



Board of Real Estate Appraisers Meeting

Alaska Division of Corporations, Business and
Professional Licensing

Tuesday, November 18, 2025, at 10:00 AM AKST

Join Zoom Meeting Registration

Link:<https://us02web.zoom.us/meeting/register/7Jyv4qNNQLqG-bb9n8Wo2A>

After registering, you will receive a confirmation email containing information about joining the meeting.

Call to Order



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Draft Agenda: All times are approximate

1. Call to Order / Roll Call 10:00 AM
 - A. Review / Approve Agenda
 - B. Disclosure of Potential Ethics Act Conflicts
 - C. Continuing Education Statement
 - D. Welcome New Board Member McKenzie LaBuda

Breaks to be taken as needed
2. Public Comment 10:10 AM
3. Division Update: Fiscal Report 10:15 AM

Presenter: Melissa Dumas
4. Investigations Section Report 10:40 AM

Presenter: Chace Evans

 - A. Appraisal Expert Contract Possibility
 - B. Update Board on Options for Training Regarding Investigation Process
5. Regulation Project Motion to Approve 11:00 AM
 - A. File #2024200154 and File #2024200487
6. Administrative Order 360 11:15 AM

Presenter: Director, Sylvan Robb
7. Statutory Proposals Update 11:45 AM
8. Board Business 11:50 AM
 - A. Final Legislative Audit 2025
 - B. PEREA Email and Work Experience
 - C. Pearson Vue Email Regarding Testing Policy Change
 - D. Public Listing for Trainee Supervisors
 - E. Schedule 2026 Board Meetings & January 2026 AO 360 Meeting Date
 - F. Pending Board Ballots
9. Adjournment

Ethics Report

Continuing Education Statement



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing

APR

FOR DIVISION USE ONLY

Real Estate Appraisers Program

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550

Email: *RealEstateAppraisers@Alaska.Gov*

Website: *ProfessionalLicense.Alaska.Gov/RealEstateAppraisers*

Continuing Education Credit for Participation

This form certifies attendance at a meeting of the Alaska Board of Certified Real Estate Appraisers for continuing education credit. 12 AAC 70.210(g)(1-5)

Full Legal Name:	First	Middle	Last
Alaska Certification #:			

Board Meeting Date:	mm/dd/yyyy	<input type="checkbox"/> In Person	<input type="checkbox"/> Teleconference
Attendance Hours:		Hours Claimed: (7 Hours Max)	

I certify the information reported above is true and correct and that I maintained attendance for the duration of the hours claimed.

Signature:		Date:	mm/dd/yyyy
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BELOW IS FOR DEPARTMENTAL AND BOARD USE ONLY

Verified Hours of Attendance

(From Board Meeting Minutes)

Via Electronic or Mail Ballot: Approved Denied

OR

Via in Person Board Meeting: Approved Denied

Board Member Signature:		Date:	mm/dd/yyyy
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If denied, reason for denial:

Welcome New Board Member

Public Comment

Division Update

Department of Commerce Community, and Economic Development
Corporations, Business and Professional Licensing

Summary of All Professional Licensing
Schedule of Revenues and Expenditures

Board of Certified Real Estate Appraisers	FY 18	FY 19	Biennium	FY 20	FY 21	Biennium	FY 22	FY 23	Biennium	FY 24	FY 25	Biennium
Revenue												
Revenue from License Fees	\$ 76,010	\$ 190,565	\$ 266,575	\$ 80,550	\$ 207,770	\$ 288,320	\$ 62,165	\$ 224,750	\$ 286,915	\$ 75,640	\$ 180,565	\$ 256,205
General Fund Received					\$ -	-	\$ 9,845	\$ 1,594	11,439	\$ 111	\$ -	111
Allowable Third Party Reimbursements	1,534	4,314	5,848	2,559	-	2,559	3,600	-	3,600	-	-	-
TOTAL REVENUE	\$ 77,544	\$ 194,879	\$ 272,423	\$ 83,109	\$ 207,770	\$ 290,879	\$ 75,610	\$ 226,344	\$ 301,954	\$ 75,751	\$ 180,565	\$ 256,316
Expenditures												
Non Investigation Expenditures												
1000 - Personal Services	45,123	91,165	136,288	98,414	54,866	153,280	97,525	68,101	165,626	59,614	115,313	174,927
2000 - Travel	16,384	11,267	27,651	1,933	-	1,933	4,067	11,445	15,512	5,255	4,007	9,262
3000 - Services	7,445	10,666	18,111	30,418	13,957	44,375	2,247	5,763	8,010	4,560	5,898	10,458
4000 - Commodities	716	161	877	602	-	602	-	10	10	-	-	-
5000 - Capital Outlay	-	-	-	-	-	-	-	-	-	-	-	-
Total Non-Investigation Expenditures	69,668	113,259	182,927	131,367	68,823	200,190	103,839	85,319	189,158	69,429	125,218	194,647
Investigation Expenditures												
1000-Personal Services	25,013	18,383	43,396	38,249	18,727	56,976	23,942	28,242	52,184	30,980	26,017	56,997
2000 - Travel		1,050	1,050	2,547	-	2,547	452	2,325	2,777	2,876	-	2,876
3023 - Expert Witness	3,485	1,050	4,535	4,050	2,850	6,900	-	-	-	-	-	-
3088 - Inter-Agency Legal	33	33	66	2,453	14,131	16,584	2,998	1,552	4,550	-	-	-
3094 - Inter-Agency Hearing/Mediation	217	-	217	-	65	65	-	-	-	-	-	-
3000 - Services other		633	633	111	22	133	880	725	1,605	850	248	1,098
4000 - Commodities		-	-	-	-	-	-	-	-	-	-	-
Total Investigation Expenditures	28,748	21,149	49,897	47,410	35,795	83,205	28,272	32,844	61,116	34,706	26,265	60,971
Total Direct Expenditures	98,416	134,408	232,824	178,777	104,618	283,395	132,111	118,163	250,274	104,135	151,483	255,618
Indirect Expenditures												
Internal Administrative Costs	15,708	20,705	36,413	21,754	15,657	37,411	18,655	20,712	39,367	16,948	20,796	37,744
Departmental Costs	13,293	21,286	34,579	17,090	10,445	27,535	16,760	12,571	29,331	13,589	19,873	33,462
Statewide Costs	7,826	11,964	19,790	18,005	10,101	28,106	15,268	10,477	25,745	8,766	12,057	20,823
Total Indirect Expenditures	36,827	53,955	90,782	56,849	36,203	93,052	50,683	43,760	94,443	39,303	52,726	92,029
TOTAL EXPENDITURES	\$ 135,243	\$ 188,363	\$ 323,606	\$ 235,626	\$ 140,821	\$ 376,447	\$ 182,794	\$ 161,923	\$ 344,717	\$ 143,438	\$ 204,209	\$ 347,647
Cumulative Surplus (Deficit)												
Beginning Cumulative Surplus (Deficit)	\$ 374,791	\$ 317,092		\$ 323,608	\$ 171,091		\$ 238,040	\$ 130,856		\$ 195,277	\$ 127,590	
Annual Increase/(Decrease)	(57,699)	6,516		(152,517)	66,949		(107,184)	64,421		(67,687)	(23,644)	
Ending Cumulative Surplus (Deficit)	\$ 317,092	323,608		\$ 171,091	\$ 238,040		\$ 130,856	\$ 195,277		\$ 127,590	\$ 103,946	
Statistical Information												
Number of Licenses for Indirect calculation	342	298		345	370		390	468		409	422	
Additional information:	<ul style="list-style-type: none"> • General fund dollars were received in FY21-FY24 to offset increases in personal services and help prevent programs from going into deficit or increase fees. • Most recent fee change: Fee change FY19 • Annual license fee analysis will include consideration of other factors such as board and licensee input, potential investigation load, court cases, multiple license and fee types under one program, and program changes per AS 08.01.065. 											

Sub Unit	(All)
PL Task Code	APR1

Sum of Budgetary Expenditures Object Name (Ex)	Object Type Name (Ex)			Grand Total
	1000 - Personal Services	2000 - Travel	3000 - Services	
1011 - Regular Compensation	74,262.31			74,262.31
1021 - Allowances to Employees	77.94			77.94
1023 - Leave Taken	10,889.58			10,889.58
1028 - Alaska Supplemental Benefit	5,226.46			5,226.46
1029 - Public Employee's Retirement System Defined Benefits	12,739.00			12,739.00
1030 - Public Employee's Retirement System Defined Contribution	1,978.43			1,978.43
1034 - Public Employee's Retirement System Defined Cont Health Reim	1,391.71			1,391.71
1035 - Public Employee's Retirement Sys Defined Cont Retiree Medical	313.61			313.61
1037 - Public Employee's Retirement Sys Defined Benefit Unfnd Liab	6,448.25			6,448.25
1039 - Unemployment Insurance	242.75			242.75
1040 - Group Health Insurance	23,035.62			23,035.62
1041 - Basic Life and Travel	17.22			17.22
1042 - Worker's Compensation Insurance	324.06			324.06
1047 - Leave Cash In Employer Charge	1,967.36			1,967.36
1048 - Terminal Leave Employer Charge	1,057.31			1,057.31
1053 - Medicare Tax	1,177.68			1,177.68
1062 - GGU Business Leave Bank Contributions	70.90			70.90
1077 - ASEA Legal Trust	98.74			98.74
1079 - ASEA Injury Leave Usage	5.70			5.70
1080 - SU Legal Trst	4.78			4.78
1970 - Personal Services Transfer	-			-
2012 - Out-State Employee Airfare		1,286.58		1,286.58
2013 - Out-State Employee Surface Transportation		188.00		188.00
2014 - Out-State Employee Lodging		2,354.28		2,354.28
2015 - Out-State Employee Meals and Incidentals		390.98		390.98
2019 - Out-State Non-Employee Lodging		1,159.88		1,159.88
2020 - Out-State Non-Employee Meals and Incidentals		342.00		342.00
2022 - Out-State Non-Employee Non-Taxable Reimbursement		366.97		366.97
2970 - Travel Cost Transfer		(2,080.65)		(2,080.65)
3000 - Training/Conferences			3,725.00	3,725.00
3045 - Postage			26.66	26.66
3085 - Inter-Agency Mail			70.38	70.38
3088 - Inter-Agency Legal			2,323.37	2,323.37
3970 - Contractual Transfer			-	-
Grand Total	141,329.41	4,008.04	6,145.41	151,482.86

