

ACOW Appraiser Qualifications Board Survey Results

Survey Dates – May 31, 2018 – June 8, 2018

Via Survey Monkey

Question #1 - At present the state requires a person obtaining a Licensed Appraiser credential to have a two year college degree. The Appraiser Qualifications Board (AQB) has eliminated the college education requirement to become a state licensed appraiser. Do you think the state of Washington should adopt this change?

Answered: 510 **Yes – 56.27% / 287 Responses**

Skipped: 4 No – 43.73% / 223 Responses

Question #2 - At present the state requires a person obtaining a Licensed Appraiser credential to have completed 2,000 hours of experience obtained in a minimum of 24 months. The AQB has reduced the experience requirements to 1,000 hours to be obtained in a minimum of 6 months. Based on the above information, the fact that the AQB developed the above standard with PAREA being part of the experience module, and after conversation with a number of appraisers within the state of Washington, it is the ACOW Board of Directors (BOD's) thought that the DOL should require 1,500 hours of experience to be obtained in no fewer than 12 months. Do you think the state of Washington should adopt the BOD's change, the AQB's change, or maintain the current standard?

Answered: 511 Maintain the current standard - 41.10% / 210 Responses

Skipped: 3 **Adopt the ACOW BOD's change – 47.36% / 242 Responses**

Adopt the AQB's change – 11.55% / 59 Responses

Question #3 - The state of Washington currently requires a person obtaining a Certified Residential credential have a four year college degree. The AQB has developed new education standards, allowing an applicant become credentialed, providing they obtain any one, or any combination of, the following:

- (a) Possession of a bachelor's degree in any field of study.**
- (b) Possession of an Associate's degree in a field of study related to business administration, accounting, finance, economics, or real estate.**
- (c) Successful completion of 30 semester hours of college level courses that cover topics such as English composition, microeconomics, macroeconomics, finance, algebra, geometry, statistics, computer science, business or real estate law, and two electives.**
- (d) Successful completion of at least 30 semester hours of college level examination program (CLEP) examinations in college algebra, college composition, college mathematics, principles of macroeconomics, principles of microeconomics, introductory business, law, and information systems.**
- (e) As an alternative to the above requirements. Individuals who have held a licensed residential credential for a minimum of five years may qualify for a certified residential credential by satisfying the following: no record of non-appealable disciplinary action, successful completion of the additional**

required qualifying education as specified, successful completion of the required experience as specified, and successful completion of a certified residential real estate appraiser examination.

Do you think the state of Washington should adopt these changes?

Answered: 510 Yes – 70.20% / 358 Responses

Skipped: 4 No – 29.80% / 152 Responses

Question #4 - At present the state requires a person obtaining a Certified Residential credential to have completed 2,500 hours of experience obtained in a minimum of 24 months. The AQB has reduced the experience requirements to 1,500 hours to be obtained in a minimum of 12 months. Based on the above information, the fact that the AQB developed the above standard with PAREA being part of the experience module, and after conversation with a number of appraisers within the state of Washington, it is the ACOW BOD's thought that DOL should continue to require 2,500 hours of experience to be obtained in no fewer than 24 months. Do you think the state of Washington should maintain the current experience standard or adopt the AQB's change?

Answered: 507 Maintain current requirements – 68.44% / 347 Responses

Skipped: 7 Adopt the AQB's Change – 31.56% / 160 Responses

Question #5 - At present the state requires a person obtaining a Certified General credential to have completed 3,000 hours of experience, with at least 1,500 hours of experience being non-residential, to be obtained in a minimum of 30 months. The AQB has reduced the experience requirements to 3,000 hours of experience with at least 1,500 hours of experience being nonresidential to be obtained in a minimum of 18 months. Based on the above information, the fact that the AQB developed the above standard with PAREA being part of the experience module, and after conversation with a number of appraisers within the state of Washington, it is the ACOW BOD's thought that DOL maintain the current standard for hours of experience in no fewer than 30 months. Do you think the state of Washington should maintain the current experience standard or adopt the AQB's change?

Answered: 512 Maintain the current standard – 64.84% / 332 Responses

Skipped: 2 Adopt the AQB's change – 35.16% / 180 Responses

Address

- Answered: 514
- Skipped: 0

Answer Choices –	Responses –
Responses	100.00%
Name and Designations (if any)	514
Responses	50.39%
Company (optional)	259
Responses	0.00%
Address	0
Responses	0.00%
Address 2	0
Responses	0.00%

City/Town	0
Responses	0.00%
State/Province	0
Responses	0.00%
ZIP/Postal Code	0
Responses	0.00%
Country	0
Responses	63.81%
Email Address (optional)	328
Responses	0.00%
Phone Number	0
Q7 w0	

Please provide any brief comments you may have.

- Answered: 204
- Skipped: 310

[RESPONSES \(204\)](#)



I'd like something in between the current and the proposed changes. Not as many requirements as the Current Standards. But something more than the AQB's changes. I am not concerned about having college courses or a degree as I know so many qualified individuals who would do good in this job, just couldn't afford college but their work history is very impressive without college.

6/8/2018 4:07 PM



One other item to consider is changing the trainee certificate issuing date and renewal date to be the time the license is actually issued. Depending on when your license is issued you can lose up to one year.

6/8/2018 3:06 PM



n/a

6/8/2018 3:02 PM



I like the idea of the same or higher work experience and course work requirements. I have never thought having a significant college degree should be a requirement.

6/8/2018 2:59 PM



I am happy these issues are being addressed.

6/8/2018 2:53 PM



Na

6/8/2018 2:28 PM



We need more appraisers in our profession. If there was some way to get newer appraisers to meet with appraisers that have significant experience it would really help out newer appraisers. Some sort of a mentor program perhaps which would help direct new appraisers.

6/8/2018 1:46 PM



Thank you

6/8/2018 1:38 PM



I still am on the fence regarding the change for certified residential.

6/8/2018 1:17 PM



There is no reason to reduce the amount of hours, time and experience that is required to obtain licensed or certified status. While I do not believe that a college degree is necessary, it is imperative that the requirements for experience in obtaining such a license remain in place.

6/8/2018 1:14 PM



In my experience, the shorter periods of time are sufficient for a qualified mentor to determine if a trainee is likely to be successful in the profession and advise them accordingly; for the trainee to determine if this is really the right career choice; and for a qualified diligent trainee to be competent. If they're not by this time, they're likely to be dismissed or leave for lack of earnings. As far as the degree requirement, the best appraisers I know do not have degrees. I've lost count of how many people I've spoken to who, like me, wanted to enter the profession after a career in a related industry that made them well prepared for entry into ours. Mature, stable, experienced individuals without degrees that could have entered the profession and seen success if not for that barrier. If the intent is to limit the number of new appraisers, stifle the profession and keep out potential quality appraisers, then the current standards should stand. If the intent is to adapt the requirements to our current economic and market conditions and keep our profession thriving, then the requirements put in place in reaction to an economic atmosphere that no longer exists should be rolled back. Thank you.

