015
Fax: 402-471-9017

April 10, 2026

LIZ DE KANTER
APPRAISAL INSTITUTE
200 W MADISON ST STE 2000
CHICAGO IL 60606-3515

RE: Continuing Education Activity Submission Deficiencies

Dear Liz de Kanter,

The Nebraska Real Property Appraiser Board ("Board") has received an Application for Approval as a Continuing Education Activity in Nebraska from Appraisal Institute for the following education activity(s):

- Online Valuation Bias and Fair Housing Laws and Regulations Course

In accordance with Title 298 NAC Chapter 6, §003.02A.1, an education provider applying for approval of a Continuing Education Activity must submit an application for the activity on forms approved by the Board showing compliance by the education provider and the activity with all requirements established by the Nebraska Real Property Appraiser Act or by Title 298, Nebraska Administrative Code.

- The Application states that the evidence of delivery mechanism approval is through The Appraiser Qualifications Board of The Appraisal Foundation. Upon review of the AQB approval document, there is no statement evidencing that the AQB document contains delivery mechanism approval. Therefore, staff cannot assign evidence of delivery mechanism approval to the AQB document.
- The delivery mechanism approval document included in the Application lists that the total number of hours for the activity as eight hours, and the Application requests seven hours for approval.

The continuing education activity submittals identified above are deficient the listed materials required in 298 NAC Chapter 6, § 003.02A.1. Please provide the deficient materials before the end of the day on May 1, 2026.

The materials may be sent via email to nrpab.education@nebraska.gov or by the address listed below.

Chairperson of the Board
Kevin Hermsen, Gretna
Certified General Appraiser
2nd District Representative
Term Expires: January 1, 2027

Vice-chairperson of the Board
Rodney Johnson, Norfolk
Certified General Appraiser
Licensed Real Estate Broker Rep
Term Expires: January 1, 2028

Board Member
Derek Minshull, North Platte
Financial Institutions
Representative
Term Expires: January 1, 2029

Board Member
Adam Batie, Kearney
Certified General Appraiser
3rd District Representative
Term Expires: January 1, 2030

Board Member
Lori Johnson, Lincoln
Certified General Appraiser
1st District Representative
Term Expires: January 1, 2031

Exhibit #5

NEBRASKA REAL PROPERTY APPRAISER BOARD
301 CENTENNIAL MALL SOUTH
PO BOX 94963
LINCOLN NE 68509-4963

If the requested materials are not received at the Board's office by the end of the day on May 1, 2026, the application will go before the Board for consideration at its next scheduled meeting on May 21, 2026.

Please feel free to contact me with any questions or concerns by phone at 402-471-9015, or by email at kashinda.sims@nebraska.gov.

Sincerely,

Kashinda Sims
Education Program Manager

Exhibit #6

NRPAB
Nebraska Real Property Appraiser Board
301 Centennial Mall South, First Floor
PO Box 94963
Lincoln, NE 68509-4963

Jim Pillen, Governor
Tyler N. Kohtz, Director
Tyler.kohtz@nebraska.gov

Website: https://appraiser.ne.gov/
Facebook: www.facebook.com/nrpab
Phone: 402-471-9015
Fax: 402-471-9017

May 7, 2026

LIZ DE KANTER
APPRAISAL INSTITUTE
200 W MADISON ST STE 2000
CHICAGO IL 60606-3515

RE: Nebraska Application for Approval

Dear Liz de Kanter,

The Nebraska Real Property Appraiser Board ("Board") has received the Application for Approval as a Continuing Education Activity ("Application") of the following activities:

- *Online Valuation Bias and Fair Housing Laws and Regulations Course* for 7.00 hours

The applications will be put in front of the Board for consideration at its next scheduled meeting on May 21, 2026. In accordance with 298 NAC Chapter 6, §003.02D, the application may be denied by the Board at any time during the process if the education provider, submitted activity or instructor(s) for the submitted activity fail to meet the requirements in the Act and Title 298 NAC. You will receive another letter informing you of the Board's decision after the meeting occurs.

In the meantime, please feel free to contact me with any questions or concerns at 402-471-9022.

Sincerely,

Kashinda Sims
Education Program Manager

Chairperson of the Board
Kevin Hermsen, Gretna
Certified General Appraiser
2nd District Representative
Term Expires: January 1, 2027

Vice-chairperson of the Board
Rodney Johnson, Norfolk
Certified General Appraiser
Licensed Real Estate Broker Rep
Term Expires: January 1, 2028

Board Member
Derek Minshull, North Platte
Financial Institutions
Representative
Term Expires: January 1, 2029

Board Member
Adam Batie, Kearney
Certified General Appraiser
3rd District Representative
Term Expires: January 1, 2030

Board Member
Lori Johnson, Lincoln
Certified General Appraiser
1st District Representative
Term Expires: January 1, 2031

NRPAB
Nebraska Real Property Appraiser Board

Agenda Item Summary

Prepared By: Kashinda Sims **Title:** Education Program Manager **Date:** May 21, 2026

Agenda Section: L. Education

Agenda Item Identification Number: 2261430.01

Subject: ASFMRA's Requested Instructor, Matt Gunderson

Description: ASFMRA's Application for Approval as a Continuing Education Activity for, "Mastering the Consultant and Expert Witness Role" identifies the qualification as an instructor for Matt Gunderson, one of three instructors for this education activity, as holding a bachelor's degree in any field and having at least three years of experience directly related to the subject matter to be taught.

SUMMARY

An Application for Approval as a Continuing Education Activity in Nebraska ("Application") for, "Mastering the Consultant and Expert Witness Role" was received at the Board office on March 30, 2026 [Exhibit 1]. The Application lists Matt Gunderson as one of three instructors for this activity. Gunderson's qualification as an instructor is identified by the education provider as holding a bachelor's degree in any field and having at least three years of experience directly related to the subject matter to be taught [Exhibit 2]. Based on the designated description and learning objectives received with the Application, it does not appear that Gunderson meets the three years of experience directly related to the subject matter to be taught. ASFMRA was notified on May 18, 2026, of the Application's notice to go before the Board.

RELEVANT LAWS/RULES/GUIDANCE DOCUMENTS/INTERNAL PROCEDURES

Neb. Rev. Stat. §76-2207.31 - Instructor means a person approved by the board that meets or exceeds the instructor requirements specified in the Real Property Appraiser Act and rules and regulations of the board and is responsible for ensuring that the education activity content is communicated to the activity's audience as presented to the board for approval and that the education activity contributes to the quality of real property valuation services provided to the public. A person that communicates assigned materials or a portion of the education activity content under the authorization of the education provider, but is not responsible for the education activity content, is not an instructor.

298 NAC Chapter 6, §005 - Any instructor(s) that meet the education provider's instructor qualifications policy, who is responsible for ensuring that the activity content is communicated to the activity's audience as approved must be identified on the education provider's application submitted for approval of the activity. Such identification must include first name, last name, email address, and phone number, and state the instructor's qualification as specified in Section 005.01 of this Chapter.

298 NAC Chapter 6, §005.01A - An instructor for any qualifying education activity, continuing education activity, or supervisory real property appraiser and trainee course, must hold a bachelor's degree in any field and have at least three years of experience directly related to the subject matter to be taught.

DISCIPLINARY/WRITTEN ADVISORY HISTORY

There are no known disciplinary actions taken by the Board or written advisories issued by the Board.

EXHIBITS

[Exhibit 1] - "ASMFRA (Mstrng the Consult and Exp Wit Role) Application_March 30, 2026" located in Database under Education (Search Education/Enter Activity Number '2261430'/ select 'Mastering the Consultant and Expert Witness Role'/ Communication and Documentation Log dated 05/18/2026)

[Exhibit 2] - "Gunderson Ins Qualifications_March 30, 2026" located in Database under Education (Search Education/ Enter Activity Number '2261430'/ Select 'Mastering the Consultant and Expert Witness Role'/ Communication and Documation Log dated 05/18/2026)

[Exhibit 3] - "ASFMRA (Mstrng the Consult and Exp Wit Role) Upd Desc, Lrn Obj, TO_May 5, 2026" located in Database under Education (Search Education/Enter Activity Number '2261430'/ Select 'Mastering the Consultant and Expert Witness Role'/Communication and Documentation Log dated 05/18/2026)

Exhibit #1

NRPAB
Nebraska Real Property Appraiser Board

301 Centennial Mall South, First Floor
PO Box 94963
Lincoln, NE 68509-4963
https://appraiser.ne.gov/
402-471-9015

Board Number: 2261430.01
Date Received:

RECEIVED
MAR 3 0 2026
BY: CF

For Board Use Only

APPLICATION FOR APPROVAL AS A CONTINUING EDUCATION ACTIVITY IN NEBRASKA

This application is to be used by an education provider applying for approval of a continuing education activity or resubmission of an active approved continuing education activity. A separate application form must be filed for each continuing education activity submitted for approval. Applicants should carefully read Chapter 6 of Title 298 of the Nebraska Administrative Code before completing the information below. Any application deemed to be incomplete may be returned.

Education Provider Information

Education Provider Name: American Society of Farm Managers and Rural Appraisers

Contact Person Name: Ilk (Last) Deanna (First) _____ (Middle)

Address: 720 S Colorado Blvd Suite 360S (PO Box or Street Number) Glenadle (City) CO (State) 800246 (Zip Code + 4)

dilk@asfmra.org (Email Address) 303-692-1222 (Area Code + Phone Number)

Continuing Education Activity Information

Activity Title: Mastering the Consultant and Expert Witness Role

Activity Length (Hours): 8

Each continuing education activity shall be at least two (2) hours in length, not to exceed eight (8) hours of instruction in any day. At least a one-half hour break shall be given to credential holder(s) by no later than the end of four (4) hours of instruction in any day. Except for semester hours received from an accredited college or university, education activity hours are determined as follows (exam included if applicable):

- *For a timed outline in a schedule format, where sixty (60) minutes equals one (1) hour in Coordinated Universal Time, the start time and the end time is utilized to determine the total minutes engaged in instruction. Breaks, meal periods, and time not engaged in instruction are removed. Fifty (50) minutes engaged in instruction out of each sixty (60) minute segment equals one (1) hour.*
- *For a timed outline in a non-schedule format, where each topic is assigned a specific duration, each minute engaged in instruction is utilized to determine the total minutes engaged in instruction. Fifty (50) minutes engaged in instruction equals one (1) hour.*

Activity Setting: ☒ Classroom ✓ ☐ Synchronous ☐ Asynchronous ☐ Hybrid

Synchronous educational offering means, the instructor and students interact simultaneously online, similar to a phone call, video chat or live webinar, or web-based meeting. Asynchronous educational offering means the instructor and students' interaction is non-simultaneous, and the student progresses at their own pace and follows a structured course content and quiz/exam schedule.

The activity is being submitted for approval as a:

☐ Seven-hour National USPAP Continuing Education Course

☐ Four-hour Valuation Bias and Fair Housing Laws and Regulations Course

☐ Seven-hour Valuation Bias and Fair Housing Laws and Regulations Course

■ Other ✓

Exhibit #1

AQB CAP Approval: ☐ Yes ■ No

The seven-hour Uniform Standards of Professional Appraisal Practice Continuing Education Course, the four-hour valuation bias and fair housing laws and regulations course, and the seven-hour valuation bias housing laws and regulations course shall be approved by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program.

This submission is a: ■ New Continuing Education Activity ☐ Resubmission of an Active Approved Continuing Education Activity

Continuing Education Activity Secondary Provider: ☐ Yes ■ No

Secondary provider means any education provider that purchases rights to, or otherwise lawfully acquires from another education provider, activity material to deliver.

Application Submission Requirements

All materials submitted to the Board related to an Application for Approval as a Continuing Education Activity in Nebraska are for Board use only and shall be retained by the Board.

If *New Continuing Education Activity* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, the following items are required:

☐ Completed application. not marked, however, application's required material obtained - KS 05/15/2026

☐ For an AQB CAP approved activity, a non-refundable continuing education application fee of $35.00.

OR

☐ For a non-AQB CAP approved activity, a non-refundable continuing education application fee of $100.00.

not marked, however, application was received with payment - KS 05/15/2026

☐ A document certifying completion issued to each attendee upon completion of any continuing education activity that includes the name of education provider, signature of education provider and/or instructor, name of activity as approved, location at which activity was conducted or presentation method, date(s) activity was conducted, number of hours, pass or fail statement, and name of attendee, **or** be an official transcript from a university or college that includes the name of activity as approved, the number of credit hours awarded, and the name of the attendee.

not marked, however, certificate was received with application and meets minimum requirements - KS 05/15/2026

If *Yes* is selected for Education Provider is a Secondary Provider of the Continuing Education Activity Material is selected under CONTINUING EDUCATION ACTIVITY INFORMATION:

☐ Evidence that the rights to the continuing education activity have been purchased or lawfully acquired from the education provider that owns the rights to the activity materials.

If *Resubmission of an Approved Continuing Education Activity* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, the following items are required:

☐ Completed application.

☐ For an AQB CAP approved activity, a non-refundable continuing education application fee of $35.00.

OR

☐ For a non-AQB CAP approved activity, a non-refundable continuing education application fee of $100.00.

☐ A document certifying completion issued to each attendee upon completion of any continuing education activity. The document includes the name of education provider, signature of education provider and/or instructor, name of activity as approved, location at which activity was conducted or presentation method, date(s) activity was conducted, number of hours, pass or fail statement, and name of attendee, or be an official transcript from a university or college that includes the name of activity as approved, the number of credit hours awarded, and the name of the attendee.

OR

☐ The name of education provider, signature of education provider and/or instructor, name of activity as approved, location at which activity was conducted or presentation method, date(s) activity was conducted, number of hours, pass or fail statement, name of attendee, or format have not changed on the document certifying completion since the Board's approval of the continuing education activity.

☐ A written explanation of the reason for resubmission.

Exhibit #1

Purpose for Resubmission of an Active Approved Continuing Education Activity

If *Resubmission of an Active Approved Continuing Education Activity* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, the reason for resubmission is:

- ☐ There is a change in the status of approval by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program.
- ☐ There is a change in the status of 298 NAC Chapter 6, § 001.15 qualifications under which a distance education activity was approved.
- ☐ There is a substantial change to the materials, presentation, or policies.
- ☐ There is a change in the qualifications as specified in 298 NAC Chapter 6, § 005 for any instructor.
- ☐ One or more instructors are added or removed by the education provider.
- ☐ The materials, theories, and/or methodologies are no longer current.
- ☐ The activity content and/or policies are no longer communicated or administered as approved.
- ☐ There is a change to a secondary provider's rights to the activity.

Non-AQB CAP Approved Continuing Education Activities

For an activity not approved by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program for continuing education, submit the following (If *Resubmission of an Active Approved Continuing Education Activity* is selected under CONTINING EDUCATION ACTIVITY INFORMATION, only information that has changed since the Board's approval of the continuing education activity is required):

- ■ An activity description that clearly describes the content.
- ■ All learning objectives that meet the requirements of 298 NAC Chapter 6, § 003.02A.2d.
- ■ An instructor policy that requires the use of instructors who meet the requirements of NAC Chapter 6, § 005.
- ■ All student and instructor materials that meet the requirements of 298 NAC Chapter 6, § 003.02A.2e.
- ■ A timed outline/activity matrix that accounts for the general flow and recommended time spent on topics contained within the activity and reflects hours of credit per topic.
- ■ A record retention policy that requires that a record of attendance for each activity is maintained for a period of at least five (5) years.
- ■ An attendance policy that meets the requirements of 298 NAC Chapter 6, § 003.02A.2h.
- ☐ If applicable, a closed-book final examination proctored in person or remotely by an official approved by the education provider that meets the requirements of 298 NAC Chapter 6, § 003.02A.2f. Bio-metric proctoring is acceptable. The examination may be written on paper or administered electronically on a computer workstation or other device. Oral exams are not acceptable.

Distance Education Continuing Education Activities

If *Asynchronous, or Hybrid (in which the learning environment includes Asynchronous interaction)* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, education activity includes:

- ☐ A closed-book final examination.

OR

- ☐ Prescribed activity mechanisms required to demonstrate knowledge of the subject matter.

If *Asynchronous* or *Hybrid (in which the learning environment includes asynchronous interaction)* is selected under CONTINUING EDUCATION ACTIVITY INFORMATION, evidence of delivery mechanism approval from one of the following sources:

- ☐ The Appraiser Qualifications Board of The Appraisal Foundation.

OR

- ☐ An organization approved by the Appraiser Qualifications Board of The Appraisal Foundation that provides approval of activity design and delivery (Secondary providers must have approval under own name). IDECC/ARELLO are acceptable.

OR

- ☐ Is conducted by an accredited college, community college, or university that offers distance education programs and is approved or accredited by the Commission on Colleges, a regional or national accreditation association, or by an accrediting agency that is recognized by the U.S. Secretary of Education, that awards academic credit for the distance education courses or that maintains an education delivery program that approves activity design and delivery that incorporate interactivity (If no closed-book final examination is included, evidence of prescribed activity mechanisms must be submitted with the application) **AND**
- ☐ The activity provides interaction in a reciprocal environment where the student has verbal or written communication with the instructor.

received via email 05/11/2026 -KS

Exhibit #1

Instructor Information

An instructor is an individual who is responsible for ensuring that the activity content is communicated to the activity's audience as presented to the Board for approval, and that the activity contributes to the quality of valuation services provided to the public. An individual who communicates assigned materials or a portion of activity content under the authorization of the education provider, but is not responsible for the activity content, is not an instructor.

If reporting more than two instructors for the activity, submit the form titled, "Supplemental Instructor Information for Education Activity Application" at https://appraiser.ne.gov/Education/

Instructor Name: Meneses, ARA (Last) Stacey (First) (Middle)

smeneses@cobank.com (Email Address) 406-880-8314 (Area Code + Phone Number)

Is the instructor a Nebraska real property appraiser or hold an appraiser license, registration, or certification in any other jurisdiction? ■ Yes ☐ No

Is the instructor an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation? *Required if the activity is a seven-hour National USPAP Continuing Education Course* ☐ Yes ■ No

An instructor for any continuing education activity must satisfy at least one of the following qualifications: *Select one option only*

■ Hold a bachelor's degree in any field and have at least three years of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in any field and have at least one year of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in a field that is directly related to the subject matter to be taught;

☐ Have five years of real property appraisal practice teaching experience directly related to the subject matter to be taught; or

☐ Have seven years of real property appraisal practice experience directly related to the subject matter to be taught.

Instructor Name: Gunderson, AFM (Last) Matt (First) (Middle)

matt_gunderson@hotmail.com (Email Address) (402) 496-7956 (Area Code + Phone Number)

Is the instructor a Nebraska real property appraiser or hold an appraiser license, registration, or certification in any other jurisdiction? ☐ Yes ■ No

Is the instructor an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation? *Required if the activity is a seven-hour National USPAP Continuing Education Course* ☐ Yes ■ No

An instructor for any continuing education activity must satisfy at least one of the following qualifications: *Select one option only*

■ Hold a bachelor's degree in any field and have at least three years of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in any field and have at least one year of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in a field that is directly related to the subject matter to be taught;

☐ Have five years of real property appraisal practice teaching experience directly related to the subject matter to be taught; or

☐ Have seven years of real property appraisal practice experience directly related to the subject matter to be taught.

received via email 05/11/2026 -KS

Exhibit #1

NRPAB
Nebraska Real Property Appraiser Board

301 Centennial Mall South, First Floor
PO Box 94963
Lincoln, NE 68509-4963
https://appraiser.ne.gov/
402-471-9015

Board Number: _____
Date Received:

For Board Use Only

SUPPLEMENTAL INSTRUCTOR INFORMATION FOR AN EDUCATION ACTIVITY APPLICATION IN NEBRASKA

An instructor is an individual who is responsible for ensuring that the activity content is communicated to the activity's audience as presented to the Board for approval, and that the activity contributes to the quality of valuation services provided to the public. An individual who communicates assigned materials or a portion of activity content under the authorization of the education provider, but is not responsible for the activity content, is not an instructor.

Any instructor of the qualifying education fifteen-hour National Uniform Standards of Professional Appraisal Practice Course, the seven-hour National Uniform Standards of Professional Appraisal Practice Continuing Education Course, and/or the supervisory real property appraiser and trainee course, must be an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation.

INSTRUCTOR INFORMATION

Instructor Name: Minahan (Last) Sean (First) (Middle)

sminahan@ldmlaw.com (Email Address)

(402) 255-3527 (Area Code + Phone Number)

Is the instructor a Nebraska real property appraiser or hold an appraiser license, registration, or certification in any other jurisdiction? ☐ Yes ■ No

Is the instructor an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation? ☐ Yes ■ No

An instructor for any continuing education activity must satisfy at least one of the following qualifications: *Select one option only*

☐ Hold a bachelor's degree in any field and have at least three years of experience directly related to the subject matter to be taught;

■ Hold a master's degree or higher in any field and have at least one year of experience directly related to the subject matter to be taught;

☐ Hold a master's degree or higher in a field that is directly related to the subject matter to be taught;

☐ Have five years of real property appraisal practice teaching experience directly related to the subject matter to be taught; or

☐ Have seven years of real property appraisal practice experience directly related to the subject matter to be taught.

Exhibit #1

General Requirements

1. The Board may at any time conduct an audit of any approved education activity to verify that the activity is being conducted in accordance with the Real Property Appraiser Act and Title 298 as approved. If requested, electronic access will be provided to the Board for any approved distance education activity. The electronic access must provide administrative rights that allow for access to the activity, quizzes, and examinations, without having to take the distance education activity in sequential order and without having to take quizzes to examinations to proceed with the activity. In addition, at the Board's request, a transcript of the distance education activity must be provided to the Board.

2. The Board may at any time review activity and instructor materials approved by the Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program to verify that the activity and/or instructor(s) meets the requirements of the Real Property Appraiser Act and Title 298 as approved.

3. Approval of activities does not transfer from one education provider to another, unless one education provider obtains the legal rights to all activities of another education provider. The expiration date of any continuing education activity will remain the same as approved under the previous education provider.

4. Education providers and instructors will comply with the Nebraska Private Postsecondary Career Schools Act, NEB. REV. STAT § 85-1601, et seq. as applicable.

5. Knowingly offering or attempting to offer a qualifying or continuing education activity as being approved to a real property appraiser or an applicant, without first obtaining approval of the activity, except for activities required by an accredited degree-awarding college or university for completion of a degree in real estate, if the college or university had its curriculum approved by the Appraiser Qualifications Board as qualifying education is a violation of Neb. Rev. Stat. § 76-2238(21).

6. Any continuing education activity must contribute to a credential holder's development of real property appraiser related skill, knowledge, and competency in any one or more of the following subjects:
   (1) Real property appraisal practice,
   (2) Valuation methodology and/or techniques,
   (3) Market fundamentals, characteristics, conditions, and analysis,
   (4) Real property concepts, characteristics, and analysis,
   (5) Real property appraiser client communication,
   (6) Arbitration, dispute resolution
   (7) Ethics and standards of professional practice, USPAP
   (8) Valuation bias and fair housing laws and regulations,
   (9) Land use, planning, zoning
   (10) Management, leasing, timesharing,
   (11) Property development, partial interests,
   (12) Real Estate law, easements, and legal interests,
   (13) Real estate litigation, damages, condemnation,
   (14) Real estate financing and investment,
   (15) Real property appraisal-related computer applications,
   (16) Real estate securities and syndication,
   (17) Seller concessions and impact on value, and/or
   (18) Energy-efficient items and "green building" appraisals.

7. An activity in which the primary purpose is training in the use of a specific software, and not utilization of a software to improve competency in any of the previously listed subjects does not meet the requirements for approval as a continuing education activity.

8. No activity may rely upon a textbook as the primary instructional material. Textbooks are permitted to be used as a background reference for an activity; however, textbooks will not be reviewed as the activity. All activities must contain sufficient stand-alone instructional material supporting the specific activity learning objectives.

9. An instructor for any qualifying education activity, continuing education activity, or supervisory real property appraiser and trainee course, must meet qualifications established pursuant to any other applicable law.

10. An instructor for any qualifying education activity, continuing education activity, or supervisory real property appraiser and trainee course, who holds a credential as a real property appraiser in Nebraska or any other jurisdiction shall maintain each credential in good standing in accordance with the laws of the jurisdiction in which each credential is held, not have had a credential revoked, suspended, or have surrendered a credential in lieu of disciplinary action within five (5) years; and not have had disciplinary action taken against his or her credential that may constitute a violation of NEB. REV. STAT. § 76-2238 within five (5) years.

11. The standing of an instructor identified on an education provider's application submitted for approval, who holds a credential as a real property appraiser in Nebraska or an appraiser credential any other jurisdiction, may be verified through the Appraiser Registry of the Appraisal Subcommittee for the Federal Financial Institutions Examination Council.

12. Any instructor of the qualifying education fifteen-hour National Uniform Standards of Professional Appraisal Practice Course, the continuing education seven-hour National Uniform Standards of Professional Appraisal Practice Continuing Education Course, and/or the supervisory real property appraiser and trainee course, must be an AQB Certified USPAP Instructor by the Appraiser Qualifications Board of The Appraisal Foundation.

13. An instructor for any qualifying education activity, continuing education activity, or supervisory real property appraiser and trainee course must satisfy the education provider's instructor policy that requires the use of instructors who meet the requirements of the Nebraska Real Property Appraiser Act and Title 298.

Exhibit #1

I hereby attest that I have included all required materials, complied with all the listed requirements, completed the submitted application in its entirety, and that all statements and materials are true and correct to the best of my knowledge and belief. I understand that, should this application be found to be incomplete, that it may be considered invalid and be returned. Furthermore, I understand that if the Board finds that one or more statements made in this application, or materials submitted with this application, are not true and correct, the Board may deny the application.

Print Name: Ilk (Last) Deanna (First) (Middle)

Signature

3/25/26

Date

Expiration Date and Rescinding Approval

1. Except for the seven-hour Uniform Standards of Professional Practice Continuing Education Course, the seven-hour valuation bias and fair housing laws and regulations course, and the four-hour valuation bias and fair housing laws and regulations course, which expire on the date on which the approval by the Appraiser Qualifications Board expires, a continuing education activity shall expire on the date five years after the date of approval.
2. The Board may rescind approval of a continuing education activity if the Board finds:
    1) Falsification of information submitted for activity approval,
    2) A change in approval by Appraiser Qualifications Board of The Appraisal Foundation through its Course Approval Program,
    3) A change in status of 298 NAC Chapter 6, § 001.15 qualifications under which a distance education activity was approved,
    4) Substantial errors and/or deficiencies in the materials or presentation,
    5) The materials, theories, and/or methodologies are not current and/or practical,
    6) The instructor(s) responsible for the activity content and presentation do not meet the qualification specified in 298 NAC Chapter 6, § 005,
    7) The activity content and/or policies are not communicated or administered as approved,
    8) A material violation of Real Property Appraiser Act or Title 298 by the education provider or instructor for the activity, or
    9) There is a change in the secondary provider's rights to the activity.
3. If reason to rescind approval of an activity is found, a written notice shall be made to the education provider that includes a description of the reason(s) for rescinding approval. The education provider has sixty (60) days from the date of notice to provide a written response. If the response is satisfactory to the Board, the Board will not rescind its approval. If the response is not satisfactory to the Board, or no response is received, the Board may rescind approval of the activity. If approval is rescinded, the education provider may file a new application for approval of the qualifying education activity, and if so, meet the requirements in place at the time a new application is submitted to the Board.
4. Nothing in 298 NAC Chapter 6 may be construed to preclude education providers from surrendering approval of education activities.

Directions

1. Complete entire application. If required information is not provided, application will be considered incomplete and may be returned.
2. Along with the application, all information requested must be included.
3. Mail application, fee, and supporting documentation to:
    NEBRASKA REAL PROPERTY APPRAISER BOARD
    PO BOX 94963
    LINCOLN NE 68509-4963

    Deliver to (FedEx of UPS):
    NEBRASKA REAL PROPERTY APPRAISER BOARD
    301 CENTENNIAL MALL SOUTH, FIRST FLOOR
    LINCOLN NE 68508
4. Questions or concerns may be directed to Board staff at 402-471-9015 or nrpab.education@nebraska.gov.

Exhibit #1

RECEIPT

NEBRASKA REAL PROPERTY APPRAISER BOARD

No.: 23656 Date: 03/30/2026

Received from: ASFMRA

For: 1 CE New app (non-AQB approved)

Check # 32487

Application Fee	$	
AMC Registration Fee: ___ new ___ renewal		
AMC ASC National Registry Fee: _____ appraisers @ $25		
Reporting Year ____/____/_____ to ____/____/_____		
Review of Courses: ___ QE 1 CE ___ CE renewal		
Penalty Fees/Fines		100.00
Fingerprint Processing		
Late Processing: _____ months @ $25		
Other: _____		
TOTAL	$	100.00

Received by: Kristin Gering

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

American Society of Farm Managers and Rural Appraisers
720 South Colorado Blvd.
Suite 360-S
Glendale, CO 80246

SouthState Bank

32487
Date: 03/09/2026

Pay To
The Order of NE Real Estate Appraisers Board
One Hundred Dollars

$**100.00**

NE Real Estate Appraisers Board
United States

Amanda DeSoul

Details on back. Security Features Included

VOID VOID VOID VOID VOID

Exhibit #2

MATTHEW J. GUNDERSON, AFM

Chief Executive Officer | Senior Vice President | Strategic Growth Leader
matt_gunderson@hotmail.com | 605-695-3213

EXECUTIVE PROFILE

Driving exponential growth, strategic innovation, and organizational excellence across agriculture, financial services, and non-profit sectors. Proven track record of scaling operations, leading $13B+ asset portfolios, and delivering breakthrough results through strategic vision, stakeholder alignment, operational excellence and data-driven decision making. Expert in M&A strategy, market expansion, digital transformation, and building high-performance teams that consistently exceed targets.

Strategic Vision: Proven ability to identify market opportunities, develop comprehensive strategies, and execute complex initiatives that drive sustainable growth and competitive advantage.
Operational Excellence: Track record of optimizing processes, implementing technology solutions, and building scalable systems that enhance efficiency and profitability.
Leadership Development: Expertise in building high-performance teams, succession planning, and creating cultures of accountability and continuous improvement.
Stakeholder Management: Exceptional relationship-building skills with boards, investors, clients, and industry partners, consistently building trust and delivering results.

Core Leadership Competencies: Strategic Planning & Execution | P&L Management | Mergers & Acquisitions | Digital Transformation | Stakeholder Relations | Board Governance | Team Development | Market Expansion

EXECUTIVE EXPERIENCE

GEO | *Gretna, Nebraska* | 2025 – Present

Fractional C-Suite Leadership offering modular, strengths-based, and tailored leadership to the unique needs of agricultural, financial services, estate planning and non-profit organizations.

CEO | *2025 – Present*

- Guide organizations through growth, transition, or strategic alignment bringing clarity, confidence, and collaboration to every decision.
- Specialize in agricultural business leadership and operational excellence by helping agriculture companies, lenders, non-profits, universities in strategic vision, organizational alignment and operational excellence through data-driven decision making.
- Assist family farming and livestock operations in overseeing administrative, financial, human resources, record keeping and estate planning processes.

FARMERS NATIONAL COMPANY | *Omaha, Nebraska* | 2014 – 2025

$13 billion asset management firm - Nation's largest integrated farm management, real estate & energy services company

Senior Vice President, Business Growth & Strategic Relations | *2023 – 2025*
Strategic Leadership & Growth:

- Executive team member orchestrating enterprise-wide growth strategies across 11 business lines, driving alignment between operations, sales, and corporate strategy
- Spearheaded M&A initiatives and institutional client acquisitions, expanding market presence across Farm Management, Ranch Management, and Forestry divisions
- Led strategic partnerships with industry leaders including American Society of Farm Managers & Rural Appraisers, Farmland Capital Alliance, and major banking and lending institutions

Operational Excellence:

- Directed Consultation, Collateral Inspection, and Capital Advisor business lines with full P&L responsibility
- Chaired FNC Foundation Board of Directors, overseeing scholarship programs and community investment initiatives
- Established corporate representation strategy across key industry associations and board positions

Senior Vice President, Strategy, Sales & Marketing | *2022 – 2023*

Corporate Strategy & Long-Range Planning:

- Architected comprehensive corporate strategy framework across all 11 business lines, integrating market analysis, competitive positioning, and growth opportunities
- Led executive Long-Range Planning Committee, establishing 5-year strategic roadmaps and performance metrics
- Enhanced strategic planning methodology through advanced SWOT analysis for Area Vice Presidents and Sales Coordination Committee

Senior Vice President, Sales & Marketing | *2020 – 2021*

Revenue Growth & Market Expansion:

- Launched first comprehensive 5-year Marketing Strategic Plan, unifying all marketing efforts and establishing clear ROI metrics
- Created Collateral Inspections division from concept to six-figure revenue generator, including proprietary software development that reduced processing time by 75%
- Built high-performance sales culture through bi-annual Sales Coordination Meetings and comprehensive training programs

Digital Transformation & Innovation:

- Championed technology initiatives including Oracle Enterprise 1 implementation, CRM integration, and client portal development
- Established strategic technology partnerships enhancing service delivery and operational efficiency

Vice President, Farm & Ranch Management | *2019 – 2020*

- Led national prospective client development and sales team coordination
- Managed key client relationships and cross-business line sales integration

Assistant Vice President Client Relations, Farm & Ranch Management | *2015 – 2018*

- Oversight of the key client's program and a farm management territory.
- Led training of new farm managers and other employees
- Directed special projects for the Company and Farm & Ranch Management

---

KNIGHTS OF AK-SAR-BEN FOUNDATION | *Omaha, Nebraska* | 2006 – 2014

Nebraska's premier community foundation supporting scholarships and economic development

Executive Vice President | *2010 – 2014*

Strategic Leadership & Governance:

- Executed Board-directed strategic initiatives and organizational transformation
- Directed Human Resources, IT, Finance, and Operations functions with full executive authority
- Managed external audit relationships and fiscal oversight for multi-million dollar foundation
- Served as primary Board liaison coordinating volunteer leadership and auxiliary boards

Executive Director, River City Rodeo & Stock Show | *2006 – 2014*

World's second-largest rodeo and largest national 4-H stock show

Turnaround Leadership & Financial Performance:

- Transformed financially distressed operation, achieving **400% net income increase** and establishing record profitability

Exhibit #2

- Revolutionized sponsorship strategy, generating **500% growth in title sponsorships** and **900% increase in in-kind partnerships**
- Pioneered 4-H Stock Show profitability strategy, achieving first-ever positive net income in 86-year history
- Led comprehensive rebranding initiative driving community engagement and market awareness
- Managed complex event logistics, budgets, marketing, and scholarship programs

---

GUNDERSON ENTERPRISES, INC. LLC | *Mission Hill, South Dakota* | 2002 – Present
President & Owner

- Founded and operate multiple diversified agricultural, seedstock livestock and consulting enterprises.

EARLY CAREER & FOUNDATION EXPERIENCE

University of Nevada Cooperative Extension | 4-H Activities & Events Manager (2004-2006)
South Dakota Cooperative Extension | Extension Assistant Youth Development (2002-2004)
Hull-less Oat Growers of America | Executive Director (2002-2004)

EDUCATION & PROFESSIONAL CREDENTIALS

Bachelor of Science, Animal Science | *South Dakota State University*
Business & Production Emphasis • Agricultural Business & Marketing Minors
Graduate Coursework | *Educational Administration & Leadership*
South Dakota State University • University of Nevada Reno

Professional Certifications:

- **Accredited Farm Manager (AFM)** | American Society of Farm Managers & Rural Appraisers
- **Real Estate License** | Nebraska & Minnesota
- **ASFMRA Leadership Institute Graduate**

BOARD POSITIONS & INDUSTRY LEADERSHIP

Current Appointments:

- Ag. Builders of Nebraska | Member
- Greater Omaha SDSU Alumni Chapter | Board Member & Founding President
- Nebraska Farm Bureau Services Board | Board Member
- Nebraska State Fair 1868 Foundation | Board Member & Fundraising Chair
- Kiwanis Club of Omaha | Member (Former President)

Previous Leadership:

- National Youth Livestock Contests | Board Chair
- Nebraska Farm Bureau Foundation | Former Board Member & Vice Chair
- Omaha Agri-Business Club | Former President

RECOGNITION & AWARDS

2023 & 2020 | H.E. "Buck" Stalcup Excellence in Education Award | ASFMRA
2019 | Hall of Fame Inductee | The ShowTimes
2015 | Top 10 Leaders Under 40 | Cattle Business Weekly

GALLUP STRENGTHSFINDER:

Achiever | Learner | Analytical | Positivity | Woo

received via email 05/05/2026 -KS

Exhibit #3

American Society of Farm Managers & Rural Appraisers

Mastering the Consultant and Expert Witness Role: From Field to Courtroom

Seminar Length: 8 hours

Description

Whether you've never seen the inside of a courtroom or you're looking to sharpen your expert-witness skills, this Mock Trial provides a practical, engaging, and memorable learning experience tailored to the realities of agricultural appraisal and farm management. Step into the courtroom and experience the expert-witness role like never before. This interactive Mock Trial is designed specifically for consultants, farm managers and rural appraisers who may be called upon to provide valuation, management, real estate and legal description expertise in litigation. Participants will follow the full arc of the legal process — from initial engagement with counsel to deposition to trial testimony — while observing how consulting, management, appraisal and real estate work is challenged, defended, and ultimately judged in a live courtroom setting.

Learning Objectives

1. Prepare and deliver expert testimony specific to agricultural land—including irrigated acres, rangeland, improvements, and mixed-use parcels.
2. Apply appropriate valuation methodologies (cost, sales comparison, parcel allocation) and defend them under cross-examination.
3. Analyze how access, water availability, topography, and improvements influence a court's evaluation of partition feasibility.
4. Demonstrate effective communication in the witness chair, using clear reasoning, defensible adjustments, and evidence*based conclusions.
5. Evaluate operational impacts of parcel division, including cropping patterns, grazing rotations, irrigation systems, fencing, and water infrastructure.
6. Evaluate expert witness performance using a structured rubric focused on credibility, rigor, clarity, and legal relevance.

