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APPRAISER QUALIFICATIONS BOARD

# Appraiser Qualifications Board Q&As

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**Revised Date:** May 9, 2025

## Introduction to this Compilation of Q&As

This document is a compilation of both previously issued and newly added Q&As related to the implementation of the Valuation Bias and Fair Housing Laws and Regulations Course (VB-FH Course) under the 2026 Real Property Appraiser Qualification Criteria. Normally, Q&As are issued separately and later compiled over time, but in this case, we have gathered them into a single document for the convenience of state regulators.

To distinguish the newly added Q&As, they are marked “NEW” next to the question. This format allows for easy identification of recent additions while maintaining access to all relevant guidance in one place.

Please review this document carefully and refer to the notations to identify new content.

*Note for state regulators: The 2026 Criteria measure the VB-FH continuing-education requirement in two-calendar-year increments, which may or may not align with a state’s CE cycle.*

## NEW Q&As:

### Upgrade Requirement for the VB-FH Course **NEW!**

**Question:** I earned my credential before January 1, 2026. Do I still need to take the 8-hour VB-FH Course if I plan to upgrade my credential after that date?

**Answer:** Yes. The 8-hour VB-FH Course (which includes a 1-hour exam) is required for all appraisers to upgrade their credentials after January 1, 2026. It doesn’t matter when your original credential was earned; the 8-hour VB-FH Course must be completed as part of the educational requirements for the upgraded credential. This ensures that all appraisers are knowledgeable about valuation bias and fair housing issues.



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## Why the VB-FH Course is Not Listed in Upgrade Course Requirements

### NEW!

**Question:** Why doesn't the 8-hour VB-FH Course appear in the lists of required courses on page 26 of the 2026 *Criteria* for upgrading to a higher credential?

**Answer:** The 8-hour VB-FH Course is not included in the upgrade course lists because the 2026 *Criteria* are structured to outline what is required to obtain a credential under the new AQB *Criteria*, not to address situations where an individual has not completed one or more of the Required Core Curriculum (RCC) courses from a prior version of the AQB *Criteria*.

The upgrade course lists in the 2026 *Criteria* are meant to show only the additional coursework required beyond the RCC already required for the lower-level credential. For example, on page 26 of the 2026 *Criteria*, the additional 100 hours of coursework required to upgrade from Certified Residential to Certified General are listed. The 8-hour VB-FH Course is not included in this list because the 2026 *Criteria* assumes appraisers upgrading their credentials have already completed it as part of the RCC for a Certified Residential credential.

Because the 8-hour VB-FH Course was not required for credentials earned before 2026, some appraisers upgrading in the future may not have taken it. If an appraiser has not taken that or any course which is part of the RCC for their current credential, they must complete that Course before upgrading.

State agencies should ensure that appraisers who earned their credentials prior to 2026 are aware they **must** complete the 8-hour VB-FH Course before upgrading, even though it is not explicitly listed in the "upgrade lists" on page 26 of the 2026 *Criteria*.

## Upgrading Credentials Earned Before 2026 NEW!

**Question:** I earned my Licensed Residential credential before January 1, 2026. If I want to upgrade to Certified Residential after that date, do I need to take the 8-hour VB-FH Course?

**Answer:** Yes. Any appraiser upgrading their credential after January 1, 2026, must complete the **8-hour** VB-FH Course, regardless of when their initial credential was issued. Because the 8-hour VB-FH Course was not part of the RCC at the time you earned your Licensed Residential credential, you must complete it (including passing the 1-hour exam that is part of the Course) to meet the 2026 *Criteria* and qualify for an upgrade.



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## State Regulations and 8-hour VB-FH Course Requirements **NEW!**

**Question:** My state's regulations follow the 2026 *Criteria* but don't explicitly mention the 8-hour VB-FH Course for upgrades. Is the course still required?

**Answer:** Yes, the 8-hour VB-FH Course is required. The 2026 *Criteria* makes the 8-hour VB-FH Course a mandatory part of the RCC, which applies to **all** credentials and upgrades after January 1, 2026.

## Why Require the 8-hour VB-FH Course for Upgrades? **NEW!**

**Question:** Why is the 8-hour VB-FH Course required for appraisers to upgrade their credentials if they already hold a credential?

**Answer:** The 8-hour VB-FH Course is the first newly added requirement in the 2026 *Criteria* that applies universally to both newly credentialed **and** existing appraisers. This approach ensures that all appraisers, regardless of when their initial credential was earned, are educated on critical issues related to valuation bias and fair housing laws.

By applying the 8-hour VB-FH Course universally, the AQB has established a standard that reinforces professionalism and competency and maintains the public trust across the appraisal profession. This requirement ensures that no credentialing or upgrade scenario allows appraisers to bypass the 8-hour VB-FH Course, maintaining consistency, accountability, and necessary knowledge across all levels of credentialing.

## Qualifying Education (QE) and Continuing Education (CE) Differences for the VB-FH Courses **NEW!**

**Question:** Does the VB-FH Course requirement apply to both QE and CE?

**Answer:** Yes, but with differences. The 8-hour VB-FH Course is required for QE (7 hours of instruction plus a 1-hour exam) when earning or upgrading a credential after January 1, 2026. For CE, appraisers must take the 7-hour instruction portion of the 8-hour VB-FH Course within the first two calendar years after the 2026 *Criteria* becomes effective on January 1, 2026, followed by a shorter 4-hour VB-FH Course every two calendar years thereafter.

## Meeting QE with a CE Course **NEW!**

**Question:** If I took the 7-hour VB-FH CE course, does it count toward the 8-hour VB-FH Course required as QE?



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**Answer:** No, it does not count toward the QE requirement. For it to count towards the QE requirement, you also must pass the 1-hour exam required for QE. The 7-hour VB-FH CE course alone does not meet the 8-hour VB-FH Course QE requirement.