6/8/2018 1:09 PM



I believe the changes are necessary to maintain the appraisal industry.

6/8/2018 12:25 PM



I entered this industry to be able to successfully support my family. I am eight appraisals away from 1500 hours and have 3 classes remaining. Of course I want to see the standard lowered. I started thinking about being a certified appraiser in 2013 when I went back to school to complete my four-year degree. Since graduating, I have been training for 3.5 years!! I want to support my family and earn full compensation. At the moment, I can barely afford the fees and expenses required to continue to stay in the program. Becoming an appraiser will afford me the agency and financial stability to support myself and my children should my husband ever be killed in combat. I want to see the standards lowered. It's difficult enough trying to find an appraiser willing to take on a trainee. I was lucky, I actually get paid a small percentage for my work. Other appraisers I encountered wanted me to pay them for my work! No wonder very few people are willing to enter into appraising. It's difficult to enter in to, the requirements are stiff, and most people can't afford to live on pittance for a minimum of two years. I've known people who have had to quit training because they needed money to live. Keep in mind the appraisers that are wanting to maintain the current standard of 2,500 hours are people who 1) have been appraising for at least over 20 years 2) did not have to meet some of the current requirements when they first entered into the field, and 3) most of them are at retirement age and are not likely to retire anytime soon because appraising is not physically demanding work 4) these same appraisers balk at any kind of change and that explains why you have people still making adjustments for lot size at \$0.25 cents a square foot on properties less than an acre!

6/8/2018 12:06 PM



Reducing standards does NOT benefit promoting the public trust.

6/8/2018 11:52 AM



Raise fees and you would have all the appraisers you would need.

6/8/2018 11:44 AM



None

6/8/2018 11:42 AM



It appears another cycle has passed now the entire industry is pushing again for high values and less qualified appraisers. Do we have to experience another industry lending scandal to have everyone wake up again? It is amazing to me how quickly we all forget. Thanks Don

6/8/2018 11:41 AM



This is important to stay where it is, staying strong with requirements, the industry needs it. There is too much breakdown of our industry already.

6/8/2018 11:39 AM



The standards do not need to be lowered. Lenders need to be more willing to accept trainee work. If lenders would be more willing to accept trainee work it would provide incentive for appraisers to take on trainees, and it would also attract more people to the appraisal profession, as it would become financially viable for both supervisors and trainees.

6/8/2018 11:35 AM



I do not think that qualifications for becoming licensed appraisers should be contingent on having a degree. Simply having a degree does not make one person more qualified than someone else who may just have life experience (life experience can be of great value) especially if that experience has been in the real estate and home inspection field. The important thing, I believe, is hours spent as an apprentice and specified training on subject matters regarding real estate. Thank you.

6/8/2018 11:29 AM



Thank you for the opportunity to respond to the survey.

6/8/2018 11:17 AM



After gaining my appraisal trainee license I found it almost impossible to find a mentor for the General Certificate license. When I did find that mentor, I couldn't support myself and family off the minimum wage that Kidder Mathews offered. I tried to make it in the industry but my savings depleted after 6 months, hence I had to leave the appraisal field altogether. Too much time for Very little money will not advance the Appraisal industry.

6/8/2018 11:16 AM



The difference between a Licensed and Certified are nill as we both take the same classes, have the same training, do the same job. 27 years appraising experience and licensed since 2001. I am a better appraiser than 80% of the Certifies in my state.

6/8/2018 11:16 AM

Greatly appreciate the BOD's and DOL staff's time and attention to this important issue for the industry.
6/8/2018 11:11 AM

Thank you for providing the survey. Let us know the results of the survey, and then later, what DOL does regarding potential changes to qualifications.
6/8/2018 11:03 AM

Field experience is the most important part of becoming an appraiser. Do NOT reduce these requirements!
6/8/2018 11:02 AM

I'm not practicing anymore and didn't know there are levels of residential licensing.
6/8/2018 10:56 AM

As an Appraiser Trainee, I do think the education requirements are not right. I don't see the benefit of having a Bachelor's degree over an Associates for this profession since there is no degree that focuses on this profession. Having a Bachelor's degree will not necessarily make an appraiser any better than someone with an Associate's Degree. I think any Associates Degree should fulfill the requirement (not just finance or real estate related.) I also think that 1000 hours is too little to gather the necessary experience to become a good appraiser. 1500 should be the minimum. Thank you for your consideration.
6/8/2018 10:56 AM

I believe the State and AQB should: 1. Allow the current licensed appraisers grandfathered waiver of requirements for Certification. 2. Remove the 4 yr. degree requirement completely from Certification. In lieu of 4 or 2 year degree, increase education requirements to higher level classes & increase the current education requirements to possibly 500 clock hours. 3. Maintain the 2400/2 yr. trainee position for incoming prospective Certified Appraisers. This is a crucial time for our industry. There is a slowly growing population of soon to be retired certified appraiser and a small stable of eligible/new appraisers on the horizon.
6/8/2018 10:55 AM

It would be beneficial if lenders worked closer with appraisers/trainees so that trainees could go into more houses without the certified appraiser so that it would be easier to obtain the desired number of hours. If there is a way for the WA appraiser board to help bridge this gap and get more lenders to allow this then I think it would increase the number of certified appraisers willing to take on new trainees and help with the shortage.
6/8/2018 10:38 AM

As an appraiser trainee for over 2 years now as I am still working towards completing my degree I would say that I feel this line of work is primarily experience based. I have felt that investing not only my time and energy but also my money into completing my degree in something that is completely unrelated to my career has been quite discouraging and I am hoping that WA state will change the education requirements for future appraisers coming into the field.
6/8/2018 10:21 AM

I feel strongly that a certified appraisal license should only require 1500 hrs. at a minimum of 12 months. This is more than adequate for a trainee to become comfortable, professional and knowledgeable in this field.
6/8/2018 10:21 AM



I believe strongly in experience hours. My stepdad can been an appraiser in this state for over 45 years, and I think it would be doing any trainee a disservice if you cut the experience hours. Going out in the field with a knowledgeable appraiser time and time again is the best education in my opinion for this career path.

6/8/2018 10:18 AM



Having almost reached the current state licensing requirements, It seems unobtainable to shorten the Experience hours needed, but shortening the months required to obtain the hours needed would help. A 4 year college is costly and not necessary if one has a 2 year degree with course requirements for certified license appraisal.

6/8/2018 10:16 AM



I have trained over 10 residential appraiser trainees--with at least 1 appraisal per day, each trainee could be certified in 1 year. 2 years is not necessary! I have 2 trainees right now...and wish they could have been certified at 1 year--they were ready. It would also allow me to hire and train more trainees. Take it from a Certified Appraiser business owner who actually trains appraiser trainees...PLEASE ADOPT THESE CHANGES!! They are exactly what needs to happen. Please call to discuss if you want. 206-290-3241.