Exhibit #3

American Society of Farm Managers & Rural Appraisers

Outline

Time	Topics	Learning Objectives The student will be able to	Slides	Approved CE Appraisal Topic Alignment
7:30-7:50 am	Welcome and Orientation: Introductions, goals, ground rules, and case primer.	Orient to objectives; preview case facts and legal remedies.		Litigation & expert witness practice; Appraisal assignment scope & competency framing (USPAP context); Real estate law overview (partition actions).
7:50-8:20 am	Case Study Briefing: Facts, parcels (North Pivot, Unit 62/Mirage Flats, Ranch with sections and improvements), ownership shares, and the competing remedies	Analyze how access, water availability, topography, and improvements influence a court's evaluation of partition feasibility. Apply appropriate valuation methodologies (cost, sales comparison, parcel allocation) and defend them under cross-examination.		Partial interests & partition; Easements/access & legal interests; Appraisal methods (Sales Comparison, Cost); Market analysis & highest and best use; Water rights & improvements.
8:20-8:40 am	Roles and Team Assignments: Parties (Appellants vs. Appellees), counsel, multiple experts (valuation, operations, access, water), fact witnesses, and judge(s).	Prepare and deliver expert testimony specific to agricultural land—including irrigated acres, rangeland, improvements, and mixed-use parcels.		Litigation & expert witness (pretrial preparation); Communication of appraisal opinions; Appraisal review concepts (credibility factors).
8:40-9:40 am	Team Prep: Each side preps theory, witness order, exhibits; experts draft outlines.	Prepare and deliver expert testimony specific to agricultural land—including irrigated acres, rangeland, improvements, and mixed-use parcels. Analyze how access, water availability, topography, and improvements		Report writing & workfile documentation; Appraisal methods selection & support (Sales Comparison, Cost); Marketability analysis.

American Society of Farm Managers & Rural Appraisers

		influence a court's evaluation of partition feasibility. Apply appropriate valuation methodologies (cost, sales comparison, parcel allocation) and defend them under cross-examination.		
9:40-9:50 am	BREAK			
9:50-10:35 am	Evidentiary Motions and Foundations: Practice qualifying experts; foundations for exhibits (maps, comps, cost sheets).	Prepare and deliver expert testimony specific to agricultural land—including irrigated acres, rangeland, improvements, and mixed-use parcels.		Litigation & expert witness practice; Real estate law & legal procedure (foundations); Ethics & professional standards (testimony conduct); Appraisal review (qualifying experts).
10:35-10:45	BREAK			
10:45-11:45	Mock Trial, Pt. 1: Opening Statements (6–8 min/side) Plaintiff's case: Experts and witnesses	Prepare and deliver expert testimony specific to agricultural land—including irrigated acres, rangeland, improvements, and mixed-use parcels. Demonstrate effective communication in the witness chair, using clear reasoning, defensible adjustments, and evidence-based conclusions.		Litigation & expert witness testimony; Developing and defending opinions of value; Sales Comparison & Cost approach application; Communication & report writing.
11:45 am-12:45 pm	LUNCH			
12:45-1:45 pm	Mock Trial, Pt. 2: Cross by defense	Prepare and deliver expert testimony specific to agricultural land—including irrigated acres, rangeland, improvements, and mixed-use parcels. Demonstrate effective communication in the witness chair, using clear		Litigation & expert witness practice; Appraisal review and rebuttal; Marketability, access & easements; Adjustments & reconciliation defense.

American Society of Farm Managers & Rural Appraisers

		reasoning, defensible adjustments, and evidence-based conclusions.		
1:45-1:55 pm	BREAK			
1:55-3:10 pm	Mock Trial, Pt. 3: Defendant's case: Experts and Witnesses Cross by plaintiffs Closing statements (6-8 min/side)	Prepare and deliver expert testimony specific to agricultural land—including irrigated acres, rangeland, improvements, and mixed-use parcels. Demonstrate effective communication in the witness chair, using clear reasoning, defensible adjustments, and evidence-based conclusions.		Litigation & expert witness testimony; Appraisal methods and parcel allocation; Partial interests & partition; Operational impacts to value (ag facilities, irrigation, water).
3:10-3:20 pm	BREAK			
3:20-3:40 pm	Judge Renders Opinion: provides rational aligned to legal standards	Evaluate expert witness performance using a structured rubric focused on credibility, rigor, clarity, and legal relevance. Analyze how access, water availability, topography, and improvements influence a court's evaluation of partition feasibility.		Appraisal review (credibility, rigor, clarity); Real estate law (partition standards); Marketability & access evaluation; Owelty/settlement concepts.
3:40-4:10 pm	Debrief and Peer Evaluations: Participants score experts using rubric; panel feedback	Evaluate expert witness performance using a structured rubric focused on credibility, rigor, clarity, and legal relevance. Analyze how access, water availability, topography, and improvements influence a court's evaluation of partition feasibility.		Appraisal review & review writing; Professional communication; Litigation practice management & ethics.
4:10-4:30	Wrap-Up and Takeaways			Professional practice considerations for litigation work; Ethics &

Exhibit #3

American Society of Farm Managers & Rural Appraisers

				professionalism; Next steps for CE and accreditation.

07:30a-04:30p = 9 hours => 540 - 100(lunch and breaks) = 440/50 = 8.8 hours

NRPAB
Nebraska Real Property Appraiser Board

Memo

To: Nebraska Real Property Appraiser Board

From: Kashinda Sims, Education Program Manager

CC:

Date: May 21, 2026

Re: Review of Nebraska Community College Real Estate Degree Programs for Potential AQB Approval

---

The Board's short-term goal to reach out to Nebraska colleges, community colleges, and universities with real estate degree programs to gauge interest in obtaining AQB Approval was completed as of May 4, 2026.

The Appraisal Foundation's Real Estate Degree Review Program is an alternative way for students with real estate college degrees to receive credit for qualifying education. Instead of reviewing each course individually, the AQB evaluates the entire associate, bachelor's or graduate real estate degree from a college or university to see how much of the required core curriculum the program covers under the Real Property Appraiser Qualification Criteria ("Criteria"). If a degree program does not cover all core curriculum course material, any qualifying education still required to become a trainee real property appraiser, will be listed in the approval letter.

Staff utilized the University of Nebraska – Omaha's ("UNO") Bachelor of Business Administration degree with a concentration in Real Estate and Land Use Economics program as well as The AQB's Guide Note 1 for required core curriculum content as a guide to reviewing for eligible degree programs. Below is a brief summary of each degree program reviewed by staff:

- Bellevue University
    - Bachelor's Degree in Finance with a minor in Tax
        - Content does not appear to meet any core curriculum requirements.
    - Bachelor's Degree in Financial Planning
        - Content does not appear to meet any core curriculum requirements.

- Bryan College of Health Sciences
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Central Community College
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Chadron State College
    - Degree of Bachelor of Arts in Business Administration with a Minor in Agri-business
        - Content does not appear to meet any core curriculum requirements.

- Clarkson College
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- College of Saint Mary
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Concordia University – Nebraska
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Creighton University
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Doane University
    - Agribusiness Degree
        - Content does not appear to meet any core curriculum requirements.

- Grace University
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.
- Hastings College
    - Bachelor's in Agribusiness
        - Content does not appear to meet any core curriculum requirements.
    - Bachelor's in Business Administration
        - Content does not appear to meet any core curriculum requirements.

- Little Priest Tribal College
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Metropolitan Community College
    - Associate's Degree in Business Administration with a Career Certificate as a Real Estate Specialist (see program description below)
        - Review of the career certificate when applied to the associate's degree in business administration, appears to meet requirements as an AQB Approved Degree Program. Staff contacted The Appraisal

Foundation to request feedback as to if the program was eligible for AQB approval prior to engaging with the institution. In response, The Appraisal Foundation provided procedure for degree programs applying for AQB approval. Based on review of the AQB approved program procedures, it appears that any approval would not exceed thirty (30) hours of qualifying education. The effort would greatly exceed the benefits for application.

- Midland University
  - Bachelor's of Science in Business Administration Agribusiness
    - Content does not appear to meet any core curriculum requirements.

- Mid-Plains Community College
  - Associate's Degree in Business Administration
    - Content does not appear to meet any core curriculum requirements.

- Nebraska Christian College
  - Bachelor's of Business Administration
    - Content does not appear to meet any core curriculum requirements.

- Nebraska College of Technical Agriculture
  - There are no known undergraduate programs that appear to meet core curriculum requirements.

- Nebraska Indian Community College
  - There are no known undergraduate programs that appear to meet core curriculum requirements.

- Northeast Community College
  - There are no known undergraduate programs that appear to meet core curriculum requirements.

- Nebraska Methodist College of Nursing & Allied Health
  - There are no known undergraduate programs that appear to meet core curriculum requirements.

- Nebraska Wesleyan University
  - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Peru State College
  - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Southeast Community College Area
  - There are no known undergraduate programs that appear to meet core curriculum requirements.

- Summit Christian College
  - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- The Creative Center

    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- Union Adventist University (Union College)
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

- University of Nebraska at Kearney
    - Bachelor's of Science in Agribusiness Comprehensive.
        - Content does not appear to meet any core curriculum requirements.

- University of Nebraska – Lincoln
    - Bachelor's of Science in Agriculture Economics
        - Content does not appear to meet any core curriculum requirements.

- Wayne State College
    - Bachelor's in Business Administration/Agribusiness
        - Content does not appear to meet any core curriculum requirements.

- Western Nebraska Community College
    - There are no known undergraduate programs that appear to meet core curriculum requirements.

- York College
    - There are no known undergraduate or graduate programs that appear to meet core curriculum requirements.

Business Administration (BSAAS)

Location(s): Fort Omaha Campus, South Omaha Campus, Elkhorn Valley Campus, Online

Award: Associate in Applied Science Degree
Academic Focus Area: Business

Business administration includes all aspects of leading people and managing resources. Within a business, administration spans all operational functions including accounting, finance, marketing, management, human resources, law, etc. Business administrations seeks to accomplish the organizational goals and objectives through the efficient and effective utilization of all resources.

Graduation Requirements
To earn this degree, a student must complete all required courses.
Total credit hours required: 96.0

Recommended Curriculum Plan

Links to Additional Resources

Tuition Information
Financial Aid
Scholarships

Major Requirements - 46.5 credits

- ACCT 1100 - Accounting I 4.5 Credits
- ACCT 1110 - Accounting II 4.5 Credits
- ACCT 1120 - Accounting III 4.5 Credits
- BSAD 1000 - Introduction to Business 4.5 Credits
- BSAD 1100 - Business Law I 4.5 Credits
- MRKT 1010 - Principles of Marketing 4.5 Credits
- ECON 1000 - Macroeconomics 4.5 Credits
- ECON 1100 - Microeconomics 4.5 Credits
- MGMT 2100 - Principles of Management 4.5 Credits
- FINA 2230 - Business Finance 4.5 Credits
- BSAD 2940 - Business Capstone 1.5 Credits

Elective Requirements - 27.0 credits

Select 27 credit hrs. from the following prefixes:

ACCT, BSAD, ECON, FINA (excluding FINA 1000), ENTR, INSU, LAWS, MGMT, MRKT, and REES.

Students may not use the same course to satisfy more than one degree requirement.

General Education Course Recommendations for this Program:

- Professionalism/Life Skills and Information Literacy: HMRL 1010

Associate in Applied Sciences General Education Requirements - 22.5 credits

The following are General Education requirements for an Associate in Applied Sciences degree (AAS). **Students may not use the same course to satisfy more than one degree requirement.**

Communication

1 Course 4.5 credit hrs.

Select 1 Level I course from the list of Communication General Education Courses.

Quantitative/Numeracy

1 Course 4.5 - 5.0 credits

Please check your degree program for recommended Math course. Based on the Math course you select, pre-requisites may be required.

Select 1 course from the list of Quantitative/Numeracy Skills General Education Courses.

Critical Thinking/Creativity & Social/Cultural Awareness

1 Course 4.5 credit hrs.

Select 1 course from the list of Humanities **or** Social Sciences courses under the Critical Thinking/Creativity & Social/Cultural Awareness General Education Courses.

Scientific Inquiry

1 Course 4.5-6.0 credit hrs.

Select 1 course from either the list of Natural Sciences **or** Social Sciences General Education courses.

**Students choosing a Social Sciences course to satisfy the Scientific Inquiry requirement should take a Humanities course to satisfy the Critical Thinking/Creativity and Social/Cultural Awareness competency.*

Professionalism/Life Skills & Information Literacy

1 Course 4.5

Select 1 course from the list of Professionalism/Life Skills and Information Literacy General Education Courses.

Recommended Curriculum Plan

Business Administration (BSAAS)

The following plan is designed to be the most direct path to degree completion and is **based on a fall quarter start**. Students are expected to meet with their student success navigator or advisor to plan a customized course schedule that meets their specific needs. For more information or assistance with registering, please call 531-622-2400.

Year 1

Quarter 1

- BSAD 1000 - Introduction to Business 4.5 Credits
- HMRL 1010 - Human Relations Skills 4.5 Credits **Recommended Professionalism/Life Skills and Information Literacy general education course for this program.*
- **Elective** - Select **1** elective course from those listed in the degree requirements.

Quarter 2

- MRKT 1010 - Principles of Marketing 4.5 Credits
- **Communication General Education -** Select 1 course from the list of Communication general education course options.
- **Elective** - Select **1** elective course from those listed in the degree requirements.

Quarter 3

- BSAD 1100 - Business Law I 4.5 Credits
- **Quantitative/Numeracy General Education -** Select 1 course from the list of Quantitative/Numeracy Skills general education course options.
- **Elective** - Select **1** elective course from those listed in the degree requirements.

Quarter 4

- ACCT 1100 - Accounting I 4.5 Credits
- ECON 1100 - Microeconomics 4.5 Credits
- **Critical Thinking/Creativity & Social/Cultural Awareness General Education -** Select 1 course from the list of Humanities or Social Sciences general education course options.

Additional Note: ACCT 1100, ACCT 1110, and ACCT 1120 must be completed in order.

Year 2

Quarter 5

- ACCT 1110 - Accounting II 4.5 Credits
- ECON 1000 - Macroeconomics 4.5 Credits
- **Elective** - Select **1** elective course from those listed in the degree requirements.

Quarter 6

- ACCT 1120 - Accounting III 4.5 Credits
- MGMT 2100 - Principles of Management 4.5 Credits
- **Elective** - Select **1** elective course from those listed in the degree requirements.

Quarter 7

- FINA 2230 - Business Finance 4.5 Credits
- **Elective** - Select **1** elective course from those listed in the degree requirements.

Quarter 8

- BSAD 2940 - Business Capstone 1.5 Credits
- **Scientific Inquiry General Education -** Select **1** course from the General Education Natural Sciences or Social Sciences course options.

Program Level Student Learning Outcomes

- Prepare a business report that effectively communicates to a target audience.
- Identify ethical dilemmas in business situations.
- Recommend ethical courses of action in business.
- Explain how diversity affects the business environment.
- Apply a decision-making process to business issues.
- Apply core concepts of the foundational business disciplines: accounting, business law, economics, finance, marketing and management.
- Design a career development plan

Real Estate Specialist (RESCC)

Location(s): Online

Award: Career Certificate
Pathway to Associates Degree: Business Administration (BSAAS)
Academic Focus Area: Business

This program prepares students for varied fields related to real estate, including residential and commercial real estate sales. Studies include principles of real estate, specific Nebraska license laws, assistance in applying for state and national real estate exam, investments, finance, sales, property management, and real estate calculations. Finance is included to prepare students for managing income and increase awareness of client circumstances and challenges in funding homes and other real estate investments.

Graduation Requirements
To earn this degree, a student must complete all required courses.
Total credit hours required: 27.0

Links to Additional Resources

Tuition Information
Financial Aid
Scholarships

Course Requirements - 27.0 credits

- REES 1000 - Real Estate Principles 4.5 Credits
- REES 1100 - Real Estate Law 4.5 Credits
- REES 2100 - Real Estate Finance 4.5 Credits
- REES 2110 - Building and Property Management 4.5 Credits
- REES 2120 - Real Estate Sales and Marketing 4.5 Credits
- REES 2200 - Real Estate Investments 4.5 Credits

Program Level Student Learning Outcomes

1. Students will understand basic terms in real estate and describe forms of real estate ownership available to individuals and business entities.
2. Students will explore the legal system and nature of real property by defining, describing, and illustrating the terminology and characteristics inherent and unique to the field of real estate such as analyzing the various interests, rights, and relationships that exit by virtue of constitutional law, statutes, and common law relative to real estate transactions.
3. Students will be about to evaluate the nature and cycle of real estate finance and the mortgage market by identifying the differences of various instruments available.
4. Students will assess the nature of real estate investments including the purpose, ownership interests, and feasibility.
5. Students will be able to analyze the role and purpose of professional property management in terms of planning, marketing and contract negotiations.
6. Students will be ab to define personal time management techniques as well as the goals and objectives of a manager.

NRPAB
Nebraska Real Property Appraiser Board

Guidance Document 26-02

Proposed May 21, 2026

This guidance document is advisory in nature but is binding on the Nebraska Real Property Appraiser Board ("Board") until amended or repealed by the Board. A guidance document does not include internal procedural documents that only affect the internal operations of the Board and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document (Neb. Rev. Stat. § 84-901.03 (2)).

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

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?
>
> 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 for 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. Any document certifying completion for the 8-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted to meet the qualifying education requirements for an initial or upgrade credential awarded under the requirements in the 2026 Criteria or was accepted as meeting this continuing education requirement in another jurisdiction. Any document certifying completion for the 7-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted as meeting this continuing education requirement in another jurisdiction.

NRPAB
Nebraska Real Property Appraiser Board

Guidance Document 26-02

Proposed May 21, 2026 (Amended)

This guidance document is advisory in nature but is binding on the Nebraska Real Property Appraiser Board ("Board") until amended or repealed by the Board. A guidance document does not include internal procedural documents that only affect the internal operations of the Board and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document (Neb. Rev. Stat. § 84-901.03 (2)).

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

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?
>
> 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~~for~~ 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. ~~Any document certifying completion for the 8-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted to meet the qualifying education requirements for an initial or upgrade credential awarded under the requirements in the 2026 Criteria or was accepted as meeting this continuing education requirement in another jurisdiction. Any document certifying completion for the 7-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted as meeting this continuing education requirement in another jurisdiction.~~

From:	Tom Lewis
To:	Kohtz, Tyler
Subject:	Re: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement
Date:	Friday, May 15, 2026 2:00:48 PM
Attachments:	Outlook-signature .png Outlook-A picture .png Outlook-Logo Desc.png Outlook-Icon Desc.png Outlook-Icon Desc.png Outlook-signature .png Outlook-A picture .png Outlook-Logo Desc.png Outlook-Icon Desc.png Outlook-Icon Desc.png Outlook-facebook 1.png

---

Tyler,

Yes sir, I do think that would make the ASC more comfortable. I also believe, however, that we would still consider Nebraska as exceeding.

Tom Lewis
Program Manager
O 202.792.1216
C 202.430.1849

1717 K ST NW
Suite 900
Washington, DC , 20006

Confidentiality Notice: The information contained in this transmittal, including attachments, if any, may be confidential or privileged under applicable law, or otherwise may be protected from disclosure to anyone other than the intended recipient(s). Any review, use or copying of the contents of this e-mail or its attachments by any person other than the intended recipient for any purpose other than its intended use, is strictly prohibited and may be unlawful. This communication is not intended as a waiver of the confidential, privileged or exempted status of the information transmitted. If you have received this e-mail in error you should permanently delete the e-mail and any attachments. Do not save, copy, disclose or rely on any part of the information contained in this e-mail or its attachments. Also immediately notify the sender of the misdirection of this transmittal.

From: Kohtz, Tyler <tyler.kohtz@nebraska.gov>
Sent: Friday, May 15, 2026 1:18 PM
To: Tom Lewis <Tom@asc.gov>
Subject: RE: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement

Hi Tom,

Just out of curiosity for the purpose of Board discussion, would the following change make any difference in the ASC's position?

Any real property appraiser who submits a document certifying completion for 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. ~~Any document certifying completion for the 8-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted to meet the qualifying education requirements for an initial or upgrade credential awarded under the requirements in the 2026 Criteria or was accepted as meeting this continuing education requirement in another jurisdiction. Any document certifying completion for the 7-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted as meeting this continuing education requirement in another jurisdiction.~~

Regards,

Tyler Kohtz

Executive Director

Nebraska Real Property Appraiser Board

From: Tom Lewis <Tom@asc.gov>
Sent: Friday, May 15, 2026 11:38 AM
To: Kohtz, Tyler <tyler.kohtz@nebraska.gov>
Subject: Re: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement

Thanks, Tyler. Appreciate the discussion and I will be standing by.

Tom Lewis

Program Manager

O 202.792.1216

C 202.430.1849

1717 K ST NW

Suite 900

Washington, DC , 20006





Confidentiality Notice: The information contained in this transmittal, including attachments, if any, may be confidential or privileged under applicable law, or otherwise may be protected from disclosure to anyone other than the intended recipient(s). Any review, use or copying of the contents of this e-mail or its attachments by any person other than the intended recipient for any purpose other than its intended use, is strictly prohibited and may be unlawful. This communication is not intended as a waiver of the confidential, privileged or exempted status of the information transmitted. If you have received this e-mail in error you should permanently delete the e-mail and any attachments. Do not save, copy, disclose or rely on any part of the information contained in this e-mail or its attachments. Also immediately notify the sender of the misdirection of this transmittal.

From: Kohtz, Tyler <tyler.kohtz@nebraska.gov>
Sent: Friday, May 15, 2026 12:36 PM
To: Tom Lewis <Tom@asc.gov>
Subject: RE: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement

Thank you very much, Tom. I will present the guidance document to the Board, along with our email chain and a summary of our phone conversation. If the Board or myself have any follow-up questions for you, or if the Board would like to amend the proposed guidance document, I'll be in touch.

Regards,

Tyler Kohtz

Executive Director

Nebraska Real Property Appraiser Board

From: Tom Lewis <Tom@asc.gov>
Sent: Friday, May 15, 2026 11:29 AM
To: Kohtz, Tyler <tyler.kohtz@nebraska.gov>
Subject: Fw: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement

Tyler,

It was good talking with you earlier today. One caveat, I know I indicated our concern was with the possibility of Nebraska exceeding Title XI as it applies to reciprocity. After some thought and discussion with other staff, I was in error, and as you can see our concern is

oriented to the possibility that Nebraska would exceed the AQB Criteria by adopting the below guidance document. I apologize for the confusion.

Thank you, again, for letting us review this and we recognize how important it is for all licensees to complete the 7-hour Valuation Bias and Fair Housing Rules and Regulations (VBFH) continuing education course as required by the AQB Criteria. Nebraska's proposed guidance provided below on administering this 7-hour VBFH course seems to exceed the AQB Criteria. There are concerns that this guidance might treat resident and non-resident licensees differently, possibly in a few limited situations.

Simplifying appraiser qualification requirements is a key goal in today's regulatory landscape. *see* Federal Register 91 FR 13203, 13205 (Mar. 18, 2026). We suggest reviewing this guidance with an eye toward simplifying appraiser requirements. During our next compliance review, we'll look at how this guidance is put into practice. Additionally, if you haven't already, we suggest consulting your State attorney to ensure adherence to applicable State laws and regulations.

Tom Lewis

Program Manager

O 202.792.1216

C 202.430.1849

1717 K ST NW

Suite 900

Washington, DC , 20006

Confidentiality Notice: The information contained in this transmittal, including attachments, if any, may be confidential or privileged under applicable law, or otherwise may be protected

from disclosure to anyone other than the intended recipient(s). Any review, use or copying of the contents of this e-mail or its attachments by any person other than the intended recipient for any purpose other than its intended use, is strictly prohibited and may be unlawful. This communication is not intended as a waiver of the confidential, privileged or exempted status of the information transmitted. If you have received this e-mail in error you should permanently delete the e-mail and any attachments. Do not save, copy, disclose or rely on any part of the information contained in this e-mail or its attachments. Also immediately notify the sender of the misdirection of this transmittal.

From: Tom Lewis <Tom@asc.gov>
Sent: Tuesday, May 12, 2026 5:06 PM
To: Kohtz, Tyler <tyler.kohtz@nebraska.gov>
Subject: Re: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement

Thanks, Tyler. I will get into this and be in touch with you here shortly.

Tom Lewis

Program Manager

O 202.792.1216

C 202.430.1849

1717 K ST NW

Suite 900

Washington, DC , 20006

Confidentiality Notice: The information contained in this transmittal, including attachments, if any, may be confidential or privileged under applicable law, or otherwise may be protected from disclosure to anyone other than the intended recipient(s). Any review, use or copying of the contents of this e-mail or its attachments by any person other than the intended recipient for any purpose other than its intended use, is strictly prohibited and may be unlawful. This communication is not intended as a waiver of the confidential, privileged or exempted status of the information transmitted. If you have received this e-mail in error you should permanently delete the e-mail and any attachments. Do not save, copy, disclose or rely on any part of the information contained in this e-mail or its attachments. Also immediately notify the sender of the misdirection of this transmittal.

From: Kohtz, Tyler <tyler.kohtz@nebraska.gov>
Sent: Tuesday, May 12, 2026 2:56 PM
To: Tom Lewis <Tom@asc.gov>
Subject: Administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course Continuing Education Requirement

Tom,

I'm working on a guidance document concerning administration of 7-hour Valuation Bias and Fair Housing Rules and Regulations Course continuing education requirement for the Board to approve at its meeting next week. Below is the guidance that I am presenting to the Board. Please let me know if this captures our conversations. If you have any recommendations, please feel free to offer.

Any real property appraiser who submits a document certifying completion for 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. Any document certifying completion for the 8-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted to meet the qualifying education requirements for an initial or upgrade credential awarded under the requirements in the 2026 Criteria or was accepted as meeting this continuing education requirement in another jurisdiction. Any document certifying completion for the 7-Hour VB&FH Laws and Regulations Course must also include documentation evidencing that this course was accepted as meeting this continuing education requirement in another jurisdiction.

Thanks,

Tyler N. Kohtz

Executive Director

Nebraska Real Property Appraiser Board

301 Centennial Mall South, First Floor

Lincoln, NE 68509-4963

Phone: (402) 471-9015

Email: tyler.kohtz@nebraska.gov

Website: appraiser.ne.gov

Visit NRPAB on Facebook

Nebraska Real Property Appraiser Board
500 S 16th St, Ste 202
PO Box 94963
Lincoln, NE 68509-4963
https://appraiser.ne.gov/
402-471-9015

Check Number:

For Board Use Only

2027–28 APPLICATION FOR TWO YEAR RENEWAL OF NEBRASKA TRAINEE REAL PROPERTY APPRAISER CREDENTIAL

APPLICATION INFORMATION

Principal Place of Business Address is utilized for mail communications and will appear in the Appraiser Listing on the Board's website.

Nebraska Real Property Appraiser Credential Number: _____ Date of Application: _____

Nebraska County of Business
(required for Nebraska residents only) _____ Date of Birth: _____

Name: _____ (Last) _____ (First) _____ (Middle)

Business Name: _____

Principal Place of Business Address: _____ (PO Box or Street Number) _____ (City) _____ (State) _____ (Zip Code + 4)

_____ (Principal Business Email Address) _____ (Business Area Code + Phone Number)

Secondary or Residential Address, if different: _____ (PO Box or Street Number) _____ (City) _____ (State) _____ (Zip Code + 4)

_____ (Email Address) _____ (Area Code + Phone Number)

CONTINUING EDUCATION (CE) REQUIREMENTS

All CE certificates must be submitted through Appraiser Login, emailed to nrpab.education@nebraska.gov, or attached to this application. Please note that registering for, or intending to complete a continuing education activity in the future, does not meet the continuing education requirements. "Approved" means you received an email from the NRPAB confirming approval of the CE submission.

Two-Year CE Period

CE Period is located in Appraiser Login and on your current Credentialing Card issued by the Board.

☐	I understand that I am required to have completed the required two years of my continuing education cycle to be eligible for renewal. If I have not completed the required 28 continuing education hours prior to submitting my renewal application, my application will not be processed. I understand that an application that is not processed may be returned to me. I understand that I will be responsible for all late processing fees incurred after November 30, 2026

7-Hour National USPAP Continuing Education Course

7-Hour National USPAP CE Course must be completed at least once every two calendar years:

☐	I have completed and submitted the 7-Hour National USPAP Continuing Education Course on or after January 1, 2025.	Date completed (month/year): _____

Valuations Bias and Fair Housing (VB&FH) Laws and Regulations Course

Select **one** of the following (A VB&FH Laws and Regulations Course must be completed at least once every two calendar years, beginning January 1, 2026. A 7-Hour VB&FH Laws and Regulations Course must be completed by any credential holder who has not successfully completed the 8-Hour VB&FH Laws and Regulations Course. Once the 7-Hour VB&FH Laws and Regulations Course or the 8-Hour VB&FH Laws and Regulations Course is completed, a 4-Hour VB&FH Laws and Regulations Course may be completed. A VB&FH Laws and Regulations Course may not be submitted for credit more than once within the same two-year continuing education period):

Please note that completion of the 8-Hour Valuations Bias and Fair Housing Laws and Regulations Course is required for upgrade from Trainee Real Property Appraiser credential to a higher real property appraiser classification.

☐	I have completed and submitted the 8-Hour VB&FH Laws and Regulations Course in 2026. I understand that I may complete any VB&FH Laws and Regulations Course, including the 4-Hour VB&FH Laws and Regulations Course, on or before the end of 2028.	Date completed (month/year): _____
☐	I have completed and submitted the 7-Hour VB&FH Laws and Regulations Course in 2026. I understand that I may complete any VB&FH Laws and Regulations Course, including the 4-Hour VB&FH Laws and Regulations Course, before the end of 2028.	Date completed (month/year): _____
☐	I have completed and submitted the 4-Hour VB&FH Laws and Regulations Course in 2026. (8-Hour VB&FH Laws and Regulations Course previously completed and approved as qualifying education for issuance of a credential as a real property appraiser or 7-Hour VB&FH Laws and Regulations Course previously completed and approved as continuing education in another jurisdiction). I understand that I may complete any VB&FH Laws and Regulations Course, including the 4-Hour VB&FH Laws and Regulations Course, before the end of 2028.	Date completed (month/year): _____
☐	I have not yet completed a VB&FH Laws and Regulations Course. I understand that I must complete a 7-Hour VB&FH Laws and Regulations Course or an 8-Hour VB&FH Laws and Regulations Course on or before December 31, 2027.	

LATE PROCESSING FEE

☐	My application is postmarked on or before November 30, 2026. No Late Processing Fees are due.
☐	My application is postmarked after November 30, 2026. A $25.00 Late Processing Fee is included for each month or portion of a month the application is late.
☐	My initial credential was issued after November 1, 2026. If postmarked after December 31, 2026, a $25.00 Late Processing Fee is included for each month or portion of a month the application is late.

APPLICATION CHECKLIST

1. ☐ Completed application form signed on pages 4 and 5.
2. ☐ All required continuing education certificates (including the 7-Hour National USPAP certificate, if applicable) have been submitted through Appraiser Login, emailed to nrpab.education@nebraska.gov, or are attached to this application.
3. ☐ All applicable late processing fees are included.

DISCIPLINARY QUESTIONS

1. Have you ever been convicted of a felony, including a conviction based upon a plea of guilty or nolo contendere? ☐ YES ☐ NO

   If your answer to No. 1 above is yes, have your civil rights been restored? ☐ N/A ☐ YES ☐ NO

2. Have you been convicted of any crime of fraud, dishonesty, breach of trust, money laundering, misrepresentation, or deceit, including a conviction based upon a plea of guilty or nolo contendere involving real estate, financial services, or real property appraisal practice within the five-year period immediately preceding the date of application? ☐ YES ☐ NO

3. Have you been convicted of any crime related to the qualifications, functions, or duties of a real property appraiser within the five-year period immediately preceding the date of application, including a conviction based upon a plea of guilty or nolo contendere? ☐ YES ☐ NO

4. Have any civil judicial actions, including dismissal with settlement, in connection with real estate, financial services, or real property appraisal practice been brought against you within the five-year period immediately preceding the date of application? ☐ YES ☐ NO

5. Are there any criminal charges pending against you at this time, or have you been convicted of a misdemeanor criminal offense within the five-year period immediately preceding the date of application? ☐ YES ☐ NO

6. Have you surrendered a Nebraska real property appraiser credential, or an appraiser credential or any other registration, license, or certification, issued by any other regulatory agency or held in any other jurisdiction, in lieu of disciplinary action pending or threatened within the five-year period immediately preceding the date of application? **Please note that you are required to disclose any action, even if it has been previously disclosed on an application for this agency. Failure to disclose this may result in a delay in processing your application for renewal of your credential.** ☐ YES ☐ NO

7. Has your Nebraska real property appraiser credential, or your appraiser credential or any other registration, license, or certification issued by any other regulatory agency or held in any other jurisdiction, been revoked or suspended within the five-year period immediately preceding the date of application? **Please note that you are required to disclose any action, even if it has been previously disclosed on an application for this agency. Failure to disclose this may result in a delay in processing your application for renewal of your credential.** ☐ YES ☐ NO

8. Has disciplinary action been taken against your appraiser credential or any other registration, license, or certification issued by any regulatory agency or held in any jurisdiction within the three-year period immediately preceding the date of application? **Please note that you are required to disclose any action, even if it has been previously disclosed on an application for this agency. Failure to disclose this may result in a delay in processing your application for renewal of your credential.** ☐ YES ☐ NO

9. Are disciplinary proceedings pending against you or are you currently under investigation by any regulatory agency in Nebraska or in any other jurisdiction? ☐ YES ☐ NO

If you answered yes to any of the above questions 1 through 9, provide a brief statement on a separate sheet that includes all significant details, the circumstances surrounding the matter, the name of any persons involved, and resolution or conviction. Provide copies of all official records related to the matter, including convictions, orders, and/or settlement agreements. Provide this information even if you have previously provided it with an application to this agency.

LICENSE SUSPENSION ACT, LAWS OF NEBRASKA, 1997

MANDATORY RELEASE OF SOCIAL SECURITY NUMBER DATA REQUIRED BY THE PRIVACY ACT OF 1974

Effective September 13, 1997, the Real Property Appraiser Act (Neb. Rev. Stat. § 76-2201 to 76-2250) requires the social security number of all applicants. Pursuant to the License Suspension Act (Neb. Rev. Stat. § 43-3301 to 43-3326), the Real Property Appraiser Board is required to submit this information to the Nebraska Department of Health and Human Services. Provision of this information is mandatory. The information will be used to assist authorized agencies in the enforcement of child, spousal, and medical support orders against holders of professional, occupational, and recreational licenses. Disclosure is mandatory for all individuals, regardless of whether the individual has ever been ordered to pay support.

Social Security Number: _____

NRPAB
Nebraska Real Property Appraiser Board

UNITED STATES CITIZENSHIP ATTESTATION FORM

For the purpose of complying with Neb. Rev. Stat. §§ 4-108 through 4-114, I attest as follows:

☐ I am a citizen of the United States of America

OR

☐ I am a qualified alien under the federal Immigration and Nationality Act, 8 U.S.C. 1101 et seq., am lawfully present in the United States, and have included a copy of my USCIS documentation with this application.

Immigration Status: _____ Alien Number: _____

OR

☐ I am not a citizen of the United States of America and I am not a qualified alien under the federal Immigration and Nationality Act. I am described in section 202(c)(2)(B)(i) through (x) of the federal REAL ID Act of 2005, Public Law 109-13, have demonstrated lawful presence pursuant to section 4-108, and I am eligible to obtain a credential as a real property appraiser.

If I am not a citizen of the United States of America and I am not a qualified alien under the federal Immigration and Nationality Act:

- I understand that I must submit (i) an unexpired employment authorization document issued by the United States Department of Homeland Security, Form I-766, and (ii) documentation issued by the United States Department of Homeland Security, the United States Citizenship and Immigration Services, or any other federal agency, such as one of the types of Form I-797 used by the United States Citizenship and Immigration Services, demonstrating that I am described in section 202(c)(2)(B)(i) through (x) of the federal REAL ID Act of 2005, Public Law 109-13, have demonstrated lawful presence pursuant to Neb. Rev. Stat. § 4-108, and am eligible to obtain a real property appraiser credential.
- I understand that such credential shall be valid only for the period of time during which my employment authorization document is valid, and that my employment authorization document shall be verified through the Systematic Alien Verification for Entitlements Program operated by the United States Department of Homeland Security or an equivalent program designated by the United States Department of Homeland Security.

I hereby attest that my response and the information provided on this form and any related application for public benefits are true, complete, and accurate and I understand that this information may be used to verify my lawful presence in the United States of America.

Print Name: _____ (Last) _____ (First) _____ (Middle)

_____ (Applicant's Signature) _____ (Date)

AFFIDAVIT OF APPLICANT

I expressly agree that:

- I am at least nineteen (19) years of age.
- I have read and will comply with the Uniform Standards of Professional Appraisal Practice.
- I will comply with the Nebraska Real Property Appraiser Act and Title 298 of the Nebraska Administrative Code.

I understand that the following may be grounds for disciplinary action or denial of the application under Neb. Rev. Stat. §§ 76-2227(4) and/or 76-2238:

- Surrendering an appraiser credential, or any other registration, license, or certification, issued by any other regulatory agency or held in any other jurisdiction, in lieu of disciplinary action pending or threatened within the five-year period immediately preceding the date of application;
- Having an appraiser credential, or any other registration, license, or certification, issued by any other regulatory agency or held in any other jurisdiction, revoked or suspended within the five-year period immediately preceding the date of application;
- Failing to demonstrate character and general fitness such as to command the confidence and trust of the public;
- Possessing a background that would call into question public trust or a credential holder's fitness for credentialing;
- Being convicted of, including a conviction based upon a plea of guilty or nolo contendere:
  - Any felony if civil rights have not been restored;
  - Any crime of fraud, dishonesty, breach of trust, money laundering, misrepresentation, or deceit involving real estate, financial services, or real property appraisal practice within the five-year period immediately preceding the date of application; or
  - Any other crime which is related to the qualifications, functions, or duties of a real property appraiser within the five-year period immediately preceding the date of application;
- Entry of a final civil or criminal judgment against credential holder, including dismissal with settlement, on grounds of fraud, dishonesty, breach of trust, money laundering, misrepresentation, or deceit involving real estate, financial services, or real property appraisal practice brought within the five-year period immediately preceding the date of application;
- Procuring or attempting to procure a credential under the Nebraska Real Property Appraiser Act by knowingly making a false statement, submitting false information, or making a material misrepresentation in an application filed with the board or procuring or attempting to procure a credential through fraud or misrepresentation;
- Paying money or other valuable consideration other than the fees provided for by the Act to any member or employee of the board to procure a credential;
- Performing an act or omission involving real estate or real property appraisal practice which constitutes dishonesty, fraud, or misrepresentation with or without the intent to substantially benefit the credential holder or another person or with the intent to substantially injure another person;
- Failing to maintain, or to make available for inspection and copying, records required by the Nebraska Real Property Appraiser Board;
- Demonstrating negligence, incompetence, or unworthiness to act as a real property appraiser, whether of the same or of a different character as otherwise specified in this section;
- Performing valuation services as a credentialed real property appraiser under an assumed or fictitious name;
- Making a false or misleading statement in that portion of a written report that deals with professional qualifications or in any testimony concerning professional qualifications; and
- Committing any violation of the Nebraska Real Property Appraiser Act and/or Title 298 of the Nebraska Administrative Code.