FY 2025 CBPL COST ALLOCATIONS

Name	Task Code	Direct Revenues	General Fund Received	3rd Party Reimbursement	Total Revenues	Direct Expense	Percentage of board licenses/total licensees:	Department certified transactions % by Fiscal Revenue \$	Indirect Expense (Total Non-PCN Allocated)	Percentage of program direct Personal Services:	Total Indirect Expenses	Total Expenses	2025 Annual Surplus (Deficit)	FY24 Direct Expense	FY24 Indirect Expenses	FY24 Total Expenses
Acupuncture	ACU1	\$ 36,704		\$ -	\$ 36,704	\$ 7,610	\$ 3,586	\$ -	\$ 3,586	1,873	\$ 5,459	\$ 13,069	\$ 23,635	\$ 6,651	\$ 5,234	\$ 11,885
Architects, Engineer	AEL1	\$ 188,460	\$ -	\$ 3,193	\$ 191,653	\$ 449,475	226,368	\$ 4,018	230,386	105,959	336,345	785,820	(594,167)	337,247	290,445	627,692
Athletic Trainers	ATH1	\$ 5,120		\$ -	\$ 5,120	\$ 3,035	2,045	\$ 918	2,963	803	3,766	6,801	(1,681)	1,642	2,538	4,180
Audiology and Speech Pathologists	AUD1	\$ 98,651		\$ -	\$ 98,651	\$ 54,058	33,460	\$ 1,439	34,899	13,362	48,261	102,319	(3,668)	41,069	41,314	82,383
Barbers & Hairdressers	BAH1	\$ 303,803		\$ -	\$ 303,803	\$ 447,826	201,888	\$ 6,299	208,187	108,174	316,361	764,187	(460,384)	364,706	299,416	664,122
Behavior Analysts	BEV1	\$ 16,771		\$ -	\$ 16,771	\$ 13,162	4,090	\$ -	4,090	3,270	7,360	20,522	(3,751)	8,861	6,382	15,243
Chiropractors	CHI1	\$ 316,985		\$ 1,200	\$ 316,985	\$ 191,694	10,136	\$ 868	11,004	43,354	54,358	246,052	70,933	194,286	46,936	241,222
Collection Agencies	COA1	\$ 19,430		\$ -	\$ 19,430	\$ 49,960	17,101	\$ 1,811	18,912	12,787	31,699	81,659	(62,229)	11,743	22,895	34,638
Concert Promoters	CPR1	\$ 13,875		\$ -	\$ 13,875	\$ -	830	\$ 372	1,202	1,202	1,202	1,202	12,673	44	774	818
Construction Contractors	CON1	\$ 1,408,302		\$ -	\$ 1,408,302	\$ 786,652	287,154	\$ 5,134	292,288	135,461	427,749	1,214,401	193,901	607,170	333,943	941,113
Home Inspectors	HIN1	\$ 8,495		\$ -	\$ 8,495	\$ 21,906	2,638	\$ 1,339	3,977	5,800	9,777	31,683	(23,188)	19,253	9,692	28,945
Dental	DEN1	\$ 630,810	\$ -	\$ -	\$ 630,810	\$ 310,844	71,070	\$ 3,472	74,542	77,402	151,944	462,788	168,022	350,066	157,023	507,089
Dietitians/Nutritionists	DTN1	\$ 13,060		\$ -	\$ 13,060	\$ 18,722	13,811	\$ 1,190	15,001	4,947	19,948	38,670	(25,610)	24,885	21,145	46,030
Direct Entry Midwife	MID1	\$ 104,366		\$ -	\$ 104,366	\$ 18,786	1,482	\$ -	1,482	4,909	6,391	25,177	79,189	24,961	3,268	28,229
Dispensing Opticians	DOP1	\$ 30,433		\$ -	\$ 30,433	\$ 18,914	5,542	\$ -	5,542	4,881	10,423	29,337	1,096	24,239	12,672	36,911
Electrical Administrator	EAD1	\$ 32,310		\$ -	\$ 32,310	\$ 88,422	27,059	\$ 223	27,282	14,330	41,612	130,034	(97,724)	96,254	46,081	142,335
Euthanasia Services	EUT1	\$ 3,500		\$ -	\$ 3,500	\$ 735	445	\$ -	445	194	639	1,374	2,126	488	548	1,036
Geologists	GEO1	\$ 1,150		\$ -	\$ 1,150	\$ 45	652	\$ -	652	7	659	704	446	991	925	1,916
Guardians/Conservators	GCO1	\$ 10,100		\$ -	\$ 10,100	\$ 60,548	741	\$ 322	1,063	4,905	5,968	66,516	(56,416)	6,758	2,881	9,639
Guide-Outfitters	GUI1	\$ 285,923		\$ -	\$ 285,923	\$ 537,908	47,212	\$ 3,795	51,007	118,688	169,695	707,603	(421,680)	434,101	166,507	600,608
Marine Pilots	MAR1	\$ 73,700		\$ -	\$ 73,700	\$ 106,816	4,090	\$ 273	4,363	21,217	25,580	132,396	(58,696)	85,392	20,286	105,678
Foreign Pleasure Craft	FPC1	\$ 70,215		\$ -	\$ 70,215	\$ -	-	\$ -	-	-	-	-	70,215	334	334	334
Marital & Family Therapy	MFT1	\$ 101,579		\$ -	\$ 101,579	\$ 97,649	5,542	\$ 570	6,112	24,843	30,955	128,604	(27,025)	29,916	13,629	43,545
Massage Therapists	MAS1	\$ 54,925		\$ 330	\$ 55,255	\$ 236,819	37,639	\$ 2,059	39,698	56,561	96,259	333,078	(277,823)	225,078	95,655	320,733
Mechanical Administrator	MEC1	\$ 21,305		\$ -	\$ 21,305	\$ 85,553	16,893	\$ 918	17,811	10,618	28,429	113,982	(92,677)	95,639	32,432	128,071
Medical	MED1	\$ 2,690,026		\$ -	\$ 2,690,026	\$ 1,961,011	302,269	\$ 4,935	307,204	284,600	591,804	2,552,815	137,211	1,707,753	482,539	2,190,292
Mortuary Science	MOR1	\$ 26,555		\$ -	\$ 26,555	\$ 8,854	4,475	\$ 372	4,847	2,275	7,122	15,976	10,579	8,230	6,524	14,754
Naturopaths	NAT1	\$ 8,280		\$ -	\$ 8,280	\$ 7,098	1,126	\$ -	1,126	1,826	2,952	10,050	(1,770)	4,147	2,744	6,891
Nurse Aides	NUA1	\$ 225,185		\$ 132	\$ 225,317	\$ 239,914	83,814	\$ 1,513	85,327	34,781	120,108	360,022	(134,705)	101,931	110,655	212,586
Nursing	NUR1	\$ 5,462,496	\$ -	\$ 3,777	\$ 5,466,273	\$ 2,218,313	896,404	\$ 4,067	900,471	473,604	1,374,075	3,592,388	1,873,885	1,843,890	1,145,143	2,989,033
Nursing Home Administrators	NHA1	\$ 16,700		\$ -	\$ 16,700	\$ 2,250	1,956	\$ -	1,956	56	2,012	4,262	12,438	2,044	1,575	3,619
Optometry	OPT1	\$ 136,631		\$ -	\$ 136,631	\$ 46,014	7,646	\$ 174	7,820	11,608	19,428	65,442	(71,189)	41,753	19,413	61,166
Pawnbrokers	PAW1	\$ 350		\$ -	\$ 350	\$ 3,076	474	\$ -	474	814	1,288	4,364	(4,014)	4,222	2,035	6,257
Pharmacy	PHA1	\$ 363,853	\$ -	\$ 2,506	\$ 366,359	\$ 829,496	204,111	\$ 6,374	210,485	213,141	423,626	1,253,122	(886,763)	658,578	364,788	1,023,366
Physical/Occupational Therapy	PHY1	\$ 163,679		\$ 719	\$ 164,398	\$ 226,724	72,611	\$ 3,993	76,604	54,249	130,853	357,577	(193,179)	185,128	124,363	309,491
Prescription Drug Monitoring Program	PDMP	\$ -		\$ 1,170	\$ 1,170	\$ 1,190	-	\$ -	-	-	-	1,190	(20)	1,721	-	1,721
Professional Counselors	PCO1	\$ 105,550		\$ 644	\$ 106,194	\$ 208,103	36,898	\$ 2,034	38,932	53,127	92,059	300,162	(193,968)	204,504	91,681	296,185
Psychology	PSY1	\$ 168,552		\$ -	\$ 168,552	\$ 198,579	11,855	\$ 645	12,500	47,869	60,369	258,948	(90,396)	173,098	59,195	232,293
Public Accountancy	CPA1	\$ 153,165	\$ -	\$ 6,859	\$ 160,024	\$ 288,048	45,760	\$ 992	46,752	70,939	117,691	405,739	(245,715)	318,407	130,590	448,997
Real Estate	REC1	\$ 148,775		\$ -	\$ 148,775	\$ 326,027	108,176	\$ 1,835	110,011	76,980	186,991	513,018	(364,243)	391,392	191,680	583,072
Real Estate Appraisers	APR1	\$ 180,565		\$ -	\$ 180,565	\$ 151,483	12,507	\$ 2,803	15,310	37,416	52,726	204,209	(23,644)	104,135	39,303	143,438
Social Workers	CSW1	\$ 126,150		\$ -	\$ 126,150	\$ 246,022	42,826	\$ 2,109	44,935	63,348	108,283	354,305	(228,155)	197,753	97,794	295,547
Storage Tank Workers	UST1	\$ 1,080		\$ -	\$ 1,080	\$ 4,678	1,838	\$ -	1,838	1,238	3,076	7,754	(6,674)	11,150	5,691	16,841
Veterinary	VET1	\$ 316,829		\$ 1,953	\$ 318,782	\$ 247,029	26,347	\$ 1,339	27,686	61,279	88,965	335,994	(17,212)	147,383	67,057	214,440
No longer existent board/commission (ie Athletic)		\$ -		\$ -	\$ -	\$ -	-	\$ -	-	-	-	-	-	-	-	-
Totals All Boards		\$ 14,143,193	\$ -	\$ 22,483	\$ 14,165,676	\$ 10,821,048	\$ 2,882,567	\$ 68,205	\$ 2,950,772	\$ 2,263,495	\$ 5,214,267	\$ 16,035,315	\$ (1,869,639)	\$ 9,098,659	\$ 4,575,725	\$ 13,674,384

ABL & Corporations	DA0801005	\$ 13,065,329	\$ -	\$ -	\$ 13,065,329	\$ 474,829	\$ 1,348,575	\$ 9,301	\$ 1,357,876	\$ 256,212	\$ 1,614,088	\$ 2,088,917				10,976,412
Fines & Forfeit GF		223,196	-	-	223,196	-	-	-	-	-	-	-	-	-	-	-
Revenue Transfer In (Carry Forward Net)	CFWD	2,011,431	-	-	2,011,431	-	-	-	-	-	-	-	-	-	-	-
Reimbursable Service Agreements AR	DA0801007	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RSA 0825023- DHSS Nurse Aide Program		129,571	-	-	129,571	129,571	-	-	-	-	-	-	-	-	-	129,571
RSA 0825024- DHSS PFS- DOA PDMP		306,958	-	-	306,958	306,958	-	-	-	-	-	-	-	-	-	306,958
RSA 0825022- DHSS PFS- DOA BJA PDMP		447,963	-	-	447,963	447,963	-	-	-	-	-	-	-	-	-	447,963
RSA 0825025- DHSS EPI PDMP		198,352	-	-	198,352	198,352	-	-	-	-	-	-	-	-	-	198,352
RSA 0825021 Child Support Assistance		302	-	-	302	302	-	-	-	-	-	-	-	-	-	302
RSA 0825309- DHSS PFS- PDMP		195,000	-	-	195,000	195,000	-	-	-	-	-	-	-	-	-	195,000
Interagency clearing		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Direct Professional Licensing TASK 8000		-	-	-	-	73,036	-	-	-	-	-	73,036	-	-	-	-
General Fund Received TASK 8000		-	288,274	-	288,274	288,274	-	-	-	-	-	288,274	-	-	-	-
Telemedicine Business Registry	TBR1	107,800	-	-	107,800	-	-	-	-	-	-	-	-	-	-	-
DWAD - Emergency Authorizations		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Real Estate Recovery Fund	ZSU1	39,020	-	-	39,020	123,846	-	-	-	-	-	123,846	-	-	-	-
Third Party Reimbursement	080801108	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total CBPL		\$ 30,868,114	\$ 288,274	\$ 22,483	\$ 31,178,872	\$ 13,059,180	\$ 4,231,142	\$ 77,506	\$ 4,308,648	\$ 2,519,707	\$ 6,828,355	\$ 19,887,535				11,291,337