6/8/2018 10:15 AM



Thank you

6/8/2018 10:07 AM



From my 14 years' experience I don't think a bachelor's degree is necessary for CG, however I do agree with keeping the present hours, and timeframe, with the option to take the higher level math, and economics, statistics, and software such as spreadsheets, to have more tools available to help in determining correct market adjustments. I have found several MAI reports with some bad adjustments from people who have bachelor's degrees. I think some practical knowledge of construction is very helpful, along with some business understanding of the risks developers, and builders look at to determine feasibility.

6/8/2018 10:04 AM



In order to uphold the integrity of the profession, the lowering of standards is not a good idea.

6/8/2018 10:04 AM



The proposed changes for Cert Res will have an immediate impact in my office as I am starting with mentorship/training of my son.

6/8/2018 9:58 AM



Thank you for keeping us informed of the pending changes. Education and experience are key elements to maintaining the public trust in our industry.

6/8/2018 9:58 AM



They should definitely eliminate the college requirement, the most important think is experience hours and a good mentor.

6/8/2018 9:54 AM



Thanks

6/7/2018 10:55 AM



As a residential appraiser that primarily focuses on review assignments, I'm not convinced that lowering educational requirements and hours of experience improves our profession. I do realize there has been a recent need for appraisers to keep up with the volume of assignments in my region over the last few years, but this appears cyclical as markets generally are. Deficiencies in reporting needed to produce credible results shows itself through all levels of experience. It could be argued the current educational requirements aren't enough to develop the needed level of mastery for our profession. There is a problem to be solved with the number of appraisers needed for our profession, but again, lowering the educational requirements may not produce the best results.

6/7/2018 8:54 AM



Not everyone has the same opportunity for higher education right out of high school. Recognizing college level education efforts and accomplishments at all levels evens the playing field. Degree or no degree recognition of higher education accomplishments and class room credits improves the appeal for the appraisal industry as a whole. Some of the brightest appraisers I know have no college degree and have been limited in their ability to be certified as a result. The industry needs these individuals certified. By lowering the requirement and recognizing the accomplishments of those without degrees, the appraiser profession becomes more attractive to young men and woman looking to establish a career in real estate valuation.

6/7/2018 5:04 AM



None

6/6/2018 6:50 PM



MAINTAIN HIGH STANDARDS, BUT ALLOW MORE FLEXABILITY FOR TRAINEES TO WORK IN ORDER TO INCREASE THE NUMBER OF APPRAISERS

6/5/2018 11:01 AM



I have been going through the process of becoming a certified residential appraiser for the second time. Despite my 17 years of experience in another state. I was forced to start over here because I allowed my license to expire. It has been a grueling process as I live in an area where mostly all the appraisals are complex and sometimes takes 30 hours to complete an appraisal. I think it's extremely unfair to only allow 12 hours credit for a residential appraisal towards the experience hours in areas like ours in Port Townsend and other small communities on the peninsula. I think you should really rethink this issue.

6/5/2018 10:40 AM



Thanks

6/5/2018 9:52 AM



Thank you for considering these changes.

6/5/2018 9:46 AM



In my opinion, the most important aspect is to reduce the hours of experience needed on each level.

6/5/2018 9:07 AM



Besides trying to make it easier to become an appraiser you could focus on getting rid of the appraisers who write fraudulent appraisals

6/5/2018 8:14 AM



None

6/5/2018 8:09 AM



How are the Trainees getting their experience hours? I believe experience is the most important factor in doing this work. We should have designated training companies.

6/5/2018 7:48 AM



When I became certified, I had worked for 15 years as a real estate agent & Broker, 5 years property management experience, 5 years as an REO property disposal agent for FNMA and 2 years as an appraisal trainee. A person with a bachelor's degree in Asian Studies with a minor in the Chinese language would be eligible to train to become an appraiser and I would not. Please remove the requirement for a college degree to become a residential appraiser. This was an attempt by appraisers to limit the number of appraisers in order to drive appraisal fees up and has no bearing on the quality of the appraisers who gain certification.

6/5/2018 6:54 AM



I am in favor of Washington state adopting the new requirements and aligning with the new national standards. With appropriate mentorship and the ability to enrich one's knowledge through affiliation with peers, an appraiser continues to learn no matter how many years on the job.

6/5/2018 12:08 AM



Don't lower our professional standards or reduce current requirements. Our recognition as a "profession" depends on the education and experience to support it.

6/4/2018 11:54 PM



Based on my experience having a college degree prepares an individual to successfully complete the criteria to be an appraiser

6/4/2018 11:21 PM



I feel if you have any other real estate experience, such as broker, you should be able to waive some education or hours.

6/4/2018 10:11 PM



As a current trainee... I wouldn't wish this on my worst enemy. This entire process is a nightmare. Low pay, long hours. The more I get into it the more the actual profession seems incredibly volatile, continually changing with more demands and for some reason we are trying to add more appraisers? Workload per appraisal is the problem; less financial reward per work hour and more complexity opening us up for litigation are things needing to be addressed, not just adding more uneducated bodies to the profession.

6/4/2018 9:41 PM



Need to have a college "clinical" like Nebraska has for experience

6/4/2018 8:24 PM



None

6/4/2018 7:35 PM



Thank you for all your efforts!

6/4/2018 7:24 PM



While the current standards for Licensed & Certified Residential Appraiser and, Certified General Appraiser in WA St are well developed and not onerous, in view of the need for younger appraisers to replace those of us who have retired or, plan to retire in the not too distant future, it may be useful to provide viable alternative approaches to upgrading from licensed to certified residential status. Some of the avenues suggested in Question 3 above, could be adopted to provide reasonable alternatives to allow an experienced, licensed appraiser to become certified. The current minimum standards provide a good, basic education necessary to result in accurate development and reporting and, are necessary to maintain and promote the development of the appraisal profession.

6/4/2018 7:21 PM



I have worked 5 years, most of the time without pay, to get from trainee status to being finally able to take the Appraisal Exam. And, more than 1/2 of the study material to prepare for it covers commercial rather than residential appraisal issues. I just pray I pass.

6/4/2018 7:01 PM



n/a

6/4/2018 5:37 PM



Even though I have taken all the Certified General Classes, I would like to wave having to have a B/A degree because of my over 6000 hours of Being a State Certified Appraiser which up until about 3 to 4 years ago I could have obtained with an Associate's Degree. I was in and out of the Hospital with Cancer and so I missed the new cut off requirements that I now have to have a B.A. Degree. I would appreciate it if the State Board would look at a case by case decision. I also have been a Real Estate Broker for over 44 Years and been involved in Subdivision Development, General Contractor Plus involved in Helping over 125 people into Rural (USDA) housing in the NE Washington Area. Thanks for Your time ---Brian Fuller

6/4/2018 5:26 PM



I believe that requiring a four year degree brings the appraisal profession to an equality with other professional areas such as accounting. Many of us work with attorneys and accountants and testify in legal matters. Being on an equal footing with other professions is required in my opinion.