I understand the types of misconduct that may initiate disciplinary proceedings. The Nebraska Real Property Appraiser Board may, upon its own motion, and will, upon the written complaint of any aggrieved person, cause an investigation to be made with respect to an alleged violation of the Nebraska Real Property Appraiser Act or Title 298.

I understand that credentials shall be issued only to persons who have a good reputation for honesty, trustworthiness, integrity, and competence to perform real property appraisal practice assignments in such manner as to safeguard the interest of the public and only after satisfactory proof of such qualification has been presented to the Nebraska Real Property Appraiser Board upon request and a completed application has been approved.

I understand that my credential status, including current standing, and any disciplinary action imposed against any of my real property appraiser credentials, shall be verified through the Appraiser Registry of the Appraisal Subcommittee of the Federal Financial Institutions Examination Council.

I understand that the Nebraska Real Property Appraiser Board reserves the right to go outside this application for information as to my trustworthiness and competency to act as a real property appraiser in the State of Nebraska.

I authorize any agency of federal, state, or local government, consumer reporting agency, present or former employer, or any other individual, partnership, corporation, or association, in this or any other state, to furnish to the Nebraska Real Property Appraiser Board, or its representatives, any information bearing upon my reputation for honesty, trustworthiness, integrity, and competence to engage in real property appraisal practice as a real property appraiser in such manner as to safeguard the interest of the public. Such information may include, but is not limited to, records of arrests for criminal offenses, the circumstances involved in any such arrests, the suspension, revocation, or discipline of any license authorizing me to engage in any profession or occupation, or the rejection of my application for such license, and the reason for suspension, revocation, rejection, or discipline.

I submit an irrevocable consent that the service of process upon me by delivery of the process to the Director of the Nebraska Real Property Appraiser Board if the plaintiff cannot, in the exercise of due diligence, effect personal service upon me in an action in a court arising out of my activities as a real property appraiser.

I UNDERSTAND THAT THE APPLICATION, ATTACHMENTS, REPRESENTATIONS, AND STATEMENTS MADE HEREIN TO PROCURE RENEWAL OF A CREDENTIAL IN NEBRASKA MAY AT ANY TIME BE USED AS EVIDENCE BY THE NEBRASKA REAL PROPERTY APPRAISER BOARD, OR IN ANY COURT IN NEBRASKA, FOR ANY ALLEGED VIOLATION OF THE NEBRASKA REAL PROPERTY APPRAISER ACT OR TITLE 298 OF THE NEBRASKA ADMINISTRATIVE CODE. I CERTIFY THAT THE STATEMENTS MADE IN THIS APPLICATION, ATTACHMENTS, AND REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND THAT I HAVE NOT SUPPRESSED ANY INFORMATION THAT MIGHT HAVE A BEARING ON THIS APPLICATION. I UNDERSTAND THAT, SHOULD MY APPLICATION BE FOUND TO BE INCOMPLETE, IT WILL NOT BE PROCESSED AND MAY BE RETURNED TO ME.

Applicant's Signature _____ Date _____

ADDITIONAL INFORMATION

- Mail application, fee(s), and supporting documentation to:
  NEBRASKA REAL PROPERTY APPRAISER BOARD
  PO BOX 94963
  LINCOLN, NE 68509-4963
  Street address for FedEx or UPS is **500 S 16TH ST, STE 202, LINCOLN NE 68508.**
- Questions or concerns may be directed to Board staff at 402-471-9015 or nrpab.renewals@nebraska.gov.
- All credentials issued under the Real Property Appraiser Act, other than temporary permits, shall remain in effect until December 31st of the designated year unless surrendered, revoked, suspended, or canceled prior to such date.
- CE Activity Approval:
  – Classroom CE taken outside Nebraska must be approved by the jurisdiction where it was taken at the time of completion.
  – Any distance (asynchronous or synchronous) continuing education not approved by the Board must be approved for continuing education credit by a jurisdiction in which the credential holder is credentialed, as verified through the ASC Appraiser Registry.
  – The 7-Hour VB&FH Laws and Regulations Course or the 8-Hour VB&FH Laws and Regulations Course must be completed before a credential holder is eligible to complete the 4-Hour VB&FH Laws and Regulations Course. If the 8-Hour VB&FH Laws and Regulations Course is completed as qualifying education prior to January 1, 2026, or the 7-Hour VB&FH Laws and Regulations Course is completed prior to January 1, 2026 and approved by another jurisdiction as meeting this purpose, the 4-Hour VB&FH Laws and Regulations Course may be completed.
- If a credential holder fails to apply and meet the requirements for renewal by November 30, 2026, such credential holder may obtain a renewal of such credential by satisfying all of the requirements for renewal and paying the appropriate late processing fee if such late renewal takes place prior to July 1, 2027. Postmark date is utilized to determine the date of submission.
- If a credential is not renewed prior to July 1, 2027, a credential holder shall reapply for credentialing and meet the current requirements in place at the time of application.
- Each successfully renewed credential holder will receive access to a free, one-time digital download of the current edition of USPAP.

Nebraska Real Property Appraiser Board
500 S 16th St, Ste 202
PO Box 94963
Lincoln, NE 68509-4963
https://appraiser.ne.gov/
402-471-9015

Check Number:

For Board Use Only

2027–28 APPLICATION FOR RENEWAL OF NEBRASKA REAL PROPERTY APPRAISER CREDENTIAL

APPLICATION INFORMATION

Principal Place of Business Address is utilized for mail communications and will appear in the Appraiser Listing on the Board's website.

Nebraska Real Property Appraiser Credential Number: _____ Date of Application: _____

Nebraska County of Business
(required for Nebraska residents only) _____ Date of Birth: _____

Name: _____ (Last) _____ (First) _____ (Middle)

Business Name: _____

Principal Place of Business Address: _____ (PO Box or Street Number) _____ (City) _____ (State) _____ (Zip Code + 4)

_____ (Principal Business Email Address) _____ (Business Area Code + Phone Number)

Secondary or Residential Address, if different: _____ (PO Box or Street Number) _____ (City) _____ (State) _____ (Zip Code + 4)

_____ (Email Address) _____ (Area Code + Phone Number)

CONTINUING EDUCATION (CE) REQUIREMENTS

All CE certificates must be submitted through Appraiser Login, emailed to nrpab.education@nebraska.gov, or attached to this application. Please note that registering for, or intending to complete a continuing education activity in the future, does not meet the continuing education requirements. "Approved" means you received an email from the NRPAB confirming approval of the CE submission.

Two-Year CE Period

Select **one** of the following: (CE Period is located in Appraiser Login and on your current Credentialing Card issued by the Board).

☐	**First Year:** This is the first year of my two-year CE period. Except for the 7-Hour National USPAP Continuing Education Course (if due in 2026), no CE certificates are required to be submitted.	**2026-2027**
☐	**Second Year:** This is the second year of my two-year CE period. 28 hours of continuing education, including the 7-Hour National USPAP Continuing Education Course, are required to be submitted.	**2025-2026**
☐	**New Credential Holder:** My credential was issued after June 30 of this year, and my first two-year CE period has not yet started. No CE certificates are required to be submitted.	**2027-2028**

7-Hour National USPAP Continuing Education Course

Select **one** of the following (7-Hour National USPAP CE Course must be completed at least once every two calendar years):

☐	I have completed and submitted the 7-Hour National USPAP Continuing Education Course on or after January 1, 2025.	Date completed (month/year): _____
☐	I am a new credential holder and the 7-Hour National USPAP Continuing Education Course is not required to be submitted.	

Valuations Bias and Fair Housing (VB&FH) Laws and Regulations Course

Select **one** of the following (A VB&FH Laws and Regulations Course must be completed at least once every two calendar years, beginning January 1, 2026. A 7-Hour VB&FH Laws and Regulations Course must be completed by any credential holder who has not successfully completed the 8-Hour VB&FH Laws and Regulations Course. Once the 7-Hour VB&FH Laws and Regulations Course or the 8-Hour VB&FH Laws and Regulations Course is completed, a 4-Hour VB&FH Laws and Regulations Course may be completed. A VB&FH Laws and Regulations Course may not be submitted for credit more than once within the same two-year continuing education period):

☐	I have completed and submitted the 8-Hour VB&FH Laws and Regulations Course in 2026. I understand that I may complete any VB&FH Laws and Regulations Course, including the 4-Hour VB&FH Laws and Regulations Course, on or before the end of 2028.	Date completed (month/year): _____
☐	I have completed and submitted the 7-Hour VB&FH Laws and Regulations Course in 2026. I understand that I may complete any VB&FH Laws and Regulations Course, including the 4-Hour VB&FH Laws and Regulations Course, before the end of 2028.	Date completed (month/year): _____
☐	I have completed and submitted the 4-Hour VB&FH Laws and Regulations Course in 2026. (8-Hour VB&FH Laws and Regulations Course previously completed and approved as qualifying education for issuance of a credential as a real property appraiser or 7-Hour VB&FH Laws and Regulations Course previously completed and approved as continuing education in another jurisdiction). I understand that I may complete any VB&FH Laws and Regulations Course, including the 4-Hour VB&FH Laws and Regulations Course, before the end of 2028.	Date completed (month/year): _____
☐	I have not yet completed a VB&FH Laws and Regulations Course. I understand that I must complete a VB&FH Laws and Regulations Course on or before December 31, 2027.	

RENEWAL TERM SELECTION

Select the credential classification for which you are applying.

1-Year Renewal **Total Fee Due: $365.00** ($325.00 Credentialing Fee and $40.00 ASC Appraiser Registry Fee)

☐ **CERTIFIED GENERAL – 1 year** ☐ **CERTIFIED RESIDENTIAL – 1 year** ☐ **LICENSED RESIDENTIAL – 1 year**

2-Year Renewal **Total Fee Due: $730.00** ($650.00 Credentialing Fee and $80.00 ASC Appraiser Registry Fee)

Application will not be processed if you are not eligible for 2-year renewal. Current CE period is required to be 2025-2026 or 2027-2028.

☐ **CERTIFIED GENERAL – 2 years** ☐ **CERTIFIED RESIDENTIAL – 2 years** ☐ **LICENSED RESIDENTIAL – 2 years**

LATE PROCESSING FEE

☐	My application is postmarked on or before November 30, 2026. No Late Processing Fees are due.
☐	My application is postmarked after November 30, 2026. A $25.00 Late Processing Fee is included for each month or portion of a month the application is late.
☐	My initial credential was issued after November 1, 2026. If postmarked after December 31, 2026, a $25.00 Late Processing Fee is included for each month or portion of a month the application is late.

APPLICATION CHECKLIST

1. ☐ Completed application form signed on pages 4 and 5.
2. ☐ All required continuing education certificates (including the 7-Hour National USPAP certificate, if applicable) have been submitted through Appraiser Login, emailed to nrpab.education@nebraska.gov, or are attached to this application.
3. ☐ All applicable fees (Renewal Credentialing Fee, ASC Appraiser Registry Fee, and Late Processing Fee (if the application is postmarked after November 30, 2026) are included.

SUPERVISORY APPRAISER CONTACT LIST

1. I am interested in being a supervisory real property appraiser for the direct supervision of one or more trainee real property appraisers. ☐ YES ☐ NO
2. I am a certified residential real property appraiser or certified general real property appraiser in good standing and have held a certified real property appraiser credential in this state, or the equivalent in any other jurisdiction, for three or more years. ☐ YES ☐ NO
3. I understand that the Supervisory Appraiser Contact List is not an endorsement as a supervisory real property appraiser by the Nebraska Real Property Appraiser Board, nor an approval by the Nebraska Real Property Appraiser Board to engage in real property appraisal practice as a supervisory real property appraiser. I also understand that if I were to agree to be a supervisory real property appraiser for a trainee real property appraiser, that I would have to submit an Application for Registration as Nebraska Supervisory Real Property Appraiser to the Nebraska Real Property Appraiser Board for each trainee real property appraiser and meet all requirements for approval in place at the time of application. ☐ YES ☐ NO

DISCIPLINARY QUESTIONS

1. Have you ever been convicted of a felony, including a conviction based upon a plea of guilty or nolo contendere? ☐ YES ☐ NO

   If your answer to No. 1 above is yes, have your civil rights been restored? ☐ N/A ☐ YES ☐ NO

2. Have you been convicted of any crime of fraud, dishonesty, breach of trust, money laundering, misrepresentation, or deceit, including a conviction based upon a plea of guilty or nolo contendere involving real estate, financial services, or real property appraisal practice within the five-year period immediately preceding the date of application? ☐ YES ☐ NO

3. Have you been convicted of any crime related to the qualifications, functions, or duties of a real property appraiser within the five-year period immediately preceding the date of application, including a conviction based upon a plea of guilty or nolo contendere? ☐ YES ☐ NO

4. Have any civil judicial actions, including dismissal with settlement, in connection with real estate, financial services, or real property appraisal practice been brought against you within the five-year period immediately preceding the date of application? ☐ YES ☐ NO

5. Are there any criminal charges pending against you at this time, or have you been convicted of a misdemeanor criminal offense within the five-year period immediately preceding the date of application? ☐ YES ☐ NO

6. Have you surrendered a Nebraska real property appraiser credential, or an appraiser credential or any other registration, license, or certification, issued by any other regulatory agency or held in any other jurisdiction, in lieu of disciplinary action pending or threatened within the five-year period immediately preceding the date of application? **Please note that you are required to disclose any action, even if it has been previously disclosed on an application for this agency. Failure to disclose this may result in a delay in processing your application for renewal of your credential.** ☐ YES ☐ NO

7. Has your Nebraska real property appraiser credential, or your appraiser credential or any other registration, license, or certification issued by any other regulatory agency or held in any other jurisdiction, been revoked or suspended within the five-year period immediately preceding the date of application? **Please note that you are required to disclose any action, even if it has been previously disclosed on an application for this agency. Failure to disclose this may result in a delay in processing your application for renewal of your credential.** ☐ YES ☐ NO

8. Has disciplinary action been taken against your appraiser credential or any other registration, license, or certification issued by any regulatory agency or held in any jurisdiction within the three-year period immediately preceding the date of application? **Please note that you are required to disclose any action, even if it has been previously disclosed on an application for this agency. Failure to disclose this may result in a delay in processing your application for renewal of your credential.** ☐ YES ☐ NO

9. Are disciplinary proceedings pending against you or are you currently under investigation by any regulatory agency in Nebraska or in any other jurisdiction? ☐ YES ☐ NO

If you answered yes to any of the above questions 1 through 9, provide a brief statement on a separate sheet that includes all significant details, the circumstances surrounding the matter, the name of any persons involved, and resolution or conviction. Provide copies of all official records related to the matter, including convictions, orders, and/or settlement agreements. Provide this information even if you have previously provided it with an application to this agency.

LICENSE SUSPENSION ACT, LAWS OF NEBRASKA, 1997

MANDATORY RELEASE OF SOCIAL SECURITY NUMBER DATA REQUIRED BY THE PRIVACY ACT OF 1974

Effective September 13, 1997, the Real Property Appraiser Act (Neb. Rev. Stat. § 76-2201 to 76-2250) requires the social security number of all applicants. Pursuant to the License Suspension Act (Neb. Rev. Stat. § 43-3301 to 43-3326), the Real Property Appraiser Board is required to submit this information to the Nebraska Department of Health and Human Services. Provision of this information is mandatory. The information will be used to assist authorized agencies in the enforcement of child, spousal, and medical support orders against holders of professional, occupational, and recreational licenses. Disclosure is mandatory for all individuals, regardless of whether the individual has ever been ordered to pay support.

Social Security Number: _____

UNITED STATES ATTESTATION



CITIZENSHIP FORM

For the purpose of complying with Neb. Rev. Stat. §§ 4-108 through 4-114, I attest as follows:

☐ I am a citizen of the United States of America

OR

☐ I am a qualified alien under the federal Immigration and Nationality Act, 8 U.S.C. 1101 et seq., am lawfully present in the United States, and have included a copy of my USCIS documentation with this application.

Immigration Status: _____ Alien Number: _____

OR

☐ I am not a citizen of the United States of America and I am not a qualified alien under the federal Immigration and Nationality Act. I am described in section 202(c)(2)(B)(i) through (x) of the federal REAL ID Act of 2005, Public Law 109-13, have demonstrated lawful presence pursuant to section 4-108, and I am eligible to obtain a credential as a real property appraiser.

If I am not a citizen of the United States of America and I am not a qualified alien under the federal Immigration and Nationality Act:

- I understand that I must submit (i) an unexpired employment authorization document issued by the United States Department of Homeland Security, Form I-766, and (ii) documentation issued by the United States Department of Homeland Security, the United States Citizenship and Immigration Services, or any other federal agency, such as one of the types of Form I-797 used by the United States Citizenship and Immigration Services, demonstrating that I am described in section 202(c)(2)(B)(i) through (x) of the federal REAL ID Act of 2005, Public Law 109-13, have demonstrated lawful presence pursuant to Neb. Rev. Stat. § 4-108, and am eligible to obtain a real property appraiser credential.
- I understand that such credential shall be valid only for the period of time during which my employment authorization document is valid, and that my employment authorization document shall be verified through the Systematic Alien Verification for Entitlements Program operated by the United States Department of Homeland Security or an equivalent program designated by the United States Department of Homeland Security.

I hereby attest that my response and the information provided on this form and any related application for public benefits are true, complete, and accurate and I understand that this information may be used to verify my lawful presence in the United States of America.

Print Name: _____ (Last) _____ (First) _____ (Middle)

_____ (Applicant's Signature) _____ (Date)

AFFIDAVIT OF APPLICANT

I expressly agree that:

- I am at least nineteen (19) years of age.
- I have read and will comply with the Uniform Standards of Professional Appraisal Practice.
- I will comply with the Nebraska Real Property Appraiser Act and Title 298 of the Nebraska Administrative Code.

I understand that the following may be grounds for disciplinary action or denial of the application under Neb. Rev. Stat. §§ 76-2227(4) and/or 76-2238:

- Surrendering an appraiser credential, or any other registration, license, or certification, issued by any other regulatory agency or held in any other jurisdiction, in lieu of disciplinary action pending or threatened within the five-year period immediately preceding the date of application;
- Having an appraiser credential, or any other registration, license, or certification, issued by any other regulatory agency or held in any other jurisdiction, revoked or suspended within the five-year period immediately preceding the date of application;
- Failing to demonstrate character and general fitness such as to command the confidence and trust of the public;
- Possessing a background that would call into question public trust or a credential holder's fitness for credentialing;
- Being convicted of, including a conviction based upon a plea of guilty or nolo contendere:
  - Any felony if civil rights have not been restored;
  - Any crime of fraud, dishonesty, breach of trust, money laundering, misrepresentation, or deceit involving real estate, financial services, or real property appraisal practice within the five-year period immediately preceding the date of application; or
  - Any other crime which is related to the qualifications, functions, or duties of a real property appraiser within the five-year period immediately preceding the date of application;
- Entry of a final civil or criminal judgment against credential holder, including dismissal with settlement, on grounds of fraud, dishonesty, breach of trust, money laundering, misrepresentation, or deceit involving real estate, financial services, or real property appraisal practice brought within the five-year period immediately preceding the date of application;
- Procuring or attempting to procure a credential under the Nebraska Real Property Appraiser Act by knowingly making a false statement, submitting false information, or making a material misrepresentation in an application filed with the board or procuring or attempting to procure a credential through fraud or misrepresentation;
- Paying money or other valuable consideration other than the fees provided for by the Act to any member or employee of the board to procure a credential;
- Performing an act or omission involving real estate or real property appraisal practice which constitutes dishonesty, fraud, or misrepresentation with or without the intent to substantially benefit the credential holder or another person or with the intent to substantially injure another person;
- Failing to maintain, or to make available for inspection and copying, records required by the Nebraska Real Property Appraiser Board;
- Demonstrating negligence, incompetence, or unworthiness to act as a real property appraiser, whether of the same or of a different character as otherwise specified in this section;
- Performing valuation services as a credentialed real property appraiser under an assumed or fictitious name;
- Making a false or misleading statement in that portion of a written report that deals with professional qualifications or in any testimony concerning professional qualifications; and
- Committing any violation of the Nebraska Real Property Appraiser Act and/or Title 298 of the Nebraska Administrative Code.

I understand the types of misconduct that may initiate disciplinary proceedings. The Nebraska Real Property Appraiser Board may, upon its own motion, and will, upon the written complaint of any aggrieved person, cause an investigation to be made with respect to an alleged violation of the Nebraska Real Property Appraiser Act or Title 298.

I understand that credentials shall be issued only to persons who have a good reputation for honesty, trustworthiness, integrity, and competence to perform real property appraisal practice assignments in such manner as to safeguard the interest of the public and only after satisfactory proof of such qualification has been presented to the Nebraska Real Property Appraiser Board upon request and a completed application has been approved.

I understand that my credential status, including current standing, and any disciplinary action imposed against any of my real property appraiser credentials, shall be verified through the Appraiser Registry of the Appraisal Subcommittee of the Federal Financial Institutions Examination Council.

I understand that the Nebraska Real Property Appraiser Board reserves the right to go outside this application for information as to my trustworthiness and competency to act as a real property appraiser in the State of Nebraska.

I authorize any agency of federal, state, or local government, consumer reporting agency, present or former employer, or any other individual, partnership, corporation, or association, in this or any other state, to furnish to the Nebraska Real Property Appraiser Board, or its representatives, any information bearing upon my reputation for honesty, trustworthiness, integrity, and competence to engage in real property appraisal practice as a real property appraiser in such manner as to safeguard the interest of the public. Such information may include, but is not limited to, records of arrests for criminal offenses, the circumstances involved in any such arrests, the suspension, revocation, or discipline of any license authorizing me to engage in any profession or occupation, or the rejection of my application for such license, and the reason for suspension, revocation, rejection, or discipline.

I submit an irrevocable consent that the service of process upon me by delivery of the process to the Director of the Nebraska Real Property Appraiser Board if the plaintiff cannot, in the exercise of due diligence, effect personal service upon me in an action in a court arising out of my activities as a real property appraiser.

I UNDERSTAND THAT THE APPLICATION, ATTACHMENTS, REPRESENTATIONS, AND STATEMENTS MADE HEREIN TO PROCURE RENEWAL OF A CREDENTIAL IN NEBRASKA MAY AT ANY TIME BE USED AS EVIDENCE BY THE NEBRASKA REAL PROPERTY APPRAISER BOARD, OR IN ANY COURT IN NEBRASKA, FOR ANY ALLEGED VIOLATION OF THE NEBRASKA REAL PROPERTY APPRAISER ACT OR TITLE 298 OF THE NEBRASKA ADMINISTRATIVE CODE. I CERTIFY THAT THE STATEMENTS MADE IN THIS APPLICATION, ATTACHMENTS, AND REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND THAT I HAVE NOT SUPPRESSED ANY INFORMATION THAT MIGHT HAVE A BEARING ON THIS APPLICATION. I UNDERSTAND THAT, SHOULD MY APPLICATION BE FOUND TO BE INCOMPLETE, IT WILL NOT BE PROCESSED AND MAY BE RETURNED TO ME.

Applicant's Signature

Date

ADDITIONAL INFORMATION

- Mail application, fee(s), and supporting documentation to:
  NEBRASKA REAL PROPERTY APPRAISER BOARD
  PO BOX 94963
  LINCOLN, NE 68509-4963
  Street address for FedEx or UPS is **500 S 16TH ST, STE 202 LINCOLN NE 68508**
- Questions or concerns may be directed to Board staff at 402-471-9015 or nrpab.renewals@nebraska.gov.
- All credentials issued under the Real Property Appraiser Act, other than temporary permits, shall remain in effect until December 31st of the designated year unless surrendered, revoked, suspended, or canceled prior to such date.
- CE Activity Approval:
  – Classroom CE taken outside Nebraska must be approved by the jurisdiction where it was taken at the time of completion.
  – Any distance (asynchronous or synchronous) continuing education not approved by the Board must be approved for continuing education credit by a jurisdiction in which the credential holder is credentialed, as verified through the ASC Appraiser Registry.
  – The 7-Hour VB&FH Laws and Regulations Course or the 8-Hour VB&FH Laws and Regulations Course must be completed before a credential holder is eligible to complete the 4-Hour VB&FH Laws and Regulations Course. If the 8-Hour VB&FH Laws and Regulations Course is completed as qualifying education prior to January 1, 2026, or the 7-Hour VB&FH Laws and Regulations Course is completed prior to January 1, 2026 and approved by another jurisdiction as meeting this purpose, the 4-Hour VB&FH Laws and Regulations Course may be completed.
- If a credential holder fails to apply and meet the requirements for renewal by November 30, 2026, such credential holder may obtain a renewal of such credential by satisfying all of the requirements for renewal and paying the appropriate late processing fee if such late renewal takes place prior to July 1, 2027. Postmark date is utilized to determine the date of submission.
- If a credential holder who first obtained his or her credential at the current level on or after November 1, 2026 fails to apply and meet the requirements for renewal by December 31, 2026, the credential holder may obtain a renewal of the credential by satisfying all the requirements for renewal and paying a late processing fee if such late renewal takes place prior to July 1, 2027. Postmark date is utilized to determine the date of submission.
- If a credential is not renewed prior to July 1, 2027, a credential holder shall reapply for credentialing and meet the current requirements in place at the time of application.
- Each successfully renewed credential holder will receive access to a free, one-time digital download of the current edition of USPAP.

NRPAB
Nebraska Real Property Appraiser Board

Real Property Appraiser Credential Renewal Application Procedures

Effective May 21~~15~~, 202~~5~~6

1. The PDF renewal application will be posted to the website no earlier than July 1, but no later than July 10. Renewal procedures and continuing education ("CE") requirements will be updated in Appraiser Login and on the Board's website on or shortly after July 1. The online renewal application is available July 1. A renewal application will be accepted as received any time after July 1.

    a. A memo from the Board, or the summer edition of The Nebraska Appraiser that includes a feature article, will be sent no later than the last day in August reminding real property appraisers of their upcoming renewal, and of the processes in place to renew their credential.

    b. In early July, automated emails will be sent to all credential holders whose credentials are expiring December 31 with ~~the text of the~~ renewal requirements ~~postcard~~ and any information regarding ~~any~~ significant changes in procedures or requirements. This email will also notify the credential holder that the online and PDF renewal applications are available.

2. All applications received, whether online or PDF, are reviewed for completeness. Applications that are incomplete due to unanswered questions; missing information, signatures, or documentation; incorrect payment; ineligibility for two-year renewal; lack of evidence supporting at least 28 hours CE submitted at the end of the CE period; or no 7-Hour USPAP Continuing Education Course Update completion documentation submitted (if required with the renewal), will be rejected. The real property appraiser's 7-Hour USPAP Continuing Education Course due date will be verified. The real property appraiser's CE period will be verified to determine whether 28 hours of CE are required with the application and whether the applicant is eligible for a 2-year renewal. ~~For real property appraisers whose credentials were issued within the past three years, the date on which the credential was issued and whether the credential was approved through reciprocity will be verified to determine Y~~the beginning date of the two-year CE period is determined in accordance with N.R.S. § 76-2218. Incomplete applications may be accepted if the applicant can reasonably rectify the deficiency to complete the application within a specific ~~time period~~period as determined by NRPAB, in which case processing may continue. If such incomplete application is not rectified within the specified ~~time period~~period, the applicant shall be notified in writing (letter) that their application will go before the Board at the next meeting unless the deficiency is rectified. If all elements of an application are present, the application is considered complete.

a. A complete renewal application includes:

   i. a completed application form;

   ii. $3654~~0~~ payment for a timely one-year renewal, $730~~680~~ for a timely two-year renewal, (credentialing fee and ASC Appraiser Registry fee – no payment required for a timely Trainee two-year renewal, two-year renewal must be at the end of the second year in the two-year continuing education cycle, otherwise the appraiser is ineligible);

   iii. explanations and documents for any "yes" answers to disciplinary questions;

   iv. all continuing education certificates not previously submitted and approved (or submitted separately by electronic means and not yet approved), including the 7-Hour USPAP Continuing Education Course if due that year, and all others if it is the end of the second year in the two-year continuing education cycle; and

   v. late processing fees, as applicable, for any application postmarked after November 30 of the current year unless the credential was issued on or after November 1 of the current year, in which case the late processing fees begin after December 31 of the current year.

b. The Licensing Programs Manager (LPM) or another NRPAB ~~teammate~~staff as assigned by the Director, will review new online renewal applications each day.

   i. If the application is complete, the application will be marked "Accepted" in Initial Staff Review and "Under Review" selected for status in the Appraiser Application~~s and~~ Review~~s~~ Interface. The EFW payment will be included in the next EFW file to be built and sent to US Bank. All receipts will be deposited with Treasury Management in accordance with the Internal Control Plan after US Bank confirms receipt of the EFW file. The application will be entered in the Applicant Tracker spreadsheet, and the appropriate information will be entered in the ASC Appraiser Registry Tracker.

   ii. If the application is late, the late processing fees ~~will~~ must be entered ~~in~~into the real property appraiser's Payments tab in the NRPAB Database. For EFW payments, the EFW reference number will be recorded as the payment number; for checks, the payment number is the check number. ~~with the EFW reference number as the payment and receipt numbers.~~ The receipt number is located in the Application Summary under Payment Details. No paper receipt is required, as the database automatically generates and emails a receipt. ~~the payment of the late processing fee is itemized in the EFW receipt.~~

   iii. If the application is incomplete, the application will be marked "Rejected" in Initial Staff Review in the Appraiser Application~~s and~~ Review~~s~~ Interface and the reason detailed in the text box. The status will also be changed in the Appraiser Application~~s and~~ Review~~s~~ Interface to "Rejected." A letter or email will be sent to the real property appraiser with the reason for rejection and logged in the application Communication and

Documentation log. The Business Programs Manager (BPM) shall be notified so that any EFW payment related to this rejection is not included in the next EFW file built.

c. The Licensing Programs Manager (LPM), or another NRPAB ~~teammate~~staff as assigned by the Director, will review new paper renewal applications each day.

i. When paper applications are received at the Board's office, the renewal application will be stamped with the received date in accordance with the Internal Control Plan. All checks or monies received will be copied and attached to the application. The name of the real property appraiser, credential number, and renewal period (1-yr or 2-yr) will be written on the copy of the check attached to the application and the copy of the check attached to the deposit. The paper application will be scanned to a PDF and each application will be manually entered in the Renewal of Real Property Appraiser Credential Application (Manual Entry) interface. Everything will be entered as it appears on the application, even if the information given by the real property appraiser is incorrect (e.g., responses to CE Period and 7-Hour USPAP Continuing Education Course questions). Short answers to disciplinary questions may be typed in. Longer answers and documents will be scanned and uploaded ~~in~~to the appropriate locations. CE certificates not already on the Education Tab will be scanned to be reviewed and entered.

ii. If the application is complete, the application will be marked "Accepted" in Initial Staff Review and "Under Review" set for status in the Appraiser Application ~~s and~~ Review~~s~~ Interface. All receipts will be deposited in accordance with the Internal Control Plan. The application will be entered in the Applicant Tracker spreadsheet and the appropriate information will be entered in the ASC Appraiser Registry Tracker.

iii. The postmark date on the envelope will be checked to verify that all late processing fees (if applicable) have been paid. Late fees are assessed at $25 per month or partial month beginning December 1, unless the initial credential was issued after November 1, in which case the late-fee period begins January 1. If any late processing fees are included, ~~a receipt will be written, copied with the payment,~~ the payment of the late processing fees will be entered on the Payments tab in the NRPAB Database, and payment information will be edited under the Payment Details tab of the application. Save & Send Check Receipt will be selected at the bottom of the review section and the database will ~~receipt held to be mailed to the real property appraiser after the application is approved or denied~~automatically generate and email a receipt to the real property appraiser.

~~iii.~~iv. If any required late processing fees ~~due~~ are not included, the payment and application will be scanned and logged in the Appraiser Application~~s and~~ Review~~s~~ Interface log. The check submitted with the application should not be deposited until the full late fee has been received; however, because checks must be deposited within agency guidelines, the applicant has no more than 48 hours from the time of receipt or until the last day of the current month, whichever occurs first, to submit the missing late fee. An EFW payment request will be created for the outstanding amount and set to expire on the earlier of these two deadlines. A note must be added to the EFW request

explaining that the application was received without the required late fee and that the application is considered incomplete until the full amount is submitted. If no response is received before the expiration of the EFW request, the application and check will be returned to the real property appraiser. ~~, then returned with a letter of explanation.~~ At the real property appraiser's request, the payment and application may be shredded instead of returned.

~~iv.~~v. If the application is incomplete, the application will be marked "Rejected" in Initial Staff Review in the Appraiser Application~~s and~~ Review~~s~~ Interface and the reason detailed in the text box. The status will also be changed in the Appraiser Applications ~~and~~ Review~~s~~ Interface to "Rejected." A letter or email will be sent to the real property appraiser with the reason for rejection and logged in the application Communication and Documentation log.

3. The LPM, or another NRPAB ~~teammate~~staff member as assigned by the Director, verifies that all non-continuing education requirements for renewal are met. Upon further review, complete applications may still~~be found to have~~ contain incorrect information or deficiencies, CE activities ~~submitted~~ may ~~be found~~ not ~~to~~ meet requirements, or the ASC Appraiser Registry may reveal undisclosed disciplinary action. Complete applications are ~~eventually~~ ultimately approved by staff, the Director, or the Board; ~~or~~ denied by the Board (after hearing); ~~,~~ not renewed by the Board (after Notice to Show Cause); not renewed by staff (due to application deficiencies); or ~~are~~ withdrawn by the real property appraiser. During this process ~~the~~ ~~teammate~~staff will check the application for the following and mark each step as complete in the Appraiser Application~~s~~ and Review~~s~~ Interface, logging all communications and documents in the Communication and Documentation Log for that application.

   a. ~~The information in the application is accurate and complete. Teammate~~D ~~will d~~etermine whether the real property appraiser has provided any incorrect/misleading responses (e.g., education completion, disciplinary action, legal action), and all address ~~or~~ and personal information fields match the application's information in the NRPAB Database. If updates to address or personal information are required based on the PDF application or information entered in Appraiser Login, staff will update the NRPAB Database accordingly. To complete an update, staff will open the Appraiser tab, select the appropriate field, enter the revised information in ALL CAPS, and select the Update Appraiser button. ~~If there is a discrepancy regarding the address or personal information between the PDF application and NRPAB Database, the NRPAB Database will be updated to reflect the information included on the PDF application.~~ If there is a change in the real property appraiser's name or Principal Place of Business Contact Information in Appraiser Login or on a PDF application, the ASC Appraiser Registry will be updated with the new information as well. If clarification is needed on any answers, staff will email real property appraiser requesting a response within a specified time period, if no response is received, a formal letter will be sent to the real property appraiser requesting a response. The real property appraiser will be asked to respond to the Board's office in writing within ten business days. The Board's Director has authority to approve the response, or the Director may determine that the response will be reviewed by the Board at its next regular meeting.

b. Verify if the application is for a one- or two-year renewal. If the real property appraiser is not eligible for a two-year renewal and this was missed at Step 2c, or an online renewal application allowed an incorrect two-year renewal and was accepted at Step 2b, the application will be processed as a 1-year renewal and the real property appraiser notified with a letter explaining the requirements for a two-year renewal and why the real property appraiser has not met those. The letter will include a W-9 form to be completed and mailed or emailed back to the Board's office. The letter to the real property appraiser will explain that the W-9 is required ~~in order to~~to process the refund of the overpayment.

c. Verify disciplinary action by utilizing the ASC Appraiser Registry; previous NRPAB Database log entries reporting disciplinary action, court cases, and advisory letters; and the real property appraiser's Disciplinary Actions and Investigations tabs in the NRPAB Database. All credential holders will be verified on the ASC Appraiser Registry whether they are reciprocal or Nebraska resident credential holders. The~~is~~ ASC Appraiser Registry Report will be saved as a PDF (or printed off and scanned) and uploaded~~ as a Communication and Documentation log entry~~ into the Appraiser Application~~s and~~ Review~~s~~ Interface in the Disciplinary Survey section. If there is no disciplinary action,~~ the ASC review will simply be placed in the renewal application log. In the Disciplinary Review section of the Appraiser Applications and Reviews Interface,~~ the Disciplinary Survey Review, NE Disciplinary Action Review, and ASC Appraiser Registry Review will be marked as "Complete" and Recommendation set to "Approved."~~:~~ If there is disciplinary action, ~~the teammate~~staff will highlight it in the ASC Appraiser Registry Report and note that Disciplinary action has been appropriately reported on previous applications (if applicable). The Disciplinary Survey Review, NE Disciplinary Action Review, and ASC Appraiser Registry Review will be marked as "Complete." If this is the first time that a disciplinary action has been reported (and the action occurred in a jurisdiction other than Nebraska), the Board's Director will be consulted. Director Review will be set to "Applicable" and Ready for Director's Review will be selected and a notation will be added to the text box. The Director will determine whether the ~~teammate~~staff should proceed with processing, request additional information pertaining to the disciplinary action, or whether the application should go before the Board for consideration.