DIVISION INDIRECT EXPENSES	Total	Prof Lic	Corp & Bus Lic
Percentage of program direct Personal Services:			
Business Supplies	25,582	25,478	104
Office Equipment	195,244	189,754	5,490
State Vehicles	2,641	2,324	317
Storage and Archives	17,687	15,112	2,575
Legal Support	51,005	51,005	-
Central Mail Services Postage	46,394	21,267	25,127
Software Licensing and Maintenance	93,639	93,639	-
Division Administrative Expenses - all other	262,518	262,518	-
Division allocated by percentage of direct personal services:	694,710	661,097	33,613
Percentage of board licenses/total licensees:			
Investigations indirect Personal Services	360,659	331,542	29,117
Division Administration Personal Services	3,179,249	1,942,740	1,236,509
Division allocated by percentage of board licenses/total licensees:	3,539,908	2,274,282	1,265,626
Total Division Indirect Expenses	4,234,618	2,935,379	1,299,239
DEPARTMENT INDIRECT EXPENSES	Total	Prof Lic	Corp & Bus Lic
Percentage of program direct Personal Services:			
Commissioner's Office	205,782	181,088	24,694
Administrative Services - Director's Office	98,735	86,887	11,848
Administrative Services - Human Resources	81,583	71,793	9,790
Administrative Services - Fiscal	134,815	118,637	16,178
Administrative Services - Budget	77,293	68,018	9,275
Administrative Services - Information Technology	229,784	202,210	27,574
Administrative Services - Information Technology - Network & Database/ Management &	149,044	131,159	17,885
Administrative Services - Mail	14,875	13,090	1,785
Administrative Services - Facilities - Maintenance	-	-	-
Department allocated by percentage of direct personal services:	991,911	872,882	119,029
Percentage of board licenses/total licensees:			
Department administrative services support: Fiscal, IT, Procurement	691,234	608,285	82,949
Receipting transaction % by Personal Services:			
Department certified transactions % by Fiscal Revenue \$	77,506	68,205	9,301
Total DEPARTMENT INDIRECT EXPENSES	1,760,651	1,549,372	211,279
STATEWIDE INDIRECT EXPENSES	Total	Prof Lic	Corp & Bus Lic
Percentage of program direct Personal Services:			
Accounting and Payroll Systems	86,615	76,221	10,394
State Owned Building Rental (Building Leases)	297,003	261,363	35,640
State OIT Server Hosting & Storage	7,712	6,787	925
State OIT SQL	8,040	7,075	965
State Software Licensing	-	-	-
Human Resources	78,602	69,170	9,432
IT Non-Telecommunications (Core Cost)	316,458	274,883	41,575
IT Telecommunications	36,340	31,979	4,361
Risk Management	2,316	2,038	278
Statewide allocated by percentage of direct personal services:	833,086	729,516	103,570
FY25 TOTALS BY METHODOLOGY	Total	Prof Lic	Corp & Bus Lic
Percentage of program direct Personal Services:	2,519,707	2,263,495	256,212
Percentage of board licenses/total licensees:	4,231,142	2,882,567	1,348,575
Receipting transaction % by Personal Services:	77,506	68,205	9,301
Grand Total	6,828,355	5,214,267	1,614,088

Investigations



MEMORANDUM

DATE: October 30, 2025
TO: Board of Certified Real Estate Appraisers
THRU: Erika Prieksat, Chief Investigator *EP*
FROM: Chace Evans, Investigator *CE*
RE: Investigative Report for the November 18, 2025 Meeting

The following information was compiled as an investigative report to the Board for the period of August 02, 2025 thru October 30, 2025; this report includes cases, complaints, and intake matters handled since the last report.

Matters opened by the Paralegals in Anchorage and Juneau, regarding continuing education audits and license action resulting from those matters are covered in this report.

OPEN - 1

<u>Case Number</u>	<u>Violation Type</u>	<u>Case Status</u>	<u>Status Date</u>
REAL ESTATE APPRAISER			
2024-000953	Violation of Profession Statute or Regulation	Intake	10/08/2024

Closed -

<u>Case #</u>	<u>Violation Type</u>	<u>Case Status</u>	<u>Closed</u>	<u>Closure</u>
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END OF REPORT

Regulation Project

Motion to Approve

Regulation Project #2024200487

Motion to Approve

NOTICE OF PROPOSED CHANGES ON THE APPROVAL PROCESS FOR EDUCATION PROVIDERS FOR CONTINUING EDUCATION AND INITIAL CERTIFICATION, AND REQUIREMENTS FOR ANNUAL AMC REPORTS IN THE REGULATIONS OF THE ALASKA BOARD OF CERTIFIED REAL ESTATE APPRAISERS

BRIEF DESCRIPTION: The Board of Certified Real Estate Appraisers proposes to update various regulations to update requirements and streamline approval processes, updates to the number of required hours spent on qualifying courses, simplified approval processes for education providers, requirements for AMC annual reports, and definitions.

The Board of Certified Real Estate Appraisers (Board) proposes to adopt regulation changes in Title 12, Chapter 70 of the Alaska Administrative Code dealing with continuing education, initial certification, approval processes for education providers, requirements for AMC annual reports, and definitions, including the following:

- (1) **12 AAC 70.130. Real estate appraiser examinations**, is proposed to be amended to clarify the timelines for an applicant to pass the required examination after receiving approval, and for how long an examination score is valid.
- (2) **12 AAC 70.140 and 12 AAC 70.145** are proposed to be amended to update and streamline the educational requirements for initial certification, and to update The Real Property Appraiser Qualification Criteria from the 2018 version to the 2026 version. The provisions broadly mirror the changes made at .200, .210, and .220 for conformity across the regulations.
- (3) **12 AAC 70.160. Real estate appraisal management company registration**, is proposed to be amended in compliance with federal recommendations to clarify that a controlling person for a real estate AMC may not have had action under AS 08.87.135(b)(2) taken by this state.
- (4) **12 AAC 70.175. Annual reporting and federal registry requirements for appraisal management companies**, is proposed to be amended to include a cut off date of June 30 of each year for an AMC to submit an annual report; a delayed submission will result in a recorded status of “inactive” on the AMC registry.
- (5) **12 AAC 70.200, 12 AAC 70.210, 12 AAC 70.215, and 12 AAC 70.220** are proposed to be reorganized by repeal and readopting .200 and .210 and repealing .215 to streamline the board approval process for education providers so that certain courses are automatically approved by the board to simplify the process for courses not listed for automatic approval. It is proposed that .200 will address course approval processes; .210 will address the criteria for approval, including online courses; and .220 will address hours of continuing education required. 12 AAC 70.215 is proposed to be repealed entirely as this is now redundant after proposed revisions.
- (6) **12 AAC 70.910. Definition of classroom hour**, is proposed to clarify that a classroom hour now applies to both in-person or online instruction, and to update cross references.
- (7) **12 AAC 70.935. Supervision of trainee appraisers**, is proposed to amend the number of qualifying education hours required for trainee appraisers from 75 hours to 83 in compliance with federal requirements.

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by submitting written comments to Stefanie Davis, Regulations Specialist, Division of Corporations, Business and Professional Licensing, P.O. Box 110806, Juneau, AK 99811-0806. Additionally, the Board will accept comments by facsimile at (907) 465-2974 and by

electronic mail at RegulationsAndPublicComment@alaska.gov. Comments may also be submitted through the Alaska Online Public Notice System by accessing this notice on the system at <http://notice.alaska.gov/220581>, and using the comment link. **The comments must be received not later than 4:30 p.m. on September 25, 2025.**

You may submit written questions relevant to the proposed action to Stefanie Davis, Regulations Specialist, Division of Corporations, Business and Professional Licensing, P.O. Box 110806, Juneau, AK 99811-0806 or by e-mail at RegulationsAndPublicComment@alaska.gov. **The questions must be received at least 10 days before the end of the public comment period.** The Board will aggregate its response to substantially similar questions and make the questions and responses available on the Alaska Online Public Notice System and on the Board's website at <https://www.commerce.alaska.gov/web/cbpl/ProfessionalLicensing/RealEstateAppraisers.aspx>.

If you are a person with a disability who needs a special accommodation in order to participate in this process, please contact Stefanie Davis at (907) 465-2537 or RegulationsAndPublicComment@alaska.gov not later than September 18, 2025 to ensure that any necessary accommodation can be provided.

A copy of the proposed regulation changes is available on the Alaska Online Public Notice System and by contacting Stefanie Davis at (907) 465-2537, RegulationsAndPublicComment@alaska.gov, or at <https://www.commerce.alaska.gov/web/portals/5/pub/Regulations/APR-0824.pdf>.

A copy of material proposed for adoption by reference is available on the Alaska Online Public Notice System, or by visiting <https://appraisalfoundation.sharefile.com/share/view/s8464fccdfde4422f9f4a95b6470e3178>.

After the public comment period ends, the Board will either adopt the proposed regulation changes or other provisions dealing with the same subject, without further notice, or decide to take no action. The language of the final regulation may be different from that of the proposed regulation. **You should comment during the time allowed if your interests could be affected.**

Statutory Authority: AS 08.87.020; AS 08.87.110; AS 08.87.120; AS 08.87.130; AS 08.87.135; AS 08.87.155; AS 08.87.310

Statutes Being Implemented, Interpreted, or Made Specific: AS 08.87.020; AS 08.87.110; AS 08.87.120; AS 08.87.135; AS 08.87.155; AS 08.87.310

Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

For each occupation regulated under the Division of Corporations, Business and Professional Licensing, the Division keeps a list of individuals or organizations who are interested in the regulations of that occupation. The Division automatically sends a Notice of Proposed Regulations to the parties on the appropriate list each time there is a proposed change in an occupation's regulations in Title 12 of the Alaska Administrative Code. If you would like your address added to or removed from such a list, send your request to the Division at the address above, giving your name, either your e-mail address or mailing address (as you prefer for receiving notices), and the occupational area in which you are interested.