6/4/2018 4:16 PM



n/a

6/4/2018 4:12 PM



I specialize in review appraising, and I have noticed that even with the highest level of educational requirements and experience training, far too many appraisers are not very articulate or competent in their report writing and analyses. Limiting the hours of education and training, in my opinion, will only impact the industry in an adverse way with a less professional quality product. I realize that it is very difficult to join the appraisal profession these days; however, I do not believe we should sacrifice quality for quantity.

6/4/2018 4:11 PM



My only concern is that if many of the states adopt the reduced standards proposed by AQB, Washington appraisers my have problems getting reciprocal licenses or if moving to another state. College degree requirements never should have been adopted.

6/4/2018 4:00 PM



To be within the national accepted guidelines and not have problems is accepting and applying for licensing in other states, it would be better to consistent from state to state

6/4/2018 3:50 PM



I believe the State of Washington should allow trainee experience hours for work done outside the state of Washington, as long as the supervisor and trainee are registered in the state of Washington and comply with any federal requirements. Federal law does not require appraisers to be licensed in each state that they are assigned work in. There are required only to maintain a license in one state.

6/4/2018 3:34 PM



I feel that by lowering the standards to become an appraiser, the quality of work will be jeopardized. I found that it takes extensive experience to be proficient in this profession. I do not believe that a shorter time period of training can acquire this needed experience. I feel that a degree is a must in this profession along with extensive training. If we want to be the best, we need to have the best, and lowering the standards will not produce the best appraisers.

6/4/2018 3:13 PM



I do not think it is wise to lessen standards. We already have too many appraisers out there that don't know what they are doing!

6/4/2018 3:12 PM



My trainee had to take a pizza delivery job to make ends meet between appraisals that I could give him. The degree of time required to become an appraiser. Has become ridiculous.

6/4/2018 3:11 PM



Reducing education requirements should not be considered.

6/4/2018 3:09 PM



Thanks

6/4/2018 2:43 PM



I think a college degree is ridiculous - especially since it could be in anything.

6/4/2018 2:37 PM



Any reduction in qualifying standards will diminish and weaken the quality of appraisal work product. It will result in over supply of appraisers and reducing what is already a low rate of compensation. Do not water down the profession with lesser qualified individuals. Negative consequences for both the appraiser and the client. Lower fees to appraisers and lower quality work to client.

6/4/2018 2:32 PM



I believe that reducing the requirements to become an appraiser reduces the public's confidence in the position.

6/4/2018 2:23 PM



There is not a shortage of appraiser's in this state and no need to change the standards. I think the colleges, university and WSDOL should advertise the profession and a means to self-support, but don't lower the standards.

6/4/2018 2:14 PM



There are practicing MAIs in the field without a 4-year college degree. It is arbitrary, and economically and otherwise prejudicial to require a 4-year degree as a Certified General requirement, in my opinion. Don't be elitists.

6/4/2018 2:08 PM



Reducing the requirements will allow for more entrants into the profession which is needed. A college degree does not ensure any level of competence in appraising real estate.

6/4/2018 2:07 PM



As a trainee, speaking from my own experience I don't feel a 12 month apprentice ship is enough time to learn what you need to know in order to be a Certified appraiser in Rural Lewis County. I feel the new suggested work experience hours are a great idea for appraisers working in more suburban areas where the homes are more similar and the properties are smaller. Even if the law changes I feel 2 years is the proper amount of time I would need in order to feel confident in my work in this area... I also feel a two year college degree is sufficient to become a Licensed Appraiser however a Bachelor's degree is still a good requirement to become a Certified Appraiser. People who obtain Bachelor's degrees show a higher level of commitment to improving their knowledge, and experience. If it were easy to get a bachelor's degree everyone would be doing it. I feel having a bachelor's degree has set me apart from my peers by means of the way I communicate, write, and use critical thinking skills to solve problems; all extremely important skills to have when writing appraisals. With that being said however, I don't feel the schooling requirements are the big issue here but rather finding senior appraisers to take on trainees for 2 years... I can understand the responsibility, liability, and time put in with new trainees, that this is a big commitment for any working appraiser. I feel lowering the training period would take the pressure off of supervisor appraisers, however I don't feel 1 year is enough time to learn appraising in rural areas. I do feel it would possibly help bring more people into the field, "maybe".... Still, this requires the commitment of appraisers already practicing to take on trainees. I feel a better solution to this issue would be requiring new appraisers to take on at least one trainee during the time they are licensed.

6/4/2018 2:07 PM



None

6/4/2018 1:43 PM



I've been a trainee for 2.5 years. It has been a struggle to get enough hours in order to be eligible to take the exam. Especially in the beginning when each appraisal takes much longer yet only getting credit for a fraction of the time spent. Financially it has been difficult as well and there have been a few people I know that are discouraged to even start the process because of the anticipated financial hardship. Also, there appears to be less of an incentive for appraiser mentors as it financially doesn't always make sense. I feel lucky and appreciative to have found someone to mentor me, as a few friends of mine have not had such luck and quickly gave up on becoming an appraiser.

6/4/2018 1:42 PM



I think the hours and years could be reduced across the board. However, the suggestions made by the AQB go too far. 24 months should be required for both res and general, and I think 18 is good for license. If you think of our profession as a union, apprenticeships are usually 2 -3 years before being granted a journeyman's status. State licensing should follow a similar model, at a minimum.

6/4/2018 1:42 PM



The education is certainly a good thing, however some of the things you run into in the field cannot be taught. It takes a good five years of time and grade to start maturing as an appraiser. After near 25 years I still run into things that have not been dealt with before. I do believe that an appraiser with over ten years' experience should be able to challenge the Certified test, as they will generally have adequate education and certainly enough experience.

6/4/2018 1:40 PM



I believe the state should go back to obtaining a 2 year associates degree and pas the exam to become certified residential.

6/4/2018 1:37 PM



Barriers to entry into the RE Appraisal profession is reducing the number of licensed professionals as existing licensees appear to be retiring, or on the verge of retiring in next 5-years, decreasing the pool of General Certified Appraisers faster than licensing of new GC appraisers (net reduction in licensees for the foreseeable future). Attracting trainees for General Certified path is difficult due to low earnings during training period. It would be very helpful to allow new researchers one-year to obtain General Trainee license which should encourage employers to pay for Principals, Procedures and 2-day USPAP curriculum (I'm unaware of any office that will pay for 3-course Trainee package due to 25% retention ratio for new hires. This change will not solve the developing labor shortage, but it should encourage recruitment of researchers into the profession (after completing a 4-year degree, the 3 qualifying courses cost a trainee about \$1,000 before they know if real estate appraisal "speaks to them").

6/4/2018 1:33 PM



As a recently certified appraiser, I became certified in May of 2017, I strongly believe the current requirements are what we need to maintain. It took me almost 4 years to accumulate the 2500 hours and during that time I learned so much. We see so many types of properties and situations that a trainee wouldn't be able to in a shorter period. I believe we need to uphold higher standards than just the minimal requirements. It also helps evaluate the candidates who are willing to go the distance and do the work. Thank you.