4. The Education Program Manager ("EPM"), or another NRPAB ~~teammate~~staff member as assigned by the Director, verifies that all continuing education requirements, as applicable for renewal, are met.

   a. Verify that the education certificates required have been received~~. Verify~~ and that all education activities were completed timely (e.g., All CE completed within the real property appraiser's two-year CE period, the 7-Hour USPAP Continuing Education Course completed within two years). The two-year CE period may not begin on January 1 for new credential holders. ~~For real property appraisers whose credentials were issued within the past three years, the date on which the credential was issued and whether the credential was approved through reciprocity will determine~~ Tthe beginning date of the two-year CE period is determined in accordance with N.R.S. § 76-2218. If not already completed, certificates will

then be entered into the Education tab in the NRPAB Database. The continuing education submittal acceptance is determined by the NRPAB's records in the NRPAB Database.

i. Upon completion of the continuing education review, if all continuing education is approved, the ~~teammate~~staff will update the "USPAP" field with the next 7-Hour USPAP Continuing Education Course due date, the next Valuation Bias and Fair Housing Laws and Regulations~~BFH~~ Course due date (if applicable), a~~long with~~nd the "CE Period" field with the next continuing education period in the Appraiser Interface for the real property appraiser (if applicable). It is imperative that thes~~eis~~ be updated to ensure that there is no confusion arising from incorrect data in Appraiser Login and to ensure that the online renewal application does not allow a real property appraiser to submit an incorrect 2-year renewal application. The ~~teammate~~staff will mark the Education Review as "Complete" in the Appraiser Application ~~s and~~ Review~~s~~ Interface.

ii. If ~~the continuing~~continuing education is deficient for any reason (e.g., submitted education activity not approved, 7-Hour USPAP Continuing Education Course not submitted) the application will not be processed any further. An email will be sent to real property appraiser explaining the deficiencies and requesting resolution within a specified time period. If no response is received, a formal~~A~~ letter will be sent to the real property appraiser explaining the deficiencies. ~~and~~ Communications will be logged in the Appraiser Application ~~s and~~ Review~~s~~ Interface log. The portions of the review that were completed will be marked as "Complete" in the Appraiser Application~~s and~~ Review~~s~~ Interface. If the real property appraiser does not choose to remedy the deficiencies and complete the continuing education requirements, processing of the application shall cease~~be placed before the Board for consideration~~. If the submitted continuing education is determined to be deficient, in the Education tab, a note must be added to the entry for the certificate indicating why the continuing education activity has been denied. The application is presented to the Director for review. The Director may approve the education activity, request another course of action, or place the application before the Board for review at its next meeting. If the Board denies the application, a denial letter, as appropriate, will be sent and will include a W-9 form to be completed and mailed or emailed back to the Board's office. If the Board expresses intent to not renew the credential, a Notice to Show Cause, as appropriate, will be sent to the real property appraiser. If the real property appraiser fails to show adequate support for why the Board should renew the credential, and the Board elects to no renew the credential, a letter will be sent and a W-9 form included to be completed and mailed or emailed back to the Board's office. The letter to the real property appraiser will explain that ~~the~~ a W-9 is required ~~in order to~~to process the refund of the payment of fees.

b. A 7-Hour USPAP Continuing Education Course is required to be completed at least once every two years. Verify the year that the 7-Hour USPAP Continuing Education Course is due. If the 7-Hour USPAP Continuing Education Course is due and the submission is ~~acceptable, but~~acceptable but found to not have been completed in a timely manner, the application may be approved with a~~n~~ written advisory ~~letter~~ for the first occurrence for a late

submission in accordance with Internal Procedural Document 201715. For any subsequent occurrences of a late submission of the 7-Hour USPAP Continuing Education Course, the application is presented to the Director for review. The Director may approve the activity in question with or without additional directives (written advisory ~~letter~~), or the Director may determine that the application shall go before the Board at its next regular meeting. ~~Applicant~~Applicants will be notified of any action by letter. If the 7-Hour USPAP Continuing Education Course was not completed timely, the next 7-Hour USPAP Continuing Education Course will be due two years from the previous due date, not two years after it was actually completed. The "USPAP" field must be updated in the Appraiser Interface of the NRPAB Database accordingly. In the Education tab, a note must be added to the entry for the 7-Hour USPAP Continuing Education Course indicating why the year on the certificate does not match the year to which it is applied. Complete Step 4a.

~~b.~~

c. Beginning in 2026, a Valuation Bias and Fair Housing (VB&FH) Laws and Regulations Course must be completed at least once every two years. A 7-Hour VB&FH Laws and Regulations Course must be completed by any credential holder who has not successfully completed the 8-Hour VB&FH Laws and Regulations Course. Once either the 7-Hour or 8-Hour VB&FH Laws and Regulations Course is completed, a 4-Hour VB&FH Laws and Regulations Course may be taken. Before accepting a 4-Hour VB&FH Laws and Regulations Course, verify that the appraiser previously completed a 7- or 8-Hour VB&FH Laws and Regulations Course. A VB&FH Laws and Regulations Course may not be submitted for credit more than once within the same two-year continuing education period. Verify the year that the VB&FH Laws and Regulations Course is due and update the "VBFH" field in the Appraiser Interface of the NRPAB Database accordingly. Complete Step 4a.

~~c.~~

d. For continuing education activities completed in another jurisdiction, the certificate will be reviewed for verification of approval of the activity in the jurisdiction in which it was completed, and at the time it was completed, for classroom activities; or for verification of approval of the activity by a jurisdiction in which the real property real property appraiser is credentialed as verified through the ASC Appraiser Registry at the time the activity was completed for distance (asynchronous, synchronous, hybrid) continuing education activities not approved by the Board. The education activity will be entered into the Education Interface in the NRPAB Database (if not already completed) in accordance with the procedures for entering out of state education. The number given to the education activity will be written on the certificate and the certificate will be entered into the Education tab in the NRPAB Database for the real property appraiser. If verification of acceptance as continuing education by another jurisdiction cannot be obtained, the education activity will be entered into the Education tab and denied. The ~~teammate~~staff responsible for processing the application shall be notified. Notification shall be sent to the real property appraiser requesting that the real property appraiser provide supporting documentation evidencing that the activity is accepted as continuing education by the jurisdiction in question. If the real property appraiser cannot provide requested evidence in a timely manner, and if the

continuing education requirements for renewal are not met, the application will not be processed any further. A letter will be sent to the real property appraiser explaining the deficiencies and will be logged in the application log. Complete Step 4a.

e. For CE completed after the end of the CE period, applied to that CE period, the ~~teammate~~staff will write the year due on the certificate and enter the activity in the Education tab with the CE period to which it is being applied. In the Education tab, a note must be added to the entry for a certificate applied to a previous CE Period, indicating why the year on the certificate does not match the year to which it is applied. Complete Step 4a.

5. Upon the successful completion of the education review, the disciplinary action check, and Board review, if any, the status of the application will be updated to "Ready for Credentialing" in the Appraiser Application~~s and~~ Review~~s~~ Interface by the LPM, or another NRPAB ~~teammate~~staff member as assigned by the Director.

a. The required information will be entered under the credentialing card tab in the NRPAB Database (credential type, fee amount, ASC Appraiser Registry fee, effective date, expiration date, paid by, form of payment~~,~~, check or EFW number, and Date Received~~receipt of EFW number)~~. Once these items are entered, the credentialing card will be generated. The ~~teammate~~staff will enter the credentialing card number in the Applicant Tracker spreadsheet and on the photocopy of the check attached to the deposit or beside the real property appraiser's name on the EFW document attached to the deposit. If any late processing fees were paid, the ~~teammate~~staff will verify that the fees are recorded under the Payments tab in the NRPAB Database (fee type, fee amount, paid by, form of payment, check or EFW number, and receipt or EFW number) and record any late processing fees not entered earlier in the process. Date credentialing card is issued will be entered in the Final Processing section of the Appraiser Application~~s and~~ Review~~s~~ Interface.

b. To save the updated information in the NRPAB Database, the ~~teammate~~staff will click the "Update" button at the bottom of the profile or the "Save" button at the bottom of the Appraiser Application~~s and~~ Review~~s~~ Interface.

c. After completing the update in the NRPAB Database, the ~~teammate~~staff will update the ASC extranet with the renewal information (unless real property appraiser is a Trainee). The ~~teammate~~staff will enter the appropriate information in the ASC Appraiser Registry Tracker. The date the contact information is updated in the ASC Appraiser Registry and the date the renewal is entered in the ASC Appraiser Registry will be entered in the final Processing section of the Appraiser Application~~s and~~ Review~~s~~ Interface.

~~d.~~ The ~~teammate~~staff will change the Application Status to "Credential Issued~~Approved~~" and select "Save & Notify." This automatically generates an email to the real property appraiser that the credential has been renewed~~.~~

6. ~~The real property appraiser will be mailed a postcard~~ with information on how to print the renewed credentialing card and access the current electronic version of USPAP (if it has not already been downloaded). The real property appraiser will be sent ~~a receipt and~~ any applicable written advisories~~y~~ ~~letters regarding~~ (e.g., late application or late 7-Hour USPAP Continuing Education Course Update~~), if applicable~~. Staff will confirm that an email receipt was sent for any late fees.

7. Applications will be processed in the order in which they are received. Any renewals received postmarked or date stamped on or before November 30 of the designated year are considered priority and will be processed as soon as possible. For all late applications (those received at the Board's office not postmarked or date stamped by the November 30 deadline) processing will stop after all requirements have been met and verified before the credentialing card is issued and the expiration date changed in the ASC Extranet.
~~7.~~
8. All applications are considered important; however, anything received after December 31 of the designated year will be completed as staff is able. The priorities of the office will shift back to normal duties as of January 1 of the next year.

2026 Spring AARO Conference; San Diego, CA

<u>Monday, April 27, 2026</u>

Opening Remarks

Dennis Badger, 2025-2026 AARO President; Brandy March, Managing Director

Case Studies on Irregularities in Regulatory Agencies

Joshua Walitt, Walitt Solutions; Victoria Reel-Kersch, Walitt Solutions

- Presented multiple case studies observed across multiple states showing irregularities in regulatory agencies.
- Case study criteria:
  - Consistent application of statutes and rules,
  - Competent, trained staff,
  - Relabel processes and communications,
  - Appropriate process for licensees and applicants.
- Seven categories of regulatory irregularities
  - Course approval disparities.
  - Board meeting constraints (is a board meeting needed for all decisions).
  - Process failures – ensure proper checks and balances in place and audit processes.
  - Failure to maintain current information – outdated forms or addresses.
  - Communication confusion.
  - Unsupported state findings – accuracy of information.
- Considerations:
  - Training for staff to understand appraisal methods, USPAP, and state-specific regulations.
- Vulnerabilities:
  - Program administrators, program staff, and board members can proactively prevent these failures
  - Mechanisms to catch errors early.
  - Culture.

The Appraisal Foundation Update

Kelly Davids, President of TAF

- 2026 Focus – Building public trust in the appraisal profession.
- Survey on public trust.
- Provided a brief summary of the Real Property Appraiser Regulatory System.
  - Mission – transparent, collaborative, impactful.
- Recognized partners.
- Provided a brief summary of the work of TAF Board of Trustees.

- IMPACT:
  - State Harmonization Task Force
  - Building Public Trust on the International State.
  - Strategic Plan Update.
  - Women's Forum.
  - Trustee Public Interviews.
- Pathways to Success Scholarship.
- AARO-ASC-TAF Partnership – forging positive working relationship (regular leadership meetings, transparency).
- Washington, DC Spotlight on Appraisals.
  - President Trump's Executive Order on Promoting Access to Mortgage Credit.
  - 21st Century Road to Housing Act.
- Foundation Resources:
  - Monthly newsletters and podcasts.
  - State regulator newsletters.
  - Foundation Tools for State Regulators:
    - State Regulator Training Series.
    - State Regulator Advisory Group (SRAG).
    - Corrective Education.

Nick Pilz, Appraisal Standards Board

- Introduced new ASB members.
- Second Exposure Draft – Proposed New Advisory Opinion 41: Use of Technology in an Appraisal or Appraisal Review Assignment.
  - Clarifying Artificial Intelligence Terminology.
  - Competency and Cross-Disciplinary Application.
- USPAP Courses and Publications.
  - Working on the new installation of the USPAP courses.
- New Q&A and reference materials were released this year.

Jerry Yurek, Appraiser Qualifications Board

- Introduced new AQB members.
- AQB Activities:
  - Real Property Appraiser Qualifications Criteria.
    - Working on second exposure draft (estimated summer release).
    - Qualifications Reassessment Project – Possible experience and exam changes.
  - Working on outline for certified general PAREA.
  - Course Approval Program.
  - Certified USPAP Instructor Program.
- Course Approval Program:

    - Provide standard review process for education providers.
    - Better define Practicum Course Programs.
    - 320 Registered USPAP Instructors.
- Real Estate Degree Review Program:
    - Provide education headstart for those entering the profession.
    - Great marking tool for colleges and universities.
    - 33 undergraduate degrees approved
    - 18 graduate degrees approved
    - 2 associate degrees approved.
- PAREA:
    - 245 enrolled in PAREA (227 LR, 18 CR).
    - 84 PAREA Program graduates.
    - Exam pass rate is 100%.
    - Drafting certified general PAREA language.
- 2026 Criteria:
    - Two new Interpretations
        - Retirement of Guide Note 4 on Practicum (moved to CAP Policies).
        - VB&FH Laws and Regulations Course requirements for inactive appraisers.
- One Practicum Course has been submitted to AQB for approval and there is another program preparing to submit an application as well.

Valerie Scott, Appraiser Qualifications Board

- 100% pass rate for PAREA Program participants.
- Always assessing testing criteria and factors – work to eliminate consistent issues.
- Focus on first time test takers, not repeat test takers.

From Exposure to Evaluation: What AQB is Hearing on Proposed Changes to the Criteria

Kelly Davids, President of TAF

- Purpose of session:
    - Share what TAF heard from Exposure Draft and Concept Paper.
    - Highlight key themes and tensions.
    - Discuss decisions ahead.
    - Get regulator input.

Jerry Yurek, Appraiser Qualifications Board

- Most comprehensive Criteria review in decades.
- Workforce challenges (fewer entrants, declining number of appraisers, aging profession)
- Goal is to expand access and maintain public trust.

- What was heard:
  - Support for modernization.
  - Paired with concern about implementation.
  - Difficulty evaluating mass appraisal experience.
- Access vs. Proficiency:
  - Support for reducing barriers.
  - Concern about lowering standards.
  - Difficulty accessing supervisor/trainee pathway.
- Experience Requirements:
  - Agreement – Experience matters.
  - Disagreement – How should work.
  - Increasing focus on work product vs. hours.
- Alternative Pathways:
  - Interest in new pathways.
  - Concerns about verification and consistency.
- Examination Only:
  - Major feasibility concerns and significant skepticism.
  - Cannot measure applied proficiency.
- Regulatory Burden (e.g., who verifies proficiency, who enforces standards, impact on states, evaluating specialized experience).
- Consistency vs. Flexibility:
  - National consistency.
  - State flexibility.

Valerie Scott, Appraiser Qualifications Board

- Decision Areas:
  - Experience – maintain current model; reduce hours/time requirements; allow broader experience types (non-traditional); shift timing (before vs. after credential).
  - Alternative Pathways – expand PAREA style models; require demonstration (case studies, reports, capstone-style work); introduce skills-based pathways; define who evaluates proficiency.
  - Education – focus on appraisal specific knowledge; reduce non-essential requirements; improve consistency in curriculum; implementation timelines and course development challenges.
  - Implementation – who is responsible (AQB or States); new processes or infrastructure.
- Reality for Regulators - Implementation matters as much as policy; Consistency matters; Burden matters.
- What happens next – refinement of proposals; second exposure draft.

Appraisal Subcommittee Update

Frederick Griefer, Acting Executive Director

- Plans to attend more compliance visits.
- Posting for accounting manager, executive director, and three program managers.
- Provided a career summary.
- Provided an update of the appraisal regulatory system.
- Summarized the ASC core responsibilities.
- State Compliance Reviews:
  - Only four were awarded excellent for both appraiser and AMC program during last review (Nebraska one of them).
- Provided a summary of ASC Grant Program.
- Federal Legislation:
  - PAL Act – create an appraiser licensing information portal
  - Appraisal Improvement Act – Add VA and USDA RHD to the ASC.
  - Allow Licensed appraiser back on the FHA Roster.
  - Add trainees to National Registry.
  - Broaden ASC grant-making authority.
- Executive Order
  - Executive Order protecting access to mortgaged credit.
  - Section 6, Appraisal Modernization.
  - Executive Order requiring payments to Federal government be electronic.
- ASC has a new address.
- ASC plans to attend all future AARO Conferences and the Valuation Expo.

Tuesday, April 27, 2026

Hot Topic – Appraisal Subcommittee and The Appraisal Foundation

Frederick Griefer, Appraisal Subcommittee; Kelly Davids, TAF

- Uniform discipline (discipline matrix) was discussed.
- Upgrade for the ASC Extranet and ASC Appraiser Registry was discussed.
- A discussion took place regarding what is considered to be a final report (multiple drafts – signed or unsigned).

AQB Advisory Council

Ed Neelly, Mississippi

- College degree requirements discussed.
- Valuation Bias and Fair Housing Laws and Regulations Course application discussed.
- Continuing education requirements were discussed.

- CG PAREA Program discussed.
- Discussion took place regarding the AQB's authority within FIREAA to require experience.

Administrator/Director Breakout Session

Dave Campbell, North Dakota; Jodie Campbell, North Dakota

- Supervisory Appraiser/Trainee model discussed.
- A discussion took place regarding concepts to keep trainee real property appraisers engaged in the process.
- A discussion regarding what should be included in the ASC Appraiser Registry upgrade.
- Application of inactive status was discussed.
- TAF Funding and influencing state policy discussed.
- ASC enforcement time requirement discussed.

Hot Topic – Artificial Intelligence

Chandra Mast; Nicholas Pilz, ASB; Paul Ryll, Oscar Mike Group, LLC

- Categories of AI were discussed (chatbot, media, hominoid robots).
- ASB spent considerable amount of time studying effects of AI on USPAP - the guardrails still apply.
- Regenerative AI is still settling down – more is needed before it is completely trustworthy.
- Agent mode in ChatGPT can pull large scale research for investigations.
- Appraisers are responsible for verifying AI information used in an appraisal – public trust.
- A Q&A discussion took place regarding AI use in an appraisal report.

<u>Wednesday, April 29, 2026</u>

Gray Areas in Appraisal Cases: When Is It Intent, Negligence, or Just a Mistake?

Mel Black, Coibri Group; Craig Capilla, Franklin, Greenswag, Channon and Capilla, LLC; Laura Smith, South Carolina

- Greater emphasis must be placed on application of AI in the enforcement processes.
- Must determine if negligence, fraud, or a minor mistake is made.
- States doing a better job at involving appraisers in the investigative process.
- Examples of unique USPAP violations were presented.
- Boards must remember the school scoring concept – they may score 90% when completing appraisals; respondents that score 70% is still passing. USPAP is a minimum standard – no scoring curve.

An Inside View of State Regulator Experience: The Building Framework at High-Quality Practicum Programs

Mujiburrahman Khateer, California

- Pathways into the Appraisal Profession.
  - Traditional Client-based vs. alternative.
- Program Structure Requirements.
  - Curriculum, methodology, USPAP Compliance, Documentation, Verifiable experience hours.
- Practicum Approval Process.
  - Multi-disciplinary committee (licensing, education, enforcement, legal, and executive).
  - Not a pass/fail exercise – collaborate with applicant to meet standards.
- Build pathways not barriers.
- Program Requirements – documented experience hours; included the generally applicable methods of appraisal practice for credential; defined contents, lab work , and assignments; course schedule (credit hours vs. classroom and research hours); stated and documented compliance to USPAP; included supporting policies to ensure experience verification; readiness to the audit of the program.
- California has approved two practicum programs.
- Lessons Learned - Early clarity prevents major redesigns later; repeatability is essential – consistency matters more than uniformity; USPAP compliance checkpoints must be built into the program; experience-hour justification must be worked-basked, not aspirational; instructor qualifications and role definitions mater; strong student-progress policies are crucial to maintaining program integrity; documentation systems need to be built before the program launches; collaboration with BREA during application review procedures lead to stronger programs.

Carmen Dones, West Los Angeles College

- Implementation of practicum course started with advisory board.
- AQB and BERA were involved with project before the curriculum committee review.
- Work on practicum course started in 2018 and the program was launched in 2025.
- 194 people have shown interest in program with no advertising.
- Program currently active.

Randy Flowers, RSDS Appraisal

- RSDS Valuation launched January 2021 - Trained more than 50 trainees in first two years and graduated 91 appraisers to date in AZ, CA, CO, FL, KS, MO, NC, NV, TN, TX.

- RSDS Valuation launched Non-Business Transaction in 2023 – Graduated two appraisers in TX.
- AppraisalU is approved in Missouri and California and pending AQB approval (and in Texas).
  - Course 101 – 8 assignments = 500 hours
  - Course 201 – 20 assignments = 500 hours
  - Transition Course – Two weeks = 40 hours
  - Virtual instruction, physical application, and demonstration reports.
  - $12,000.00 for licensure.
- AU101 and AU210 are $6,000.00,
- Program feedback – in-field application; class discussion and critical thinking application; geographic application; scalable with regulatory support; additional funding opportunities need explored.

Fannie Mae Update

Kevin Smith, Senior Manager in Appraiser Engagement

- Appraisal Quality Monitoring:
  - Informal letters sent to appraisers and AMCs
  - Detailed Letters to appraisers
  - State Tips – Appraisal level tip provided to state agencies for remediation action.
  - State Referrals – Referrals of an appraiser to the state agency for patterns of unsupported work. State Tips – Monthly process that sends appraisal to stat regulatory agencies due to Loan Quality Center defects/repurchases.
- Common issues:
  - Improbable distances – Personal inspection in both Bakersfield, CA and Tyler, TX in one day.
  - Inadequate market conditions analysis – Educational letters sent to appraisers for repeated submissions using comparable sale that occurred more than 12 months prior to the appraisal, and appraisers that only presented market conditions date for 12 months.
  - Highest and best use does not reflect actual property.
- LQC review/lender outreach/final resolution/state regulatory agencies (attempting to complete process within 60 months.

Lyle Radke, Senior Director Collateral Policy

- Provided a timeline of the UAD 3.6 implementation.
  - Limited Production - September 8, 2025-January 25, 2026
  - Broad Production – January 26, 2026-November 1, 2026
  - Mandate – November 2, 2026

    - Retirement of UAD 2.6 – May 3, 2027
- UAD 3.6 in Broad Production
    - All lenders may now submit UAD 3.6 Appraisals.
    - Verified Appraisal Software Vendors – Aivre, Cotality (a la mode), Ascent Software Group, SFREP (Appraise-It-Pro).
- 3.6 report submission has quadrupled since March.
- Presented new 3.6 concepts vs. 2.6 canned messages.

Freddie Mac Update on Appraiser Quality

Scott Reuter, Chief Appraiser for Freddie Mac

- AQM (Appraiser Quality Monitoring)
    - Purpose and Objectives – To improve appraisal quality by identifying the patterns or issue of concerns in appraisal reports. Appraisers which do not employ recognized appraisal methodologies and/or do not follow Freddie Mac appraisal policies resulting in risk to the company.
    - Recommendations and Actions – Communicate patterns of quality issues to appraiser for training and educational purposes, and to provide them with opportunity improve their work.
    - Identify theses or trends and recommend updates to QC processes, policy changes, and/or industry communications.
    - Refer to applicable state regulatory boards and/or to Freddie Mac's Single Family Fraud Risk Group.
- AQM Actions:
    - Review patterns or trends in appraiser work quality.
    - Send educational letters to appraisers.
    - Reserve complaints for more serious issues.
    - Freddie Mac, no state tips…only complete referrals.
- Market Condition Analysis – Additional guidance and requirements included selection of comparable sales; establish minimum time frame (12 months) from which overall market trend must be derived; identify that the overall market trend may be different from the adjustments applied to individual comparable sales; include an illustration of the methodology used.
- Around half of repots have 1004MC – not compliant with 3.6.
- Proper quality rating reporting has been an issue – developed training for sellers.
    - As is vs. renovation in progress - minor repairs, deficiencies and deferred maintenance.
- Summarized the timeline for implementation of UAD 3.6.

The Cost of Consistency: A Case Study in Uneven Enforcement

Craig Capilla, Franklin, Greenswag, Channon and Capilla, LLC; John Dingeman, Class Valuation; Malinda Griffin, South Carolina

- A presentation was made on various enforcement cases pertaining to the same matters in different jurisdictions, and how each jurisdiction adjudicated the matter differently.

THE NEBRASKA APPRAISER

News from the Nebraska Real Property Appraiser Board | Spring 2026

Director's Comments



Director Tyler Kohtz

Tyler Kohtz has been the Director for the Nebraska Real Property Appraiser Board since March of 2012. He is responsible for the development, implementation, and management of all programs for the agency, including the administration and enforcement of the Real Property Appraiser Act and the Appraisal Management Company Registration Act.

SWOT Analysis

Each year at its strategic planning meeting, the Board completes a SWOT Analysis. During this analysis, the Board discusses its strengths, weaknesses, opportunities, and threats. This analysis helps the Board see patterns that are helpful for establishing future goals and objectives. As mentioned in the winter edition of The Nebraska Appraiser, LB1072 introduced in January would transfer $100,000.00 from the Board's AMC Fund to the State's General Fund, after $250,000.00 was transferred from the Appraiser Fund and AMC Fund earlier this year. The Board's efforts to have this amount reduced was unsuccessful, and the AMC Fund balance is projected to be under $100,000.00 at the beginning of the fiscal year on July 1, 2026. As preparations begin for the next fiscal year and the 2027-2029 Biennial Budget Request, the Board will no doubt be mindful of these fund reductions. In April, I also attended the Association of Appraiser Regulatory Officials Spring Conference in San Diego, California; I have included a conference recap for you. One of the dominant topics at the conference was looking at opportunities to grow the profession, which aligns well with the Board's mission and vision. I anticipate that the SWOT analysis discussion, along with the general discussions, will be very productive at this year's strategic planning meeting. As always, the Board is here for you, so please feel free to contact me by phone or email with any questions or comments. I hope that you enjoy this edition of The Nebraska Appraiser.

In This Issue

NRPAB Features:

- 2026 Spring AARO Conference Summary

NRPAB Quick Hits:

- Compliance Update (January – March 2026)
- Guidance Documents Adopted/Retired Between January and March of 2026
- Employee Anniversaries
- NRPAB Moving to New Address
- Valuation Bias and Fair Housing Laws and Regulations Course

Coming and Going:

- Who's New? (January - March 2026)
- Real Property Appraiser and AMC Numbers and Trends as of April 1, 2026
- Real Property Appraiser Credential Renewal Report as of April 1, 2026

Financial Snapshot:

- March 31, 2026 Financial Report

Upcoming NRPAB Meetings:

- June 18, 2026 @ NRPAB Office (Conference Room)
- July 16, 2026 @ NRPAB Office (Conference Room)
- August 20, 2026 @ NRPAB Office (Conference Room)

These meeting dates are all tentative. Please check the Board's Facebook page or website for information as these dates approach. The start time for each meeting can be found in the public notice and on the agenda posted to the Board's website at least 48 hours prior to the start of the meeting. Any meeting also held by virtual conferencing will be stated as such in the public notice for that meeting.

2026 Spring AARO Conference Summary

By Tyler N. Kohtz, Director

I attended the 2026 Spring AARO Conference in San Diego, California, from April 27 through April 29, 2026. Primary topics of discussion included the Real Property Appraiser Qualifications Criteria update, UAD 3.6, technological advancements in the appraisal industry, practicum courses, and administration of the Criteria and enforcement of USPAP. The TAF, ASC, Fannie Mae, and Freddie Mac also provided their regular updates. I noted the following highlights:

- Joshua Walitt and Victoria Reel-Kersch of Walitt Solutions presented multiple case studies showing regulatory irregularities observed across multiple states, with explanation provided for case study criteria, categories of regulatory irregularities, considerations, and vulnerabilities.
- Kelly Davids of The Appraisal Foundation provided a summary of the Real Property Appraiser Regulatory System. TAF's 2026 focus is on building public trust in the appraisal profession. Davids also recognized TAF partners and provided a brief summary of the work of TAF Board of Trustees, IMPACT, and the State Harmonization Task Force. Davids then summarized the Pathways to Success Scholarship, the AARO-ASC-TAF Partnership, President Trump's Executive Order on Promoting Access to Mortgage Credit, 21st Century Road to Housing Act, and TAF resources.
- Nick Pilz with The Appraisal Foundation's Appraisal Standards Board introduced new ASB members and provided an update on the ASB's activities during the past year. Pilz discussed the Second Exposure Draft – Proposed New Advisory Opinion 41: Use of Technology in an Appraisal or Appraisal Review Assignment and the new installation of the USPAP courses and publications. Finally, Pilz brought attention to the new Q&A and reference materials released this year.
- Jerry Yurek with The Appraisal Foundation's Appraiser Qualifications Board introduced new AQB members and provided an update on the AQB's activities during the past year. Specifically, the AQB has been busy working on the second exposure draft of the Real Property Appraiser Qualifications Criteria and the Qualifications Reassessment Project, which may result in experience and exam changes; updating the Course Approval Program, which includes a standard review process for education providers and better defines Practicum Course Programs; and developing an outline for certified general PAREA. Yurek mentioned that there are now 320 Certified USPAP Instructors. Yurek also provided a brief update on the Degree Approval Program, PAREA, and changes made to the 2026 Criteria, which includes retirement of Guide Note 4 on Practicum Courses and clarification of Valuation Bias and Fair Housing Laws and Regulations Course requirements for inactive appraisers. Yurek ended his presentation by bringing attention to progress made for AQB-approved Practicum Courses. One Practicum Course has been submitted to AQB for approval, and another program is preparing to submit an application.
- Valerie Scott with the Appraiser Qualifications Board also provided additional information on the National Uniform Licensing and Certification Examination. According to Scott, PAREA program participants have a 100% pass rate. Scott also indicated that the AQB is always assessing testing criteria and factors to eliminate issues.
- In the presentation titled, "From Exposure to Evaluation: What AQB is Hearing on Proposed Changes to the Criteria" Kelly Davids, President of TAF, outlined the purpose of the session. Specifically, what TAF heard on the exposure draft and concept paper, highlight key themes and tensions, discuss decisions ahead, and receive regulator input. Jerry Yurek with the Appraiser Qualifications Board indicated that this was the most comprehensive Criteria review in decades. Workforce challenges (e.g., fewer entrants, declining number of appraisers, aging profession) were drivers, and the goal is to expand access and maintain public trust. Yurek then summarized what was heard. Specifically, there is support for modernization, but concern about implementation; there is support for reducing barriers, but concern about lowering standards; there is agreement that experience matters, but disagreement on how it should work (i.e., focus on work product vs. hours); there is interest in new pathways, but concern about verification and consistency; feasibility concerns and significant skepticism exist for an exam-only pathway as applied proficiency could not be measured; concerns regarding regulatory burden on states exist (e.g., who verifies proficiency, who enforces standards, who evaluates specialized experience); and conflict between national consistency and state flexibility exists. Valerie Scott, also with the Appraiser Qualifications Board, provided a summary of decision areas (i.e., experience, alternative pathways, education, and implementation). Scott finished by explaining the AQB's next step, which includes refinement of proposals and a second exposure draft.

- After a brief hiatus, the Appraisal Subcommittee made its return to the AARO Conference. Frederick Griefer, Acting Executive Director, introduced himself, provided a career summary, and gave an update on the ASC's activities. According to Griefer, he plans to attend more compliance visits, and the ASC is posting for an accounting manager, executive director, and three program managers. Griefer also provided an update of the appraisal regulatory system; summarized the ASC's core responsibilities; and provided a summary of the ASC Grant Program. As for state compliance reviews, only four were awarded "excellent" for both appraiser and AMC program during last review, with Nebraska being one of them. Griefer also summarized current federal legislation—specifically, the PAL Act, which creates an appraiser licensing information portal and the Appraisal Improvement Act, which adds the VA and USDA RHD to the ASC. There is also an effort to allow licensed real property appraisers back on the FHA Roster and add trainee real property appraisers to the National Registry. Griefer then moved to the ASC grants and indicated that the ASC is working to broaden its grant-making authority. Griefer finished the ASC update by summarizing Section 6 in President Trump's Executive Order protecting access to mortgaged credit. The ASC plans to attend all future AARO Conferences and the Valuation Expo.
- The "Hot Topic" presentation titled, "Appraisal Subcommittee and The Appraisal Foundation" was facilitated by Frederick Griefer with the Appraisal Subcommittee and Kelly Davids with The Appraisal Foundation. Topics covered include use and feasibility of the Uniform Discipline Matrix; upgrade of the ASC Extranet and ASC Appraiser Registry; and when a report is considered to be a final report (e.g., multiple drafts – signed or unsigned).
- The AQB Advisory Council Breakout Session included discussion of college degree requirements, Valuation Bias and Fair Housing Laws and Regulations Course application; continuing education requirements; the Certified General PAREA Program concept; and the AQB's authority within FIREAA to require experience.
- The Executive Directors and Administrators Breakout Session included discussion on the Supervisory Appraiser/Trainee model; concepts to keep trainee real property appraisers engaged in the process; what functions or features should be included in the ASC Appraiser Registry upgrade; application of inactive status for real property appraisers; TAF funding and influence over state policy; and the ASC Policy Statement enforcement time requirement.
- The "Hot Topic" presentation titled, "Artificial Intelligence" was facilitated by Chandra Mast, Nicholas Pilz, and Paul Ryll. Topics covered included categories of AI (e.g., chatbot, media, humanoid robots); time spent by the ASB studying the effects of AI on USPAP—the guardrails still apply; the current state of regenerative AI—more is needed before it is completely trustworthy; agent mode in ChatGPT—which can pull large-scale research for investigations; real property appraiser responsibility—responsible for verifying accuracy of AI information used in an appraisal. This session ended with a Q&A discussion regarding AI use in an appraisal report.
- A presentation titled, "Gray Areas in Appraisal Cases: When Is It Intent, Negligence, or Just a Mistake?" was given by Mel Black of the Colibri Group; Craig Capilla of Franklin, Greenswag, Channon and Capilla, LLC; and Laura Smith from South Carolina. Discussion included the need for greater emphasis placed on application of AI in the enforcement processes; deeper investigation to determine if negligence, fraud, or a minor mistake is made; states' efforts to involve appraisers in the investigative process has improved; examples of unique USPAP violations were provided; and use of "the school scoring concept" – a respondent that scores 70% is still passing (USPAP is a minimum standard – no scoring curve).
- A presentation titled "An Inside View of State Regulator Experience: The Building Framework at High-Quality Practicum Programs" was given by Mujiburrahman Khateer from California, Carmen Dones of West Los Angeles College, and Randy Flowers of RSDS Appraisal. Khateer discussed the process from the State of California perspective, which included program structure requirements and the practicum approval process. The California Practicum Course requirements include documented experience hours; generally applicable methods of appraisal practice for credentialing; defined contents, lab work, and assignments; course schedule requirements; stated and documented compliance with USPAP; supporting policies to ensure experience verification; and readiness for the audit of the program. California has approved two practicum programs. Khateer finished by summarizing what lessons were learned. Dones discussed the process from the West Los Angeles College perspective. According to Dones, implementation of practicum course started with advisory board; AQB and BREA were involved with the project before the curriculum committee review; work on practicum course started in 2018 and the program was launched in 2025; 194 people have shown interest in the program with no advertising.

(2026 Spring AARO Conference Summary continued on Page 6)

NRPAB Quick Hits

- Compliance Update
  - Between the months of January and March, three grievances were filed against Nebraska real property appraisers. During this time, no disciplinary actions were taken by the Board against any appraisers, one grievance was dismissed without prejudice, and two grievances were dismissed with prejudice.
  - Between the months of January and March, no grievances were filed against any Nebraska appraisal management companies. During this time, no disciplinary actions were taken by the Board against any appraisal management companies, and one grievance was closed.



- The Nebraska Real Property Appraiser Board retired no guidance documents, and adopted one new guidance document, between January and March.

  26-01: Consideration of Disciplinary Action Imposed Against an Appraisal Management Company by Another Appraiser Regulatory Agency

  All guidance documents are available for viewing on the Board's website at: https://appraiser.ne.gov/guidance_documents.html.

- Congratulations to Kashinda Sims, who has been with the Board for three years as of February 6th.

- The Nebraska Real Property Appraiser Board will be relocating to 500 South 16th Street in Lincoln, Nebraska (directly east of the Nebraska State Capitol) on July 27, 2026. Between July 20-24, 2026, the Board will have no physical location, as it is required to vacate its current location on Friday, July 17, 2026. During this time, all staff will be in remote status. Please feel free to continue to contact staff by mail, phone, or email during the transition to the new location. The mailing address will remain PO Box 94963, Lincoln, NE 68509-4963. The new physical address will be 500 S. 16th St., Lincoln, NE 68508. Please contact Colby Falls at colby.falls@nebraska.gov or 402-471-9015 with questions regarding the Board's relocation.

NRPAB
Nebraska Real Property Appraiser Board

Board Members

Chairperson of the Board
Kevin P. Hermsen, Gretna
Certified General Appraiser
2nd District Representative
Term Expires: January 1, 2027

Vice-Chairperson of the Board
Rodney Johnson, Norfolk
Certified General Appraiser
Licensed Real Estate Broker Rep
Term Expires: January 1, 2028

Board Member
Derek Minshull, North Platte
Financial Institutions Rep
Term Expires: January 1, 2029

Board Member
Adam Batie, Kearney
Certified General Appraiser
3rd District Representative
Term Expires: January 1, 2030

Board Member
Lori Johnson, Lincoln
Certified General Appraiser
1st District Representative
Term Expires: January 1, 2031

Have questions? We have answers!