DATE: 8/24/2025

/s/
Stefanie Davis, Regulations Specialist
Division of Corporations, Business and
Professional Licensing

ADDITIONAL REGULATION NOTICE INFORMATION

(AS 44.62.190(d))

1. **Adopting agency:** Department of Commerce, Community, and Economic Development, Division of Corporations, Business and Professional Licensing - Board of Certified Real Estate Appraisers.
2. **General subject of regulation:** Regulation language and continuing education updates in compliance with ASB requirements.
3. **Citation of regulation:** 12 AAC 70.130 through 12 AAC 70.935.
4. **Department of Law file number:** 2024200487.
5. **Reason for the proposed action:** Update and clarification of current regulations; compliance with state statute.
6. **Appropriation/Allocation:** Corporations, Business and Professional Licensing – #2360.
7. **Estimated annual cost to comply with the proposed action to:**
A private person: None known
Another state agency: None known.
A municipality: None known.
8. **Cost of implementation to the state agency and available funding (in thousands of dollars):**
No costs are expected in FY 2026 or in subsequent years.
9. **The name of the contact person for the regulation:**
Lori Rogers, Licensing Examiner
Board of Certified Real Estate Appraisers
Division of Corporations, Business and Professional Licensing
Department of Commerce, Community, and Economic Development
Telephone: (907) 269-7140
E-mail: RealEstateAppraisers@Alaska.Gov
10. **The origin of the proposed action:** Staff of state agency.
11. **Date:** 8/24/2025 **Prepared by:** /s/
Stefanie Davis
Regulations Specialist

Chapter 70. Board of Certified Real Estate Appraisers.

(Words in **boldface and underlined** indicate language being added; words [CAPITALIZED AND BRACKETED] indicate language being deleted. Complete new sections are not in boldface or underlined.)

The introductory language of 12 AAC 70.130(a) is amended to read:

(a) To be certified as a real estate appraiser by examination, an applicant must pass the following examination **not later than** [WITHIN THE] 24 months **after being approved to take the examination** [IMMEDIATELY PRECEDING THE DATE OF CERTIFICATION]:

• • •

12 AAC 70.130 is amended by adding a new subsection to read:

(c) An examination score is valid for 24 months after the date the applicant passed the examination. (Eff. 7/16/92, Register 123; am 4/15/94, Register 130; am 1/16/2005, Register 173; am 5/24/2007, Register 182; am ___ / ___ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.110

12 AAC 70.140 is repealed and readopted to read:

12 AAC 70.140. Standards for acceptable education. (a) To comply with the real estate appraisal education requirements of 12 AAC 70.115 for initial certification or the registered trainee education requirements of 12 AAC 70.125, an applicant's classroom hours of instruction as defined in 12 AAC 70.910 must

- (1) relate directly to real estate appraisal theory or practices;
- (2) be obtained through a course approved under 12 AAC 70.145; and
- (3) meet the requirements of 12 AAC 70.145.

(b) Only a course that has prior approval of the board under 12 AAC 70.145 will be credited toward the classroom hours of instruction required for certification or registration.

(c) An applicant's classroom hours of education for certification as a general or residential real estate appraiser must include coverage of the full scope of the fundamentals of appraisal theory, principles, and practices and all topics listed in the applicable Appraiser Qualification Criteria developed by the Appraiser Qualifications Board of The Appraisal Foundation, *The Real Property Appraiser Qualification Criteria* effective January 1, 2026, and adopted by reference. A course that is highly specialized or narrow in focus will not be credited toward an applicant's required classroom hours of instruction unless the applicant has also completed sufficient courses to cover the fundamental aspects of appraisal theory, principles, and practices as set out under this section.

(d) An online course that meets the requirements of this section will be approved under the same process and criteria as an in-person course.

(e) The board will not award credit for noninstructional course time except for a maximum of 20 hours spent writing appraisal reports for a course on that subject. The number of hours credited under this subsection may not exceed 50 percent of the total classroom hours awarded for the course for which the appraisal reports were written. The board will award credit under this subsection for not more than one course during an applicant's total classroom hours of instruction.

(f) The board may require additional information if necessary to determine whether an applicant's classroom hours of instruction meet the requirements in this section. (Eff. 7/16/92, Register 123; am 4/15/94, Register 130; am 12/13/94, Register 133; am 6/13/97, Register 142; am 6/5/98, Register 146; am 4/16/2004, Register 170; am 1/16/2005, Register 173; am

5/24/2007, Register 182; am 9/14/2012, Register 203; am 6/28/2015, Register 214; am 10/18/2017, Register 224; am 3/28/2019, Register 229; am 3/5/2023, Register 245; am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.110 AS 08.87.310

The first paragraph of the editor's note that follows 12 AAC 70.140 is changed:

Editor's note: Copies of *The Real Property Appraiser Qualification Criteria*, [THE APPRAISER QUALIFICATION CRITERIA] adopted by reference in 12 AAC 70.140, are available from the Appraisal Qualifications Board of The [THE] Appraisal Foundation, 1155 15th Street, N.W., Suite 1111, Washington, DC 20005-3517; phone: (202) 347-7722; website at www.appraisalfoundation.org.

12 AAC 70.145 is repealed and readopted to read:

12 AAC 70.145. Approval of course or seminar for initial certification or trainee registration. (a) The following courses or seminars are approved by the board to meet the education requirements for initial certification or trainee registration if the courses or seminars meet the requirements of 12 AAC 70.140 and (b) of this section:

- (1) a course or seminar offered by a member organization of The Appraisal Foundation;
- (2) a course or seminar offered by a regionally accredited junior college, college, or university;
- (3) a course or seminar approved by the Appraiser Qualifications Board Course Approval Program of The Appraisal Foundation;

(4) an online education course or seminar approved by the International Distance Education Certification Center.

(b) An education provider or other organization that wishes to sponsor a course or seminar for approval under this section shall submit to the board

(1) a completed application on a form provided by the department;

(2) applicable fees required under 12 AAC 02.370; and

(3) if applying for approval under (a)(3) or (4) of this section, verification that the course or seminar is approved by the Appraiser Qualifications Board or the International Distance Education Certification Center.

(c) The board will use the standards established under this section to determine if a course or seminar that is not approved under (a) of this section contains material sufficiently related to real estate appraisal, and may credit the course or seminar toward an applicant's total classroom hours of instruction.

(d) To receive the board's approval under (b) and (c) of this section, a course or seminar must

(1) have a primary focus directly related to the theories, concepts, principles, practices, techniques, methods, or problems applicable to one or more aspects of real property appraisal;

(2) meet the following requirements:

(A) the course or seminar must offer a verification of attendance;

(B) the course or seminar must require successful completion of a final examination and be a minimum of 15 classroom hours in duration, except that

(i) a course or seminar on valuation bias and fair housing laws and regulations must be a minimum of eight classroom hours in duration;

(ii) time spent on an assignment that is not an appraisal report under 12 AAC 70.140(e) will not be counted toward a minimum course or seminar duration or credited toward the total classroom hours of instruction required for initial certification or trainee registration; and

(3) have the number of hours of instruction sufficient for quality instruction on the subject matter that the course or seminar covers.

(e) A course or seminar that is approved by the board under (d) of this section but is not approved by the Appraiser Qualifications Board or the International Distance Education Certification Center is valid for three years after the date of initial approval. Approval may be renewed by submitting a renewal application on forms provided by the department.

(f) A course or seminar that is approved by the Appraiser Qualifications Board or the International Distance Education Certification Center has an expiration date consistent with the organization's expiration date, as follows:

(1) the department

(A) will update the course or seminar expiration date if the course or seminar provider submits recertification documents;

(B) will not update the course or seminar expiration date if the Appraiser Qualifications Board or International Distance Education Certification Center recertification exceeds three years after the date of initial approval;

(2) approval for a course or seminar that expires after three years may be renewed by submitting a renewal application on forms provided by the department.

(g) The board will maintain a list of courses and seminars approved under 12 AAC 70.140 and this section. (Eff. 6/13/97, Register 142; am 9/16/2000, Register 155; am 1/16/2005, Register 173; am 6/22/2005, Register 174; am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.110 AS 08.87.310

12 AAC 70.160(a)(1)(E)(ii) is amended to read:

(ii) has not had **action under AS 08.87.135(b)(2) taken by this state against** a real estate appraiser certificate [DENIED, CANCELLED, SUSPENDED, REVOKED, PUT ON PROBATION, OR SURRENDERED IN LIEU OF A PENDING REVOCATION, AS DESCRIBED IN AS 08.87.135(b)(2), AND FOR A SUBSTANTIVE CAUSE AS DETERMINED BY THE SAME STATE THAT ISSUED THE CERTIFICATE]; and
(Eff. 3/28/2019, Register 229; am 4/8/2021, Register 238; am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.130 AS 08.87.135

12 AAC 70.175 is amended to read:

12 AAC 70.175. Annual reporting and federal registry requirements for appraisal management companies. (a) **Not later than June 30 of each year, a** [A] registered appraisal management company shall **submit**

(1) an annual report [ANNUALLY] on a form provided by the department; and

(2) [SUBMIT] the registry fee required **under** [IN] 12 AAC 02.370(b)(5) for each appraiser on the appraiser panel **who performed** [PERFORMING] appraisals for covered transactions in the state during the preceding calendar year.

(b) **Not later than June 30 of each year, a federally** [FEDERALLY] regulated appraisal management **company shall submit**

(1) [COMPANIES MUST REPORT ANNUALLY TO THE BOARD] information required by AS 08.87.155 **to the board** on a form provided by the department; and

(2) [SUBMIT] the registry fee required **under** [IN] 12 AAC 02.370(b)(5) for each appraiser on the appraiser panel **who performed** [PERFORMING] appraisals for covered transactions in the state during the preceding calendar year.

(c) An appraisal management company that fails to submit the required form and corresponding fee by the designated reporting date in (a) and (b) of this section will be recorded as inactive on the appraisal management company registry and may be subject to disciplinary proceedings under AS 08.87.215 and 08.87.220. (Eff. 3/28/2019, Register 229;

am 4/8/2021, Register 238; am ____/____/_____, Register _____)

Authority: [AS 08.07.130] **AS 08.87.130** AS 08.87.155
AS 08.87.020 AS 08.87.135

12 AAC 70.200 is repealed and readopted to read:

12 AAC 70.200. Application for continuing education course or seminar approval.

(a) The following courses or seminars are approved for continuing education if they comply with the requirements of 12 AAC 70.210 and (b) of this section:

(1) a course or seminar offered by a member organization of The Appraisal Foundation;

(2) a course or seminar offered by a regionally accredited junior college, college, or university;

(3) a course or seminar approved by the Appraiser Qualifications Board Course Approval Program of The Appraisal Foundation;

(4) an online education course or seminar approved by the International Distance Education Certification Center.

(b) To obtain approval by the board under (a) of this section, the education provider or other organization sponsoring the course or seminar shall submit

(1) a completed application on forms provided by the department;

(2) applicable fees required under 12 AAC 02.370; and

(3) if applying for approval under (a)(3) or (4) of this section, verification that the course or seminar is approved by the Appraiser Qualifications Board or the International Distance Education Certification Center.

(c) An education provider or other organization that wishes to sponsor a real estate appraisal continuing education course or seminar that is not approved under (a) and (b) of this section shall apply for board approval by submitting

(1) a completed application on forms provided by the department; and

(2) applicable fees required under 12 AAC 02.370.

(d) A course or seminar that is approved by the board under (c) of this section but is not approved by the Appraiser Qualifications Board or the International Distance Education Certification Center is valid for three years after the date of initial approval. Approval may be renewed by submitting a renewal application on forms provided by the department.