6/4/2018 1:31 PM



I believe in the high standard that was set previously by the AQB, and that the decrease in educational requirements will decrease the quality of individuals entering the appraisal profession, and also reducing the quality of appraisal work. We're already under threat in our profession from the AVM's which are being used for many loans now. Decreasing the quality of appraisers and increasing the pool of appraisers greatly will most likely have negative consequences to those already appraising and negative consequences to the public by way of lower quality appraisals on average. If there is an appraiser shortage, which I don't feel is the case, the better solution would be to promote the profession more at colleges and high schools, as well as possible incentive programs for certified appraisers to take on apprentices, such as tax credits or other such programs. The amount of experience being proposed will not produce quality appraisers, plain and simple.

6/4/2018 1:31 PM



At times, there has been a shortage of available appraisers. It appears that the standards are being lowered to reduce this shortage. However, I do not know of any other profession which lowers their standards to increase the supply of available professionals. Based on the appraisals I see every day, the standards need to be raised, not lowered. Maintaining or increasing standards may encourage lenders/FNMA/FHA to provide the needed training to future appraisers.

6/4/2018 1:31 PM



The class hours and the experience hours should not be changed in my opinion. The education regarding a BA or BS for the certified residential could be relaxed to the prior requirements which were in place prior 2008.

6/4/2018 1:26 PM



I think the current requirements are appropriate.

6/4/2018 1:24 PM



My last trainee had three university degrees, and never did figure out how to measure a simple house. She just couldn't do it and quit.

6/4/2018 1:24 PM



None

6/4/2018 1:22 PM



There is a shortage of Residential Appraisers and new people are needed. I would welcome smart & capable people into the industry that have integrity.

6/4/2018 1:19 PM



I think that Washington's current standards set a high bar for appraisers within the state. I understand that the AQB is considering the lack of appraisers, however, we are still professionals with a goal of maintaining the public's trust. I believe that we will lose that should the standards be lowered.

6/4/2018 1:18 PM



Let's not water down these requirements.

6/4/2018 1:17 PM



Good coverage of the topics. The Washington State DOL should adopt the rules per the above comments.

6/2/2018 5:18 PM



I have worked in an appraisal office for almost two years. There is no way that I could obtain all the info necessary to be a competent appraiser in one year. This is a very specific field and requires the best of the best, if the field allows for less college and less training, the field will be saturated with incompetent appraisers.

6/1/2018 1:39 PM



Thankyou

6/1/2018 10:59 AM



The time for experience could be reduced by offering alternative simulated course content to give a trainee exposure to multiple types of property covered by their level of license/certification.

6/1/2018 10:42 AM



Education and experience are invaluable. Our profession must maintain these standards to credible reports and to protect the public.

6/1/2018 10:00 AM



In regard to question 3, I have been a licensed appraiser for many years and feel that I should be able to become certified based on my years of experience. I can't pick any of the choices you offer there since they all require college education. This is a job you learn "on the job" not in college. I did go to college but don't have the right combination of courses to meet these requirements. Because of this, although I am FULLY competent as an appraiser and SHOULD be certified, I can't be. The things we need to know as appraisers aren't taught in college, they're taught through experience and nothing can replace that.

6/1/2018 7:16 AM



Reducing the educational requirements will make it easier for unscrupulous individuals to enter the appraisal field. Not that having an AA or BA is an assurance of ethical conduct, but while relaxed educational standards may fulfill the appraiser demand in the short term they may diminish the profession and public trust over the long term.

6/1/2018 6:43 AM



Residential Certified should have a 2 year degree, not 4 year degree. Field of study should be related to Appraisal Industry.

6/1/2018 6:37 AM



Lowering standards is an overreaction to a supposed appraiser shortage. If there ever was one, it resolved itself.

6/1/2018 6:20 AM



I think for the profession, the high standards should stay were there at.

6/1/2018 6:18 AM



None

5/31/2018 8:26 PM



For Certified Residential- I think a drop from 2,500 hours to 1,500 is too drastic, but I would be ok with 2,000 in 18 months...

5/31/2018 8:00 PM



Appraisers typically have been self-taught or family-taught; this needs to change. Requirements to be an appraiser does not need to be changed; pay does if lender work is to be a staple.

5/31/2018 7:03 PM



In my opinion, commercial appraisals are vastly more extensive and warrant a college degree as prerequisite to be eligible to perform. Where residential appraising does not require the additional prerequisite. Specific college courses geared around appraisal needs could be helpful prior to certified levels. Where the 2500 hrs. should be removed and replaced with 2.5 to 3 yrs. of consistent experience in lieu of inclusion of 2500 hrs.
5/31/2018 4:40 PM



I have been a trainee appraiser for just over two years. Every day is a new learning experience and I love the challenges this profession offers. Even today I come across things that are new, which I haven't dealt with before. Because of that I believe the experience requirement should remain unchanged. I logged over 2,300 hours my first year as a trainee and there were still many facets I was uncomfortable with. Even now, after two years, I feel like I am just now hitting my stride. As for the education requirement, I don't believe my degree has helped me with this career. Sure I have benefited math courses, but I didn't need a bachelor's degree to prepare me for this. A degree cannot give you the education you get from the field and from working with other appraisers. I believe the new guidelines the AQB has adopted for education requirements are more than enough and I hope the state adopts them as well. As for the experience I hope the state elects to keep the existing requirements in place.
5/31/2018 4:34 PM



I know of no other professional organization that is "lowering their standards" and feel these proposals are very detrimental to our industry. We should be striving for higher levels of competency and professionalism as do all other licensed professionals. This is all an overreaction to a perceived shortage of appraisers. We have just been through a bull market in the appraisal field, stimulated by the Fed's Quantitative Easing which drove down interest rates to record levels and created more work that appraisers could handle. That time has passed and we are entering a bear market period of rising interest rates which is already greatly reducing the demand for appraisal services. This, coupled with lenders now using artificial intelligence models will have a significant negative affect on our industry. Add to that a new influx of appraisers and you will see an industry in dire straits. These changes are unnecessary especially given that the market itself will solve any perceived shortage of appraisers. Less education and less experience is not the answer. Stand up for our profession and retain current standards!
5/31/2018 4:27 PM



Appraisers already get too little respect for their training, experience and abilities....lowering those standards isn't aimed at helping appraisers.
5/31/2018 4:12 PM



We have to increase the number of appraisers, but not by dumbing down the requirements.
5/31/2018 4:02 PM



I was certified in 2013 and started my internship under an appraiser in the fall of 2009. Even after all of the hours I put in training, I still had a lot of learning to do. I can't imagine going out on my own in half the time and would be very concerned for any new appraisers that are allowed to do so.
5/31/2018 4:02 PM



Thanks
5/31/2018 3:16 PM



Good job
5/31/2018 3:01 PM



The post high school education is critical in developing an appraisal report from the basic writing to developing adjustments from the market using regression, extraction and other methods.