Questions related to appraisal management company registration and renewal: nrpab.amc@nebraska.gov

Questions related to AMC Login: nrpab.amclogin@nebraska.gov

Questions related to real property appraiser credentialing: nrpab.credentialing@nebraska.gov

Questions related to real property appraiser credential renewal: nrpab.renewals@nebraska.gov

Questions related to real property appraiser education (QE & CE): nrpab.education@nebraska.gov

Questions related to investigations, or how to file a grievance: nrpab.compliance@nebraska.gov

Questions related to Appraiser Login: nrpab.AppraiserLogin@nebraska.gov

General Questions: nrpab.questions@nebraska.gov

NRPAB Quick Hits

- On June 22, 2023, the Appraiser Qualifications Board of The Appraisal Foundation adopted modifications to the Real Property Appraiser Qualification Criteria ("Criteria") that require all applicants for credentialing as a real property appraiser, and all active real property appraisers, complete valuation bias and fair housing ("VB&FH") laws and regulations courses. LB992 updated the Nebraska Real Property Appraiser Act to implement the Criteria effective January 1, 2026.

  Any application for credentialing as a real property appraiser in Nebraska, whether for an initial credential or an upgrade to a higher classification, must include the eight-hour VB&FH laws and regulations qualifying education course after December 31, 2025.

  Beginning January 1, 2026, the continuing education requirements for all Nebraska real property appraisers are amended to include completion of the VB&FH laws and regulations course once every two years. The seven-hour VB&FH laws and regulations course is required for any credential holder who has not successfully completed the eight-hour VB&FH laws and regulations course required to qualify for a credential as a real property appraiser. The four-hour VB&FH laws and regulations course is required for any credential holder who has successfully completed the seven-hour VB&FH laws and regulations course or the qualifying education eight-hour VB&FH laws and regulations course.

  Every real property appraiser, except for those who have completed the eight-hour VB&FH laws and regulations course as qualifying education prior to January 1, 2026, or the seven-hour VB&FH laws and regulations course as approved by another jurisdiction as meeting this purpose prior to January 1, 2026, and who hold an active credential on January 1, 2026, must successfully complete the eight-hour VB&FH laws and regulations course or the seven-hour VB&FH laws and regulations course on or before December 31, 2027. If you completed the eight-hour VB&FH laws and regulations course as qualifying education prior to January 1, 2026, or the seven-hour VB&FH laws and regulations course as approved by another jurisdiction as meeting this purpose prior to January 1, 2026, you may complete the four-hour VB&FH laws and regulations course on or before December 31, 2027, with evidence of the successful completion of the eight-hour VB&FH laws and regulations course or the seven-hour VB&FH laws and regulations course. All other requirements for continuing education approval apply.

  If you have any questions about the VB&FH laws and regulations courses, please contact Education Program Manager, Kashinda Sims by phone at 402-471-9022 or by email at nrpab.education@nebraska.gov.

NRPAB Staff

Tyler Kohtz
Executive Director
402-471-9015
tyler.kohtz@nebraska.gov

Kashinda Sims
Education Program Manager
402-471-9022
kashinda.sims@nebraska.gov

Karen Loll
Licensing Programs Manager
402-471-9024
karen.loll@nebraska.gov

Colby Falls
Business Programs Manager
402-471-9015
colby.falls@nebraska.gov

301 Centennial Mall South, First Floor
PO Box 94963
Lincoln, NE 68509-4963

Phone: 402-471-9015
Fax: 402-471-9017
Website: appraiser.ne.gov

Visit NRPAB on Facebook

The Appraisal Foundation

What's new at The Appraisal Foundation? *appraisalfoundation.org*

APPRAISAL SUBCOMMITTEE FFIEC

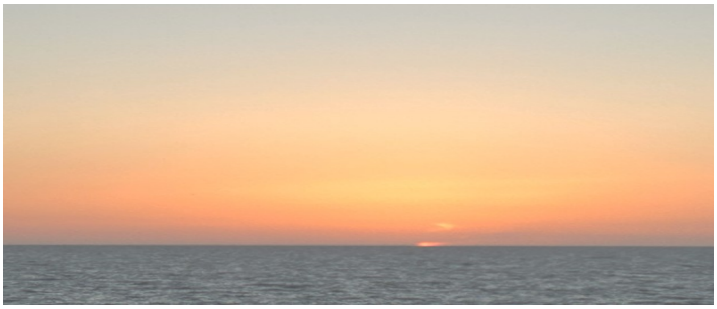
What's new at the Appraisal Subcommittee? *asc.gov*

AARO

What's new at the AARO? *aaro.net*

Flowers discussed the process from RSDS Appraisal's perspective. Flowers indicated that RSDS Valuation launched in January 2021 and has graduated 91 appraisers to date in multiple states. According to Flowers, AppraisalU is approved in Missouri and California and is pending AQB approval and approval in Texas. The Practicum Course includes virtual instruction, physical application, and demonstration reports.

- The Fannie Mae Update was provided by Kevin Smith, Senior Manager in Appraiser Engagement, and Lyle Radke, Senior Director of Collateral Policy. Smith discussed Appraisal Quality Monitoring and indicated that informal letters are sent to appraisers and AMCs—detailed letters are sent to appraisers; State Tips are appraisal-related tips provided to state agencies for remediation action; and State Referrals are the reporting of an appraiser to the state agency for patterns of unsupported work. Common issues seen by Fannie Mae include improbable distances; inadequate market conditions analysis; and highest and best use that does not reflect the actual property. Radke provided a timeline for UAD 3.6 implementation and indicated that all lenders may now submit UAD 3.6 appraisals. According to Radke, UAD 3.6 report submissions have quadrupled since March. Radke finished by presenting new 3.6 concepts vs. 2.6 canned messages.



Sunset over the Pacific Ocean at Shell Beach in La Jolla, CA.

- Scott Reuter, Chief Appraiser for Freddie Mac, summarized the purpose and objectives of the Appraiser Quality Monitoring Program, which include identifying trends and recommending updates to QC processes, policy changes, and industry communications; sending educational letters to real property appraisers; and referring more serious issues to state regulatory boards and/or to Freddie Mac's Single-Family Fraud Risk Group. Freddie Mac only uses referrals; no state tips. Reuter then moved to market condition analysis issues and indicated that additional guidance and requirements include more accurate selection of comparable sales; establishing a minimum time frame (12 months) from which overall market trend must be derived; recognizing that the overall market trend may be different from the adjustments applied to individual comparable sales; and including an illustration of the methodology used. Reuter also noted that around half of reports have a 1004MC, which is not compliant with UAD 3.6. Reuter next discussed quality rating reporting, and indicated that training has been developed for sellers to better identify "as is" vs. "renovation in progress." Reuter finished by once again summarizing the timeline for implementation of UAD 3.6.

- The presentation titled, "The Cost of Consistency: A Case Study in Uneven Enforcement" was given by Craig Capilla of Franklin, Greenswag, Channon and Capilla, LLC; John Dingeman of Class Valuation; and Malinda Griffin from South Carolina on various enforcement cases pertaining to the same matters in different jurisdictions and how each jurisdiction adjudicated the matter differently.

If you have questions regarding the 2026 Spring AARO Conference, please contact me by email at tyler.kohtz@nebraska.gov, or by phone at 402-471-9015.

Who's New?

The Nebraska Real Property Appraiser Board congratulates the following individuals who received real property appraiser credentials, and the organization newly registered as appraisal management company, between January and March of 2026.

Certified General Real Property Appraisers

McAfee, Blythe, Lincoln, NE – CG2026001
Zabel, Aaron, Bartlett, IL – CG2026002R
Loseke, Emma, Lincoln, NE – CG2026003
Lebsack, Ryan, Yuma, CO – CG2026004R
Brown, McKay, Cheyenne, WY – CG2026005R
Seacat, Reid, Liberty, MO – CG2026006R
McDonald, Ryan, St. Louis, MO – CG2026007R
Riesenberg, Lucas, Halbur, IA – CG2026008R

Licensed Residential Real Property Appraisers

Brinkman, Anita, Pleasant Dale, NE – L2026001
Yost, Anton, Plattsmouth, NE – L2026002

Trainee Real Property Appraisers

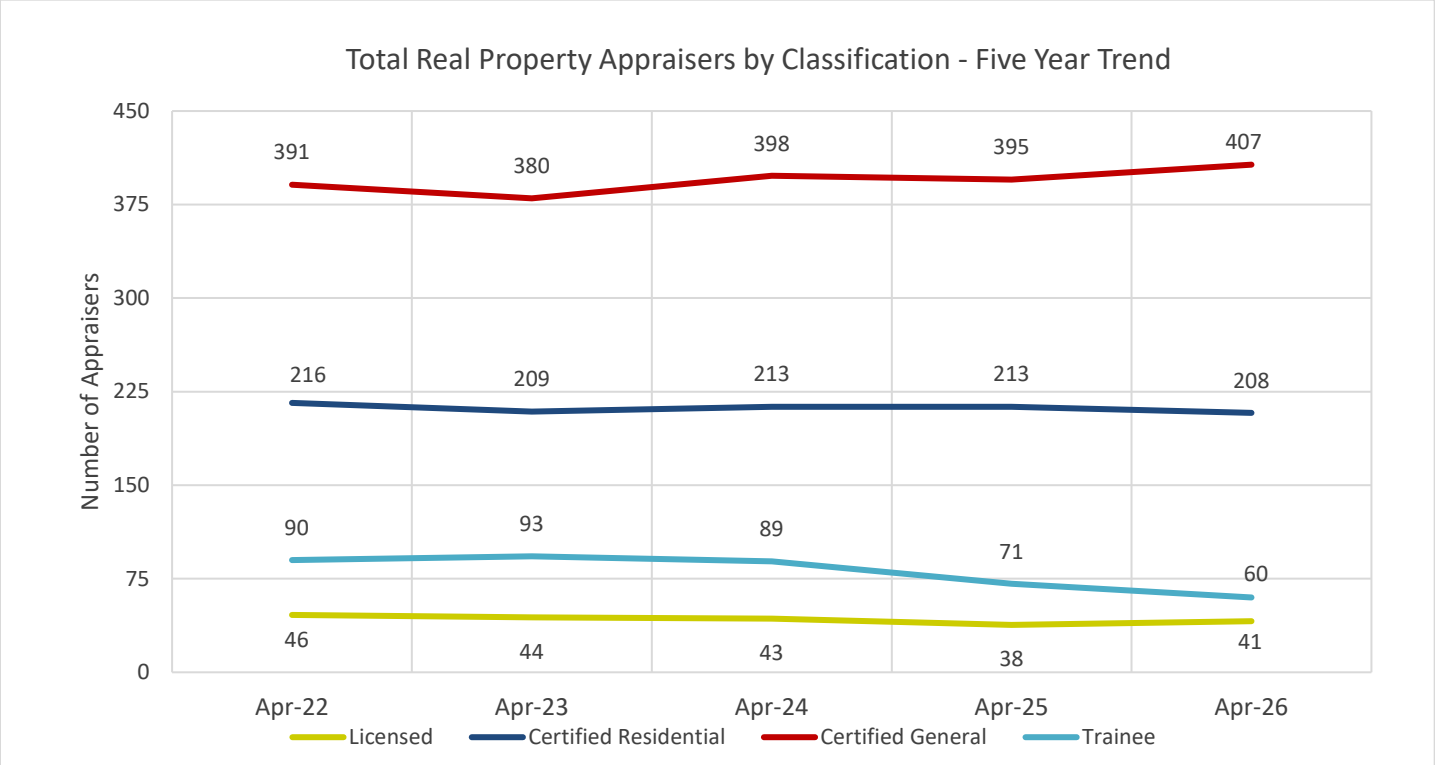
Schaefer, Christoper, Omaha, NE – T2026001
Mapes, Samuel, *Council Bluffs, IA* – T2026002
Kunkee, Celie, Broken Bow, NE – T2026003

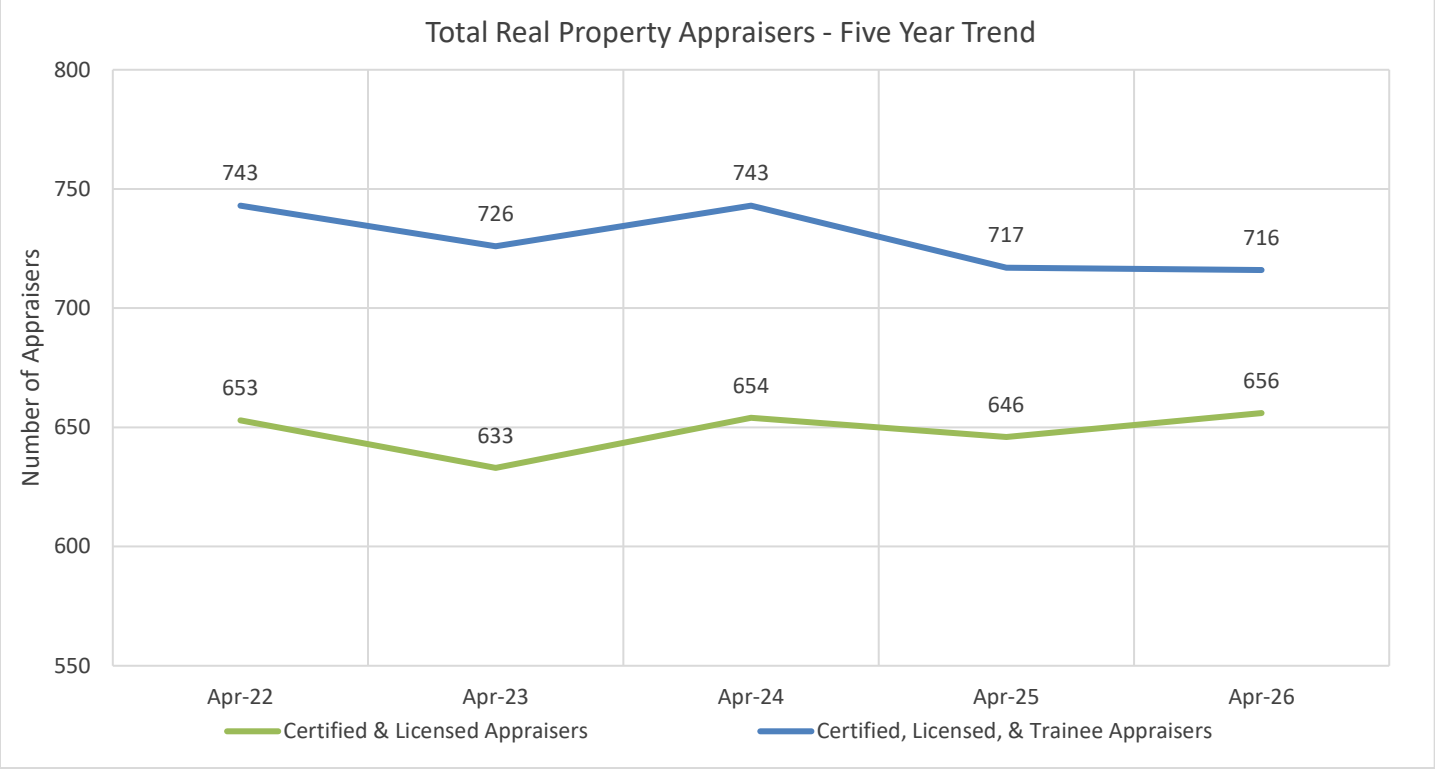
Appraisal Management Companies

Direct Appraisal Management, Corp., Carol Stream, IL – NE2026001

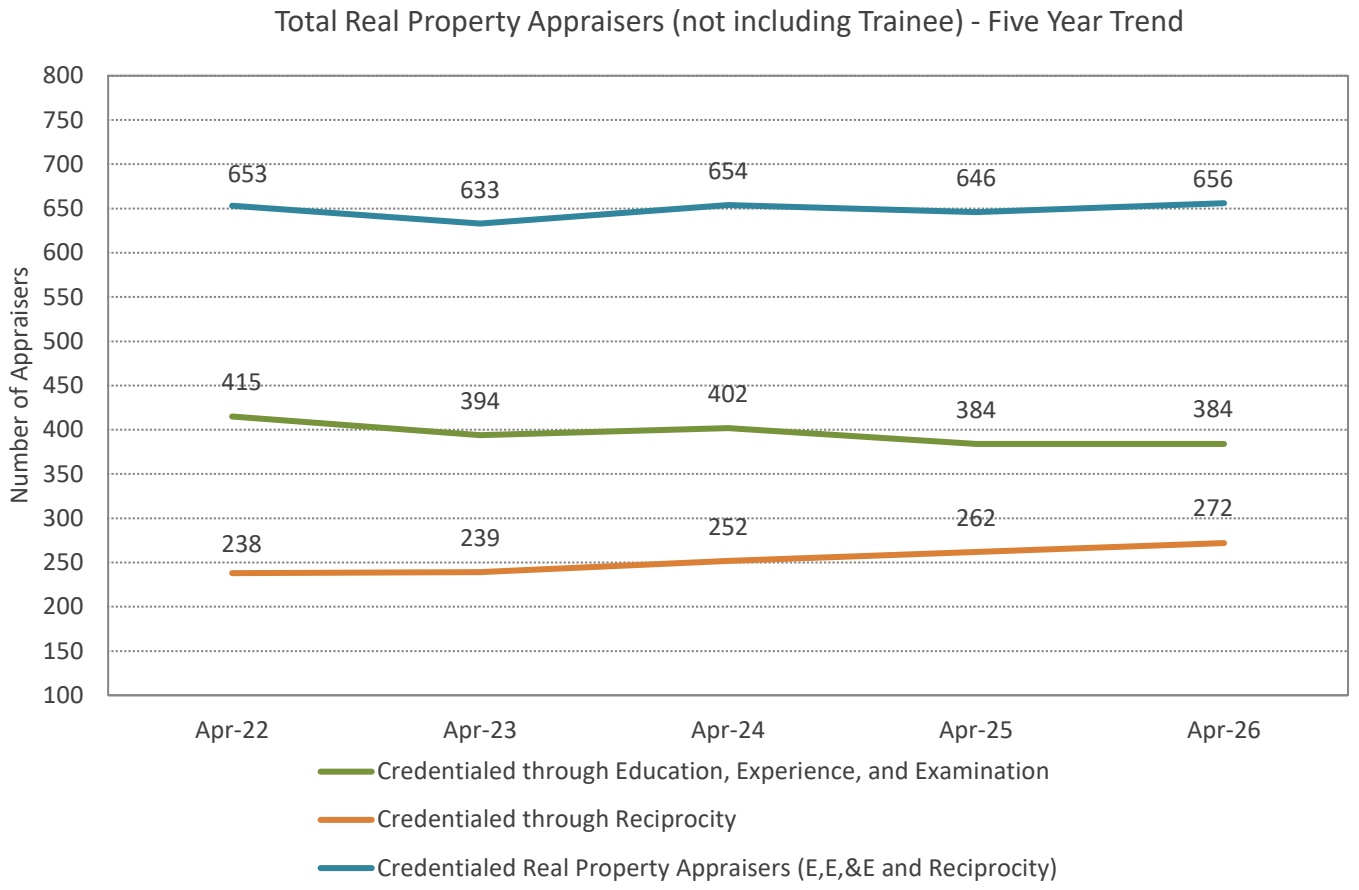
Real Property Appraiser and AMC Numbers and Trends as of April 1, 2026

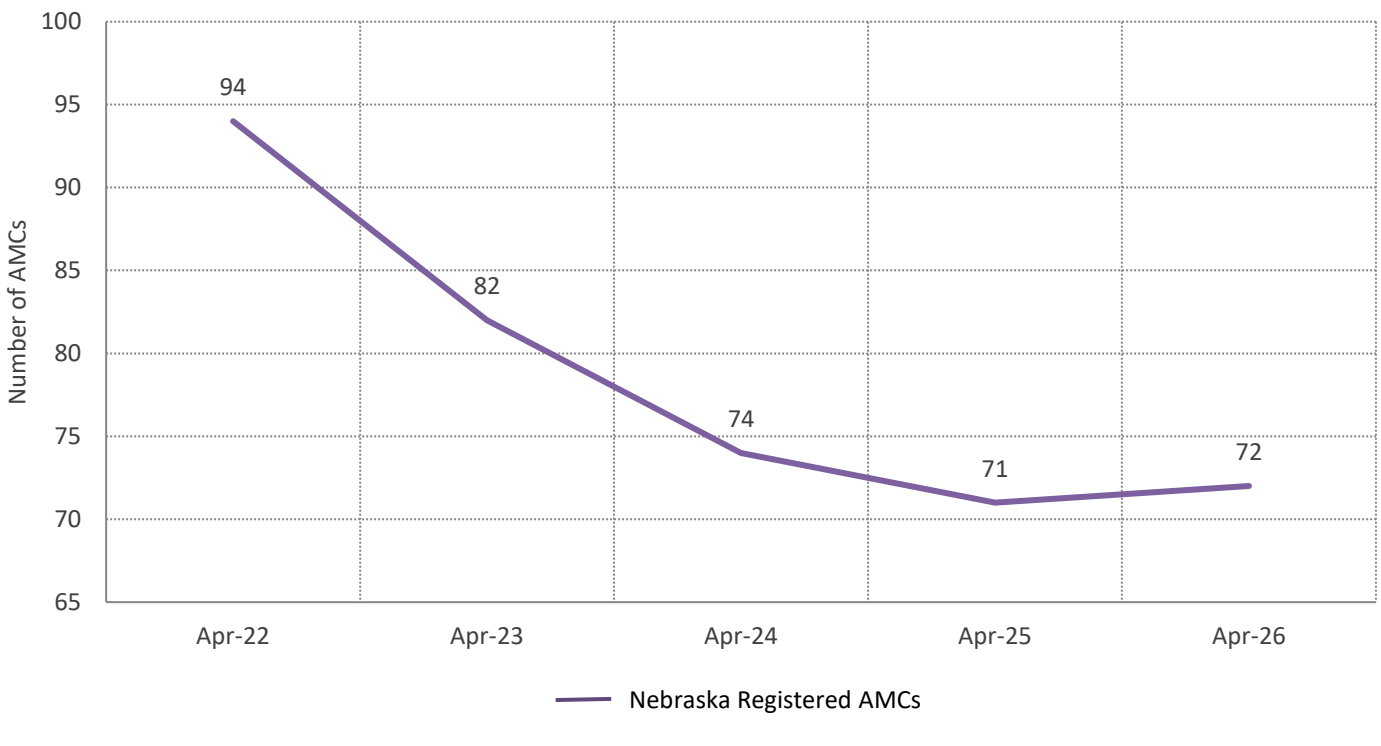
The charts below outline the five-year trend for the number of Nebraska credentialed real property appraisers and Nebraska registered appraisal management companies as of April 1, 2026. There are currently 656 licensed residential, certified residential, and certified general real property appraisers in Nebraska, and 60 credentialed trainee real property appraisers. In addition, there are currently 72 appraisal management companies registered in Nebraska.





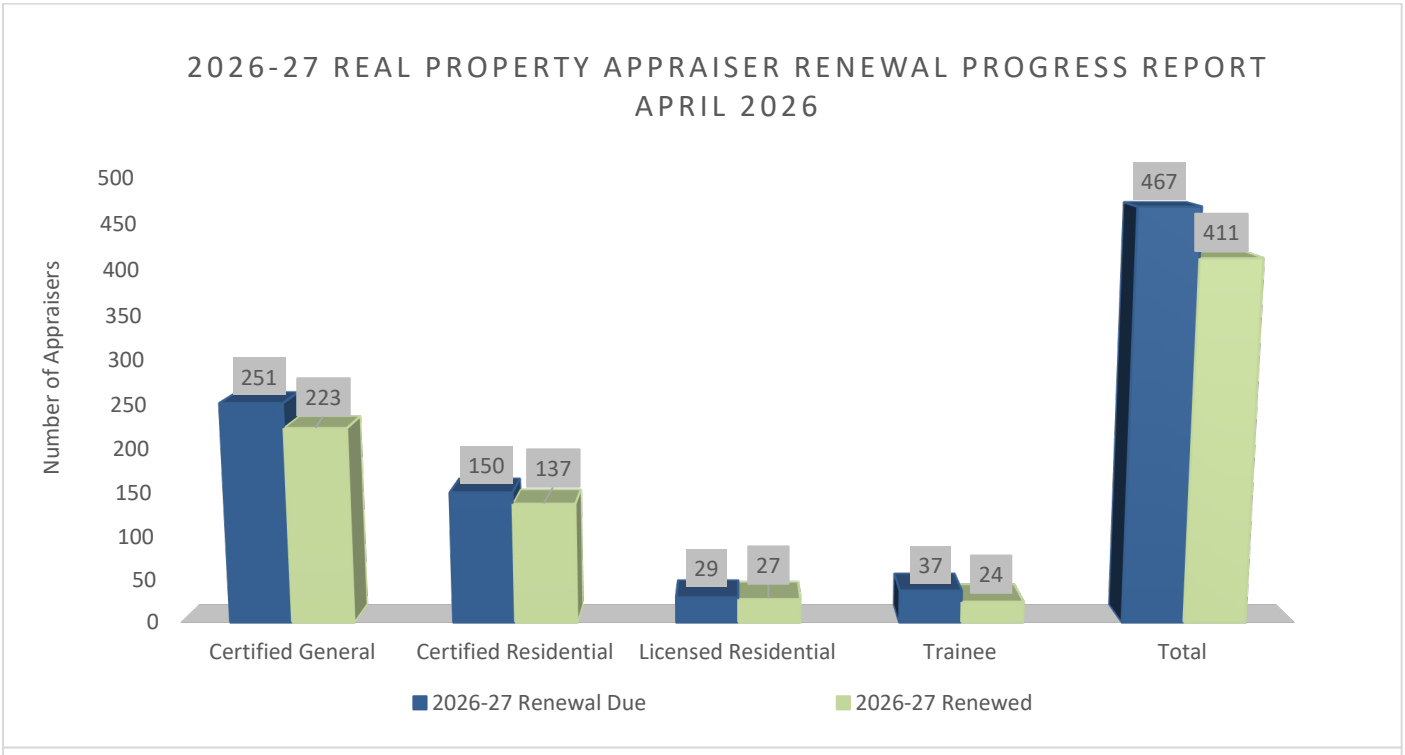
Real Property Appraiser and AMC Numbers and Trends as of April 1, 2026 (Continued)

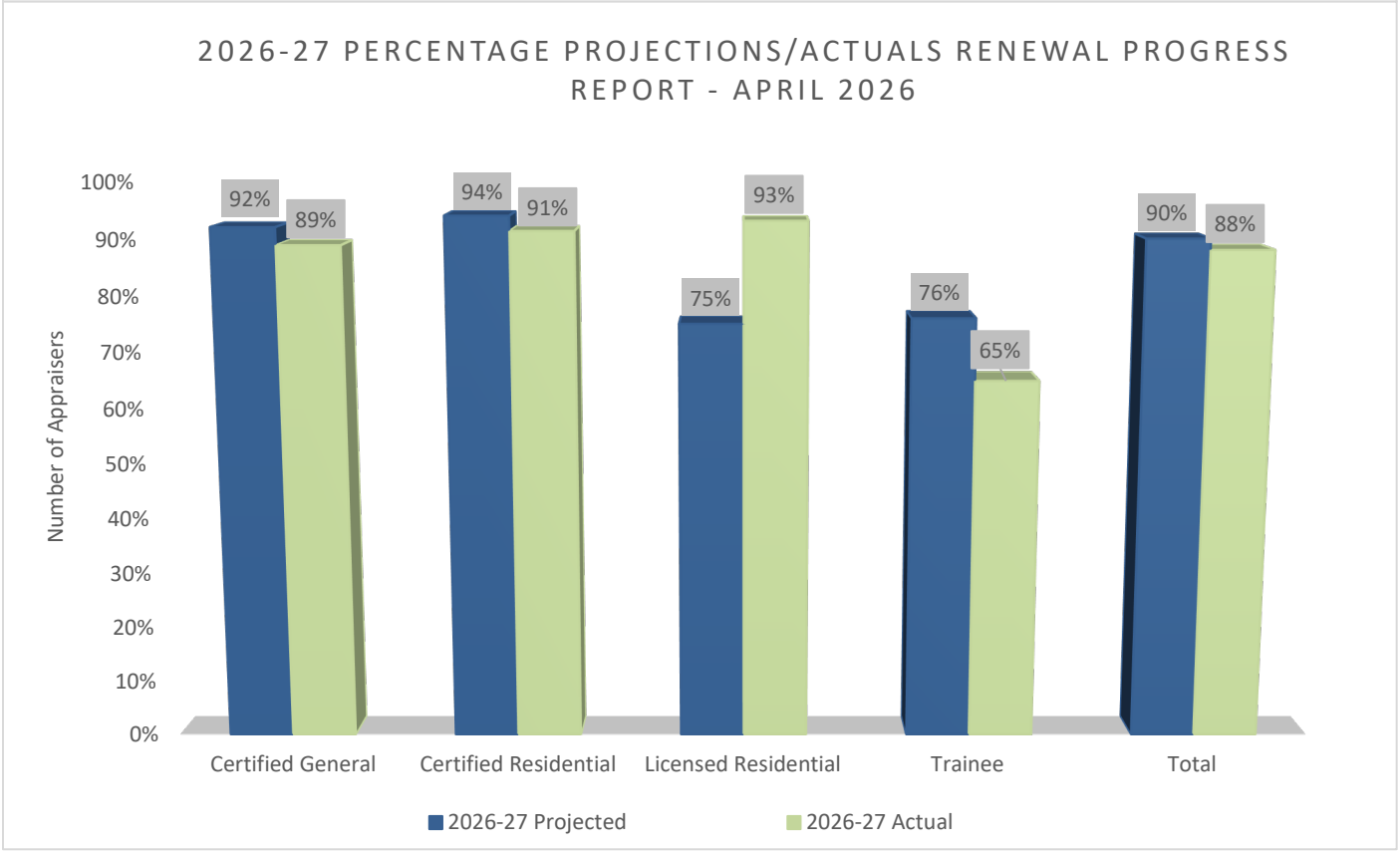




Real Property Appraiser Renewal Counts and Percentages as of April 2026

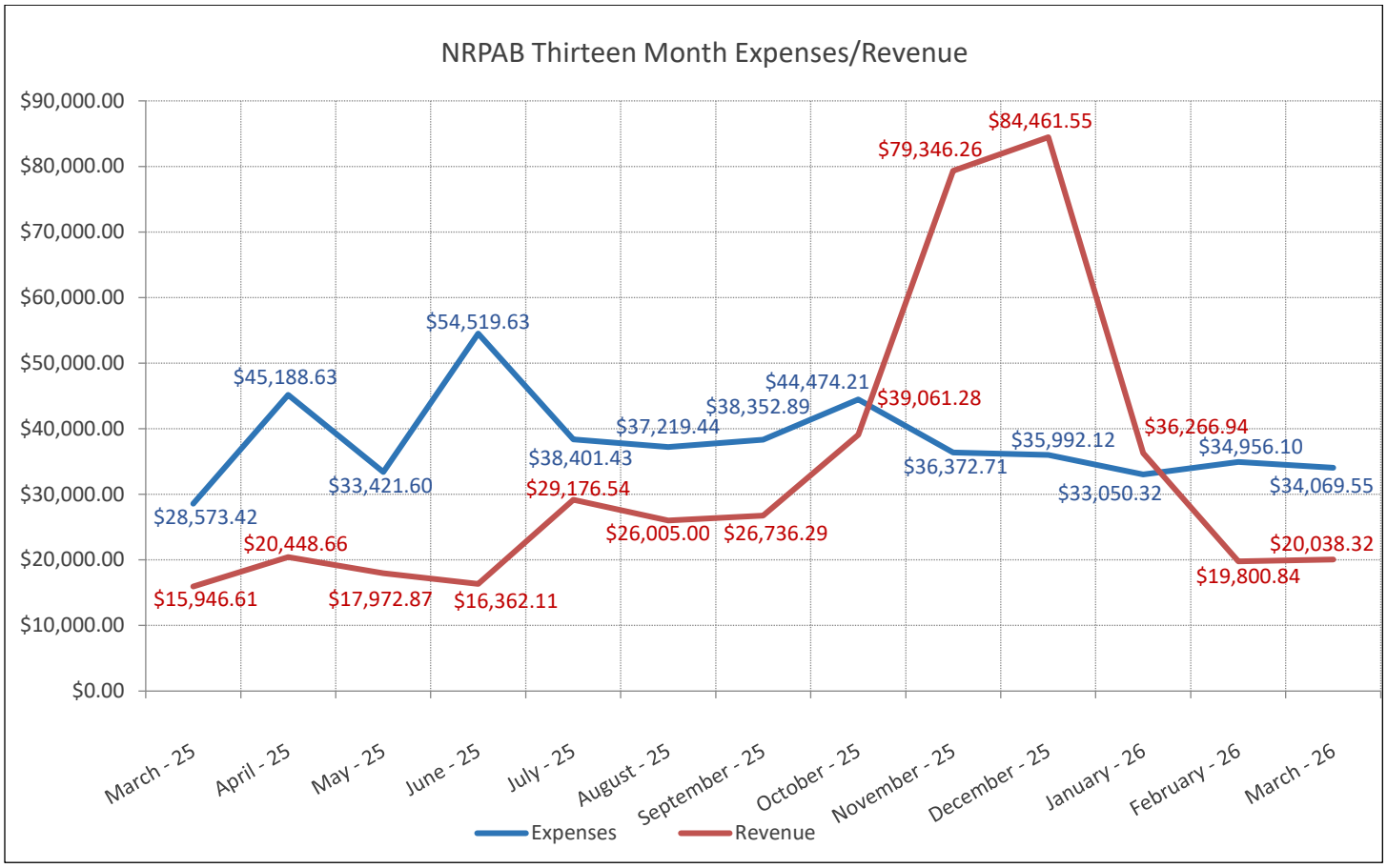
The charts below outline the real property appraiser renewal counts and percentages as of April 2026. There were 467 trainee, licensed residential, certified residential, and certified general real property appraiser renewals due, and 411 credentials were renewed.





NRPAB Financial Snapshot as of March 31, 2026

For the Real Property Appraiser Program, which includes both the appraiser fund and the AMC fund, a total of $332,888.77 in expenditures and $360,893.02 in revenues were recorded as of March 31, 2026. Actual expenses registered at 65.81 percent of the budgeted expenditures for the fiscal year; 75.07 percent of the fiscal year has passed.





Your credentialing card, the Online Renewal Application with EFW Payment, the Education Submission Portal, continuing education requirements, education history, and USPAP download are all found in the Appraiser Login on the Board's website.



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

A guest letter from Sam Harris, the first Pathways to Success graduate

I cannot understate my overwhelming gratitude to The Appraisal Foundation for funding my PAREA Pathways to Success Scholarship. My career has always been centered on problem-solving, mentorship, and service. I have transitioned from nuclear engineering to corporate executive leadership and later into building affordable residential housing for the community I grew up in to give back. While considering my next chapter, I wanted a profession that would combine my technical and analytical skills with the love I had developed for Real Estate, and I believed that a career of a Residential Appraiser offered the perfect intersection. The autonomy of the profession was a perfect fit, given that I have spent decades working independently.

After completing my required appraisal courses, I spent nearly a year trying to secure a supervisory appraiser to obtain the necessary experience hours. Despite my background, I encountered significant resistance and repeated rejection, and it was a discouraging and disappointing period. I began to feel defeated until I recalled the PAREA program which I learned about in one of my first appraisal courses. Although it seemed like a great way to move forward, the cost would be a barrier given that my corporate career and primary source of income had come to an end.

In February 2025, I received an email about the Pathways to Success Scholarship. It was a glimmer of hope, given that this opportunity fit both my circumstances and my qualifications. I applied for the scholarship, and receiving the news that I had been selected was an emotional, defining moment in my appraisal journey.

This scholarship removed the financial burden that would have prevented me from participating in PAREA. It gave me the ability to fully dedicate myself to the program's rigorous curriculum without distraction. Because of the scholarship, I was able to successfully complete the PAREA program, which gave me a comprehensive and well-rounded foundation. Equally important, it restored my confidence and is a testament to the principle that persistence and faith can lead to opportunity, even in the face of adversity.

I fully believe that PAREA provided a broader and more diverse learning experience than traditional mentorship alone. The range of scenarios and structured training prepared me to enter the appraisal field with confidence and immediate value. I now feel prepared to enter into this career not just with technical knowledge but also with the judgment and adaptability required to be successful and effective.

To aspiring appraisers who may find themselves where I was a year ago, I would say this: remember to remain patient and persistent. The traditional path to securing a supervisor can be challenging and, at times, discouraging, but do not let that deter you. Explore alternative pathways like PAREA, which offer structured, high-quality training and a viable path into the profession. Stay committed to your goal, even when progress feels slow.

To the Foundation's Board of Trustees, my message is simple but sincere and full of gratitude: Thank You! Your investment extends far beyond financial support; it gives aspiring appraisers access, opportunity, and a path forward. Your commitment to expanding pathways into the profession and promoting diversity is meaningful beyond words. Because of your support, I am not only beginning a new career, but I am also committed to paying it forward. I intend to mentor, support, and eventually employ others who are seeking entry into this field. Your investment in me will multiply through the individuals I am able to foster moving forward.

Please know that your support has made a lasting difference, and it will continue to do so for years to come.

Sam Harris
PAREA Graduate

Board of Trustees Meeting

Be sure to join us next week in Fort Lauderdale for an impactful two and a half days. Trustees will discuss pressing issues facing the profession, examine the Foundation's strategic plan, consider establishing an endowment fund, hear from panels on international appraisal issues and wealth building, and much more. Click below to check out the full agenda and register.

May 6-8 | Fort Lauderdale, FL

Register for BOT Today >

Updates from the AQB

The AQB has now moved past the first exposure draft phase of its substantial review of the *Real Property Appraiser Qualification Criteria* and is working rapidly through the wide range of ideas put forward in stakeholders' comment letters. The Board is meeting often and giving each idea careful consideration as it shapes what comes next. To help stakeholders follow this work, the AQB has prepared a companion document describing where the project stands and how the Board is approaching its current deliberations. We encourage you to take a look and to keep sharing your perspectives.

Updates from the ASB

On April 16, 2026, the Appraisal Standards Board adopted Advisory Opinion 41, Use of Technology in an Appraisal or Appraisal Review Assignment. AO-41 offers guidance on appraisers' USPAP responsibilities when using technological tools, including automated valuation models, regression and statistical software, and generative artificial intelligence, in appraisal and appraisal review assignments across real property, personal property, and intangible property. The Advisory Opinion is available now and will be incorporated into a future edition of the USPAP Guidance and Reference Manual.

Joint Council Meeting

June 23-25 | Washington, DC

Register Today >

Appraiser Talk

Have you checked out USPAP Talk? This special series on Appraiser Talk walks you through USPAP in weekly episodes. Join Amy and Lisa as they explore USPAP from week to week. Listen here.