(e) A course or seminar approved by the Appraiser Qualifications Board or the International Distance Education Certification Center has an expiration date consistent with the organization's expiration date, as follows:

(1) the department

(A) will update the course or seminar expiration date if the course or seminar provider submits recertification documents;

(B) will not update the course or seminar expiration date if the Appraiser Qualifications Board or International Distance Education Certification Center recertification exceeds three years after the date of initial approval;

(2) approval for a course or seminar that expires after three years may be renewed by submitting a renewal application on forms provided by the department. (Eff. 7/16/92, Register 123; am 12/13/94, Register 133; am 6/13/97, Register 142; am 9/16/2000, Register 155; am 6/22/2005, Register 174; am 12/28/2018, Register 228; am 4/8/2021, Register 238; am ___/___/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.120

12 AAC 70.210 is repealed and readopted to read:

12 AAC 70.210. Approved continuing education courses and seminars. (a) To be approved by the board, a continuing education course or seminar must have a primary focus directly related to the theories, concepts, principles, practices, techniques, methods, or problems applicable to one or more aspects of real property appraisal.

(b) The board will approve a course or seminar on the following topics if the course or seminar meets the requirements of (a) of this section:

- (1) construction cost estimating;
- (2) ethics and standards of professional appraisal practice;
- (3) land use planning, zoning, and taxation;
- (4) property development;
- (5) real estate appraisal, including valuations and evaluations;
- (6) real estate financing and investment;
- (7) real estate law;
- (8) real estate litigation;
- (9) real estate appraisal related computer applications;
- (10) other topics related to real estate appraisal that are approved by the board.

(c) To be approved by the board, a continuing education course or seminar must include a minimum of two classroom hours that meet the requirements of (a) of this section.

(d) To be approved by the board, a continuing education course or seminar must offer a verification of attendance.

(e) Consistent with the Appraiser Qualification Criteria in *The Real Property Appraiser Qualification Criteria*, adopted by reference in 12 AAC 70.140, the board will award continuing education credit for participation in one in-person or teleconference board meeting each biennial licensing period if participation meets the requirements of this section and

- (1) the participant is a certified real estate appraiser subject to the requirements of 12 AAC 70.220;
- (2) the board meeting is a minimum of two hours;
- (3) the hours claimed for participation do not exceed seven hours;

(4) attendance is maintained throughout the duration of the scheduled meeting;

and

(5) participation is documented on a form provided by the department and returned to the board.

(f) An online course that meets the requirements of this section will be approved under the same process and criteria as an in-person course. (Eff. 7/16/92, Register 123; am 4/15/94, Register 130; am 12/13/94, Register 133; am 6/13/97, Register 142; am 6/5/98, Register 146; am 12/30/99, Register 152; am 9/14/2012, Register 203; am 6/28/2015, Register 214; am 12/28/2018, Register 228; am 3/5/2023, Register 245; am ____ / ____ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.120

An editor's note is added to 12 AAC 70.210 to read:

Copies of *The Real Property Appraiser Qualification Criteria*, adopted by reference in 12 AAC 70.140 and referenced in 12 AAC 70.210, are available from the Appraisal Qualifications Board of The Appraisal Foundation, 1155 15th Street, N.W., Suite 1111, Washington, DC 20005-3517; phone: (202) 347-7722; website at www.appraisalfoundation.org.

12 AAC 70.215 is repealed:

12 AAC 70.215. Approved online courses. Repealed. [(a) TO BE APPROVED BY THE BOARD TO MEET THE CONTINUING EDUCATION REQUIREMENTS OF 12 AAC 70.220, THE PRIMARY PURPOSE OF AN ONLINE COURSE MUST BE DIRECTLY RELATED TO THE THEORIES, CONCEPTS, PRINCIPLES, PRACTICES, TECHNIQUES,

METHODS, OR PROBLEMS APPLICABLE TO ONE OR MORE ASPECTS OF REAL PROPERTY APPRAISAL.

(b) THE BOARD WILL APPROVE AN ONLINE COURSE ON THE FOLLOWING TOPICS IF THE ONLINE COURSE MEETS THE REQUIREMENTS OF (a) OF THIS SECTION:

- (1) REPEALED 6/28/2015;
- (2) CONSTRUCTION COST ESTIMATING;
- (3) ETHICS AND STANDARDS OF PROFESSIONAL APPRAISAL PRACTICE;
- (4) LAND USE PLANNING, ZONING, AND TAXATION;
- (5) PROPERTY DEVELOPMENT;
- (6) REAL ESTATE APPRAISAL, INCLUDING VALUATIONS AND EVALUATIONS;
- (7) REAL ESTATE FINANCING AND INVESTMENT;
- (8) REAL ESTATE LAW;
- (9) REAL ESTATE LITIGATION;
- (10) REAL ESTATE APPRAISAL RELATED COMPUTER APPLICATIONS;
- (11) OTHER TOPICS RELATED TO REAL ESTATE APPRAISAL THAT ARE APPROVED BY THE BOARD.

(c) IN ADDITION TO THE ONLINE COURSES APPROVED BY THE BOARD UNDER (b) OF THIS SECTION, THE FOLLOWING ONLINE COURSES ARE APPROVED FOR CONTINUING EDUCATION IF THEY ARE CONSISTENT WITH (a) OF THIS SECTION:

(1) COURSES PRESENTED BY A REGIONALLY ACCREDITED JUNIOR COLLEGE, COLLEGE, OR UNIVERSITY THAT OFFERS DISTANCE EDUCATION PROGRAMS IN OTHER DISCIPLINES;

(2) REPEALED 1/16/2005;

(3) COURSES APPROVED BY THE APPRAISER QUALIFICATIONS BOARD COURSE APPROVAL PROGRAM OF THE APPRAISAL FOUNDATION INCLUDING QUALIFYING EDUCATION AND CONTINUING EDUCATION IN THE ASYNCHRONOUS OR SYNCHRONOUS FORMAT;

(4) REPEALED 6/28/2015.] (Eff. 1/7/2001, Register 157; am 1/16/2005, Register 173; am 6/28/2015, Register 214; am 3/5/2023, Register 245; repealed ___ / ___ / _____, Register _____)

12 AAC 70.220(b) is amended to read:

(b) The board will not recognize continuing education hours claimed by an applicant for renewal for taking the same [,] or substantially identical [,] course **or seminar** more than once during a certification period.

12 AAC 70.220(c) is amended to read:

(c) **Credit** [EXCEPT AS PROVIDED IN (d) OF THIS SECTION, CREDIT,] is given for classroom and examination hours only and not for hours devoted to class preparation or completion of assignments. A classroom hour is defined in 12 AAC 70.910.

12 AAC 70.220(d) is amended to read:

(d) **Only a course or seminar that has prior approval of the board under 12 AAC 70.200 will be credited towards the requirements of (a) of this section.** [HOURS REQUIRED BY THIS SECTION MAY BE OBTAINED THROUGH ONLINE COURSES APPROVED UNDER 12 AAC 70.210 OR ONLINE COURSES APPROVED UNDER 12 AAC 70.215.]

12 AAC 70.220(f) is repealed:

(f) Repealed ____/____/_____. [DURING THE LICENSING PERIOD OF JULY 1, 2019 TO JUNE 20, 2021, AN UNLIMITED NUMBER OF THE HOURS REQUIRED BY THIS SECTION MAY BE OBTAINED THROUGH DISTANCE EDUCATION DESCRIBED IN (d) OF THIS SECTION.]

12 AAC 70.220 is amended by adding a new subsection to read:

(g) The board will award up to 10 hours of continuing education credit for each hour completed in preparation for instruction or discussion as an instructor or discussion leader of an educational program that meets the requirements of 12 AAC 70.210 as set out in AS 08.87.120(b)(2). A maximum of 10 credits may be obtained under this section during each biennial licensing period. To receive credit under this subsection, an applicant for renewal shall provide the documentation necessary to substantiate the applicant's participation and experience, including

- (1) information on the topics covered and the hours spent in the program; and
- (2) documentation that the applicant's involvement in the program was in the technical and professional aspects of real estate appraisal and that the primary focus of the program was directly related to the theories, concepts, principles, practices, techniques, methods,

or problems applicable to one or more aspects of real property appraisal. (Eff. 7/16/92, Register 123; am 12/13/94, Register 133; am 1/7/2001, Register 157; am 4/16/2004, Register 170; am 1/16/2005, Register 173; am 6/22/2005, Register 174; am 9/14/2012, Register 203; am 6/28/2015, Register 214; am 4/8/2021, Register 238; am 3/5/2023, Register 245; am ____/____/_____, Register _____; add'l am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.120

12 AAC 70.910(1) is amended to read:

(1) except as provided in [12 AAC 70.145(d)(2)(A) AND] 12 AAC 70.220(c) **and (g)**, one classroom hour equals a minimum of 50 minutes of **in-person or online** instruction; (Eff. 7/16/92, Register 123; am 12/13/94, Register 133; am 1/16/2005, Register 173; am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.110 AS 08.87.120

12 AAC 70.935(h)(2) is amended to read:

(2) is not eligible towards the **83** [75] hours of qualifying education required under 12 AAC 70.125. (Eff. 6/28/2015, Register 214; am 4/8/2021, Register 238; am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.310

Regulation Project #2024200154

Motion to Approve

**NOTICE OF PROPOSED CHANGES ON REEXAMINATION AND REGISTRATION
REQUIREMENTS IN THE REGULATIONS OF THE ALASKA BOARD OF CERTIFIED REAL
ESTATE APPRAISERS**

BRIEF DESCRIPTION: The Board of Certified Real Estate Appraisers proposes to update various regulations by amending verbiage and adding a new continuing education course in compliance with ASC requirements.

The Board of Certified Real Estate Appraisers (Board) proposes to adopt regulation changes in Title 12, Chapter 70 of the Alaska Administrative Code dealing with continuing education requirements and updating verbiage throughout the regulations, including the following:

1. **12 AAC 70.100, 12 AAC 70.105, and 12 AAC 70.107**, are proposed to be amended to update the requirements that an applicant for certification must submit to verify the applicant's completion of the education requirements required in 12 AAC 70.115.
2. **12 AAC 70.108. Work experience requirements for real estate appraiser certification**, is proposed to be amended to replace the verbiage “continuously” with “cumulatively” relating to hours of appraisal work/experience.
3. **12 AAC 70.111, 12 AAC 70.112 and 12 AAC 70.113**, are proposed to amend the required core curriculum hours, to reference that the hours required are specified in *The Real Property Appraiser Qualification Criteria*, and to update references to the requirements in 12 AAC 70.115.
4. **12 AAC 70.115. Education requirements for real estate appraiser certification**, is proposed to be amended to add a new course requirement of valuation bias and fair housing laws and regulations, reduce the required appraisal subject matter elective hours, and update the number of creditable classroom hours required for a trainee appraiser.
5. **12 AAC 70.125. Application for approval as a trainee appraiser**, is proposed to be amended to update the number of classroom hours required in line with changes to 12 AAC 70.115 and simplify the requirements to provide evidence of completion of continuing education requirements under 12 AAC 70.220.
6. **12 AAC 70.160. Real estate appraisal management company registration**, is proposed to be amended to update various verbiage.
7. **12 AAC 70.220. Hours of continuing education required**, is proposed to be amended to include the updated reference to the 7-Hour National USPAP continuing education course, and to add the new course requirement of valuation bias and fair housing laws and regulations.