5/31/2018 2:48 PM



Appraising pays well, but not great. If you lower the bar too much the supply of appraisers may increase beyond the point of financial incentives. In other words, too many appraisers mean lower fees; thus, dissuading the creation of new appraiser in competitive jobs market. It is best to keep standards high enough to equal good pay, but not so high as to limit applicants.

5/31/2018 2:46 PM



New regulations should be equal to, or more demanding for the appraiser. Appraisal of real estate demands substantial education and experience if the "appraisal process" and USPAP is closely followed. Lowering educational and experience standards for licensure reduces the relevance of the appraisal profession, and reduces the value of the appraisal work to our clients.

5/31/2018 2:29 PM



I believe the state should maintain the current standards to maintain a high level of integrity for the profession. Slashing licensing standards sends a wrong message and is not at all fair to those who have sacrificed the time and effort to reach a level of licensing under the current standards. We don't want to walk backwards but move forward with qualified appraisers under the current standards.

5/31/2018 2:06 PM



Aside from required appraisal courses; there is NOTHING better than a mentor who takes his or her time to train someone. The training appraiser is responsible for the trainee's education and their ability to appraise. Formal schooling is "wonderful". However, the Licensed or Certified Appraiser will still ultimately be the only person to decide if a trainee has the ability to become an appraiser. They will have a significant investment of their time to ensure the trainees' ability. Trainees who cannot perform or grasp the principles of appraising will be cut by the training appraiser. Of course at the end of their time in the field, and a certified recommendation by the mentoring appraiser: the trainee will still need to pass the State's test(s). This in my opinion "should be" the only bench mark to make a trainee an appraiser. One can have a degree in liberal arts or in business; but that "sheep skin" means nothing if they cannot demonstrate to the Training Appraiser their ability to understand the appraisal process. The Training appraiser has a significant investment of time and their credibility as an appraiser is on the line. I believe this is where the focus should be. Someone can be book smart and still be a box of rocks.

5/31/2018 1:19 PM



Reduce license requirements but maintain certified requirements (mostly).

5/31/2018 1:15 PM



Lowering the requirements invites unqualified individuals into the industry, with little or no experience.

5/31/2018 1:12 PM



I think the proposed minimum training is inadequate.

5/31/2018 1:08 PM



I hope the State can make to right decision to reduce college education for licensed appraisers and put these changes into effect immediately. These past changes have drastically impacted my career.

5/31/2018 1:02 PM



As a trainee appraiser, it seems that the amount of time to finish my bachelors, the appraisal course hours and my experience hours all once is very extensive. I am determined to become an appraiser and I will achieve that but I do believe that the new AQB requirements are more manageable.

5/31/2018 12:53 PM



1,000 hours of on the job training is not enough. I also do not think 30 credit hours of college is enough either. That is only 2 quarters. You are drastically lowering the standards that you put me through having been recently certified. I think an AA should be a minimum.

5/31/2018 12:45 PM



I'm surprised there isn't a compromise for the certified residential appraisal requirements. 2,000hrs over 18months, perhaps.

5/31/2018 12:44 PM



Although appraising does require analytical skills and a certain amount of knowledge and such, it is not a profession that requires a college degree. There are plenty of people out there that have degrees that would have no business being an appraiser. It is NOT rocket science. The key is to finding good mentors. That is who should have to be qualified.

5/31/2018 12:42 PM



The amount of experience is critically important. I would have had no business signing reports without a supervisor at 30 months. 18 months is just asking for problems. If the intent is to increase the number of appraisers then a better response is to increase the fees so shops will hire more trainees. I am a commercial appraiser and know very little about residential appraising or appraisers. I might not be the best person to ask about residential issues. My perception is that the field was decimated by the great recession and has not recovered.

5/31/2018 12:41 PM



We need to stick with higher standards, why drop them because of financial/political pressure? I worked hard for my certification and took years to gain the knowledge of where I am at. Allowing lower educated appraisers in the industry will cause a black hole of lower fees, you will see the more seasoned appraisers leave once again. Stop the cycle!! Thank you, Sam Berg, CRA

5/31/2018 12:36 PM



I believe the hours of experience is very important, please don't reduce the number of hours of experience.

5/31/2018 12:32 PM



Standardization should be implemented the same throughout the country. Why should each state have their own when are under the same federal scrutiny.

5/31/2018 12:30 PM



I am a Certified General Appraiser and hold a GAA designation.

5/31/2018 12:28 PM



Due to the varying types and complexities of residential properties a longer period as a trainee is beneficial to consumers and lenders.

5/31/2018 12:20 PM



I feel the current requirements help insure a higher degree of expertise in the appraisal field.

5/31/2018 11:58 AM



1. It is a serious mistake to loosen the qualifications to become a real estate appraiser: the appraiser is the only unbiased party involved in a real estate finance transaction. 2. Any apparent tightening of appraiser services since 2008 is the direct result of middlemen (appraisal management companies) secretly withholding an inappropriate portion of the appraiser's fee. The solution to this problem is not to loosen standards but to require transparent separation of the AMC fee from the appraisal fee.

5/31/2018 11:40 AM



This is basic licensing. Appraisers complained that licensing killed the value of designations. It is like a driver's license. When you pass the written test and the driving test, you are not a perfect driver, but are allowed to legally drive. The same should be held here. Just because you have an appraiser credential doesn't mean you are the best. If you want to excel and become better, great..join an organization and get a designation that requires more practical experience, more rigorous testing, and a demonstration report...to show that you know how to do this. At the basic state credentialing level, leave it basic so that more can join the profession. Let appraisers then choose to better themselves with more advanced education and requirements if they want to obtain a designation.

5/31/2018 11:38 AM



No additional comments.

5/31/2018 11:36 AM



I attended the Issaquah hearing and was pleased to see the commissioners paying close attention to the comments being made, and asking detailed follow up questions. Thanks to ACOW for working on this.

5/31/2018 11:36 AM



We need to get more qualified appraisers into the profession. The college requirement seems like the biggest obstacle. I really think the appraisal education and experience needs to stay the same or similar since it is really needed to do a good job. I don't think we can mint a good appraiser in 6 or 12 months.

5/31/2018 11:35 AM



I think that lowering the education standards weakens our profession in general. Imagine if suddenly in order to be a CPA, you did not need a college degree. I think the key is more outreach to potential appraisers.

5/31/2018 11:33 AM



The ability for the appraisal profession as we know it to survive is dependent on these changes being adopted. Otherwise there will not be enough appraisers to handle the workload and lenders will move on without us.

5/31/2018 11:31 AM



None

5/31/2018 11:27 AM



New education standards are fine. Experience standards need to be longer than stipulated by the AQB as stated in my responses.

5/31/2018 11:25 AM



It's imperative that Washington State maintains the current experience requirements (hours) to ensure the professional integrity of the appraisal industry (public trust). Experience. Is. Everything.

5/31/2018 11:16 AM



I have thought about this for over a year now. The experience hours being set to 2,500 hours in two years for Certified eligibility is a bit excessive, in my opinion. That promotes quantity over quality, which I am sure was not the intention of the AQB.