Partner Spotlight

American Society of Farm Managers and Rural Appraisers
Elevate your professional expertise this summer with ASFMRA's Summer Learning Series July 12-24, featuring dynamic seminars crafted for rural appraisers, farm managers, and agricultural consultants.

The series begins with “Working as an Expert Witness: A Tutorial for the Appraiser, Farm Manager, and Agricultural Consultant,” an in-depth, 8-hour exploration of the expert witness role.

Building on that foundation, “Legal Descriptions for Rural Professionals” delivers hands-on training in the key land description systems used across the U.S., teaching attendees to plot parcels, calculate acreage, identify boundaries, and resolve real-world discrepancies that affect valuation and land use decisions.

The series culminates in a live Mock Trial, giving participants a rare chance to apply their new knowledge in a realistic courtroom scenario — strengthening communication skills, deepening legal understanding, and boosting confidence in high-stakes professional situations.

Register Today!

Appraisal Institute
The AI-on-AI webinar series (conducted between October 2025–March 2026) is a practical learning program that helps real estate appraisers understand and responsibly apply generative artificial intelligence in valuation work. Participants get on-demand access to session recordings plus prompts, resources, and exercises covering topics like prompt design, ethics and USPAP considerations, workflow automation, and agentic AI. This cutting-edge program emphasizes using artificial intelligence to enhance efficiency and insight while ensuring every output is independently verified and guided by professional judgment.

Collateral Risk Network
The Collateral Risk Network (CRN), in partnership with Alston & Bird LLP, is hosting a three-part industry Roundtable series focused on Section 6 of the Promoting Access to Mortgage Credit Executive Order.

The first Roundtable was held virtually, on April 23, 2026. The second session is scheduled for May 21, 2026, with the final Roundtable taking place June 25–26, 2026.

The concluding session will be held in person at the Alston & Bird offices in Washington, D.C. Registration details will be available soon.

International Society of Appraisers
ISA continues to bring valuable education and resources to its members this season, with upcoming programming designed to strengthen both professional practice and hands-on expertise.

On June 17, 2026, ISA will host The Engagement Letter Blueprint, a timely webinar led by Craig Bell, ISA AM, and Attorney at Law. This session will explore how a well-crafted engagement letter serves as the foundation of a successful client relationship—clarifying expectations, defining responsibilities, and helping prevent disputes before they arise. More information here!

Looking ahead to summer, ISA is excited to welcome back a standout program with the 2nd Annual ISA Summer Institute 2026, presented by Doyle on August 3–4 in New York City. Hosted at Doyle Auctioneers & Appraisers, this immersive experience offers attendees the chance to engage directly with industry-leading specialists through hands-on learning and expert-led sessions. The program will also feature guest lectures on key antique topics, providing deeper insight into connoisseurship and valuation.

Register today to secure your spot and take advantage of these exceptional opportunities to grow your expertise and strengthen your appraisal practice.

National Association of Appraisers
The 2026 ACTS Conference was a tremendous success, bringing appraisers together for education, networking, and industry collaboration. NAA proudly welcomed Barry Phillips, MNAA, as President and Jason Covington, MNAA, as Vice President, marking an exciting new chapter of leadership. The association also honored Brian Marlow, MNAA, as the 2026 Appraiser of the Year for his outstanding service and dedication.

Attendees enjoyed a lively mix of professional development and memorable experiences, from the Trainee Murder Mystery and hands on trainee field trip to the always popular Local Flavor Night at the Museum of Flight. New this year, we introduced our first ever Bottle Pull, Pickleball Tournament, and a 50/50 raffle, with all proceeds benefiting the Appraiser Relief Fund and the George R. Harrison Scholarship Fund. The exhibitor hall was buzzing throughout the event, featuring 25 exhibitors showcasing tools, technology, and resources that support today's appraisers.
ACTS 2026 delivered meaningful connections, fresh momentum for the profession, and equipped attendees with the information needed to thrive in an ever-changing appraisal landscape.
North Carolina Professional Appraisers Coalition
The North Carolina Professional Appraisers Coalition (NCPAC) represents appraisal professionals across North Carolina through advocacy, peer review, continuing education, and professional development. NCPAC's Mentorship Program connects experienced appraisers with newly credentialed, early-career independent practitioners for peer-to-peer professional conversation in a supportive, non-supervisory environment. NCPAC also publishes a Weekly News Brief tracking federal, state, and regulatory developments affecting the profession and hosts an annual statewide conference each fall; membership and program information are available at https://www.ncpac.us.

Royal Institute of Chartered Surveyors
In partnership with New York University Stern School of Business, the NYU-RICS Americas Conference returns for its fifth year, Thursday, June 4, 2026.

Join us for a day of expert discussions, policy analysis, and forward-thinking conversations that will help industry professionals navigate the challenges and opportunities of a rapidly evolving real estate landscape. Register here!

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

The Appraisal Foundation
1155 15th Street NW, Suite 1111
Washington, DC 20005
202-347-7722

Manage Your Preferences Unsubscribe

higher logic

The Appraisal FOUNDATION

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

APPRAISER QUALIFICATIONS BOARD

VERIFICATION OF PRACTICE READINESS PRIOR TO INDEPENDENT LICENSURE

A Research Brief

Prepared in connection with the current review of the *Real Property Appraiser Qualification Criteria*

May 2026

Q.26

Notice

This research brief compiles findings from the published research literature on professional licensing and assessment, the federal statutory and regulatory record applicable to appraiser oversight in the United States, and the publicly available regulatory frameworks of comparable U.S. licensed professions. The brief is informational and is not a statement of policy of the Appraiser Qualifications Board (AQB), The Appraisal Foundation® (Foundation), or any state appraiser regulatory agency. It does not commit any party to any particular position or course of action. The *Real Property Appraiser Qualification Criteria* (*Criteria*) are revised through the public exposure-draft-and-comment process, which is conducted separately from this brief.

Inquiries regarding the brief may be directed to AQB@appraisalfoundation.org.

Contents

Notice **2**
Contents **3**
Summary of Findings **5**
From the federal statutory and regulatory record 5
From the survey of comparable U.S. licensed professions 6
From the preliminary scoping inquiry into alternative examination structures 7
Preliminary findings 7
1. Background and Context **9**
2. Methodology **10**
2.1 Federal statutory and regulatory record 10
2.2 Licensing-assessment research literature 10
2.3 Regulatory frameworks of comparable U.S. licensed professions 11
2.4 Preliminary scoping inquiry into alternative examination structures 11
2.5 Limitations 11
2.6 Scope of the brief 12
3. The Federal Regulatory Framework for Appraiser Oversight **14**
3.1 Title XI 14
3.2 The federal-state architecture 14
3.3 Federal regulatory characterization of the Criteria 15
3.4 Historical context: the Savings and Loan Crisis 16
3.5 Economic context: structural features of professional valuation services 16
4. Terminology in the Statutory and Standards Record **18**
4.1 The term *competency* 18
4.2 The term *experience* 19
5. The Licensing-Assessment Research Literature **20**
5.1 Historical evolution of occupational licensing in the United States 20
5.2 Layered structure of professional ability 21
5.3 What different assessment formats are designed to measure 22
5.4 The distinction between difficulty and fidelity 23
5.5 Tacit knowledge in professional practice 23

Q.28

5.6 Implications identified in the literature 24
6. Survey of Comparable U.S. Licensed Professions 25
6.1 Cross-profession summary 25
6.2 Medicine 27
6.3 Nursing 28
6.4 Engineering 29
6.5 Accounting (CPA) 29
6.6 Psychology 30
6.7 Social work, occupational therapy, and aviation 30
6.8 Law 31
6.9 Cross-profession observations 32
7. Preliminary Scoping Inquiry into Alternative Examination Structures 34
7.1 Methodology of the inquiry 34
7.2 The current national appraiser examination 35
7.3 Three model formats considered 36
7.4 Order-of-magnitude cost estimates 37
7.5 The preparation problem identified in the licensing literature 38
7.6 Scope of the inquiry 38
8. Preliminary Findings 39
8.1 Findings from the federal statutory and regulatory record 39
8.2 Findings from the licensing-assessment research literature 40
8.3 Findings from the survey of comparable U.S. licensed professions 41
8.4 Findings from the preliminary scoping inquiry 41
8.5 Common observation 42
Bibliography 43
Statutes, Regulations, and Court Decisions 43
Federal Agency Reports and Policy Documents 43
AQB and The Appraisal Foundation Materials 44
Accreditation Bodies, Examination Authorities, and Standards Organizations 44
Academic and Professional Literature 46

Q.29

Summary of Findings

This research brief addresses one specific question that has surfaced repeatedly in discussion of the *Criteria*: whether an examination paired with qualifying education, could serve as the gateway to independent practice in place of the *Criteria's* current requirement that candidates perform appraisal work under the oversight of a qualified appraiser before being credentialed.[1] The brief refers to that requirement as a question of "practice readiness," meaning the day-one ability of a credentialed individual to perform appraisal work without supervision at the basic level the credential authorizes.

The brief surveys four bodies of source material bearing on the verification of practice readiness in U.S. licensed professions and reports findings relevant to the question of whether an examination, on its own, can carry the evidentiary weight a credential is intended to signal. The findings are presented as observations from the published research and regulatory record, not as conclusions of the AQB.

The findings can be summarized as follows.

From the federal statutory and regulatory record

- Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (Title XI) establishes the federal-state regulatory framework for appraiser oversight in the United States.[2] The statutory purpose clause requires that appraisals used in connection with federally related transactions be performed *"by individuals whose competency has been demonstrated and whose professional conduct will be subject to effective supervision."*[3] In the context of *this* statute, the term competency refers to a determination made before the issuance of a credential.
- The federal oversight body charged under the statute with monitoring the qualification criteria, the Appraisal Subcommittee of the Federal Financial Institutions Examination Council (ASC), has, in writing, characterized the testing, experience, and educational criteria established by the AQB as *"meaningful standards which the states could use for licensing"* since the framework's first year of operation.[4]
- The federal framework was enacted in response to the Savings and Loan Crisis of the 1980s, which produced approximately $124 billion in direct resolution costs

[1] For the purposes of this brief, the term "credential" or "credentialing," when used in connection with appraisal practice, unless the context specifically otherwise indicates, includes those awarded by a state appraiser regulatory agency to a Trainee Real Property Appraiser, Licensed Residential Real Property Appraiser, Certified Residential Real Property Appraiser, or Certified General Real Property Appraiser.

[2] Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended, Pub. L. No. 101-73, Title XI, 103 Stat. 183 (codified at 12 U.S.C. §§ 3331–3355).

[3] 12 U.S.C. § 3331.

[4] Federal Financial Institutions Examination Council, Appraisal Subcommittee, *1990 Annual Report to the Speaker of the House of Representatives* (Washington, DC: Appraisal Subcommittee, January 31, 1991), 3.

to the federal government and identified inflated and unreliable appraisals as a contributing cause.[5]

- From the licensing-assessment research literature on examination-based licensure: The licensing-assessment literature describes professional ability as a layered structure of four levels: knowledge, application, demonstration, and performance.[6] No single component of a qualification framework has been demonstrated to verify all levels on its own.[7]
- Standardized written examinations are well-suited to verify the first two levels (knowledge and application). The literature finds that the upper two levels (demonstration and performance) are not directly observed within the structure of a multiple-choice examination, irrespective of the examination's difficulty.[8]
- The licensing literature distinguishes the *difficulty* of an assessment from the *fidelity* of an assessment. Increasing the difficulty of multiple-choice items has been shown not to change the level of professional ability the items measure.[9]
- A separate body of research on tacit knowledge in professional practice finds that significant components of professional ability develop through practice and resist full articulation in written form.[10]

From the survey of comparable U.S. licensed professions

- Every U.S. licensed profession surveyed for this brief includes structured guided practice somewhere in the qualification pathway prior to authorization for independent practice. The location varies: integrated into the educational program, following the educational program, or both.[11]
- The American legal profession is the closest comparator that does not require formal post-bar supervised practice. The Carnegie Foundation's 2007 report on legal education and the Clinical Legal Education Association's 2007 report each identified the absence of structured experiential preparation as a documented

---

[5] Timothy Curry and Lynn Shibut, "The Cost of the Savings and Loan Crisis: Truth and Consequences," *FDIC Banking Review* 13, no. 2 (2000): 26–35; see also U.S. Government Accountability Office, *Residential Appraisals: Opportunities to Enhance Oversight of an Evolving Industry*, GAO-09-703 (Washington, DC: GAO, 2009).

[6] George E. Miller, "The Assessment of Clinical Skills/Competence/Performance," *Academic Medicine* 65, no. 9 supp. (1990): S63–S67.

[7] Val Wass, Cees van der Vleuten, John Shatzer, and Roger Jones, "Assessment of Clinical Competence," *The Lancet* 357, no. 9260 (2001): 945–949; Ronald M. Epstein and Edward M. Hundert, "Defining and Assessing Professional Competence," *Journal of the American Medical Association* 287, no. 2 (2002): 226–235.

[8] American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, *Standards for Educational and Psychological Testing* (Washington, DC: American Educational Research Association, 2014); Wass et al., "Assessment of Clinical Competence," 945–949.

[9] Wass et al., "Assessment of Clinical Competence," 945–949.

[10] Michael Polanyi, *The Tacit Dimension* (Garden City, NY: Doubleday, 1966); Robert J. Sternberg and Joseph A. Horvath, eds., *Tacit Knowledge in Professional Practice: Researcher and Practitioner Perspectives* (Mahwah, NJ: Lawrence Erlbaum, 1999); Michael Eraut, "Non-formal Learning and Tacit Knowledge in Professional Work," *British Journal of Educational Psychology* 70, no. 1 (2000): 113–136.

[11] Sources for each profession surveyed are set out in Section 6 of this brief.

gap.[12] The American Bar Association amended its accreditation standards in 2014 to require six credit hours of experiential coursework as a condition of accreditation.[13]

From the preliminary scoping inquiry into alternative examination structures

- A preliminary scoping inquiry conducted by Foundation staff in early 2026 identified three model formats for an examination intended to verify the upper levels of professional ability: enhanced examination with embedded case simulations, timed report-production examination, and portfolio or practicum-style performance examination.[14]
- Order-of-magnitude cost estimates produced by the inquiry, which are scoping figures rather than vendor quotations, range from approximately $0.8 million to $6 million in startup cost, $325,000 to $2.5 million in annual operating cost, and $610 to $6,700 per candidate at a volume of 1,000 candidates per year.[15]
- The inquiry was preliminary and did not constitute a formal feasibility study. A more comprehensive analysis of any specific proposal would require dedicated funding, multi-year development work, and external technical expertise.

Preliminary findings

The four bodies of source material reviewed in this brief converge on a single observation: across the licensed professions and assessment frameworks surveyed, structured opportunities for candidates to perform professional work under qualified oversight prior to independent licensure are a feature of every framework reviewed. The form of these opportunities varies: their presence does not.

These observations bear directly on the question raised in the comment record on the *Criteria*, of whether an examination on its own could replace the requirement that candidates perform appraisal work under qualified oversight before being credentialed. The methodology of the brief is set out in Section 2. The statutory and regulatory

[12] William M. Sullivan, Anne Colby, Judith Welch Wegner, Lloyd Bond, and Lee S. Shulman, *Educating Lawyers: Preparation for the Profession of Law* (San Francisco: Carnegie Foundation for the Advancement of Teaching / Jossey-Bass, 2007); Roy Stuckey et al., *Best Practices for Legal Education: A Vision and a Road Map* (Columbia, SC: Clinical Legal Education Association, 2007).

[13] American Bar Association, Council of the Section of Legal Education and Admissions to the Bar, Standard 303(a)(3), effective 2016.

[14] The scoping inquiry described in this brief was conducted by Foundation staff in early 2026, drawing on initial input from the national examination provider under contract to the AQB and on examination structures used in comparable U.S. licensed professions. The inquiry was not a formal feasibility study.

[15] The cost ranges in this brief are scoping estimates inferred from comparable professional models, the published economics of human-scored assessment in licensing, and program-development cost data from the practical applications training program within the appraiser qualification framework. They are not vendor quotations and should not be relied upon as such. A more thorough analysis of any specific proposal could surface considerations the preliminary inquiry did not.

background is set out in Section 3. The detailed findings supporting these observations are set out in Sections 5, 6, and 7.

Q.33

1. Background and Context

The AQB, the Congressionally authorized body charged under Title XI with establishing minimum qualification criteria for the state certification and licensing of appraisers, periodically reviews the *Criteria*.[16] A current review is underway, with a first exposure draft of proposed changes published in December 2025[17] and a second exposure draft in preparation.

In connection with the current review, this research brief was prepared to compile findings on a specific question raised in the public discussion of the *Criteria*: whether an examination, paired with qualifying education, could on its own serve as the gateway to independent practice. The brief surveys four lines of inquiry bearing on that question: the federal statutory and regulatory record applicable to trainee, licensed, and certified appraisers; the licensing-assessment research literature on verification of professional ability; the regulatory frameworks of comparable U.S. licensed professions; and a preliminary scoping inquiry into the cost and structure of alternative national examination formats.

The brief is intended as a research compilation, not as a statement of policy. The *Criteria* are revised through the public exposure-draft-and-comment process. Comments on the substance of the *Criteria* are taken in that process.

The purpose of the brief is to make the relevant research record available in a single, citable document for the use of the AQB, state appraiser regulatory agencies, the ASC, the Foundation's advisory councils, and any member of the public who wishes to consult it.

[16] 12 U.S.C. § 3343(a) (charging the AQB with establishing minimum qualification criteria for state-certified and state-licensed appraisers).

[17] Appraiser Qualifications Board, *First Exposure Draft of Proposed Changes to the Real Property Appraiser Qualification Criteria* (Washington, DC: The Appraisal Foundation, December 2025).

2. Methodology

The four lines of inquiry surveyed in this brief were selected for their relevance to the question of whether a licensing examination, paired with qualifying education, could on its own serve as the gateway to independent practice. The methodology used in each is described below.

2.1 Federal statutory and regulatory record

The brief reviews the operative provisions of Title XI and the federal regulatory record concerning their administration since 1990. Primary sources include the statute itself, Annual Reports of the Appraisal Subcommittee (ASC) submitted to Congress beginning in 1991, and the published Policy Statements of the ASC.[18] Secondary sources include the U.S. Government Accountability Office's 2009 report on residential appraisal oversight[19] and the published academic literature on the Savings and Loan Crisis of the 1980s.[20]

2.2 Licensing-assessment research literature

The brief reviews the research literature on verification of professional ability for licensure purposes. The research base includes:

- the *Standards for Educational and Psychological Testing*, jointly published by the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education in 2014;[21]
- George Miller's 1990 framework for the assessment of clinical skills, competence, and performance;[22]
- subsequent work by Val Wass, Cees van der Vleuten, John Shatzer, and Roger Jones on the assessment of clinical competence;[23]
- Ronald M. Epstein, MD and Edward M. Hundert, MD on defining and assessing professional competence;[24]

[18] Federal Financial Institutions Examination Council, Appraisal Subcommittee, *Annual Reports to Congress* (1991–present); *Policy Statements*, 2024 ed., https://www.asc.gov.

[19] U.S. Government Accountability Office, *Residential Appraisals: Opportunities to Enhance Oversight of an Evolving Industry*, GAO-09-703 (Washington, DC: GAO, 2009).

[20] Curry and Shibut, "Cost of the Savings and Loan Crisis," 26–35.

[21] American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, *Standards for Educational and Psychological Testing* (Washington, DC: American Educational Research Association, 2014).

[22] Miller, "Assessment of Clinical Skills/Competence/Performance," S63–S67.

[23] Wass et al., "Assessment of Clinical Competence," 945–949; Epstein and Hundert, "Defining and Assessing Professional Competence," 226–235.

[24] Epstein and Hundert, "Defining and Assessing Professional Competence," 226–235.

- Lambert W. T. Schuwirth and Cees van der Vleuten on programmatic assessment;[25]
- Polanyi's foundational work on tacit knowledge[26] and subsequent work by Sternberg and Horvath, and by Eraut, on tacit knowledge in professional practice;[27] and
- Schmitt's reference work prepared for the Council on Licensure, Enforcement and Regulation on the regulation of occupations and professions.[28]

2.3 Regulatory frameworks of comparable U.S. licensed professions

The brief surveys the qualification frameworks of nine U.S. licensed professions: medicine, nursing, engineering, accounting, psychology, social work, occupational therapy, aviation, and law. For each profession, the survey draws on the publications of the relevant accreditation body, examination authority, federal regulator, or professional association, and on Carnegie Foundation studies of professional education where available. The specific sources are cited in Section 6.

2.4 Preliminary scoping inquiry into alternative examination structures

The brief includes the results of an informal preliminary scoping inquiry conducted on behalf of the AQB in early 2026 into the cost and structure of alternative national examination formats. The inquiry was not a formal feasibility study. It drew on initial input from the national examination provider under contract to the AQB, on the published cost and structural characteristics of national examinations administered in comparable U.S. licensed professions, and on publicly available information about the development of the Practical Applications of Real Estate Appraisal (PAREA®) program, which was developed by The Appraisal Institute under a grant from the Foundation.

The inquiry produced order-of-magnitude cost estimates for three model examination formats. The estimates are scoping figures and not vendor quotations. The inquiry's methodology and findings are set out in Section 7.

2.5 Limitations

The preliminary scoping inquiry on examination structures is exploratory in character. It was undertaken to develop an order-of-magnitude understanding of what an alternative

[25] Lambert W. T. Schuwirth and Cees P. M. van der Vleuten, "Programmatic Assessment: From Assessment of Learning to Assessment for Learning," *Medical Teacher* 33, no. 6 (2011): 478–485.

[26] Polanyi, *Tacit Dimension*.

[27] Sternberg and Horvath, *Tacit Knowledge in Professional Practice*; Eraut, "Non-formal Learning and Tacit Knowledge in Professional Work," 113–136.

[28] Kara Schmitt, *Demystifying Occupational and Professional Regulation* (Lexington, KY: Council on Licensure, Enforcement and Regulation, 2015).

national examination intended to verify the practice-related dimensions of professional ability would entail. Definitive cost or design conclusions about any specific examination model would require a formal feasibility study, which is outside the scope of this brief. The brief does not address the substance of stakeholder comments received on the first exposure draft. Comments on the *Criteria* are addressed through the public comment process, which is conducted separately from this brief.

2.6 Scope of the brief

This brief is focused on a specific question: whether a licensing examination, paired with qualifying education, could on its own serve as the gateway to independent practice in place of the *Criteria's* current requirement that candidates perform appraisal work under qualified oversight before being credentialed. The brief surveys evidence bearing on that question.

A non-exhaustive list of additional research topics that have been reviewed in connection with the current *Criteria* review, but that are not addressed in this brief, is set out below. Materials concerning these topics are reflected in the public record:

- The history and structure of appraisal regulation in the United States, including the federal-state regulatory framework established under Title XI;
- Federal court decisions involving appraiser qualifications, including tax-court rulings on the qualifications of appraisers offering testimony, and federal legislation affecting the practice and supervision of appraisal, including the Dodd-Frank Wall Street Reform and Consumer Protection Act; appraisal guidelines promulgated or used by federal agencies, including the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, the Federal Housing Administration, and Fannie Mae, for the appraisers they engage;
- The U.S. Department of Labor’s Registered Apprenticeship framework and its time-based, competency-based, and hybrid training approaches, including industry-specific competency models;
- The published research literature on occupational licensing, including studies of licensing as a barrier to entry and policy literature critical of professional licensing as a regulatory tool, drawn from sources including the National Bureau of Economic Research, the Bureau of Labor Statistics, and the Knee Center for the Study of Occupational Regulation;
- Approaches taken by other licensed professions to address barriers to entry, including comparators in financial services and valuation, such as with Certified Public Accountants, Chartered Financial Analysts, actuaries, and attorneys; in healthcare, specifically nursing; and in other licensed fields;
- Workforce demographics and pipeline data in the appraisal profession, including comparisons drawn from O*NET and Bureau of Labor Statistics occupational data;

- Published empirical research on appraisal valuation patterns, including studies on confirmation bias, price-adjustment behavior, and overvaluation in residential real estate;
- The historical and regulatory record on appraisal bias and discrimination, including federal agency cases, Department of Justice actions, and academic studies;
- Appraiser qualification systems in other jurisdictions, including international comparisons drawn from Australia, New Zealand, Canada, the United Kingdom (Royal Institution of Chartered Surveyors), Germany, and other markets; and
- The licensing-research and administrative-law literature, including reference works such as Schmitt's *Demystifying Occupational and Professional Regulation*.

Materials concerning these related topics are part of the public record. References to them in this brief are made only where directly relevant to the lines of inquiry described in Sections 3 through 7.

3. The Federal Regulatory Framework for Appraiser Oversight

This Section sets out the relevant elements of the federal statutory and regulatory record concerning appraiser licensing in the United States. The Section is included because the question of whether a licensing examination on its own could replace the current *Criteria's* practice-readiness requirement cannot be assessed without reference to the federal statutory framework that defines what a credential issued under the *Criteria* is required to signal.

3.1 Title XI

Title XI establishes the federal-state regulatory framework for appraiser oversight in the United States. The statutory purpose clause provides that:

> "*Federal financial and public policy interests in real estate related transactions will be protected by requiring that real estate appraisals utilized in connection with federally related transactions are performed in writing, in accordance with uniform standards, by individuals whose competency has been demonstrated and whose professional conduct will be subject to effective supervision.*"[29]

Each clause of the statutory purpose has corresponding administrative implementation. The requirement that appraisals be in writing is administered through the format requirements of the *Uniform Standards of Professional Appraisal Practice* (USPAP®). The requirement that appraisals be in accordance with uniform standards is administered through USPAP, which is promulgated by the Appraisal Standards Board (ASB) and published by the Foundation. The requirement that appraisals be performed by individuals whose competency has been demonstrated is administered through the *Criteria*, established by the AQB under 12 U.S.C. § 3343. The requirement that professional conduct be subject to effective supervision is administered through state appraiser regulatory agencies, with federal oversight by the ASC.

3.2 The federal-state architecture

Title XI established a layered regulatory architecture for distributing functions among federal and state bodies.

- The ASC was established as a federal oversight body. By statute, the ASC is required to monitor the requirements established by the states for the certification and licensing of individuals qualified to perform appraisals in connection with federally related transactions; to monitor and review the practices, procedures,

[29] 12 U.S.C. § 3331. Additionally, 12 U.S.C. § 3332 uses the phrase (as it relates to the ASC requirement to monitor the requirements established by the states of) "…individuals who are qualified to **perform** appraisals…".

activities, and organizational structure of the Foundation; and to monitor each state appraiser regulatory agency for the purpose of determining whether the agency's policies, practices, and procedures are consistent with Title XI.[30] The AQB, established within the Foundation, is responsible for establishing the minimum qualification criteria for the state certification and licensing of appraisers.[31]

- State regulatory agencies are the licensing authorities. Each state administers its own program in accordance with its own statutes and regulations, subject to the AQB's *Criteria* and federal oversight from the ASC.[32]

3.3 Federal regulatory characterization of the Criteria

In its first Annual Report to Congress, covering 1990 and submitted to the Speaker of the House on January 31, 1991, the ASC characterized the *Criteria* established by the AQB as follows:

> "The Subcommittee determined that the Qualifications Board's testing, experience, and educational criteria for the residential real property appraiser established meaningful standards which the states could use for licensing. The AQB's more stringent testing, experience, and educational criteria for the general real property appraiser were determined to be the minimum standards which the states could adopt for a certified appraiser."[33]

More recent ASC policy continues to characterize experience as a federal requirement under Title XI. Policy Statement 4 of the ASC's Policy Statements governing the state application process, provides that "AQB *Criteria* sets forth the minimum education, experience and examination requirements applicable to all States for credentialing of real property appraisers (certified, licensed, trainee and supervisory)," and requires that "States must implement a reliable validation procedure to verify that each applicant's experience meets AQB *Criteria*, including but not limited to, being USPAP compliant and containing the required number of hours and months."[34]

The 1990 Annual Report also addressed the use of the term "competency" in USPAP, which differs from its use in Title XI. As Section 4 of this brief sets out, "competency" appears in both the federal statute and in USPAP, with two distinct meanings. The Annual Report, in adjacent sections, characterized each. It

---

[30] 12 U.S.C. §§ 3332(a)(1), 3332(b), 3347(a).

[31] 12 U.S.C. § 3343; Appraiser Qualifications Board, *Real Property Appraiser Qualification Criteria*, effective January 1, 2026, March 2026 ed. (Washington, DC: The Appraisal Foundation, 2026).

[32] 12 U.S.C. § 3338 (state certifying and licensing agencies); Federal Financial Institutions Examination Council, Appraisal Subcommittee, *Policy Statements*, 2024 ed.

[33] Federal Financial Institutions Examination Council, Appraisal Subcommittee, *1990 Annual Report to the Speaker of the House of Representatives* (Washington, DC: Appraisal Subcommittee, January 31, 1991), 3.

[34] Federal Financial Institutions Examination Council, Appraisal Subcommittee, *2018 Annual Report*, Policy Statement 4, §§ A and D(1), 112–115.

described the competency provision of USPAP, which had been issued in revised form by the Appraisal Standards Board in April 1990, as a provision that:

> "…places an immediate responsibility on the appraiser to refuse assignments for which the appraiser is not qualified (regardless of one's license or certification) prior to acceptance of the assignment."[35]

The ASC's subsequent Annual Reports to Congress have continued to describe and monitor the *Criteria*. The ASC's published Policy Statements, most recently consolidated and reproduced in their 2018 Annual Report, set out the federal oversight body's expectations regarding the *Criteria* and the AQB's Course Approval Program.

3.4 Historical context: the Savings and Loan Crisis

The federal regulatory framework for appraiser oversight was enacted in response to the Savings and Loan Crisis of the 1980s. The Federal Deposit Insurance Corporation has estimated the direct resolution costs of the Crisis to the federal government at approximately $124 billion. The Government Accountability Office (GAO), in its 2009 report on residential appraisal regulation, identified **appraisal practice**[36] as one of the areas implicated in the Crisis and as a continuing area requiring federal oversight; the GAO's November 2021 report on appraisal exemptions characterizes the current Title XI framework in materially the same terms, observing that "Title XI requires all state-licensed and -certified appraisers to meet minimum education, experience, and examination requirements."[37] The legislative record leading to Title XI identified inflated and unreliable appraisals as a contributing cause of the Crisis.

3.5 Economic context: structural features of professional valuation services

Economics literature has examined the market dynamics of professional services that depend on substantial professional judgment, where the soundness of the work product is established through a combination of producer qualifications and the review processes of the users and institutions that engage them. Appraisal is among the services this literature has treated as illustrative.

The seminal analysis of these dynamics is George Akerlof's 1970 paper, *"The Market for 'Lemons,'"* which describes the operation of markets under conditions of asymmetric

---

[35] Appraisal Subcommittee, *1990 Annual Report to the Speaker of the House of Representatives*, 3.

[36] The object of the federal regulatory framework is appraisal practice (the production of appraisal work product in connection with federally related transactions) and not the holding of a credential considered apart from that work. The Savings and Loan Crisis record identifies inflated and unreliable appraisals, that is, the appraisal documents themselves, as a contributing cause of the Crisis. The 2009 and 2021 GAO reports likewise characterize the regulatory question in terms of how appraisals are produced and used. This distinction is material to the question this brief addresses: a credential that signals knowledge of appraisal subject matter, standing alone, certifies what the holder *knows*. The federal record is concerned with what the holder *does*.

[37] U.S. Government Accountability Office, *Real Estate Appraisals: Appraisal Management Companies and Appraiser Independence*, GAO-22-104472 (Washington, DC: GAO, November 2021), 4; see also GAO-09-703 (2009).

information.[38] Subsequent work by Michael R. Darby and Edi Karni, and later by Uwe Dulleck and Rudolf Kerschbamer, formalized the concept of *credence goods*: services in this category, including services in healthcare, repair, and other domains in which evaluation of the work product requires specialized professional expertise.[39]

The economics and regulatory literature identify several structural features of professional valuation services that are relevant to how market mechanisms operate to discipline poor practice:

- The soundness of an appraisal report is typically established through analytical review by another qualified appraiser or trained professional, rather than through inspection of the report by, for example, any individual given a copy of the report.
- The party engaging the appraiser is typically the lender, while the parties bearing the consequences of an inaccurate valuation include third parties, in particular the federal deposit insurance system in the case of insured-depository lending and federal credit guaranty programs in the case of guaranteed lending.
- Individual transactions are typically not repeated, limiting the role of reputation mechanisms that operate in markets with frequent repeated transactions.

The economics literature does not offer a single prescriptive remedy for these dynamics. The regulatory literature identifies professional licensing as one of the principal regulatory responses available where these structural features combine with significant public-protection considerations.[40]

[38] George A. Akerlof, "The Market for 'Lemons': Quality Uncertainty and the Market Mechanism," *Quarterly Journal of Economics* 84, no. 3 (1970): 488–500.

[39] Michael R. Darby and Edi Karni, "Free Competition and the Optimal Amount of Fraud," *Journal of Law and Economics* 16, no. 1 (1973): 67–88; Uwe Dulleck and Rudolf Kerschbamer, "On Doctors, Mechanics, and Computer Specialists: The Economics of Credence Goods," *Journal of Economic Literature* 44, no. 1 (2006): 5–42.

[40] Schmitt, *Demystifying Occupational and Professional Regulation*, 59 (describing the regulatory rationale for licensure as the most restrictive form of occupational regulation).

4. Terminology in the Statutory and Standards Record

The terms *competency* and *experience* both appear in the federal record on appraiser licensing, and each is used in more than one sense. This section sorts out the senses by going to the primary sources. The distinction matters because the exam-only proposal turns in part on which sense is in play: treating the federal licensing usage of *competency* as if it were the per-assignment usage in USPAP — or vice versa — leads to conclusions about what a licensing examination would need to verify that the underlying statute and regulations do not actually support.

4.1 The term *competency*

The term *competency* appears in two foundational documents that govern the practice of real estate appraisal in the United States.

The first is Title XI, which provides at 12 U.S.C. § 3331, that appraisals used in connection with federally related transactions be performed *"by individuals whose competency has been demonstrated and whose professional conduct will be subject to effective supervision."*[41]

In the context of the statute, the term refers to a determination made *before* the issuance of a credential.

The second is USPAP, which contains a COMPETENCY RULE. The USPAP COMPETENCY RULE places an obligation on the individual appraiser, with respect to a particular assignment, to recognize when the appraiser is not qualified to perform the assignment and to take appropriate steps before accepting it.[42] In the context of USPAP, the term refers to an assignment-level professional obligation that applies *after* a credential has been issued and continues throughout the appraiser's career.

The ASC's first Annual Report to Congress, submitted in January 1991, treated the two uses as distinct. The ASC described the AQB's testing, experience, and educational criteria as "meaningful standards which the states could use for licensing"[43] and described the USPAP competency provision as one that "places an immediate responsibility on the appraiser to refuse assignments for which the appraiser is not qualified … prior to acceptance of the assignment."[44] The two passages appear in

[41] 12 U.S.C. § 3331.

[42] The Appraisal Foundation, *Uniform Standards of Professional Appraisal Practice*, 2024–2025 ed. (Washington, DC: The Appraisal Foundation, 2024), Competency Rule.

[43] Federal Financial Institutions Examination Council, Appraisal Subcommittee, *1990 Annual Report*, 3.

[44] *Ibid.*, 3–4.

adjacent sections of the same report, addressing the year in which both the *Criteria* and the first edition of USPAP were issued.

The licensing-assessment research literature treats the two contexts similarly. Schmitt, in the standard reference work prepared for the Council on Licensure, Enforcement and Regulation (CLEAR), distinguishes between *initial competence* (a threshold determination prior to licensure) and *continuing competence* (an ongoing obligation of the licensed practitioner).[45]

4.2 The term *experience*

The term *experience* appears in the *Criteria* as the umbrella label for the component of the qualification framework under which candidates perform appraisal work under the oversight of a qualified appraiser before they are credentialed.[46] The current *Criteria* recognize multiple forms within this component, including the supervisor-trainee model, programs accredited under the PAREA framework, and practicum coursework.[47]

The term *experience* also appears in the public discourse regarding the *Criteria*, frequently in a narrower sense referring specifically to the supervisor-trainee model. The narrower usage is widespread but does not correspond to the full definition of the experience component as set out in the *Criteria*.

The licensing-assessment literature uses a range of terms for comparable components of professional qualification frameworks, including "*practical training"*, "*supervised practice*", "*clinical training*", "*fieldwork"*, "*internship*", *"residency",* and *"practicum."* While the terminology differs across professions, each refers to a stage in which a candidate performs professional work under qualified oversight prior to independent practice. This distinction matters in the context of the exam-only question: because each of these components represents a form of structured, practice-based verification that an exam-only pathway would, by design, replace. Whether removing that stage is consistent with the verification function it serves is a question addressed in the licensing-assessment literature.

[45] Schmitt, *Demystifying Occupational and Professional Regulation*, 60, 94, 94–95.

[46] Appraiser Qualifications Board, *Real Property Appraiser Qualification Criteria*, Section V, Experience.

[47] Appraiser Qualifications Board, *Real Property Appraiser Qualification Criteria*, Section V, Experience.

5. The Licensing-Assessment Research Literature

This section presents findings from the licensing-assessment research literature. The research is included because the exam-only proposal turns on a single question: what can a licensing examination, on its own, verify? The literature speaks to that question directly. It identifies both what licensing examinations have been shown to verify and the elements of professional ability that written examination alone cannot capture.

5.1 Historical evolution of occupational licensing in the United States

Occupational licensing in the United States has a documented developmental record extending from the late nineteenth century to the present.

The U.S. Supreme Court, in *Dent v. West Virginia*[48] held that states may impose professional licensing requirements where the requirements bear a reasonable relationship to public protection. The Court observed that, in the context of professional licensure, the public must rely on the assurance given by the practitioner's license, issued by an authority competent to judge in that respect, that he possesses the requisite qualifications.[49]

The substantive importance of professional licensing requirements is reflected in the further fact that, although more than 1,000 occupations are subject to some form of state regulation in the United States, fewer than sixty are licensed by every state and territory; appraisal is among them[50]. The federal interest in appraiser credentialing reflected in Title XI operates against this background of comparatively narrow universal state licensure.

