Burrell, Jeffrey B <jeffrey.b.burrell@wv.gov>

Requirements for Licensure and Certification (190-02)

Francesca Tracy <francesca.tracy@theceshop.com> Wed, Jun 24, 2026 at 5:40 PM
To: "Burrell, Jeffrey B" <jeffrey.b.burrell@wv.gov>

Hi Jeff,

I hope you're doing well! I wanted to reach out about the rule change proposed for Requirements for Licensure and Certification (190-02). Since the amendments to this rule include adopting the 2026 RPAQC, there is a strike through for the 3-hour West Virginia Law course for initial licensure/certification. However, the course is listed under §190-2-110.5.b. as a condition to reactivate a license or certification. Will the 3-hour law course only be required for license/certification reactivation?

Thank you!
Francesca

Francesca Tracy
Compliance Analyst, The CE Shop
720.689.9508 TheCEShop.com AHIT.com
francesca.tracy@theceshop.com
5670 Greenwood Plaza Blvd. Suite 340, Greenwood Village, CO 80111

Burrell, Jeffrey B <jeffrey.b.burrell@wv.gov>

Requirements for Licensure and Certification (190-02)

Burrell, Jeffrey B <jeffrey.b.burrell@wv.gov> Wed, Jul 29, 2026 at 2:36 PM
To: Francesca Tracy <francesca.tracy@theceshop.com>

Francesca,

As you likely heard during the meeting today, the Board decided to remove the language in proposed §190-2-110.5.b regarding the requirement of the WV Law course for reactivation. Therefore as amended, there will be no requirement going forward for an applicant to take the WV Law course either for initial licensing, renewal, or reactivation.

If the proposed rules are approved and become effective, an education provider could still offer the WV Law Course, and it could be considered for CE credit if a licensee desires to take it.

Thank you for providing your comments on the proposed rule. Should you have any questions or concerns, please do not hesitate to contact me anytime.

Regards,

Jeff

Jeffrey B. Burrell
Executive Director
WV Real Estate Appraiser Licensing & Certification Board
405 Capitol Street, Suite 906
Charleston, WV 25301
304-558-3919
Jeffrey.B.Burrell@wv.gov

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Burrell, Jeffrey B <jeffrey.b.burrell@wv.gov>

Public Comment Regarding Proposed Amendments to Appraiser Qualification Requirements

Scott Wigal <Scott.Wigal@suddenlink.net> Wed, Jul 8, 2026 at 3:54 PM
To: jeffrey.b.burrell@wv.gov

Dear Mr. Burrell and Members of the West Virginia Real Estate Appraiser Licensing and Certification Board:

Thank you for the opportunity to provide comments regarding the proposed amendments to the requirements for appraiser licensure and certification in West Virginia.

I have reviewed the proposed amendments, including the incorporation of the 2026 Appraiser Qualifications Board (AQB) Criteria. My comments are directed primarily toward the proposed reductions in the education, experience, and qualification requirements for individuals seeking appraiser licensure and certification.

I am a Certified Residential Real Estate Appraiser first entering the profession in 1996 and have spent nearly thirty years appraising residential properties throughout the Kanawha Valley and much of southern West Virginia. During that time, I have witnessed significant changes in the appraisal profession, lending practices, regulatory requirements, and the expectations placed upon appraisers.

I appreciate the Board's commitment to ensuring that West Virginia has an adequate number of qualified appraisers to serve both the public and the lending industry. My understanding is that one of the primary reasons for considering these changes is the concern that there may be an existing or anticipated shortage of appraisers available to complete residential appraisal assignments. I respectfully question whether reducing education, experience, and qualification requirements addresses the underlying causes of that concern.

Based upon my experience in this market, many appraisers are experiencing one of the slowest periods in decades. The appraisers with whom I regularly communicate are not struggling to keep up with demand. Rather, many are concerned about whether appraisal remains an economically sustainable profession.

It is sometimes suggested that appraisal turn times contribute significantly to delays in residential lending. That has not been my experience. Lenders commonly expect completed appraisal reports within three to five days, even on complex assignments. Throughout my career, I have consistently met assignment deadlines. In my experience, delays are more often associated with underwriting, review processes, borrower-related issues, or revision requests after the appraisal has been completed.

The appraisal profession has changed dramatically since I entered it nearly thirty years ago. Earlier in my career, appraisers routinely performed assignments ranging from simple subdivision homes to highly complex rural and unique properties. Today, automated valuation models, appraisal waivers, bifurcated appraisal products, and other alternatives have largely removed most routine assignments from traditional appraisal practice.

Several years ago, a senior appraisal manager for one of the nation's largest mortgage lenders made a statement to me that has remained with me ever since: "You will never receive another routine assignment." In my experience, that observation has proven remarkably accurate. Today's appraisers are increasingly called upon to perform the assignments requiring the greatest levels of analysis, judgment, documentation, and professional responsibility.

At the same time, the work itself has become substantially more demanding. Modern appraisal practice requires extensive market analysis, detailed documentation, strict compliance with USPAP, lender overlays, GSE requirements, and increasingly rigorous review processes. The Uniform Appraisal Dataset has introduced another level of precision and consistency that requires considerable knowledge, judgment, and attention to detail. In many respects, the profession is significantly more complex today than when I entered it.