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by submitting written comments to Stefanie Davis, Regulations Specialist, Division of Corporations, Business and Professional Licensing, P.O. Box 110806, Juneau, AK 99811-0806. Additionally, the Board will accept comments by facsimile at (907) 465-2974 and by electronic mail at RegulationsAndPublicComment@alaska.gov. Comments may also be submitted through the Alaska Online Public Notice System by accessing this notice on the system at <http://notice.alaska.gov/220580>, and using the comment link. **The comments must be received not later than 4:30 p.m. on September 25, 2025.**

You may submit written questions relevant to the proposed action to Stefanie Davis, Regulations Specialist, Division of Corporations, Business and Professional Licensing, P.O. Box 110806, Juneau, AK 99811-0806 or by e-mail at RegulationsAndPublicComment@alaska.gov. **The questions must be received at least 10 days before the end of the public comment period.** The Board will aggregate its

response to substantially similar questions and make the questions and responses available on the Alaska Online Public Notice System and on the Board's website at <https://www.commerce.alaska.gov/web/cbpl/ProfessionalLicensing/RealEstateAppraisers.aspx>.

If you are a person with a disability who needs a special accommodation in order to participate in this process, please contact Stefanie Davis at (907) 465-2537 or RegulationsAndPublicComment@alaska.gov not later than September 18, 2025 to ensure that any necessary accommodation can be provided.

A copy of the proposed regulation changes is available on the Alaska Online Public Notice System, by contacting Stefanie Davis at (907) 465-2537, RegulationsAndPublicComment@alaska.gov, or at <https://www.commerce.alaska.gov/web/portals/5/pub/Regulations/APR-0923.pdf>.

After the public comment period ends, the Board will either adopt the proposed regulation changes or other provisions dealing with the same subject, without further notice, or decide to take no action. The language of the final regulation may be different from that of the proposed regulation. **You should comment during the time allowed if your interests could be affected.**

Statutory Authority: AS 08.87.020; AS 08.87.110; AS 08.87.120; AS 08.87.130; AS 08.87.135; AS 08.87.310

Statutes Being Implemented, Interpreted, or Made Specific: AS 08.87.020; AS 08.87.110; AS 08.87.120; AS 08.87.130; AS 08.87.135; AS 08.87.310

Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

For each occupation regulated under the Division of Corporations, Business and Professional Licensing, the Division keeps a list of individuals or organizations who are interested in the regulations of that occupation. The Division automatically sends a Notice of Proposed Regulations to the parties on the appropriate list each time there is a proposed change in an occupation's regulations in Title 12 of the Alaska Administrative Code. If you would like your address added to or removed from such a list, send your request to the Division at the address above, giving your name, either your e-mail address or mailing address (as you prefer for receiving notices), and the occupational area in which you are interested.

DATE: 8/24/2025

/s/
Stefanie Davis, Regulations Specialist
Division of Corporations, Business and
Professional Licensing

Chapter 70. Board of Certified Real Estate Appraisers.

(Words in **boldface and underlined** indicate language being added; words [CAPITALIZED AND BRACKETED] indicate language being deleted. Complete new sections are not in boldface or underlined.)

12 AAC 70.100(b)(1)(B) is amended to read:

(B) official transcripts, **official** [NOTARIZED] copies of certificates of completion, or other evidence of course completion acceptable to the board [,] that verify the **applicant's completion of the education requirements** [CLASSROOM HOURS OF INSTRUCTION REQUIRED] in 12 AAC 70.115(a) **and** [OR] (b) [, AS APPLICABLE];

(Eff. 7/16/92, Register 123; am 12/13/94, Register 133; am 6/28/2015, Register 214; am 12/28/2018, Register 228; am ___ / ___ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.110

The introductory language of 12 AAC 70.105(b)(1) is amended to read:

(1) submit a completed application, on a form provided by the department; the completed application must include [;]

• • •

12 AAC 70.105(b)(1)(B) is amended to read:

(B) official transcripts, **official** [NOTARIZED] copies of certificates of completion, or other evidence of course completion acceptable to the board [,] that verify the **applicant's completion of the education requirements** [CLASSROOM HOURS

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OF INSTRUCTION REQUIRED] in 12 AAC 70.115(c) **and** [OR] (d) [, AS APPLICABLE];

(Eff. 7/16/92, Register 123; am 12/13/94, Register 133; am 6/28/2015, Register 214; am 12/28/2018, Register 228; am ___ / ___ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.110

12 AAC 70.107(b)(1)(B) is amended to read:

(B) official transcripts, **official** [NOTARIZED] copies of certificates of completion, or other evidence of course completion acceptable to the board [,] that verify the **applicant's completion of the education requirements** [CLASSROOM HOURS OF INSTRUCTION] required of general real estate appraisers in 12 AAC 70.115(a) **and** [OR] (b) [, AS APPLICABLE]; and

(Eff. 4/15/94, Register 130; am 12/13/94, Register 133; am 6/28/2015, Register 214; am ___ / ___ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.110

12 AAC 70.108(a) is amended to read:

(a) An applicant for certification as a general real estate appraiser shall submit verification of 3,000 hours of appraisal work obtained **cumulatively** [CONTINUOUSLY] over a period of not less than 18 months. At least 1,500 hours of the appraisal work must be in nonresidential appraisal work. The board will only accept work experience that was obtained after January 30, 1989 and [WAS] performed in compliance with the **USPAP** [UNIFORM

STANDARDS OF PROFESSIONAL APPRAISAL PRACTICE (USPAP)] applicable as of the date of appraisal.

12 AAC 70.108(b) is amended to read:

(b) An applicant for certification as a residential real estate appraiser shall submit verification of 1,500 hours of appraisal experience obtained **cumulatively** [CONTINUOUSLY] over a period of not less than 12 months. The board will only accept work experience that was obtained after January 30, 1989 and [WAS] performed in compliance with the USPAP applicable as of the date of appraisal.

(Eff. 12/13/94, Register 133; am 2/13/2002, Register 161; am 4/16/2004, Register 170; am 5/24/2007, Register 182; am 9/14/2012, Register 203; am 3/28/2019, Register 229; am 4/8/2021, Register 238; am ____/____/_____, Register _____)

Authority: AS 08.87.020

12 AAC 70.111(a)(1)(C) is amended to read.

(C) **documentation that the applicant has completed**

(i) the core curriculum hours as specified in 12 AAC 70.115(d);

and

(ii) the educational hours required for an appraiser holding the trainee appraiser credential to receive the certified residential real property appraiser credential, as specified in the certified residential real property appraiser classification of *The Real Property Appraiser Qualification Criteria*, adopted by reference under 12 AAC 70.140(c) [IN ADDITION TO THE

CORE CURRICULUM REQUIREMENTS IN 12 AAC 70.115(f),
DOCUMENTATION OF COMPLETION OF 125 ADDITIONAL CORE
CURRICULUM HOURS AS SPECIFIED IN 12 AAC 70.115(d)(4) – (10)];

(Eff. 12/28/2018, Register 228; am 12/23/2022, Register 244; am ___ / ___ / _____, Register
_____)

Authority: AS 08.87.020 AS 08.87.110 AS 08.87.310

12 AAC 70.112(a)(1)(C) is amended to read:

(C) **documentation that the applicant has completed the core curriculum hours as specified in 12 AAC 70.115(b)** [IN ADDITION TO THE CORE CURRICULUM REQUIREMENTS IN 12 AAC 70.115(f), DOCUMENTATION OF COMPLETION OF 225 ADDITIONAL CORE CURRICULUM HOURS AS SPECIFIED IN 12 AAC 70.115(b)(4) – (10)];

(Eff. 12/28/2018, Register 228; am ___ / ___ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.110 AS 08.87.310

12 AAC 70.113(1)(C) is amended to read:

(C) **documentation that the applicant has completed the core curriculum hours as specified in 12 AAC 70.115(b)**, [IN ADDITION TO THE CORE CURRICULUM REQUIREMENTS IN 12 AAC 70.115(b)(1), (2), AND (3), DOCUMENTATION OF COMPLETION OF 100 ADDITIONAL CORE CURRICULUM HOURS AS SPECIFIED IN 12 AAC 70.115(b)(4) – (10)]; and

(Eff. 12/28/2018, Register 228; am ___ / ___ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.110

12 AAC 70.115(b)(10) is amended to read:

(10) appraisal subject matter electives, **22** [30] hours, and may include hours over the minimum of the course topics required under this subsection; [.]

12 AAC 70.115(b) is amended by adding a new paragraph to read:

(11) valuation bias and fair housing laws and regulations, eight hours.

12 AAC 70.115(d)(10) is amended to read:

(10) appraisal subject matter electives, **12** [20] hours, and may include hours over the minimum of the course topics required under this subsection; [.]

12 AAC 70.115(d) is amended by adding a new paragraph to read:

(11) valuation bias and fair housing laws and regulations, eight hours.

The introductory language of 12 AAC 70.115(f) is amended to read:

(f) An applicant for approval as a trainee appraiser **shall** [MUST] document satisfactory completion of **83** [75] creditable classroom hours as specified in the following core curriculum:

• • •

12 AAC 70.115(f) is amended by adding a new paragraph to read:

(4) valuation bias and fair housing laws and regulations, eight hours. (Eff.

12/13/94, Register 133; am 4/16/2004, Register 170; am 1/16/2005, Register 173; am 5/24/2007, Register 182; am 9/14/2012, Register 203; am 6/28/2015, Register 214; am 12/28/2018, Register 228; am 3/28/2019, Register 229; am ____ / ____ / _____, Register _____)

Authority: AS 08.87.020 AS 08.87.110

((Publisher: please replace the period that follows 12 AAC 70.115(f)(3) with a semicolon)))

12 AAC 70.125(b)(1)(B) is amended to read:

(B) proof that the applicant has, **within the five-year period before the date of submission of the trainee appraiser application,** successfully completed and passed

(i) 83 [75] classroom hours of instruction that meet the requirements in 12 AAC 70.115(f) and 12 AAC 70.140(a); [,] and

(ii) the required courses that are specifically oriented to the requirements and responsibilities of supervisory appraisers and trainee appraisers [,] and [THAT] comply with the specifications for course content established by the Appraiser Qualifications Board of **The** [THE] Appraisal Foundation [; THE COURSE MUST BE COMPLETED BY THE TRAINEE APPRAISER BEFORE OBTAINING A TRAINING APPRAISER CREDENTIAL; ALL QUALIFYING EDUCATION MUST BE COMPLETED WITHIN THE FIVE-YEAR PERIOD BEFORE THE DATE OF SUBMISSION OF A TRAINEE APPRAISER APPLICATION]; and

12 AAC 70.125(c)(2) is amended to read:

(2) provide evidence of satisfactory completion of **the applicable continuing education requirements set out under 12 AAC 70.220** [14 HOURS OF CONTINUING EDUCATION CREDIT]. (Eff. 4/15/94, Register 130; am 12/13/94, Register 133; am 6/28/2015, Register 214; am 12/28/2018, Register 228; am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.310

12 AAC 70.160(b) is amended to read:

(b) **In accordance with AS 08.87.135(a)(7), an owner** [OWNERS] of **an** [THE] appraisal management company may not have had a real estate appraiser certificate denied, cancelled, suspended, revoked, put on probation, or surrendered in lieu of a pending revocation [, AS DESCRIBED IN AS 08.87.135(a)(7), AND] for a substantive cause as determined by the **board** [SAME STATE THAT ISSUED THE CERTIFICATE]. A **controlling** person [WHO OWNS AT LEAST 10 PERCENT] of a real estate management company must be of good moral character as defined in this section.