5/31/2018 11:13 AM



Loosening standards for any industry, especially something as critical as lending, poises many risks. The real estate market has booms and busts...right now there is a shortage of appraisers, but that won't last forever. Lowering the standards will flood the industry with inexperience and costly mistakes to many parties. Both directly and indirectly.

5/31/2018 11:10 AM



Trainers should have to have additional requirements/certification for teaching....so trainees have the proper education on supporting adjustments and gathering data. Many current appraisers are still not supporting adjustments properly..... Or making proper adjustments.

5/31/2018 11:08 AM



The licensed appraiser should need to document licensed experience and have a minimal hour's threshold to accomplish before certification, not just 5 years held. At least 2 Lender/client references should be provided by the appraiser to the State, the State should reference these for appraisal quality and professionalism before a certification is issued. The industry suffers from a number of non-professional bad actors.

5/31/2018 11:08 AM



I have trained one Certified RA.

5/31/2018 11:07 AM



The AQB changes are reflective of why so many people who are interested in getting into this field, see a RED FLAG for the time frame to complete the previous requirements. Those in training, often in smaller communities, receive little compensation for their work. I do, however, believe the educational requirements for the certified residential should remain at a college level degree, as one obtains a holistic view across many disciplines, along with the development of critical thinking skills. To protect our economy, banking systems, etc., I question the validity of even having a "licensed appraiser" doing any sort of appraisal work.

5/31/2018 11:06 AM



The residential appraisal business is on the verge of collapse and replacement. The number of residential appraisers after 2025 will be a fraction of the current number. Making barriers to entry lower will not be a relevant problem.

5/31/2018 10:57 AM



For the sake of our profession I believe the qualifications should be lowered. There are too few people entering to fill the future needs.

5/31/2018 10:54 AM



Throughout my year and a half of training so far, experience has been the most relevant to my development as an appraiser. I also think that college education is important and that to be a Licensed Appraiser you should have the 30 college hours of related courses and an Associate's degree to become a Certified Appraiser. Thank you for your consideration.

5/31/2018 10:41 AM



1. Eliminate the licensed level altogether. 2. An associate degree is acceptable in any field. 3. Any additional classes for math, science, business can be part of the additional clock hours required. 4. Require a 4 hour course as part of the additional courses entitled: Washington Appraisal Law and You. 4. 2000 hours over minimum of 18 months 5. standardize the experience log to allow for cover letter outlining USPAP compliance and then in the log summarize the individual experience and tasks taken to complete the assignment

5/31/2018 10:36 AM



I feel the state should follow the new AQB recommendations for Educational Requirements in an effort to facilitate the recruitment of Appraiser Trainees. The new AQB changes would aid to cure the deficiency of Appraiser trainees by making this career available to more qualified candidates.

5/31/2018 10:36 AM



None

5/31/2018 10:35 AM



We definitely need more appraisers. I believe the requirements were too great and people weren't interested in getting into the profession. I think the new proposed requirements will help attract more people to the profession. In my opinion, if we don't attract more appraisers lenders will find a way to do without an appraisal.

5/31/2018 10:33 AM



I believe a License holder should have at minimum a 2 yr. degree which mirrors the Certified program. I also think they should phase out the Licensee.

5/31/2018 10:29 AM



Education and Experience helps in any profession

5/31/2018 10:27 AM



I am a General Certified real estate appraiser and know that not only does it take work hours, but a wide array of experience in varied property types to have the required knowledge base to competently appraise complex real property. Reducing the timeframe to 18 month to obtain the State Certified General license is not an adequate amount of time, even if the hour requirements are not changed. The Certified General allows for the appraisal of essentially any type of real property in Washington State. Watering down the requirement to 18 months would do a disservice to our industry and, frankly, would result in too many inexperienced appraisers. The public, for the most part, may not understand that simply having the Certified General license does not make for an experienced, well-rounded appraiser. I respectfully recommend that the 30-month requirement for obtaining the Certified General license be maintained.

5/31/2018 10:23 AM



The 4-yr degree requirement for commercial appraisers has been detrimental. As an employer of trainees, we are unable to match the salaries being offered to new college graduates. I (personally) would like to see a 2-yr degree requirement, with trainee-required courses offered at community colleges. Unless we are able to attract younger men and women to this profession, it will gradually wither away and be replaced by the "broker opinion of value" with none of the safeguards of USPAP. ACOW wants to maintain a small club. Within my office, two of four appraisers will retire within the next five years, and I will retire within the next ten years. We have not been able to attract any trainees to replace these losses.

5/31/2018 10:21 AM



Glad to see more reasonable standards being implemented

5/31/2018 10:20 AM



The integrity of the Appraisal Profession depends on qualified appraisers. Lowering requirements is absolutely the wrong move and will have widespread dire consequences. Realistically, it takes any individual at least 5 years of field experience and exposure to the many complexities of differing properties to become proficient. It is my opinion that there is absolutely no way the AQB's significantly lowered requirements for appraisal licensing and certification are even close to realistic. Please do not change the current requirements in Washington State.

5/31/2018 10:16 AM



Experience is by far the most important feature of the trainee process. The formal education and appraisal education is less important. Do not change the experience requirements. The best question to ask is how to incentive a supervisory appraiser to take on a trainee.

5/31/2018 10:13 AM



There is not a shortage of appraisers and no need to lower the credentials for appraisers entering into the field. The 2008 AQB qualification establishes a solid scope of education and level of discipline from an Appraiser and the quality of work that is expected. Lowering the qualifications again would be inviting a substandard of the quality that is expected of today's Appraiser. Again there is not a shortage of Appraiser in the state is WA so flooding the field in greenhorns is going to lower the fee and quality of a livelihood for any Appraiser in this or any other state. Finally, with more deregulation that is taking place in the real estate and commercial industries, let us as Appraiser be united in a front to keep the standard high, work quality high and livelihoods high.

5/31/2018 10:13 AM



There is no need to rush to bring additional appraisers into the profession. I have tried mentoring two apprentices, neither completed the requirements, and it was not due to the standards currently in place. They were drawn to the financial reward and then found out that the profession was challenging, they chose another path. Reducing requirements and standards is the wrong direction, as it takes time to be proficient in the field.

5/31/2018 10:08 AM



The most important portion of learning comes from the experience of doing the job. An unrelated degree, no matter its prestige, isn't a good indicator of a person's ability to be a quality appraiser.

5/31/2018 10:06 AM



Nothing at this time

5/31/2018 10:06 AM



It is my opinion, that there should be an additional item that has not been mentioned. I believe that a Registered appraiser must be Licensed for a minimum of 12 months prior to being qualified to obtain a Certified License. This would help in gaining experience that cannot be obtained through supervision alone, but that the person would gain by signing his own reports and being limited to the type of assignments that could be accepted.

5/31/2018 10:03 AM



I am currently a Trainee, and taking my classes to become a Certified Appraiser. I am hopeful that our training hours will shift from the 2,500 required to the 1,500 that the AQB has shifted to.