Despite these increased responsibilities, compensation has generally not kept pace. Fee pressure, competitive bidding practices, and the widespread use of appraisal management companies have contributed to an environment in which appraisers are expected to perform increasingly difficult work while compensation often remains relatively unchanged. These economic realities—not the education or experience required to become an appraiser—are, in my view, a primary reason fewer individuals choose appraisal as a long-term career.

For that reason, I respectfully believe the proposal addresses the symptom rather than the cause. Reducing qualification requirements may increase the number of individuals who are eligible to become appraisers, but it does not address why fewer people are choosing to enter or remain in the profession.

The purpose of USPAP and the appraisal regulatory system is to protect the public trust. That trust depends upon competent professionals possessing the education, training, experience, and judgment necessary to develop credible opinions of value. The consequences of poor appraisal practice extend far beyond the profession itself. Buyers, sellers, homeowners, lenders, investors, and taxpayers all rely upon the competency and independence of appraisers.

Residential appraisal is far more than completing a standardized form. Every assignment requires the appraiser to analyze commonly complex properties, understand local markets, recognize physical, legal, and economic factors affecting value, communicate conclusions clearly, and accept professional responsibility for the opinion rendered.

In my experience, professional judgment is the most valuable asset an appraiser develops, and judgment cannot be acquired solely through classroom education or accelerated qualification requirements. It is cultivated through meaningful supervision, exposure to a wide variety of assignments, careful analysis of both successes and mistakes, and years of practical experience. Experience teaches an appraiser not only what to look for, but what questions to ask when something does not appear consistent with the market, and when additional investigation is warranted. Those are the qualities that protect the public trust.

For that reason, I believe reducing the experience and preparation expected of new appraisers creates a significant risk that individuals will enter independent practice before they have had sufficient opportunity to develop the professional judgment upon which credible appraisal practice depends.

I respectfully ask the Board to consider one fundamental question. If the work expected of appraisers is substantially more complex today than it was thirty years ago, why should the preparation required to perform that work be less than it was then?

I believe the answer to that question should guide the Board's decision.

If the goal is to attract more qualified individuals into appraisal, I believe greater progress would be made by improving the economic viability of the profession, encouraging meaningful mentorship opportunities, reducing unnecessary administrative burdens, and allowing compensation to more accurately reflect the complexity, responsibility, and liability associated with modern appraisal practice.

Protecting the public trust has always been the foundation of appraisal practice. I believe that objective is best served by maintaining strong education, experience, and qualification requirements while addressing the economic realities that discourage talented individuals from entering and remaining in the profession.

Thank you for your consideration of these comments and for your continued service to the citizens of West Virginia and the appraisal profession.

Respectfully,

Scott Wigal

Certified Residential Appraiser #WVCR0966

Wigal Group, LLC

www.WigalGroup.net

Burrell, Jeffrey B <jeffrey.b.burrell@wv.gov>

Public Comment Regarding Proposed Amendments to Appraiser Qualification Requirements

Burrell, Jeffrey B <jeffrey.b.burrell@wv.gov> Wed, Jul 22, 2026 at 3:18 PM
To: Scott Wigal <Scott.Wigal@suddenlink.net>

Mr. Wigal,

Thank you for your comments regarding the proposed rule changes to §190CSR2 Requirements for Licensure and Certification. The proposed amendments to the rule, including the incorporation by reference of the 2026 AQB Real Property Appraisal Qualifications Criteria do not reduce the education or experience currently outlined in the existing language of §190CSR2. Rather, incorporating the Criteria by reference allows the Board to eliminate pages of existing language in the rule that restates what is already in the Criteria. While language in the rule as currently written related to experience or education may be proposed for removal, those same requirements exist in the Criteria. If approved, the Board would regulate according to the language in the 2026 AQB Criteria regarding qualifications for licensure, which is no different than the language in the rule as it exists today. If approved as proposed, the only West Virginia requirements that would exceed the federal minimums are that an applicant be at least 18 years old and possess a high school diploma or its equivalent. Since the requirements for licensure do not change with the proposed amendments to the rule, there is likewise no change to the currently required education or experience. If and when the AQB considers changes to the minimum criteria, any new versions would require Board review, adoption and legislative approval before becoming effective in our state.

Regarding the remaining comments about the profession, we believe there may be some confusion with the current exposure draft for proposed changes to the AQB Criteria itself, which is open for public comment. The AQB comment period overlaps with the comment period for our proposed rule amendments. We believe your comments are otherwise worthwhile, but at this time may be more appropriately directed to the AQB regarding their exposure draft for proposed changes to their criteria. I would encourage you to submit your comments to the AQB which reads and considers all comments received. The deadline for public comments to the AQB is July 27, 2026. You can submit your comments directly to the AQB by going to the following link on The Appraisal Foundation website: https://www.surveymonkey.com/r/AQBComments or by emailing them directly to AQBcomments@appraisalfoundation.org.

Thank you for taking the time to comment on our proposed rule amendments. If you need additional information, or if you have any further questions regarding the proposed rule amendments, please do not hesitate to contact me anytime.

Kind Regards,

Jeff

Jeffrey B. Burrell
Executive Director
WV Real Estate Appraiser Licensing & Certification Board
405 Capitol Street, Suite 906
Charleston, WV 25301
304-558-3919
Jeffrey.B.Burrell@wv.gov

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