(Eff. 3/28/2019, Register 229; am 4/8/2021, Register 238; am ____/____/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.130 AS 08.87.135

12 AAC 70.220(e) is amended to read:

(e) As part of the requirements of (a)(1) of this section, an applicant for renewal of a certificate shall document satisfactory completion of

(1) the 7-Hour [A SEVEN-HOUR] National USPAP **Continuing Education** [UPDATE] Course, taught by an Appraiser Qualifications Board certified instructor who is a

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certified appraiser, **or a course** [. THE BOARD WILL ACCEPT COURSES] determined [AS EQUIVALENT] by the Appraiser Qualifications Board Course Approval Program of the Appraisal Foundation **to be equivalent to the 7-Hour National USPAP Continuing Education Course; an applicant's completion** [. COMPLETION] of the 15-hour national USPAP course used for certification under 12 AAC 70.115 may not be used to satisfy the continuing education renewal requirements of the **7-Hour National** [SEVEN-HOUR] USPAP **Continuing Education** [UPDATE] Course required in this **paragraph** [SUBSECTION]; **and**

(2) a course that meets the content requirements of the Valuation Bias and Fair Housing Laws and Regulations Course Outline set out in the Real Property Appraiser Qualification Criteria, adopted by reference under 12 AAC 70.140(c); to satisfy the requirement of this paragraph, the applicant shall provide verification that the applicant has completed a

(A) seven-hour course, plus one-hour examination, for the applicant's first application for renewal of the certificate; or

(B) four-hour course during the concluding biennial licensing period for the applicant's second and each subsequent certificate renewal application.

(Eff. 7/16/92, Register 123; am 12/13/94, Register 133; am 1/7/2001, Register 157; am 4/16/2004, Register 170; am 1/16/2005, Register 173; am 6/22/2005, Register 174; am 9/14/2012, Register 203; am 6/28/2015, Register 214; am 4/8/2021, Register 238; am 3/5/2023, Register 245; am ___/___/_____, Register _____; add'l am ___/___/_____, Register _____)

Authority: AS 08.87.020 AS 08.87.120

Administrative Order 360

-Memorandum

-Real Estate Appraisers Spreadsheet

-Adopted by Reference Requirement Tracker



MEMORANDUM

TO: Members of Professional Licensing Boards DATE: October 7, 2025

FROM: Sylvan Robb, Director RE: Administrative Order 360

I am providing additional information to clarify the purpose and expectations of Administrative Order 360, which was issued by Governor Dunleavy on August 4, 2025, to improve the quality, transparency, and efficiency of the State's regulatory environment. The full language of AO 360 can be found at <https://gov.alaska.gov/admin-orders/administrative-order-no-360/>.

There are several goals associated with this Administrative Order, but I'd like to highlight #3: "Ensure boards and commissions adjust regulatory structures as necessary to maintain critical consumer protection while eliminating unnecessary barriers to entry for new professionals." This goal highlights that all state boards are critical components to accomplishing the purpose of this initiative.

The *division* is responsible for providing key deliverables throughout this project:

1. **Hold stakeholder meetings:** These meetings invite members of the public to provide suggestions on regulations that they feel can be removed or improved. The division has scheduled stakeholder meetings with corresponding windows for receiving written comments. Input from stakeholders is vitally important in the development of the boards' regulatory reform plans this winter.

These meetings are different than oral testimony on proposed regulations, so boards themselves are not holding these meetings. However, members are welcome to attend and listen.

We have organized the meetings as follows:

- Health care professions: Thursday, October 9th, 9:00 - 11:00 a.m.; Monday, October 27th, 6:00 - 8:00 p.m., Wednesday, October 29th, 11:30 a.m. - 1:30 p.m.
 - Non-health care professions: Thursday, October 9th, 9:00 - 11:00 a.m.; Monday, October 27th, 6:00 - 8:00 p.m., Wednesday, October 29th, 11:30 a.m. - 1:30 p.m.
2. **Review guidance documents:** Documents—such as PDFs and web pages—providing guidance on regulatory requirements will be published in the Online Public Notice System (OPN) and moved forward for review by the Department of Law. Guidance documents are intended to *explain* requirements contained in statutes or regulations or to provide background information. This includes forms, checklists, applications, FAQs, board opinions, and other types of information relating to the public process. The legal review will ensure no existing or new documents contain guidance that should

actually be promulgated as a regulation. Once legal reviews are completed next spring, the division and its boards may need to address any changes.

3. **Establish a baseline of current regulatory requirements:** Using statewide guidance, staff are currently reviewing regulations and determining what constitutes a regulatory requirement using the guidance provided by the Department of Law. All requirements are counted and identified as “mandatory”—required by federal, statutory, or court-ordered mandates—or “discretionary”—those that the board has the ability to evaluate, interpret, and adopt. Discretionary requirements with room for improvement in quality, transparency, and efficiency will be identified by staff and moved forward for each board to consider including it its regulatory reform plan.

Individual professional licensing *boards* are responsible for implementing the deliverables of AO 360 now through 2027. Meeting these deadlines set by the Office of the Governor will require boards to either hold additional meetings or significantly expand their agendas:

1. **Review public and staff recommendations for regulatory reform (starting in November):** Individual boards will review the input received from the public and additional changes recommended by staff. This is the opportunity to jump start any pending board regulations changes or plans that have been put “on the back burner.”
2. **Develop a regulatory reform plan (due in February):** Design and approve a plan to reduce specific regulatory requirements by 15% in calendar year 2026, culminating in a total reduction of 25% by the end of calendar year 2027. This plan must be completed and provided to me by February 13. I will submit it to the department to be included as part of the department’s overall plan. After the Office of the Governor has reviewed and approved the proposed plan, it will be posted on OPN. At that point, any regulation change included in the board’s plan has the green light to move forward through the usual regulations adoption process. (No additional waiver is required.)

To summarize, AO 360 requires the division to review regulations, count the number of requirements, determine which are discretionary, and make a recommendation to each board so it can approve a regulatory reform plan. It does not diminish the authority of the board to propose and adopt regulations concerning their industry. The Office of the Governor encourages each board and agency to focus on the end goals of regulatory transparency and efficiency rather than becoming overly concerned about the specific deliverables along the way. All departments of state government are encouraged to use this structured opportunity to work with their stakeholders and think deeply about ways to best serve the public through this initiative.

As required by the initiative, Sara Chambers has been designated by Commissioner Sande as our department’s Agency Regulatory Liaison, providing training and guidance, as well as serving as the point of contact with the Office of the Governor and the Department of Law for all divisions and corporate agencies within the DCCED umbrella. She is assisting us in seeking modifications to the statewide schedule of deadlines, as long as we are making progress toward the Governor’s goal.

Timelines and guidance are fast-moving and subject to change. The key deadlines the board should know are:

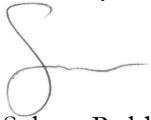
- **Informational sessions for board members to hear details and ask questions:**
 - [Monday, October 13 at 12:00 p.m.](#)
 - Meeting ID: 219 918 166 590
 - Passcode: Hm2TC2ad

 - [Thursday, October 16 at 11:00 a.m.](#)
 - Meeting ID: 248 100 560 125 1

- Passcode: 3tf2oH7t
 - [Monday, October 20 at 1:00 p.m.](#)
 - Meeting ID: 289 987 973 913 6
 - Passcode: hh2pX6aD
- **Stakeholder meetings** are scheduled for the month of October—see above.
 - **Your proposed regulatory reform plan** is due by February 13.

Your board liaison will work with your chair to schedule the meetings necessary for you to review public and staff recommendations, discuss merits and potential changes, and ultimately adopt your reform plan. If you have questions or concerns, please attend one of the informational sessions or reach out to me so I can provide you with timely responses.