The Flexner Report of 1910, prepared for the Carnegie Foundation for the Advancement of Teaching, established the model in U.S. medical education that combines formal academic instruction with structured clinical training in hospital and clinical settings.[51] The model has been retained, with modifications, since.

The U.S. Department of Health, Education, and Welfare, in its 1971 Report on Licensure and Related Health Personnel Credentialing, described licensure as *"the*

[48] *Dent v. West Virginia*, 129 U.S. 114, 122–23 (1889).

[49] *Ibid.* "*Reliance must be placed upon the assurance given by his license, issued by an authority competent to judge in that respect, that he possesses the requisite qualifications."*

[50] Schmitt, *Demystifying Occupational and Professional Regulation*, 23 ("Although the total number of regulated occupations and professions now exceeds 1,000, it is interesting to note that fewer than 60 professions are regulated by every state.").

[51] Abraham Flexner, *Medical Education in the United States and Canada: A Report to the Carnegie Foundation for the Advancement of Teaching* (New York: Carnegie Foundation for the Advancement of Teaching, 1910).

process by which an agency of government grants permission to persons to engage in a given profession or occupation by certifying that those licensed have attained the minimum degree of competency necessary to ensure that the public health, safety, and welfare may be reasonably well protected."[52]

The methodology of job task analysis as the empirical foundation for licensing examination content was developed in the 1980s and 1990s and is now standard practice across U.S. licensing programs.[53] The current edition of the *Standards for Educational and Psychological Testing* was published in 2014 by the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education.[54]

In recent decades, federal and state attention to the trade-offs between licensing requirements and labor-market access has produced reports including the 2015 Treasury-Council of Economic Advisers-Department of Labor framework on occupational licensing[55] and successive reports of the National Conference of State Legislatures.[56] These analyses have introduced an explicit regulatory principle of *proportionality* between licensing requirements and the public-protection risk they address.

5.2 Layered structure of professional ability

The licensing-assessment literature describes professional ability as a layered structure. The framework most often cited is one introduced by George E. Miller in 1990:[57]

Level	Description
Knowledge	The candidate possesses factual information about concepts, principles, methods, and applicable standards.

[52] U.S. Department of Health, Education, and Welfare, *Report on Licensure and Related Health Personnel Credentialing* (Washington, DC: U.S. Government Printing Office, 1971), 7.

[53] Mark R. Raymond and Sandra Neustel, "Determining the Content of Credentialing Examinations," in *Handbook of Test Development*, ed. Steven M. Downing and Thomas M. Haladyna (Mahwah, NJ: Lawrence Erlbaum, 2006), 181–223.

[54] American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, *Standards for Educational and Psychological Testing* (Washington, DC: American Educational Research Association, 2014).

[55] U.S. Department of the Treasury, Council of Economic Advisers, and U.S. Department of Labor, *Occupational Licensing: A Framework for Policymakers* (Washington, DC: The White House, 2015).

[56] National Conference of State Legislatures, *The Evolving State of Occupational Licensing: Research, State Policies and Trends*, 2nd ed. (Denver: National Conference of State Legislatures, 2020).

[57] Miller, "Assessment of Clinical Skills/Competence/Performance," S63–S67.

Application	The candidate can use that knowledge in a defined, structured problem in which the relevant information is provided and the task is framed in advance.
Demonstration	The candidate can produce work product in a controlled setting that resembles, but is not identical to, the conditions of professional practice.
Performance	The candidate performs the work in real-world conditions, where information may be incomplete or contradictory, the relevant problem must be identified by the candidate, and the work must be defended within the standards framework that governs ongoing practice.

The literature treats these levels as a graduated structure in which ability at one level does not establish ability at the next.[58] A candidate who can recall and apply concepts in a structured problem may not be able to produce defensible work product when the candidate must identify the problem, when the data is imperfect or contradictory, and when the standards must be applied without the prompting of a question stem.[59]

5.3 What different assessment formats are designed to measure

A standardized written examination, well-developed and administered, is recognized in the licensing-assessment literature as well-suited to verifying the first two levels of professional ability described above.[60] Schmitt summarizes the standard a licensing examination is designed to satisfy:

> "all assessment procedures must clearly relate to the job. The best way to document such a relationship is through a procedure known as a job analysis or role delineation study."[61]

The third level (*Demonstration*) can be approached through examination formats that move beyond multiple-choice items, including scenario-based items, simulation-based

[58] Wass et al., "Assessment of Clinical Competence," 945–949; Epstein and Hundert, "Defining and Assessing Professional Competence," 226–235.

[59] *Ibid.*

[60] American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, *Standards for Educational and Psychological Testing* (2014).

[61] Schmitt, *Demystifying Occupational and Professional Regulation*, 94–95.

assessment, and practical or oral assessments.[62] These formats extend the evidentiary reach of an examination but introduce additional considerations of cost, scoring consistency, and administration that low-fidelity formats do not.[63]

The fourth level (*Performance*) is generally not directly observed within a standardized examination event.[64] Verification at this level, where it is conducted, is typically accomplished through structured evaluation of the candidate's work in conditions that approximate professional practice, including residency, clinical training, supervised practice, practicum, or capstone components within the qualification pathway.[65]

5.4 The distinction between difficulty and fidelity

The licensing-assessment literature distinguishes between the *difficulty* of an assessment and the *fidelity* of an assessment.[66] *Fidelity*, as the term is used in the literature, refers to how closely the format of an assessment resembles the conditions of actual professional work. A low-fidelity assessment uses a structured, controlled task format such as multiple-choice items. A high-fidelity assessment places the candidate in conditions that more closely replicate professional practice.

Increasing the difficulty of multiple-choice items has been shown not to change the level of professional ability the items measure.[67] A more difficult multiple-choice question retains the structural characteristics of the multiple-choice format. The literature on assessment design accordingly treats difficulty and fidelity as distinct dimensions.[68]

5.5 Tacit knowledge in professional practice

A separate body of research, drawing on the work of philosopher Michael Polanyi, has examined the kinds of professional knowledge that develop through practice and resist full articulation in written form.[69] Polanyi's formulation, *"we know more than we can*

---

[62] Schuwirth and van der Vleuten, "Programmatic Assessment," 478–485.

[63] *Ibid.*

[64] Wass et al., "Assessment of Clinical Competence," 945–949; Epstein and Hundert, "Defining and Assessing Professional Competence," 226–235.

[65] Accreditation Council for Graduate Medical Education, *ACGME Common Program Requirements* (Chicago: ACGME, 2024); Accreditation Council for Occupational Therapy Education, *2018 ACOTE Standards and Interpretive Guide* (Bethesda, MD: American Occupational Therapy Association, 2018); Council on Social Work Education, *2022 Educational Policy and Accreditation Standards* (Alexandria, VA: CSWE, 2022).

[66] Wass et al., "Assessment of Clinical Competence," 945–949; Epstein and Hundert, "Defining and Assessing Professional Competence," 226–235.

[67] *Ibid.*

[68] *Ibid.*

[69] Polanyi, *Tacit Dimension*.

tell,"[70] has been applied across professional domains in subsequent work by Sternberg and Horvath[71] and by Eraut.[72]

The implication identified in this literature is that to the extent professional ability includes components that cannot be fully captured in writing, those components cannot be assessed by written examination alone.[73] Verification of such components, where it is conducted in licensing frameworks, is typically accomplished through evaluation by experienced practitioners observing the candidate's work in conditions that allow the relevant judgment and decision-making to emerge.[74]

5.6 Implications identified in the literature

The implications identified in this literature directly bear the question this brief addresses because they describe both what licensing examinations have been documented to verify and what other elements of a qualification framework have been documented to verify. The literature identifies three such implications:

- No single component of a qualification framework is structurally able to verify all dimensions of professional ability.[75]
- A qualification framework that combines components reaching different levels of the structure can verify a broader range of ability than any single component.[76]
- The question of whether a particular component is sufficient on its own depends on the dimensions of ability it is designed to verify and the dimensions the credential is intended to signal.[77]

Schmitt distills the regulatory standard the framework as a whole is designed to meet: *"licensure represents minimum competence."*[78] The Supreme Court's 1889 decision in *Dent v. West Virginia*[79] identified the same regulatory function.

---

[70] Polanyi, *Tacit Dimension*.

[71] Sternberg and Horvath, *Tacit Knowledge in Professional Practice*.

[72] Eraut, "Non-formal Learning and Tacit Knowledge in Professional Work," 113–136.

[73] *Ibid.*

[74] *Ibid.*

[75] Miller, "Assessment of Clinical Skills/Competence/Performance," S63–S67.

[76] Wass et al., "Assessment of Clinical Competence," 945–949; Epstein and Hundert, "Defining and Assessing Professional Competence," 226–235.

[77] Miller, "Assessment of Clinical Skills/Competence/Performance," S63–S67.

[78] Schmitt, *Demystifying Occupational and Professional Regulation*, 60.

[79] *Dent v. West Virginia*, 129 U.S. at 122–23.

6. Survey of Comparable U.S. Licensed Professions

This section surveys the qualification frameworks of nine U.S. licensed professions: medicine, nursing, engineering, accounting, psychology, social work, occupational therapy, aviation, and law. For each profession, the survey draws on the publications of the relevant accreditation body, examination authority, federal regulator, or professional association. The survey is included because the exam-only proposal has been raised in public discussion as a question of how appraiser qualification compares to qualification in other licensed professions; the professions surveyed in this Section are those whose qualification frameworks are most frequently invoked in that discussion.

6.1 Cross-profession summary

The table below summarizes the principal components of each profession's qualification pathway. Detailed sources for each profession appear in the subsections that follow.

Profession	Education	Guided practice within or following education	Examination	Total time post-secondary
Medicine	4-year MD or DO program.	Clinical rotations (years 3–4 of medical school); residency (3–7 years) under ACGME* standards before independent practice.	USMLE Steps 1, 2, 3 (Step 3 typically taken during residency).	7–11 years.

Nursing	Accredited BSN, ADN, or diploma program.	Clinical hours integrated into nursing program; up to 50% may be high-quality simulation under NCSBN* findings.	NCLEX-RN.	2–4 years.
Engineering	4-year ABET-accredited engineering degree.	4 years of qualifying engineering experience under licensed PE between FE and PE examinations.	FE (knowledge) and PE (applied judgment).	8 years.
Accounting (CPA)	150 semester hours OR bachelor's only under 2025 alternative pathway.	1 year supervised under licensed CPA (traditional); 2 years under 2025 alternative when education is reduced.	Uniform CPA Examination.	5–6 years.
Psychology	Doctoral degree (PhD or PsyD).	Doctoral practicum, ~1,500-hour predoctoral internship, 1,500–4,000 hours post-doctoral supervised practice.	EPPP.	7–10 years.
Social Work (LCSW)	MSW with field instruction integrated into the program.	2,000–6,400 post-graduate supervised clinical hours.	ASWB Clinical Examination.	4–6 years.

Q.51

Occupational Therapy (OTD)	Doctoral program with Level I and Level II fieldwork (~1,000 supervised clinical hours) and 14-week capstone before examination.	Integrated throughout the doctoral program.	NBCOT certification examination.	6 years.
Aviation (Private Pilot)	Ground school instruction.	Minimum flight hours including dual-instruction, solo, and cross-country (14 CFR § 61.109).	Knowledge test (14 CFR § 61.35) and practical test in the aircraft (14 CFR § 61.43).	Variable.
Law	3-year JD; ABA Standard 303(a)(3) requires 6 credit hours of experiential coursework in clinics, simulation, or externships before graduation.	Pre-bar: ABA-required experiential coursework; in some states, additional pre-bar requirements (e.g., New York pro bono). No general post-bar supervised period.	Bar examination.	3 years.

* Abbreviations: ACGME = Accreditation Council for Graduate Medical Education; NCSBN = National Council of State Boards of Nursing

6.2 Medicine

Medical licensure in the United States is structured around a sequence of formal undergraduate medical education, clinical training within that education, a national licensing examination administered in three steps, and post-graduate residency training before unsupervised practice.

Q.52

The Liaison Committee on Medical Education accreditation standards require that the third and fourth years of the four-year curriculum be devoted primarily to clinical rotations in supervised hospital and clinical settings.[80] Following medical school, graduates enter residency programs governed by the Accreditation Council for Graduate Medical Education, which require multi-year structured clinical training before a physician is eligible for independent practice.[81] The Association of American Medical Colleges reports that the National Resident Matching Program placed approximately 44,000 applicants into residency positions in 2024, with residency lengths ranging from three years for primary care to seven years or more for surgical specialties.[82] The United States Medical Licensing Examination is administered in three steps: Steps 1 and 2 during medical school and Step 3 typically during residency.[83]

Cooke, Irby, and O'Brien's 2010 Carnegie Foundation study of medical education describes the combination of academic instruction, clinical rotations, and residency as integral to the profession's training architecture.[84]

6.3 Nursing

Nursing licensure requires graduation from an accredited nursing program followed by passage of the National Council Licensure Examination (NCLEX) administered by the National Council of State Boards of Nursing. Accredited nursing programs include extensive supervised clinical practice. The American Association of Colleges of Nursing accreditation standards require integration of clinical practice into nursing education throughout the program.[85]

The 2014 study by the National Council of State Boards of Nursing, a longitudinal randomized controlled study of simulation in nursing education, found that:[86]

- up to 50% of traditional clinical hours could be replaced by simulation when the simulation met defined quality standards;

[80] Liaison Committee on Medical Education, *Functions and Structure of a Medical School: Standards for Accreditation of Medical Education Programs Leading to the M.D. Degree*, 2024–2025 ed. (Washington, DC: LCME, 2024).

[81] Accreditation Council for Graduate Medical Education, *ACGME Common Program Requirements* (Chicago: ACGME, 2024).

[82] Association of American Medical Colleges, *Results and Data: 2024 Main Residency Match* (Washington, DC: National Resident Matching Program, 2024).

[83] Federation of State Medical Boards and National Board of Medical Examiners, *USMLE Bulletin of Information*, 2024 ed. (Philadelphia: Federation of State Medical Boards / National Board of Medical Examiners, 2024).

[84] Molly Cooke, David M. Irby, and Bridget C. O'Brien, *Educating Physicians: A Call for Reform of Medical School and Residency* (San Francisco: Carnegie Foundation for the Advancement of Teaching / Jossey-Bass, 2010).

[85] American Association of Colleges of Nursing, *The Essentials: Core Competencies for Professional Nursing Education* (Washington, DC: AACN, 2021).

[86] National Council of State Boards of Nursing, "The NCSBN National Simulation Study: A Longitudinal, Randomized, Controlled Study Replacing Clinical Hours with Simulation in Prelicensure Nursing Education," *Journal of Nursing Regulation* 5, no. 2 (2014): S1–S64.

- no statistically significant differences were found in clinical competency, knowledge acquisition, or new graduate readiness for practice between the simulation and traditional groups; and
- simulation functions as a substitute for clinical hours only when defined quality standards are met.

6.4 Engineering

Engineering licensure follows a deliberately sequenced model that distinguishes between knowledge verification and the verification of applied judgment. The model is published by the National Council of Examiners for Engineering and Surveying in its Model Law, which most states have adopted in substance.[87]

Under the Model Law:[88]

1. The candidate completes a four-year ABET-accredited engineering degree.
2. The candidate takes the Fundamentals of Engineering examination, typically near the end of the degree program, and earns the designation “Engineer in Training” or “Engineer Intern.” That designation is explicitly a developmental credential, not authorization for independent practice.
3. The candidate completes a minimum of four years of qualifying engineering experience under the supervision of a licensed Professional Engineer.
4. The candidate takes the Principles and Practice of Engineering examination, which assesses the application of engineering judgment in practice.

Successful passage of the PE examination, after the supervised experience requirement is met, is the basis on which the state issues the Professional Engineer license.[89] The National Society of Professional Engineers’ published guidance on documenting qualifying experience explains that the supervised experience period exists because the FE examination, on its own, is not treated as establishing readiness for independent practice; the PE designation requires both the examination and the documented supervised experience under a licensed professional.[90]

6.5 Accounting (CPA)

The Certified Public Accountant pathway has historically required 150 semester hours of education, passage of the Uniform CPA Examination, and a period of qualifying professional experience under the supervision of a licensed CPA. The qualifying

[87] National Council of Examiners for Engineering and Surveying, *Model Law* (Clemson, SC: NCEES, 2024).

[88] National Council of Examiners for Engineering and Surveying, *Model Law* (Clemson, SC: NCEES, 2024).

[89] National Council of Examiners for Engineering and Surveying, *NCEES PE Exam Requirements and Qualifications* (Clemson, SC: NCEES, 2024).

[90] National Society of Professional Engineers, *Demonstrating Qualifying Engineering Experience for Licensure* (Alexandria, VA: NSPE, 2024).

experience period is most commonly one year of full-time supervised work, although some states require up to two years.[91]

In 2025, the American Institute of Certified Public Accountants and the National Association of State Boards of Accountancy approved an amendment to the Uniform Accountancy Act creating an alternative pathway:[92]

- a bachelor's degree (rather than 150 semester hours);
- passage of the CPA Examination; and
- two years of qualifying experience (rather than one).

The structure of the alternative pathway preserves the total preparation requirement while substituting an additional year of supervised experience for the additional 30 hours of education.

6.6 Psychology

Psychology licensure for independent practice typically requires a doctoral degree (PhD or PsyD), a predoctoral internship, and a postdoctoral period of supervised clinical experience. The Association of Psychology Postdoctoral and Internship Centers' accreditation framework describes the predoctoral internship as a year of full-time supervised clinical practice, typically approximately 1,500 hours, following completion of doctoral coursework and a doctoral practicum.[93] Postdoctoral supervised hours range across states from approximately 1,500 to 4,000 hours, with most states requiring approximately one to two additional years.[94]

Total supervised clinical hours across the doctoral practicum, internship, and postdoctoral phases typically range from approximately 3,300 to 6,000 hours before licensure for independent practice.[95]

6.7 Social work, occupational therapy, and aviation

Social work. Licensure for independent practice follows a tiered structure. The Master of Social Work degree, accredited under the standards of the Council on Social Work Education, includes substantial supervised field instruction integrated into the educational program.[96] The Licensed Clinical Social Worker designation, the credential

---

[91] American Institute of Certified Public Accountants and National Association of State Boards of Accountancy, *Uniform Accountancy Act*, 9th ed. (Durham, NC: AICPA-NASBA, 2024).

[92] American Institute of Certified Public Accountants and National Association of State Boards of Accountancy, *Uniform Accountancy Act Alternative Pathway Amendment* (Durham, NC: AICPA-NASBA, 2025).

[93] Association of Psychology Postdoctoral and Internship Centers, *APPIC Match Statistics and Internship Membership Criteria* (Houston: APPIC, 2024).

[94] Nadine J. Kaslow et al., "Guiding Principles and Recommendations for the Assessment of Competence," *Professional Psychology: Research and Practice* 38, no. 5 (2007): 441–451.

[95] Kaslow et al., "Guiding Principles and Recommendations for the Assessment of Competence," 441–451.

[96] Council on Social Work Education, *2022 Educational Policy and Accreditation Standards* (Alexandria, VA: CSWE, 2022).

authorizing independent clinical practice in most states, requires the MSW degree, examination, and a post-graduate period of supervised clinical experience that ranges from approximately 2,000 to 6,400 hours depending on the state.[97]

Occupational therapy. Doctoral programs, accredited under the standards of the Accreditation Council for Occupational Therapy Education, require Level I and Level II fieldwork (totaling approximately 1,000 supervised clinical hours) plus a 14-week doctoral capstone experience, all completed before the candidate sits for the national certification examination.[98]

Aviation. The Federal Aviation Administration's regulations governing pilot certification draw the distinction between knowledge verification and applied performance verification with particular clarity. Under 14 CFR § 61.35 and § 61.39, a candidate must pass a written knowledge test as a prerequisite to applying for a pilot certificate. Under 14 CFR § 61.43, the candidate must additionally pass a practical test, administered as an in-aircraft flight test by an FAA-designated examiner, before the certificate is issued. Under 14 CFR § 61.109, the candidate must accumulate a minimum number of flight hours under instruction, including specific dual-instruction, solo, and cross-country requirements.[99]

6.8 Law

The legal profession in the United States is, with isolated state exceptions, the principal comparator that does not require a period of formal supervised practice in a licensed practice setting as a condition of licensure following the bar examination. The American Bar Association's accreditation standards require six credit hours of experiential coursework within the JD program (clinics, simulations, or externships), but this is an academic curriculum requirement rather than a post-bar supervised practice period of the kind required in medicine, accounting, engineering, psychology, social work, and the other professions surveyed in this section. A candidate who graduates from an American Bar Association-accredited law school and passes the bar examination is, in most states, eligible to practice law without an intervening period of formal supervised practice.

The legal profession's published comparative studies of preparation for practice include the following findings:

- The Carnegie Foundation's 2007 report *Educating Lawyers: Preparation for the Profession of Law* documented what its authors described as a substantial gap between what American law schools taught and what new lawyers needed to

[97] Council on Social Work Education, *2022 Educational Policy and Accreditation Standards* (Alexandria, VA: CSWE, 2022).

[98] Accreditation Council for Occupational Therapy Education, *2018 ACOTE Standards and Interpretive Guide* (Bethesda, MD: American Occupational Therapy Association, 2018).

[99] Federal Aviation Administration, *Certification: Pilots, Flight Instructors, and Ground Instructors*, 14 C.F.R. pt. 61 (2026 ed.); see in particular §§ 61.35, 61.39, 61.43, and 61.109.

know to practice competently. The report concluded that the absence of structured experiential preparation in the American law curriculum produced graduates who, despite passing rigorous bar examinations, were not consistently prepared for independent practice.[100]

- The Clinical Legal Education Association's 2007 report *Best Practices for Legal Education* reached similar conclusions and proposed a framework for incorporating clinical, simulation, and experiential learning into the JD program.[101]
- In 2014, the American Bar Association amended its accreditation standards (Standard 303(a)(3)) to require that every JD candidate complete a minimum of six credit hours of experiential coursework, defined to include law school clinics, simulation courses, and externships, before graduation.[102]
- Multiple states have adopted or are considering supplemental practice-readiness requirements. New York, for example, requires graduates of out-of-state law schools to satisfy a specific pro bono and skills requirement before sitting for the bar examination (22 NYCRR Part 520, § 520.18).[103]

6.9 Cross-profession observations

The survey of nine U.S. licensed professions in this Section identifies a common structural pattern. Each profession surveyed includes structured guided practice somewhere in the qualification pathway prior to authorization for independent practice. The location of the guided-practice component varies:

- *Integrated into the educational program* in medicine and nursing (clinical rotations and clinical hours);
- *Following the educational program* in engineering, accounting, and psychology, where guided practice runs concurrent with or prior to the licensing examination process;
- *Added to the educational program* in law, where the American Bar Association amended its accreditation standards in 2014 to require experiential coursework as a condition of accreditation.

The published research literature on each profession identifies the guided-practice component as integral to the qualification pathway. The Carnegie Foundation studies of professional education in medicine and law each identify the experiential and

[100] Sullivan et al., *Educating Lawyers*.

[101] Stuckey et al., *Best Practices for Legal Education*.

[102] American Bar Association, Council of the Section of Legal Education and Admissions to the Bar, Standard 303(a)(3), effective 2016.

[103] New York State Court of Appeals, "Rule for the Admission of Attorneys and Counselors at Law," 22 NYCRR Part 520, § 520.18.

supervised components as the locations where candidates move from acquiring knowledge to learning to apply it under the conditions of professional practice.[104]

The descriptive observation supported by the survey is that, across the U.S. licensed professions reviewed, structured guided practice is a feature of every qualification framework. The architectural location varies; the presence of the component does not.

[104] Cooke, Irby, and O'Brien, *Educating Physicians*; Sullivan et al., *Educating Lawyers*.

Q.58

7. Preliminary Scoping Inquiry into Alternative Examination Structures

This Section sets out the methodology and findings of a preliminary scoping inquiry into the cost and structure of alternative national examination formats. The inquiry was conducted by AQB staff in early 2026. The inquiry is included because the exam-only proposal has, in public discussion, sometimes been characterized as a relatively low-cost or low-complexity alternative to the current *Criteria*. The scoping inquiry was conducted to develop a preliminary understanding of what an examination of the kind contemplated would entail in terms of design, content, and resources. The inquiry does not produce definitive feasibility conclusions; it identifies the questions a formal feasibility study would need to address, including the related question of what preparation pathway would be required for candidates to be brought to the level of professional ability the examination would be designed to verify.

7.1 Methodology of the inquiry

The inquiry was preliminary and exploratory. It did not constitute a formal feasibility study. Its purpose was to produce order-of-magnitude estimates of the cost and structural characteristics of three model formats for an examination designed to verify the upper levels of professional ability described in Section 5 of this brief.

The inquiry drew on three sources of information:[105]

1. Initial consultative input from the national examination provider under contract to the AQB.
2. The published cost and structural characteristics of national examinations administered in comparable U.S. licensed professions, including the Next Generation NCLEX administered by the National Council of State Boards of Nursing,[106] the task-based simulation components of the Uniform CPA Examination,[107] the Architect Registration Examination administered by the

[105] A preliminary scoping inquiry conducted by The Appraisal Foundation staff in early 2026, drawing on initial input from the national examination provider under contract to the AQB, on the published characteristics of national examinations administered in comparable U.S. licensed professions, and on the program-development cost record of the PAREA program. The inquiry was not a formal feasibility study and the cost figures are scoping estimates rather than vendor quotations.

[106] National Council of State Boards of Nursing, *Next Generation NCLEX: Test Plan and Item Types* (Chicago: NCSBN, 2024).

[107] American Institute of Certified Public Accountants and National Association of State Boards of Accountancy, *Uniform CPA Examination Blueprints* (Durham, NC: AICPA, 2024).

National Council of Architectural Registration Boards,[108] and the Step 3 examination of the United States Medical Licensing Examination.[109]

3. The program-development cost record of the PAREA program, an existing applied-competency component of the appraiser qualification framework.[110]

The estimates produced by the inquiry are scoping figures inferred from these sources. They are not vendor quotations and should not be relied upon as such. A more thorough analysis of any specific proposal would require dedicated funding, multi-year development work, and external technical expertise.

7.2 The current national appraiser examination

The current national appraiser examinations, administered for the AQB by PSI Services LLC under contract supported by the ASC, are built and maintained on the methodological foundation set out in the *Standards for Educational and Psychological Testing*.[111] The most recent job task analysis for the examinations was completed in November 2025, and published in December 2025.[112] The job analysis surveyed 3,691 credentialed appraisers across all 50 states and the District of Columbia. Examination content specifications were derived from the job analysis using empirical and rational procedures, with input from subject-matter expert panels representing credential holders, regulators, and educators.[113] Cut scores were established using a modified Angoff procedure. Forms of the examination are constructed using a linear on-the-fly testing system that draws unique combinations of items from a validated item bank.[114]

The current examination is, in the terminology of the licensing-assessment literature, a low-fidelity instrument.[115] As Section 5 sets out, low-fidelity instruments are well-suited to verify the *Knowledge* and *Application* levels of professional ability. The bar examination in law, the Uniform CPA Examination in accounting, the Fundamentals of Engineering examination, the NCLEX in nursing, and the Architect Registration Examination similarly employ low-fidelity instruments for these purposes.[116]

---

[108] National Council of Architectural Registration Boards, *Examination Performance Report* (Washington, DC: NCARB, 2024) (reporting approximately 39,460 division attempts on the Architect Registration Examination in 2024).

[109] Federation of State Medical Boards and National Board of Medical Examiners, *USMLE Bulletin of Information*, 2024 ed.

[110] Appraiser Qualifications Board, *Real Property Appraiser Qualification Criteria*, Section VI, PAREA.

[111] American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, *Standards for Educational and Psychological Testing* (2014).

[112] PSI Services LLC, *Job Analysis Technical Report: AQB National Uniform Licensing and Certification Examinations* (Glendale, CA: PSI Services, December 1, 2025).

[113] PSI Services LLC, *Job Analysis Technical Report*.

[114] PSI Services LLC, *Job Analysis Technical Report*.

[115] Wass et al., “Assessment of Clinical Competence,” 945–949 (introducing and explaining the concept of fidelity in licensing assessment).

[116] Wass et al., “Assessment of Clinical Competence,” 945–949 (introducing and explaining the concept of fidelity in licensing assessment).

7.3 Three model formats considered

The scoping inquiry considered three model formats for an examination intended to verify the upper levels of professional ability:[117]

7.3.1 Enhanced examination with embedded case simulations

In this model, the candidate works through structured scenarios that present documents, data, and decision points; items are scored by a combination of machine processing and limited human review. The format extends the examination's reach into the *Demonstration* level of professional ability for some types of judgment, but does not directly verify the *Performance* level, because the candidate works within a defined task structure provided by the test. The Next Generation NCLEX in nursing is an example of an enhanced examination of this kind.[118]

7.3.2 Timed report-production examination

In this model, the candidate receives a standardized assignment file (subject property information, market data package, reporting instructions) and produces selected report sections or a compressed appraisal report under examination conditions. The format approaches the *Performance* level more closely. It requires human scoring with rubrics, double-scoring, calibration, and adjudication. Comparable formats in other professions include the task-based simulation components of the Uniform CPA Examination,[119] although the CPA framework as a whole includes a separate practical-experience component as set out in Section 6.5 of this brief.

7.3.3 Portfolio or practicum-style performance examination

In this model, the candidate completes appraisal work product over time, possibly accompanied by oral defense or panel evaluation. The format reaches closest to the *Performance* level. In structural terms, however, it functions as a centrally evaluated applied pathway rather than as an examination administered as a discrete event.

7.3.4 Discontinuation of comparable formats in other professions

The United States Medical Licensing Examination Step 2 Clinical Skills, which used standardized patients to assess clinical interaction and communication, was discontinued in 2021. Reasons cited in the discontinuation announcement included

---

[117] A preliminary scoping inquiry conducted by Board staff in early 2026, drawing on initial input from the national examination provider under contract to the AQB, on the published characteristics of national examinations administered in comparable U.S. licensed professions, and on the program-development cost record of the PAREA program. The inquiry was not a formal feasibility study and the cost figures are scoping estimates rather than vendor quotations.

[118] National Council of State Boards of Nursing, *Next Generation NCLEX: Test Plan and Item Types* (Chicago: NCSBN, 2024).

[119] American Institute of Certified Public Accountants and National Association of State Boards of Accountancy, *Uniform CPA Examination Blueprints* (Durham, NC: AICPA, 2024).

scoring complexity, the infrastructure required to maintain standardized patient sites, and the cost burden on examinees.[120]

7.4 Order-of-magnitude cost estimates

The scoping inquiry produced the following order-of-magnitude cost estimates for each model format. The estimates are scoping figures, not vendor quotations.

Model	Startup	Annual operating	Per-candidate variable	All-in per candidate at 1,000/year
Enhanced simulation examination	$0.8M – $2.0M	$325K – $800K	$125 – $290	$610 – $1,490
Timed report-production examination	$1.65M – $4.3M	$750K – $1.8M	$475 – $1,150	$1,555 – $3,810
Portfolio / practicum-style examination	$2.5M – $6.0M	$1.0M – $2.5M	$1,000 – $3,000	$2,500 – $6,700

Two structural features of the cost estimates merit identification.

First, fixed costs dominate at the candidate volumes relevant to the appraisal profession. The number of first-time examinees for the appraiser qualification examinations is approximately 1,000 per year.[121] Comparable examinations in other professions serve significantly larger candidate pools. The Uniform CPA Examination, the NCLEX, and the Architect Registration Examination all serve candidate volumes in the tens of thousands or higher.[122] Larger candidate volumes permit fixed costs to be distributed across more examinees, reducing the per-candidate cost. The economics literature on credentialing examinations identifies this scale dynamic as a recognized constraint for smaller professions.[123]

Second, the figures are sensitive to candidate volume and to the addition of human-scoring components. If new-candidate volume falls below 1,000 in any year, per-

[120] United States Medical Licensing Examination, *Work to Relaunch USMLE Step 2 CS Discontinued* (Philadelphia: Federation of State Medical Boards and National Board of Medical Examiners, January 2021).

[121] Federal Financial Institutions Examination Council, Appraisal Subcommittee, *National Registry of State Licensed and Certified Appraisers*, 2024 ed., https://www.asc.gov.

[122] American Institute of Certified Public Accountants, *CPA Exam Volume Trends* (Durham, NC: AICPA, 2024); National Council of State Boards of Nursing, *NCLEX Examination Statistics* (Chicago: NCSBN, 2024); National Council of Architectural Registration Boards, *Examination Performance Report* (Washington, DC: NCARB, 2024).

[123] Schmitt, *Demystifying Occupational and Professional Regulation*, 95.

candidate costs would rise. If scoring infrastructure becomes more demanding (as in oral defense, panel evaluation, or in-person components), per-candidate costs would also rise.

7.5 The preparation problem identified in the licensing literature

The licensing-assessment literature on preparation for higher-fidelity examination identifies a structural consideration relevant to the model formats described above. The literature finds that candidates can prepare for a multiple-choice examination by studying content and working sample questions; can prepare for a scenario-based examination by working through bounded cases; but cannot effectively prepare for a true report-production or portfolio examination without doing repeated profession-specific work product and receiving feedback from someone qualified to evaluate the reasoning, methodology selection, and standards compliance involved.[124]

The literature on preparation for high-fidelity assessment in other professions reaches the same conclusion.[125] As the formats move from low-fidelity to high-fidelity, candidates require an upstream preparation system that approximates the conditions the examination is designed to assess. Schuwirth and van der Vleuten describe this dynamic as a feature of programmatic assessment design across professional domains.[126]

7.6 Scope of the inquiry

The inquiry described in this Section is preliminary. The cost figures are scoping estimates rather than the conclusions of a fully developed analysis. A more comprehensive study, conducted with dedicated funding, multi-year development work, and external technical expertise, could produce more refined estimates and could surface considerations the preliminary inquiry did not. The AQB has acknowledged this limitation in its December 2025 *Concept Paper – Examination Only Pathway*, which describes the same exploratory work in summary form.[127]

---

[124] Schuwirth and van der Vleuten, “Programmatic Assessment,” 478–485; Epstein and Hundert, “Defining and Assessing Professional Competence,” 226–235.

[125] *Ibid*.

[126] Schuwirth and van der Vleuten, “Programmatic Assessment,” 478–485.

[127] Appraiser Qualifications Board, *Concept Paper – Examination Only Pathway* (Washington, DC: The Appraisal Foundation, December 3, 2025).

8. Preliminary Findings

This Section sets out the preliminary findings that follow from the source material reviewed in Sections 3 through 7. The findings are presented as observations from the research record. They address the question with which this brief began, namely whether a licensing examination, paired with qualifying education, could on its own serve as the gateway to independent practice in place of the *Criteria's* current requirement that candidates perform appraisal work under qualified oversight before being credentialed. The findings are preliminary in the sense that the research record continues to develop and that the public exposure-draft-and-comment process for the *Criteria* is the established procedure through which any conclusions drawn from research are translated into regulatory action.

8.1 Findings from the federal statutory and regulatory record

- *Statutory framework.* The federal statutory framework applicable to appraiser oversight in the United States is established by Title XI.[128] The statutory purpose clause requires that appraisals used in connection with federally related transactions be performed *"by individuals whose competency has been demonstrated and whose professional conduct will be subject to effective supervision."*[129]
- *Federal-state architecture.* The statute establishes a federal-state architecture in which the ASC provides federal oversight, the AQB establishes minimum qualification criteria, and state appraiser regulatory agencies credential appraisers in accordance with those *Criteria*.[130]
- *Federal regulatory record on the qualification criteria.* The ASC, in writing in its 1991 Annual Report to Congress and in subsequent Annual Reports, has characterized the AQB's testing, experience, and educational criteria as meeting the standards Title XI establishes for the qualification criteria.[131]
- *Historical context.* The federal regulatory framework was enacted in response to the Savings and Loan Crisis of the 1980s, with direct resolution costs to the federal government estimated by the Federal Deposit Insurance Corporation at approximately $124 billion.[132]
- *Economic context.* The economics literature describes appraisal services as displaying structural features characteristic of professional credence goods: the

[128] 12 U.S.C. §§ 3331–3355.

[129] 12 U.S.C. § 3331.

[130] 12 U.S.C. §§ 3332, 3343, 3338.

[131] Federal Financial Institutions Examination Council, Appraisal Subcommittee, *1990 Annual Report*, 3; Federal Financial Institutions Examination Council, Appraisal Subcommittee, *Annual Reports to Congress* (1991–present).

[132] Curry and Shibut, "Cost of the Savings and Loan Crisis," 26–35.

soundness of the work product is typically established through analytical review by another qualified professional in the same field; the party engaging the appraiser is typically distinct from the party bearing the ultimate consequence of an inaccurate valuation; and individual transactions are typically not repeated. These features are identified in the regulatory and economics literature as features that affect how ordinary market mechanisms operate to discipline poor practice.[133]

8.2 Findings from the licensing-assessment research literature

- *Layered structure of professional ability.* The literature describes professional ability as a layered structure of four levels: knowledge, application, demonstration, and performance.[134]
- *Component coverage.* No single component of a qualification framework has been demonstrated in the literature to verify all four levels on its own.[135]
- *Written examination.* A standardized written examination, well-developed and administered, is well-suited to verify the first two levels (knowledge and application). The literature has not identified a written examination format that directly verifies the *Performance* level.[136]
- *Difficulty and fidelity.* The licensing-assessment literature distinguishes the difficulty of an assessment from its fidelity. Increasing the difficulty of multiple-choice items has been shown not to change the level of professional ability the items measure.[137]
- *Tacit knowledge.* The research literature on tacit knowledge in professional practice finds that significant components of professional ability develop through practice and resist full articulation in written form. Such components cannot be assessed by written examination alone and are typically verified through evaluation by experienced practitioners observing the candidate's work.[138]

[133] Akerlof, "Market for 'Lemons,'" 488–500; Darby and Karni, "Free Competition and the Optimal Amount of Fraud," 67–88; Dulleck and Kerschbamer, "On Doctors, Mechanics, and Computer Specialists," 5–42.

[134] Miller, "Assessment of Clinical Skills/Competence/Performance," S63–S67.