5/31/2018 10:01 AM



Would be nice to have a trainee.

5/31/2018 10:00 AM



As an appraiser of over 30 years and having trained appraisers it is my opinion that experience in the field is a far better teacher than a 4 year degree in ancient history. Swing the pendulum back to the middle and allow more appraisers into the field. Who in their right mind would go to college for 4 years and go to work for under \$30,000 to start and still have student loans to pay? Doesn't sound too appealing to me.

5/31/2018 10:00 AM



Reducing education and experience requirements is a short sighted solution which will undoubtedly have detrimental effects on the quality and credibility of the profession as a whole. Either an appraiser is a respected and qualified industry professional (supported by current standards) or a glorified form filler (direction of proposed standards). If there is a shortage of appraisers there are reasons for that (fees not reflecting significantly increased time/work required per assignment, fees not keeping up with inflation in many areas, 3+ levels of review by often unqualified people, extreme scope creep, harassment AMCs, agents, LO's, etc., etc.) and it would be better to address those issues rather than lower the standards to enter the profession. We should be focusing on elevating the profession by attracting better candidates, not trying to get as many appraisers as possible as quick as possible to reduce turn times. The older generation of appraisers will be retiring soon, it's important to consider who will be replacing them with and what is best for the future of the profession.

5/31/2018 10:00 AM



We do not need to flood the market with appraisers driving fees down to the bottom feeder level

5/31/2018 10:00 AM



These proposals would return the appraisal profession to the days leading up to previous 2 bailouts. They're even less stringent than 28 years ago!!!

5/31/2018 9:58 AM



Given that reason for having the DOL regulate appraisers is to protect the public it is important that DOL does NOT reduce the requirements to become a Licensed or Certified Appraiser, particularly given the massive appreciation we have had since the 2008 market crash. The market will crash (i.e. have another large "adjustment") and it would not be prudent for DOL to reduce the requirements just before that takes place (it's coming soon). If anything DOL should be looking to increase and/or further perfect the requirements for appraisers so that the public can be best protected. DOL should remember, the taxpayers will likely again bail out the lenders, but who is going to bail out the taxpayer / homeowners?

5/31/2018 9:55 AM



There are no current professions that exist that benefit from less experience and education. Appraising is a difficult and sometimes thankless job. We are often the last line of defense for people who are not educated in the process. Many times, we are the only party in the transaction without a vested interest in the results. Employees at banks tend to get more money and hours based on the number of transactions performed. Agents get a higher percentage if the subject sells for more money. We come into the transaction as the only party with "clean hands" and our job is to give a fair and honest evaluation. I have been doing this job for over ten years and still learn something new every single day. Even after I was certified I stayed on with my shop another six years to make sure I would feel comfortable with the difficult decisions we face every day. The requirements of a college degree and two year apprenticeship bring legitimacy to the industry. I strongly urge you to reconsider and retain the time and education requirements as they currently stand.

5/31/2018 9:53 AM



We need more appraisers! It's very hard to convince anyone that the time and effort is worth it right now. I'm hoping lowering the minimum requirements will help.

5/31/2018 9:52 AM



The current General standards were to enhance public protection and financial stability; are we now abandoning that goal?

5/31/2018 9:51 AM



I think it is important to have that education requirement regarding obtaining a bachelor's degree for licensed or certified residential appraisers. But I think it's fair that a licensed residential appraiser who doesn't have the education requirement should be allowed to apply or obtain a certified residential appraiser license after five years with a clean record.

5/31/2018 9:49 AM



Due to some lenders requiring inspections to be done by licensed or certified appraisers, nearly no one is taking on trainees in the state of Washington. I know 3 people that have been looking for over 6 months for a mentor. Also due to reciprocity 8 out 10 new license appraisers are from neighboring states that have already adopted the new AQB standards have made it a moot point. A number that really hit home was that in 2008 or 9 Washington state had over 1100 people apply for trainee license and in 2016 it was only 55. If we can't change the way it's going on the lenders end we have to make changes on our end.

5/31/2018 9:47 AM



The proposed changes are a slap in the face to the appraisers like myself that had to meet the current standards. It took me nearly 7 years to get certified. Wasn't the purpose to create better appraisals and appraisers?? This is only devalues the profession. Only profession in the history of professions to lower the standards. This will bring a slew of unqualified appraisers. I am appalled

5/31/2018 9:45 AM



Great job putting this together!

5/31/2018 9:45 AM



In my opinion, requiring a bachelor's degree and heavy appraiser training will not only help to insure that appraisal work continue to be done competently, but will also help to retain public trust. Washington state continues to grow; appraising is challenging and it is important for incoming appraisers to acquire all of the experience needed to analyze and interpret our developing state.

5/31/2018 9:43 AM

☐
Continue to emphasize education focus on English composition-writing and relevant math courses.
5/31/2018 9:43 AM

☐
For the certified general, what's the point of an additional year, if you can achieve the qualifying hours in 18 months? The extra year will limit qualified individuals from entering the field, and or see them move to states that did adopt the AQB standards.
5/31/2018 9:43 AM

☐
I know this is not what can change at the moment. But I believe the educational requirements for general certified appraisers is out of date and a disservice to the field. If the Institute requires 300 hours of classwork, and charges the premium that it does, that classwork needs to be relevant, not ten years out of date as most of it is. The educational requirements need to change, not the time frame of experience.
5/31/2018 9:43 AM

☐
I believe lowering the requirements will damage the profession by allowing people with insufficient training to enter the field as professionals.
5/31/2018 9:42 AM

☐
Reduce the number of appraisal licenses to two. Certified Residential and Certified General. Require a Bachelor for both. Keep experience hours at 3000 for both. 2 year minimum to sit for the exam.
5/31/2018 9:41 AM

☐
Lowering the education and or required hours of supervision would further degrade the industry.
5/31/2018 9:40 AM

☐
Thank you for sending this
5/31/2018 9:39 AM

☐
We are entering the tail of a long commercial real estate cycle. Now is not the time to lower standards for appraisal. If anything, we need better trained appraisals and reviewers to safeguard against the loosening of lending standards.
5/31/2018 9:38 AM

☐
It has to change. The industry needs young energetic minds to keep up with the rapid changes that are happening and going to happen.
5/31/2018 9:37 AM

☐
I do not see what difference it makes if the banks won't allow trainees to do inspections. Nobody wants to take on a trainee. Too much liability. If the trainee can start assuming some responsibility for the signature that might make it more attractive to have a trainee.
5/31/2018 9:37 AM

☐
The new experience qualification criteria is the only area that I believe should not be implemented. In 1998 the criteria was raised for certified residential to 2,500 hours from 2,000 and for certified general to 3,000 hours from 2,000. It is my experience as an appraiser and as a supervisor of a trainee that the newly proposed 1,500 hours and a year is not sufficient to produce an adequately trained certified appraiser.
5/31/2018 9:35 AM



:)
5/31/2018 9:35 AM

END OF COMMENTS