However, an exception exists. The AQB wishes to inject some flexibility for upgrading appraisers when strict adherence to the above answer would provide little to no benefit.

Consider the following example:

An appraiser wishes to upgrade from Certified Residential to Certified General. The appraiser has just taken the 7-hour VB-FH CE Course during the last six months of the current two-calendar-year CE periode. According to the answer above, to qualify for Certified General, successful completion of the 8-hour VB-FH Course would be necessary, resulting in the appraiser's expenditure of time and money to relearn the same subject matter.

The AQB believes this result would be unduly burdensome and has concluded that the appraiser in these circumstances only needs to take and pass the 1-hour exam component of the 8-hour VB-FH QE Course, provided that both Courses are from the same educational provider. By taking and passing the 1-hour exam, that appraiser in substance would be completing the 8-hour QE Course. The six-month period is appropriate to help ensure the subject matter covered in the 7-hour CE course closely tracks that taught in the 8-hour QE Course.

The exam may be taken at a time different from when the course is taken; however, the exam must be the one associated with that specific course and educational provider. A student may not substitute an exam from a different course or provider to satisfy the requirement.

Please check with your state agency because it may adopt more stringent requirements than those outlined in the *Criteria*.

## Handling Credential Upgrades in States **NEW!**

**Question:** How should state agencies handle appraisers who earned their credentials before January 1, 2026, and now want to upgrade?

**Answer:** Subject to the above exception, State agencies need to require appraisers seeking to upgrade their credentials after January 1, 2026, to complete the 8-hour VB-FH Course. This course is part of the RCC for all credentials and must be enforced consistently to align with the 2026 *Criteria*.



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## Clarification on VB-FH Course Options for Upgrading Appraisers **NEW!**

**Question:** Should appraisers planning to upgrade their credential in the future be advised to take the 8-hour VB-FH Course for QE now to avoid having to take the 7-hour VB-FH course for CE?

**Answer:** While it is ultimately up to the appraiser, state agencies may wish to clarify that planning could help appraisers avoid unnecessary duplication. The 7-hour VB-FH Course is designed to fulfill CE requirements, while the 8-hour VB-FH Course version, which includes a 1-hour exam, is required to satisfy QE requirements for credential upgrades.

If an appraiser takes the 7-hour VB-FH CE version now, they will meet their CE requirement but will still be required to complete the 8-hour VB-FH QE version to upgrade their credential, subject to the foregoing exception. To prevent this scenario, appraisers can be encouraged to complete the 8-hour VB-FH QE version in advance. This Course satisfies both QE and CE requirements, ensuring the appraiser is prepared for future upgrades without needing to retake the course in a different format.

State agencies may want to communicate this option to appraisers, emphasizing that, while they are free to complete the 7-hour VB-FH CE course now and the 8-hour VB-FH QE course later, completing the 8-hour VB-FH version upfront optimizes the process for those considering an upgrade in the future.



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**Issue Date:** July 18, 2024

## Previously Issued Q&As:

The following Q&As were previously issued by the AQB but have been compiled here for the convenience of state regulators:

### Can a CE version of the course count as QE?

**NOTE:** *This Q&A was updated on March 19, 2025*

**Question:** What happens when individuals who currently have a credential take a course that meets the valuation bias and fair housing laws and regulations outline (VB-FH) for the 7-Hour course for Continuing Education (CE), and then they later upgrade? Do they then have to take the 8-hour VB-FH course (7 hour plus exam), just the exam, or are they considered grandfathered (with respect to the exam) because they held a credential at the time the new requirement was implemented?

**Answer:** CE credit hours cannot be used to satisfy Qualifying Education (QE) requirements, with the following exception. If an individual seeking to upgrade their credential took a VB-FH 7-hour CE course during the current two-calendar-year CE period, a state may recognize the CE course as meeting the QE requirement only if the student takes and passes the 1-hour exam from the same education provider that administered the CE course. This ensures that the course content and exam remain consistent and aligned with the approved curriculum.

It is important to note that both the CE and QE VB-FH courses must be currently approved by the state to qualify for this exception.

### Can the course include relevant state-specific content?

**Question:** If a course that is intended to meet the Real Property Qualification Criteria's outline for valuation bias and fair housing laws and regulations (VB-FH) also includes relevant state-specific course materials on this topic, is the course eligible for QE or CE approval via the Appraisal Foundation's Course Approval Program (CAP)?

**Answer:** The outline VB-FH for a course on valuation bias and fair housing laws and regulations in the 2026 Criteria requires education developers to follow the complete outline when developing this course, which includes the federal fair housing and antidiscrimination laws and regulations topic. As stated, the requirement for the sections of the course that cover laws and regulations is that the course addresses federal fair housing and antidiscrimination laws and regulations.

The AQB understands there might be instances where some minor content in the course may refer to



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or be an example of a state-specific law or regulation. Since CAP approves courses for all states and territories, it cannot approve a course with material applicable only to an individual state.

Therefore, a VB-FH course submitted for CAP approval must strictly adhere to the outlined criteria and cover only the specified content. Minor references to state-specific issues may be acceptable as examples, but the primary focus must remain on federal fair housing and antidiscrimination laws and regulations.

## Course Completion Date

**Question:** 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?

**Answer:** 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, 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.

## 7-hour version

**Question:** Do I need to take an exam if I take the 7-hour version of the course for continuing education (CE)?

**Answer:** You only need to take the 1-hour exam if you are using the 7-hour course to meet your Qualifying Education requirements.