[135] Wass et al., "Assessment of Clinical Competence," 945–949.

[136] American Educational Research Association et al., *Standards for Educational and Psychological Testing* (2014); Wass et al., "Assessment of Clinical Competence," 945–949.

[137] Wass et al., "Assessment of Clinical Competence," 945–949.

[138] Polanyi, *Tacit Dimension*; Sternberg and Horvath, *Tacit Knowledge in Professional Practice*; Eraut, "Non-formal Learning and Tacit Knowledge in Professional Work," 113–136.

8.3 Findings from the survey of comparable U.S. licensed professions

- *Common structural pattern.* Each of the nine U.S. licensed professions surveyed for this brief includes structured guided practice somewhere in the qualification pathway prior to authorization for independent practice.[139]
- *Variation in location.* The location of the guided-practice component varies. In medicine and nursing, it is integrated into the educational program. In engineering, accounting, and psychology, it follows or runs alongside the educational program. In law, the American Bar Association amended its accreditation standards in 2014 to require six credit hours of experiential coursework as a condition of accreditation responding to studies identifying the absence of structured experiential preparation as a documented gap.[140]
- *Substitution and proportionality across components.* Where one component of a qualification framework is reduced, others are typically increased to compensate. The 2025 amendment to the Uniform Accountancy Act, which permits a bachelor's degree in lieu of 150 semester hours but increases the supervised experience requirement from one year to two, illustrates this pattern in current regulatory practice.[141]

8.4 Findings from the preliminary scoping inquiry

- *Format affects evidentiary reach.* For an examination, on its own, to verify the upper levels of professional ability described in Section 5, a different format than the current low-fidelity multiple-choice instrument would be required.[142]
- *Cost ranges.* Order-of-magnitude scoping estimates for three model formats range from approximately $0.8 million to $6 million in startup cost, $325,000 to $2.5 million in annual operating cost, and $610 to $6,700 per candidate at a volume of 1,000 candidates per year. The estimates are scoping figures, not vendor quotations.[143]
- *Scale considerations.* Fixed costs dominate at the candidate volumes relevant to the appraisal profession (approximately 1,000 first-time examinees per year), constraining the per-candidate cost reductions available to programs serving this

[139] Sources for each profession surveyed in Section 6 of this brief.

[140] American Bar Association, Standard 303(a)(3); Sullivan et al., *Educating Lawyers*; Stuckey et al., *Best Practices for Legal Education*.

[141] American Institute of Certified Public Accountants and National Association of State Boards of Accountancy, *Uniform Accountancy Act Alternative Pathway Amendment* (Durham, NC: AICPA-NASBA, 2025).

[142] Wass et al., "Assessment of Clinical Competence," 945–949; American Educational Research Association et al., *Standards for Educational and Psychological Testing* (2014).

[143] A preliminary scoping inquiry conducted by Board staff in early 2026.

profession compared to programs serving the larger candidate pools of the CPA Examination, the NCLEX, or the Architect Registration Examination.[144]

- *Preparation considerations.* The licensing-assessment literature identifies a structural relationship between the fidelity of an examination and the preparation system required for candidates to be ready for it. As examination format moves toward higher fidelity, candidates require an upstream preparation system that approximates the conditions the examination is designed to assess.[145]

8.5 Common observation

The four lines of inquiry surveyed in this brief converge on a single descriptive observation: across U.S. licensed professions and the licensing-assessment literature reviewed, structured opportunities for candidates to perform professional work under qualified oversight prior to independent licensure are a feature of every qualification framework reviewed in the survey. While the architectural location of these opportunities and their form varies, the presence of some such opportunity does not.

The further question of how such opportunities are best structured within the appraiser qualification framework is the subject of the public exposure-draft-and-comment process the AQB administers under 12 U.S.C. § 3343. That process is conducted separately from this brief.

In summary, one of the most compelling claims for an experience component is that every profession that grants authority for independent judgment requires supervised or structured practice before credentialing.

When experience is not required, one of three things is usually true:

- Either supervision is permanent rather than having a pre-credential cycle, such as real estate agents, firemen, and so forth;
- Or experience is already embedded in the educational program, such as nursing, medical school, and so forth;
- Or the profession is the acknowledged outlier often facing a recalibration of their historical processes, such as law. Notably, CPAs recently had their process revised.

Appraisal sits squarely in the first category.

[144] AICPA, *CPA Exam Volume Trends*; NCSBN, *NCLEX Examination Statistics*; NCARB, *Examination Performance Report*.

[145] Schuwirth and van der Vleuten, “Programmatic Assessment,” 478–485.

Bibliography

The sources cited in this research brief are organized below by category. Within each category, entries are listed alphabetically.

Statutes, Regulations, and Court Decisions

- *Dent v. West Virginia*, 129 U.S. 114 (1889).
- Federal Aviation Administration. *Certification: Pilots, Flight Instructors, and Ground Instructors*. 14 C.F.R. pt. 61 (2026 ed.).
- Financial Institutions Reform, Recovery, and Enforcement Act of 1989. Pub. L. No. 101-73, Title XI, 103 Stat. 183 (codified at 12 U.S.C. §§ 3331–3355).
- New York State Court of Appeals. “Rule for the Admission of Attorneys and Counselors at Law.” 22 NYCRR Part 520, § 520.18.
- *Schweizer v. Commissioner*, T.C. Memo. 2022-102 (United States Tax Court 2022).
- 12 U.S.C. § 3331 (Title XI purpose clause).
- 12 U.S.C. § 3332 (ASC establishment and functions).
- 12 U.S.C. § 3343 (qualification criteria for state-certified and state-licensed appraisers).

Federal Agency Reports and Policy Documents

- Congressional Research Service. *Real Estate Appraisal Regulation: A Brief Explanation*. Washington, DC: Congressional Research Service, 2012.
- Federal Financial Institutions Examination Council, Appraisal Subcommittee. *1990 Annual Report to the Speaker of the House of Representatives*. Washington, DC: Appraisal Subcommittee, January 31, 1991.
- Federal Financial Institutions Examination Council, Appraisal Subcommittee. *Annual Reports to Congress*. 1991–present.
- Federal Financial Institutions Examination Council, Appraisal Subcommittee. *Policy Statements*. 2024 ed. https://www.asc.gov.
- Federation of State Medical Boards and National Board of Medical Examiners. *USMLE Bulletin of Information*. 2024 ed. Philadelphia: Federation of State Medical Boards / National Board of Medical Examiners, 2024.
- United States Medical Licensing Examination. *Work to Relaunch USMLE Step 2 CS Discontinued*. Philadelphia: Federation of State Medical Boards and National Board of Medical Examiners, January 2021.
- U.S. Department of Health, Education, and Welfare. *Report on Licensure and Related Health Personnel Credentialing*. Washington, DC: U.S. Government Printing Office, 1971.
- U.S. Department of Labor, Employment and Training Administration. *Financial Services Industry Competency Model*. Version 1.1. Washington, DC: U.S. Department of Labor, August 2020.

- U.S. Department of Labor, Employment and Training Administration. *Guidelines for Competency-based, Hybrid and Time-based Apprenticeship Training Approaches*. Circular 2016-01. Washington, DC: U.S. Department of Labor, 2015.
- U.S. Department of the Treasury, Council of Economic Advisers, and U.S. Department of Labor. *Occupational Licensing: A Framework for Policymakers*. Washington, DC: The White House, 2015.
- U.S. Government Accountability Office. *Real Estate Appraisals: Opportunities for Enhanced Oversight*. Testimony before the Subcommittee on Housing and Community Opportunity, House Committee on Financial Services. Washington, DC: GAO, 2004.
- U.S. Government Accountability Office. *Residential Appraisals: Opportunities to Enhance Oversight of an Evolving Industry*. GAO-09-703. Washington, DC: GAO, 2009.
- U.S. Government Accountability Office. *Single-Family Housing: HUD's Risk-Based Oversight of Appraisers Could Be Enhanced*. GAO-05-14. Washington, DC: GAO, 2005.

AQB and The Appraisal Foundation Materials

- Appraiser Qualifications Board. *Concept Paper – Examination Only Pathway*. Washington, DC: The Appraisal Foundation, December 3, 2025.
- Appraiser Qualifications Board. *First Exposure Draft of Proposed Changes to the Real Property Appraiser Qualification Criteria*. Washington, DC: The Appraisal Foundation, December 2025.
- Appraiser Qualifications Board. *Real Property Appraiser Qualification Criteria*. Effective January 1, 2026, March 2026 ed. Washington, DC: The Appraisal Foundation, 2026.
- PSI Services LLC. *Job Analysis Technical Report: AQB National Uniform Licensing and Certification Examinations*. Glendale, CA: PSI Services, December 1, 2025.
- The Appraisal Foundation. *Uniform Standards of Professional Appraisal Practice*. 2024–2025 ed. Washington, DC: The Appraisal Foundation, 2024.

Accreditation Bodies, Examination Authorities, and Standards Organizations

- Accreditation Council for Graduate Medical Education. *ACGME Common Program Requirements*. Chicago: ACGME, 2024.
- Accreditation Council for Occupational Therapy Education. *2018 Accreditation Council for Occupational Therapy Education (ACOTE) Standards and Interpretive Guide*. Bethesda, MD: American Occupational Therapy Association, 2018.

- American Association of Colleges of Nursing. *The Essentials: Core Competencies for Professional Nursing Education*. Washington, DC: AACN, 2021.
- American Bar Association, Council of the Section of Legal Education and Admissions to the Bar. Standard 303(a)(3). Effective 2016.
- American Educational Research Association, American Psychological Association, and National Council on Measurement in Education. *Standards for Educational and Psychological Testing*. Washington, DC: American Educational Research Association, 2014.
- American Institute of Certified Public Accountants. *CPA Exam Volume Trends*. Durham, NC: AICPA, 2024.
- American Institute of Certified Public Accountants and National Association of State Boards of Accountancy. *Uniform Accountancy Act*. 9th ed. Durham, NC: AICPA-NASBA, 2024.
- American Institute of Certified Public Accountants and National Association of State Boards of Accountancy. *Uniform Accountancy Act Alternative Pathway Amendment*. Durham, NC: AICPA-NASBA, 2025.
- American Institute of Certified Public Accountants and National Association of State Boards of Accountancy. *Uniform CPA Examination Blueprints*. Durham, NC: AICPA, 2024.
- Association of American Medical Colleges. *Results and Data: 2024 Main Residency Match*. Washington, DC: National Resident Matching Program, 2024.
- Association of Psychology Postdoctoral and Internship Centers. *APPIC Match Statistics and Internship Membership Criteria*. Houston: APPIC, 2024.
- Council on Social Work Education. *2022 Educational Policy and Accreditation Standards*. Alexandria, VA: CSWE, 2022.
- Liaison Committee on Medical Education. *Functions and Structure of a Medical School: Standards for Accreditation of Medical Education Programs Leading to the M.D. Degree*. 2024–2025 ed. Washington, DC: LCME, 2024.
- National Conference of State Legislatures. *The Evolving State of Occupational Licensing: Research, State Policies and Trends*. 2nd ed. Denver: National Conference of State Legislatures, 2020.
- National Council of Architectural Registration Boards. *Examination Performance Report*. Washington, DC: NCARB, 2024.
- National Council of Examiners for Engineering and Surveying. *Model Law*. Clemson, SC: NCEES, 2024.
- National Council of Examiners for Engineering and Surveying. *NCEES PE Exam Requirements and Qualifications*. Clemson, SC: NCEES, 2024.
- National Council of State Boards of Nursing. *NCLEX Examination Statistics*. Chicago: NCSBN, 2024.
- National Council of State Boards of Nursing. *Next Generation NCLEX: Test Plan and Item Types*. Chicago: NCSBN, 2024.

Q.70

- National Society of Professional Engineers. *Demonstrating Qualifying Engineering Experience for Licensure*. Alexandria, VA: NSPE, 2024.

Academic and Professional Literature

- Akerlof, George A. “The Market for ‘Lemons’: Quality Uncertainty and the Market Mechanism.” *Quarterly Journal of Economics* 84, no. 3 (1970): 488–500.
- Blair, Peter Q., and Bobby W. Chung. “How Much of a Barrier to Entry Is Occupational Licensing?” National Bureau of Economic Research Working Paper No. 25262, November 2018, revised December 2018.
- Cooke, Molly, David M. Irby, and Bridget C. O’Brien. *Educating Physicians: A Call for Reform of Medical School and Residency*. San Francisco: Carnegie Foundation for the Advancement of Teaching / Jossey-Bass, 2010.
- Curry, Timothy, and Lynn Shibut. “The Cost of the Savings and Loan Crisis: Truth and Consequences.” *FDIC Banking Review* 13, no. 2 (2000): 26–35.
- Darby, Michael R., and Edi Karni. “Free Competition and the Optimal Amount of Fraud.” *Journal of Law and Economics* 16, no. 1 (1973): 67–88.
- Dulleck, Uwe, and Rudolf Kerschbamer. “On Doctors, Mechanics, and Computer Specialists: The Economics of Credence Goods.” *Journal of Economic Literature* 44, no. 1 (2006): 5–42.
- Epstein, Ronald M., and Edward M. Hundert. “Defining and Assessing Professional Competence.” *Journal of the American Medical Association* 287, no. 2 (2002): 226–235.
- Eraut, Michael. “Non-formal Learning and Tacit Knowledge in Professional Work.” *British Journal of Educational Psychology* 70, no. 1 (2000): 113–136.
- Flexner, Abraham. *Medical Education in the United States and Canada: A Report to the Carnegie Foundation for the Advancement of Teaching*. New York: Carnegie Foundation for the Advancement of Teaching, 1910.
- Kaslow, Nadine J., Catherine L. Grus, Linda F. Campbell, Nadya A. Fouad, Robert L. Hatcher, and Emil R. Rodolfa. “Guiding Principles and Recommendations for the Assessment of Competence.” *Professional Psychology: Research and Practice* 38, no. 5 (2007): 441–451.
- Miller, George E. “The Assessment of Clinical Skills/Competence/Performance.” *Academic Medicine* 65, no. 9 supp. (1990): S63–S67.
- National Council of State Boards of Nursing. “The NCSBN National Simulation Study: A Longitudinal, Randomized, Controlled Study Replacing Clinical Hours with Simulation in Prelicensure Nursing Education.” *Journal of Nursing Regulation* 5, no. 2 (2014): S1–S64.
- Polanyi, Michael. *The Tacit Dimension*. Garden City, NY: Doubleday, 1966.
- Raymond, Mark R., and Sandra Neustel. “Determining the Content of Credentialing Examinations.” In *Handbook of Test Development*, edited by Steven M. Downing and Thomas M. Haladyna, 181–223. Mahwah, NJ: Lawrence Erlbaum Associates, 2006.

- Schmitt, Kara. *Demystifying Occupational and Professional Regulation*. Lexington, KY: Council on Licensure, Enforcement and Regulation, 2015.
- Schuwirth, Lambert W. T., and Cees P. M. van der Vleuten. “Programmatic Assessment: From Assessment of Learning to Assessment for Learning.” *Medical Teacher* 33, no. 6 (2011): 478–485.
- Sternberg, Robert J., and Joseph A. Horvath, eds. *Tacit Knowledge in Professional Practice: Researcher and Practitioner Perspectives*. Mahwah, NJ: Lawrence Erlbaum Associates, 1999.
- Stuckey, Roy, et al. *Best Practices for Legal Education: A Vision and a Road Map*. Columbia, SC: Clinical Legal Education Association, 2007.
- Sullivan, William M., Anne Colby, Judith Welch Wegner, Lloyd Bond, and Lee S. Shulman. *Educating Lawyers: Preparation for the Profession of Law*. San Francisco: Carnegie Foundation for the Advancement of Teaching / Jossey-Bass, 2007.
- Wass, Val, Cees van der Vleuten, John Shatzer, and Roger Jones. “Assessment of Clinical Competence.” *The Lancet* 357, no. 9260 (2001): 945–949.

Q.72

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

Media Contact:
Amy Kaufman
Director of Communications
The Appraisal Foundation
amy@appraisalfoundation.org
direct phone 202.624.3048

The Appraisal Foundation Announces McKissock as Host of Foundation Asynchronous Courses

(Washington, DC) March 17, 2025 –The Appraisal Foundation today announced that McKissock, LLC has been awarded the contract to be the sole host of The Appraisal Foundation's asynchronous continuing and qualification education courses relating to the Uniform Standards of Professional Appraisal Practice, Yellow Book and other online courses. McKissock won the contract following a competitive Request for Proposal process, beating out six other providers through two rounds of rubric driven scoring.

"McKissock's commitment to developing innovative new courses that engage appraisers and promote excellence across the profession aligns perfectly with our mission to promote public trust," said Foundation President Kelly Davids. "I congratulate them on receiving this award after a highly competitive proposal process, and our team is eager to collaborate with McKissock to bring the Foundation's courses to life."

"McKissock has been a trusted partner in real property valuation education for decades, and we're excited to continue our collaboration with The Appraisal Foundation," said Michael Schenk, General Manager at McKissock Learning. "As a leader in appraisal education, we're proud to support the Foundation's mission and advance excellence in the profession. Our team looks forward to offering next-level USPAP courses that enhance engagement, accountability, and real-world application—ensuring appraisers are well-prepared for success."

The contract runs through December 31, 2029 with an option for a two-year extension.

--end--

Background: The Appraisal Foundation is the nation's foremost authority on the valuation profession. The organization sets the Congressionally-authorized standards and qualifications for real estate appraisers, and provides voluntary guidance on recognized valuation methods and techniques for all valuation professionals. This work advances the profession by ensuring appraisals are independent, consistent, and objective. More information on The Appraisal Foundation is available at www.appraisalfoundation.org.

About McKissock: For over 30 years, McKissock Learning has been the leading provider of real estate appraisal education, delivering top-tier training to valuation professionals nationwide. As the premier appraisal education provider in the U.S., McKissock is powered by a passionate team with decades of experience in both education and professional appraisal. Part of Colibri Group, McKissock is committed to equipping the next generation of appraisers with high-quality, accessible education that fosters their success and career growth. For more information, please visit www.McKissock.com.

The Appraisal FOUNDATION

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

Media Contact:
Amy Kaufman
Director of Communications
The Appraisal Foundation
amy@appraisalfoundation.org
direct phone 202.624.3048

The Appraisal Foundation Statement on Promoting Access to Mortgage Credit Executive Order

(Washington, DC) March 14, 2026 – Home ownership is central to the American Dream, an achievement that is the most significant purchase for many Americans. As the congressionally authorized body charged with the responsibility of developing standards and qualifications for real property appraisers, The Appraisal Foundation appreciates the Administration's efforts to open the dream of homeownership to more Americans. We pledge to continue working with key decision makers to identify innovative solutions which balance regulatory requirements with public trust and economic stability.

In mortgage transactions, appraisers are the only party without a vested interest in the outcome. The Appraisal Foundation's congressionally authorized work requires appraisers to adhere to the highest ethical standards. They are obligated to be independent, impartial and objective, so sellers, buyers, and the broader marketplace know they can rely on their unbiased valuations. This compliance with strict ethical valuation standards ensures the risks that led to the Savings and Loans Crisis of the 1980's and the 2008 Housing Crisis are not repeated.

The Trump Administration's Executive Order highlights several of the key initiatives the Foundation has in focus, from reassessing the current appraiser qualification criteria to the adoption of new technological tools. Appraisers are resourceful problem solvers at the forefront of technological adoption. This early adoption advances their work to provide meaningful opinions of value that the public can rely on when making the biggest financial decisions of their lives.

The appraiser regulatory system is a unique structure that brings together private sector expertise with federal and state regulators. This uniqueness is its strength. Private sector innovation blended with public service builds public trust in the valuations that undergird the world's greatest economy. With its congressional authorization and overarching mission to protect public trust, The Appraisal Foundation remains committed to working with the administration to find groundbreaking solutions under this Executive Order.

--end--

Background: The Appraisal Foundation is the nation's foremost authority on the valuation profession. The organization sets the Congressionally-authorized standards and qualifications for real estate appraisers, and provides voluntary guidance on recognized valuation methods and techniques for all valuation professionals. This work advances the profession by ensuring appraisals are independent, consistent, and objective. More information on The Appraisal Foundation is available at www.appraisalfoundation.org.

UMDP
UNIFORM MORTGAGE DATA PROGRAM

Fannie Mae Freddie Mac

2026

BROAD PRODUCTION
January 26, 2026 – November 1, 2026
Submit UAD 2.6 or UAD 3.6

NOTE: Start the transition to UAD 3.6 now. Fully transition before mandate.

- Confirm vendor, appraiser and system readiness.
- Use the Lender Readiness Kit and additional resources to get started.
- Take the GSE-developed industry training.

Visit the Freddie Mac and Fannie Mae UAD webpages for more information.

UAD 2.6 appraisals must be submitted to UCDP® before November 2, 2026 or converted to UAD 3.6.

UCDP/SSR Feedback Message
August 6, 2026: Warning message delivered only when UAD 2.6 submitted, stating that starting November 2, 2026, all new submissions must be in UAD 3.6.

MANDATE
November 2, 2026
Submit UAD 3.6 Only

NOTE: All new UCDP submissions must be in UAD 3.6.

Revisions allowed for UAD 2.6 appraisals previously submitted to UCDP November 1, 2026, or earlier.

UCDP/SSR Feedback Message
November 2, 2026: Fatal message delivered only when UAD 2.6 submitted, stating all new submissions must be in UAD 3.6.

2027

RETIREMENT
May 3, 2027
UAD 2.6 Pipeline Cleared

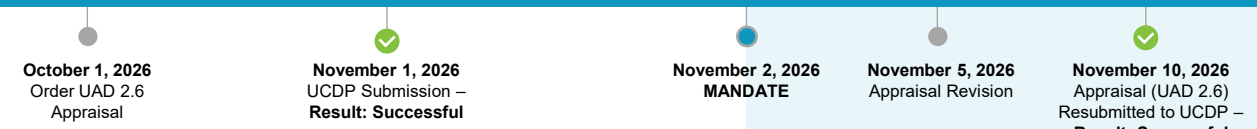
UAD 2.6 pipeline revisions period ends.

Note: Feedback messages are delivered based on UCDP submission date not appraisal effective date. View examples below.

Not Successful Example: UCDP submission of UAD 2.6 appraisal after November 2 mandate



Successful Example: UCDP submission of UAD 2.6 appraisal prior to November 2 mandate with resubmission (still using UAD 2.6) after November 2 mandate



Q.75

This document relates to the Uniform Mortgage Data Program®, an effort undertaken jointly by Freddie Mac and Fannie Mae at the direction of U.S. Federal Housing (FHFA). ©2026 Freddie Mac and Fannie Mae. Trademarks of the respective owners.

Uniform Appraisal Dataset (UAD) 3.6 Frequently Asked Questions

UAD 3.6 Overview and Key Dates

1. What is UAD and why is it being updated?

The UAD is a standardized industry dataset for appraisal property reporting that is communicated electronically through the Uniform Collateral Data Portal® (UCDP®). Fannie Mae and Freddie Mac (GSEs) are updating the UAD to create a data-driven, dynamic reporting structure to capture property and market information. One limitation of the legacy forms is that additional required data is provided in a free-form commentary addendum. This update allows for one reporting structure that accounts for all property and inspection types. As part of this initiative, the GSEs are aligning to the latest version of the Mortgage Industry Standards Maintenance Organization (MISMO®) Reference Model 3.6.

UAD 3.6 will be mandatory for all new appraisal reports submitted to UCDP on or after November 2, 2026. Refer to the implementation timeline for details.

2. [NEW] How will the UAD 3.6 mandate be enforced?

UAD 3.6 becomes mandatory for all new appraisal reports submitted to UCDP on or after November 2, 2026. The November 2, 2026 mandate is based on the initial UCDP Submission Date of each report. If a UAD 2.6 appraisal report is submitted to UCDP on or after November 2, 2026, UCDP will return a Fatal message resulting in a "Not Successful" submission.

3. [NEW] Can I still submit revisions in UAD 2.6 after November 2, 2026?

Yes. From the mandate date on November 2, 2026, through the retirement date on May 3, 2027, lenders may continue submitting revisions to UAD 2.6 appraisal reports. If the appraisal report was submitted to UCDP in UAD 2.6 prior to November 2, 2026, any revisions submitted to the existing DocFile ID will remain in UAD 2.6.

4. [NEW] How do I prepare for UAD 3.6?

Lenders, AMCs, and appraisers should prepare by ensuring systems, workflows, and all partners are ready for UAD 3.6. Lenders should begin transitioning as soon as possible because the mandate is based on the UCDP Submission Date, not the Loan Application or Effective Date. Ensure you are allowing enough time to order, receive, and submit any UAD 2.6 appraisal reports prior to November 2, 2026.

Visit the Fannie Mae and Freddie Mac UAD webpages to access onboarding materials, particularly the Lender Readiness Kit, industry training, and the joint GSE webinar from early 2025.

This document relates to the Uniform Mortgage Data Program®, an effort undertaken jointly by Freddie Mac and Fannie Mae at the direction of the Federal Housing Finance Agency.

© 2025 Fannie Mae and Freddie Mac. Trademarks of the respective owners.

General

5. Are the appraisal report forms being replaced?

Yes., The appraisal report forms listed below are being retired and replaced with a single data-driven, flexible, dynamic structure for appraisal reporting. The redesigned Uniform Residential Appraisal Report (URAR), Restricted Appraisal Update Report, and Completion Report each have a similar look and feel to the Uniform Residential Loan Application (URLA) and the Closing Disclosure (CD).

- Uniform Residential Appraisal Report (1004 / 70)
- Uniform Residential Appraisal Report (Desktop) (1004 Desktop / 70D)
- Uniform Residential Appraisal Report (Hybrid) (1004 Hybrid / 70H)
- Individual Condominium Unit Appraisal Report (1073 / 465)
- Individual Condominium Unit Appraisal Report (Desktop) (1073 Desktop / 465D)
- Individual Condominium Unit Appraisal Report (Hybrid) (1073 Hybrid / 465H)
- Exterior-Only Inspection Individual Condominium Unit Appraisal Report (1075 / 466)
- Exterior-Only Inspection Residential Appraisal Report (2055 / 2055)
- Manufactured Home Appraisal Report (1004C / 70B)
- Individual Cooperative Interest Appraisal Report (2090)
- Exterior-Only Individual Cooperative Interest Appraisal Report (2095)
- Small Residential Income Property Appraisal Report (1025 / 72)
- Single Family Comparable Rent Schedule (1007 / 1000) **** See FAQ # 8 for more information*.**
- Appraisal Update and/or Completion Report (1004D / 442)

6. Are form numbers going away?

Yes. With the new URAR, the data that describes the subject property drives the appraisal report, not a form type or number. Use the Functioning Without Form Numbers document to:

- Help understand how the URAR's dynamic structure along with discrete and repeatable data replaces the legacy form numbers
- Assist with transitioning to the redesigned report

7. [UPDATED] What is the process for completing an appraisal update or completion report under UAD 3.6?

With the implementation of UAD 3.6, Restricted Appraisal Update Reports and Completion Reports are no longer one report. They will be two separate reports that, if applicable, must be submitted to UCDP as referenced in Fannie Mae's *Selling Guide* Supplement: UAD 3.6 Policy and Freddie Mac's *Single-Family Seller/Servicer Guide* (Guide) Bulletin 2025-7.

The Restricted Appraisal Update Report or Completion Report must be submitted in UAD 3.6 ZIP format and must be associated with an existing UAD 3.6 URAR submission in UCDP.

For UAD 2.6 submissions, the process remains unchanged. The Appraisal Update and/or Completion Report (1004D/442) must be submitted in UAD 2.6 XML format and must be associated with a prior UAD 2.6 submission.

Important: UCDP does not accept mixed standards (UAD 2.6 and UAD 3.6) under the same Document File Identifier (Doc File ID). The format of the Restricted Appraisal Update Report or Completion Report must match the format of the original appraisal report file submission.

This document relates to the Uniform Mortgage Data Program®, an effort undertaken jointly by Freddie Mac and Fannie Mae at the direction of the Federal Housing Finance Agency.

© 2026 Fannie Mae and Freddie Mac. Trademarks of the respective owners.

8. When is it acceptable to use the legacy Single-Family Comparable Rent Schedule (1007 / 1000)?

In most situations, the legacy Single-Family Comparable Rent Schedule form will not be completed separately, as estimating the monthly market rent will be part of the appraisal assignment and included in the new URAR under the Rental Information section.

When the need arises to establish a monthly market rent after the URAR has been completed, then the original appraiser must be engaged to amend the original URAR to include the Rental Information section.

In rare cases, the original appraiser will not be available to amend the appraisal report. In this situation, a different appraiser may complete the Single-Family Comparable Rent Schedule to satisfy the requirement for the loan. Please note, this form was never designed to be a standalone appraisal report and the alternate appraiser completing it must take the necessary steps to be compliant with the Uniform Standards of Appraisal Practice (USPAP).

9. [NEW] Can I use an operating income statement (216/998)?

There is no requirement by the GSEs to complete the Operating Income Statement. The GSEs have retired this form and do not expect to receive it through UCDP.

10. Does UAD 3.6 support different scopes of work for different types of appraisal assignments?

Yes. UAD 3.6 supports traditional, hybrid, desktop, and exterior appraisal assignments. Refer to the GSE *Selling Guides* for specific policies.

11. Does the new appraisal report still contain a General Addendum?

No. In place of the General Addendum, there are specific fields within each section of the URAR that allow commentary to be added as necessary, offering the appraiser ample room to provide additional information.

12. Is the new URAR for mortgage purposes only?

Yes. The purpose of the URAR has not changed. The opinions, conclusions, and certifications in the appraisal report are for the intended user to evaluate the property that is the subject of the appraisal for a mortgage finance transaction or related activities.

13. Does UAD 3.6 support FHA, VA, and USDA requirements?

Yes. The GSEs have worked closely with the government agencies – Federal Housing Administration (FHA), United States Department of Agriculture (USDA), and the Department of Veterans Affairs (VA) – to include their specific requirements in UAD 3.6. Contact each agency for their implementation plans.

14. How are property characteristics described and identified?

UAD 3.6 provides standardized data fields and enumerations to define the property, helping lenders and other end users better understand the property's characteristics to verify property eligibility and determine overall collateral risk.

15. Does UAD 3.6 support land-only appraisals?

No. These appraisals are not in scope of the UAD 3.6 and Forms Redesign project.

This document relates to the Uniform Mortgage Data Program®, an effort undertaken jointly by Freddie Mac and Fannie Mae at the direction of the Federal Housing Finance Agency.

© 2026 Fannie Mae and Freddie Mac. Trademarks of the respective owners.

16. What is the UAD Compliance API?

The appraiser, through their appraisal software provider, has the ability to run the UAD compliance rules through an API. Fannie Mae and Freddie Mac created UAD Compliance APIs to evaluate the XML for compliance with the UAD Delivery Specification. The rules check for data completeness, validity (format and data type), and reasonableness.

The UAD Compliance API does not include Loan Collateral Advisor® or Collateral Underwriter® (CU®) messages or findings, such as eligibility, risk scores or appraisal quality.

To see a full list of the rules that are run by the UAD Compliance API, download Appendices H-1, H-2, and H-3.

17. What are the Uniform Loan Delivery Dataset (ULDD) requirements that are related to UAD 3.6?

For lenders that deliver loans to the GSEs, the ULDD Phase 5 (v5.1.0) update includes enhancements to align ULDD property data points with UAD 3.6. For more information, see ULDD Job Aid for Alignment with UAD 3.6.

18. As an appraiser, how can I prepare for UAD 3.6?

The GSEs have created an appraiser-specific training course, available through appraisal education providers, that will allow appraisers to obtain continuing education (CE) credit. Appraisers should also work with their appraisal software vendor to understand specific functionality, vendor-specific training, and testing timeframes.

Appraisers can also review published materials on the GSE websites:

- Training: Industry's Guide to the New URAR
- Appendices F-1, F2, and F-3: Reference Guides
- Sample Scenario PDFs (Combined)

19. As an appraiser, how will I know whether to perform an appraisal assignment using UAD 2.6 or UAD 3.6?

This information should be in the Engagement Letter. If not, work with your client to understand the assignment. Lenders may implement a staged rollout of UAD 3.6 during the transition period, so requirements may vary from assignment to assignment and from lender to lender.

URAR

20. Have the Condition and Quality Ratings been updated for UAD 3.6?

The Condition and Quality Rating scale has not changed, but definitions were rewritten to provide clarity and make it easier to distinguish between the ratings. Interior and Exterior Condition and Quality Ratings have also been added for a distinction when there are significant differences in the condition status between interior and exterior. See Appendix 2 of the URAR Reference Guide or Condition and Quality Rating Definitions for details.

21. Can the UAD Condition and Quality Ratings be applied to manufactured housing?

Yes. The Condition and Quality Ratings apply to all residential property types, including manufactured homes. This is a change from UAD 2.6.

This document relates to the Uniform Mortgage Data Program®, an effort undertaken jointly by Freddie Mac and Fannie Mae at the direction of the Federal Housing Finance Agency.

© 2026 Fannie Mae and Freddie Mac. Trademarks of the respective owners.

22. [UPDATED] Why is there a need for component-level Update Status and Condition Status?

The Update and Condition Status provide support needed to develop a credible opinion on the Condition and Quality Ratings by providing more granular data on the various components of the property.

23. Have the Update Statuses for the interior features changed?

Yes. See the Unit Interior Section of the URAR Reference Guide for details on reporting Update Status for:

- Room Update Status (Kitchens and Baths)
- Overall Update Status for Bathrooms
- Overall Update Status for Flooring

Please note, new construction should now be reported as Fully Updated instead of Not Updated.

24. If a dwelling was built in two different years, how should "*Year Built*" be reported on the URAR?

This depends on whether it was original construction covering multiple years or additional construction done years later.

Example 1: Dwelling was started in 2024 and completed in 2025. The year the structure was completed (2025) would be reported.

Example 2: Dwelling was originally built in 1950, with an addition constructed in 2002. The year of the original part of the structure (1950) would be reported.

25. What information is required for accessory dwelling units (ADUs) reported on the URAR?

The URAR includes more detailed information about ADUs, such as size, condition, rooms, and location. ADUs display in a more consistent manner on the new URAR than on the legacy forms, which will make it easier for reviewers to identify them. See the URAR Reference Guide for details.

26. [NEW] How should appraisers handle adjustments for unit discrepancies in the Sales Comparison Approach?

When a comparable either has fewer units or has additional units compared to the subject, the appraiser should use an <Additional Row> under the Dwelling(s) subsection of the Sales Comparison Approach and label it "Total Units". This row should display the number of units for the subject and each comparable.

Adjustments for differences in the total number of units should be made on the "*Total Units" highlighted in yellow* line in the Dwelling(s) subsection. For variations at the feature level (such as a one-bedroom unit compared with a two-bedroom unit) apply the appropriate adjustment to the corresponding line item within the "Unit(s)" subsection of the Sales Comparison Approach.

However, the appraiser should be mindful to not also double-adjust unit characteristics when a unit-based adjustment has already been applied (which is highlighted below with red X's).

© 2026 Fannie Mae and Freddie Mac. Trademarks of the respective owners.

	Subject Property	Comparable #1		Comparable #2		Comparable #3	
Dwelling(s)							
Year Built	1979 | 1988	1989	$$	1988	$$	1938	$$
Structure Design	Rowhouse/Townhouse	Rowhouse/Townhouse	$$	Low Rise	$$	—	$$
Gross Building Finished Area	3000 sq.ft	2000 sq.ft	$$	4000 sq.ft	$$	4000 sq.ft	$$
Total Units	3	2	$ 50,000	4	$ (50,000)	4	$ (50,000)
Add additional row under Dwelling(s)							
Unit(s)							
Structure ID | Unit ID	**Building 1 | Unit A**	**Building 1 | Unit A**		**Building 1 | Unit A**		**Building 1 | Unit A**	
Bedrooms	2	2	$$	2	$$	2	$$
Baths - Full | Half	2 | 1	2 | 1	$$	2 \| 1	$$	2 | 1	$$
Finished Area Above Grade	1000 sq. ft	1000 sq. ft	$$	1000 sq. ft	$$	1000 sq. ft	$$
Finished Area Below Grade			$$		$$		$$
<Additional Row(s)>			$$		$$		$$
Structure ID | Unit ID	**Building 1 | Unit B**	**Building 2 | Unit B**		**Building 1 | Unit B**		**Building 1 | Unit B**	
Bedrooms	2	2	$$	2	$$	2	$$
Baths - Full | Half	2 | 1	2 | 1	$$	2 \| 1	$$	2 | 1	$$
Finished Area Above Grade	1000 sq. ft	1000 sq. ft	$$	1000 sq. ft	$$	1000 sq. ft	$$
Finished Area Below Grade			$$		$$		$$
<Additional Row(s)>			$$		$$		$$
Structure ID | Unit ID	**Building 1 | Unit C**			**Building 1 | Unit C**		**Building 1 | Unit C**	
Bedrooms	2			2	$$	2	$$
Baths - Full | Half	2 | 1			2 | 1	$$	2 \| 1	$$
Finished Area Above Grade	1000 sq. ft			1000 sq. ft	$$	1000 sq. ft	$$
Finished Area Below Grade					$$		$$
<Additional Row(s)>					$$		$$
Structure ID | Unit ID				**Building 1 | Unit D**		**Building 1 | Unit D**	
Bedrooms				2	$$	2	$$
Baths - Full | Half				2 | 1	$$	2 \| 1	$$
Finished Area Above Grade				1000 sq. ft	$$	1000 sq. ft	$$
Finished Area Below Grade					$$		$$
<Additional Row(s)>					$$		$$

Cells are inactive due to absence of data

27. [NEW] If a ceiling isn't completely flat or has minor slopes or varying pitches, how should it be measured, and what ceiling style should be reported?

Measure the ceiling height at its highest point, consistent with standard measurement practice. For labeling, choose the ceiling style that most accurately reflects its overall design using the options in the UAD Reference Guide. Select the style that best aligns with the predominant ceiling shape. When none of the available types properly describe the ceiling select "Other" and provide a description.

This document relates to the Uniform Mortgage Data Program®, an effort undertaken jointly by Freddie Mac and Fannie Mae at the direction of the Federal Housing Finance Agency.

© 2026 Fannie Mae and Freddie Mac. Trademarks of the respective owners.