Sincerely,



Sylvan Robb
Director

Statutory Authority	12 AAC Section	Subsection	Discretionary?	Justification	# of Discretionary Requirements
Statutory Authority	Section	Subsection & Regulation Language	Justification	# of Discretionary Requirements	
AS 08.87.020; AS 08.87.110	12 AAC 70.100	(a) The board will issue a certification by examination to practice as a general real estate appraiser to an applicant who meets the requirements of AS 08.87.110(a), 12 AAC 70.130(a)(1), and this section.	No	Statute mandates certification if requirements are met.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.100	(b)(1) Submit a completed application, on a form provided by the department; the completed application must include:	Yes	The requirement for a specific form and its contents is not detailed in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.100	(b)(1)(A) The personal identification information requested on the form;	Yes	Specifies required information beyond statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.100	(b)(1)(B) Official transcripts, notarized copies of certificates of completion, or other evidence of course completion acceptable to the board, that verify the classroom hours of instruction required in 12 AAC 70.115(a) or (b), as applicable;	Yes	Specifies acceptable evidence and notarization, not required by statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.100	(b)(1)(C) Work experience verification forms and a log of completed appraisals, on a form provided by the department, that meet the requirements of 12 AAC 70.110 and that verify the real estate appraisal experience required in 12 AAC 70.108(a);	Yes	Specifies verification forms and logs, not required by statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.100	(b)(1)(D) Subject to the penalties of unsworn falsification as defined in AS 11.56.210, a list of crimes described in AS 08.87.110 and AS 08.87.210 for which the applicant has been convicted;	Yes	Requires disclosure and attaches penalties, not specified in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.100	(b)(2) Pay any fees required in 12 AAC 02.370.	No	Fee payment is mandated by statute.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.105	(b)(1)(B) Official transcripts, notarized copies of certificates of completion, or other evidence of course completion acceptable to the board, that verify the classroom hours of instruction required in 12 AAC 70.115(c) or (d), as applicable;	Yes	Specifies acceptable evidence and notarization, not required by statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.105	(b)(1)(C) Work experience verification forms and a log of completed appraisals that meet the requirements of 12 AAC 70.110 and that verify the real estate appraisal experience required in 12 AAC 70.108(b);	Yes	Specifies verification forms and logs, not required by statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.105	(b)(1)(D) Subject to the penalties of unsworn falsification as defined in AS 11.56.210, a list of crimes described in AS 08.87.110 and AS 08.87.210 for which the applicant has been convicted;	Yes	Requires disclosure and attaches penalties, not specified in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.105	(b)(1)(E) A copy of the work product from a minimum of two appraisals performed by the applicant, selected by the board, and included in the log of appraisals submitted under 12 AAC 70.110(a);	Yes	Requires submission of work product, not specified in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.105	(b)(2) Pay any fees required in 12 AAC 02.370.	No	Fee payment is mandated by statute.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.105	(c)(1) The board has approved the applicant's work product submitted under (b)(1)(E) of this section;	Yes	Board approval of work product is not specified in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.105	(c)(2) The applicant has passed the examination required under AS 08.87.110(b)(3) and 12 AAC 70.130;	No	Passing the examination is mandated by statute.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.106	(a) The board will issue a certification to practice as a general real estate appraiser or residential real estate appraiser by reciprocity to an applicant who meets the requirements of AS 08.87.110(c) and this section.	No	Statute mandates certification if requirements are met.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.106	(b)(1) Submit a completed application, on a form provided by the department; the completed application must include the personal identification information requested on the form;	Yes	The requirement for a specific form and its contents is not detailed in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.106	(b)(2) Pay any fees required in 12 AAC 02.370;	No	Fee payment is mandated by statute.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.106	(b)(3) Submit verification of current certification or licensure from another state on a form provided by the department.	Yes	Specifies verification form and process, not required by statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.107	(a) The board will issue a certification by examination to practice as an institutional real estate appraiser to an applicant who meets the requirements of AS 08.87.110(e) and this section.	No	Statute mandates certification if requirements are met.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.107	(b)(1) Submit a completed application, on a form provided by the department; the completed application must include:	Yes	The requirement for a specific form and its contents is not detailed in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.107	(b)(1)(A) The personal identification information requested on the form;	Yes	Specifies required information beyond statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.107	(b)(1)(B) Official transcripts, notarized copies of certificates of completion, or other evidence of course completion acceptable to the board, that verify the classroom hours of instruction required of general real estate appraisers in 12 AAC 70.115(a) or (b), as applicable;	Yes	Specifies acceptable evidence and notarization, not required by statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.107	(b)(1)(C) Proof of full-time employment with a financial institution with offices in this state;	Yes	Requires specific employment documentation, not specified in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.107	(b)(2) Pay any fees required in 12 AAC 02.370.	No	Fee payment is mandated by statute.	0
AS 08.87.020	12 AAC 70.108	(a) An applicant for certification as a general real estate appraiser shall submit verification of 3,000 hours of appraisal work obtained continuously over a period of not less than 18 months. At least 1,500 hours of the appraisal work must be in nonresidential appraisal work. The board will only accept work experience that was obtained after January 30, 1989 and was performed in compliance with the Uniform Standards of Professional Appraisal Practice (USPAP) applicable as of the date of appraisal.	Yes	Specifies detailed experience requirements and timeframes beyond statute.	1
AS 08.87.020	12 AAC 70.108	(b) An applicant for certification as a residential real estate appraiser shall submit verification of 1,500 hours of appraisal experience obtained continuously over a period of not less than 12 months. The board will only accept work experience that was obtained after January 30, 1989 and was performed in compliance with the USPAP applicable as of the date of appraisal.	Yes	Specifies detailed experience requirements and timeframes beyond statute.	1
AS 08.87.020	12 AAC 70.108	(c) Repealed 4/8/21.	No	No requirement imposed (repealed).	0
AS 08.87.020	12 AAC 70.108	(d) In this section, a residential property is one to four residential units.	No	Provides a definition, not a requirement.	0
AS 08.87.020	12 AAC 70.110	(a) An applicant's qualifying work experience must be verified by one or more individuals, on forms provided by the department, and, for an applicant for certification as a general real estate appraiser or a residential real estate appraiser, a log submitted by the applicant of appraisal work performed. If an applicant cannot, for good cause, provide work experience verification forms from one or more individuals, the board may consider and approve other kinds of work experience verification.	Yes	Specifies verification forms and logs, and allows alternative verification, not required by statute.	1
AS 08.87.020	12 AAC 70.110	(b) The board will accept a work experience verification form only if it is notarized and has been completed by (1) a licensed construction contractor; (2) a federal or state regulated lender; (3) a present or former employer of the applicant; (4) an officer of a state or federal agency; or (5) an officer of a company that customarily uses the services of a real estate appraiser who has recent knowledge of the applicant's experience on that company's behalf.	Yes	Specifies who may complete verification forms and requires notarization, not required by statute.	1
AS 08.87.020	12 AAC 70.110	(c) Repealed 12/13/94.	No	No requirement imposed (repealed).	0
AS 08.87.020	12 AAC 70.110	(d) Repealed 12/13/94.	No	No requirement imposed (repealed).	0
AS 08.87.020	12 AAC 70.110	(e) At the request of the board, an applicant for certification as a general real estate appraiser or a residential real estate appraiser shall submit a copy of the work product from any appraisal performed by the applicant and included in the log of appraisals submitted under (a) of this section.	Yes	Requires submission of work product at board's request, not specified in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.115	(a) An applicant for certification as a general real estate appraiser must document satisfactory completion of 300 creditable classroom hours of instruction that meet the requirements in 12 AAC 70.140 with emphasis on appraisal of nonresidential properties, and a bachelor's degree or higher in any field from an accredited college or university.	Yes	Specifies classroom hours, degree level, and subject emphasis beyond statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.115	(b) An applicant for the Appraiser Qualification Board approved examination for certification as a general real estate appraiser shall document satisfactory completion of 300 creditable classroom hours as specified in the following core curriculum: (1) basic appraisal principles, 30 hours; (2) basic appraisal procedures, 30 hours; (3) the 15-hour national USPAP course or its equivalent, 15 hours; (4) general appraiser market analysis and the principle of the highest and best use of the property, 30 hours; (5) statistics, modeling, and finance, 15 hours; (6) general appraiser sales comparison approach, 30 hours; (7) general appraiser site valuation and cost approach, 30 hours; (8) general appraiser income approach, 60 hours; (9) general appraiser report writing and case studies, 30 hours; (10) appraisal subject matter electives, 30 hours, and may include hours over the minimum of the course topics required under this subsection.	Yes	Specifies detailed curriculum and hours, not required by statute.	10
AS 08.87.020; AS 08.87.110	12 AAC 70.115	(c) An applicant for certification as a residential real estate appraiser must document satisfactory completion of 200 creditable classroom hours of instruction that meet the requirements in 12 AAC 70.140 with emphasis on appraisal of residential properties, and one of the following: (1) a bachelor's degree or higher in any field from an accredited college or university; (2) an associate's degree in a field of study related to business administration, accounting, finance, economics, or real estate; (3) successful completion of 30 semester hours of college level courses that cover each of the following specific topic areas and hours: (A) English composition, three hours; (B) microeconomics, three hours; (C) macroeconomics, three hours; (D) finance, three hours; (E) algebra, geometry, or higher mathematics, three hours; (F) statistics, three hours; (G) computer science, three hours; (H) business or real estate law, three hours; (I) two elective courses in any of the topics listed in (A) – (H) of this paragraph or in accounting, geography, agricultural economics, business management, or real estate, three hours each; or (4) successful completion of at least 30 semester hours of the College Level Examination Program (CLEP) examination in the following specific topic areas and hours: (A) college algebra, three hours; (B) college composition, six hours; (C) college composition modular, three hours; (D) college mathematics, six hours; (E) principles of macroeconomics, three hours; (F) principles of microeconomics, three hours; (G) introductory business law, three hours; (H) information systems, three hours.	Yes	Specifies classroom hours, degree/education options, and detailed subject requirements beyond statute.	4

AS 08.87.020; AS 08.87.110	12 AAC 70.115	(d) An applicant for the Appraiser Qualification Board examination for certification as a residential real estate appraiser shall document satisfactory completion of 200 creditable classroom hours as specified in the following core curriculum: (1) basic appraisal principles, 30 hours; (2) basic appraisal procedures, 30 hours; (3) the 15-hour national USPAP course or its equivalent, 15 hours; (4) residential market analysis and the principle of the highest and best use of the property, 15 hours; (5) residential appraiser site valuation and cost approach, 15 hours; (6) residential sales comparison and income approaches, 30 hours; (7) residential report writing and case studies, 15 hours; (8) statistics, modeling and finance, 15 hours; (9) advanced residential applications and case studies, 15 hours; (10) appraisal subject matter electives, 20 hours, and may include hours over the minimum of the course topics required under this subsection.	Yes	Specifies detailed curriculum and hours, not required by statute.	10
AS 08.87.020; AS 08.87.110	12 AAC 70.115	(e) In this section, "residential property" means property with one to four residential units.	No	Provides a definition, not a requirement.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.115	(f) An applicant for approval as a trainee appraiser must document satisfactory completion of 75 creditable classroom hours as specified in the following core curriculum: (1) basic appraisal principles, 30 hours; (2) basic appraisal procedures, 30 hours; (3) the 15-hour national USPAP course or its equivalent, 15 hours.	Yes	Specifies classroom hours and curriculum for trainees, not required by statute.	3
AS 08.87.020; AS 08.87.110	12 AAC 70.120	(a) The board may issue a certification by endorsement to practice as a general real estate appraiser or residential real estate appraiser to an applicant who meets the requirements of AS 08.87.110(h) and this section.	No	Statute authorizes certification by endorsement if requirements are met.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.120	(b)(1) Submit a completed application, on a form provided by the department; the completed application must include the personal identification information requested on the form;	Yes	The requirement for a specific form and its contents is not detailed in statute.	1
AS 08.87.020; AS 08.87.110	12 AAC 70.120	(b)(2) Pay any fees required in 12 AAC 02.370.	No	Fee payment is mandated by statute.	0
AS 08.87.020; AS 08.87.110	12 AAC 70.130	(a) To be certified as a real estate appraiser by examination, an applicant must pass the following examination within the 24 months immediately preceding the date of certification: (1) for general or institutional certification, the Uniform State General Certification Examination endorsed by the Appraiser Qualifications Board of The Appraisal Foundation; or (2) for residential certification, the Uniform State Residential Certification Examination endorsed by the Appraiser Qualifications Board of The Appraisal Foundation.	Yes	Specifies examination type, timeframe, and endorsement, not required by statute.	2
AS 08.87.020; AS 08.87.110	12 AAC 70.130	(b) Repealed 1/16/2005.	No	No requirement imposed (repealed).	0
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(a) To comply with the real estate appraisal education requirements of 12 AAC 70.115 for initial certification, or the registered trainee education requirements of 12 AAC 70.125, an applicant's classroom hours of instruction, as defined in 12 AAC 70.910, must relate directly to real estate appraisal theory or practices and must be obtained through (1) a member organization of the Appraisal Foundation; (2) a junior college, college, or university; (3) a course approved by the Appraiser Qualifications Board Educational Course Review Program; (4) a real estate appraisal or real estate related organization; (5) a state or federal agency or commission; (6) a proprietary school; or (7) another organization or academic institution approved by the board.	Yes	Specifies acceptable sources and subject matter for education, not required by statute.	7
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(b) The board will credit only a course approved under 12 AAC 70.145 toward the classroom hours of instruction required for certification or registration.	Yes	Restricts credit to board-approved courses, not required by statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(c) An applicant's classroom hours of education for certification as a general or residential real estate appraiser must include coverage of all topics listed in the applicable Appraiser Qualification Criteria developed by the Appraiser Qualifications Board of the Appraisal Foundation, The Real Property Appraiser Qualification Criteria effective May 1, 2018, and adopted by reference.	Yes	Requires coverage of specific topics and adopts external criteria by reference, not required by statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(d) Repealed 1/16/2005.	No	No requirement imposed (repealed).	0
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(e) Repealed 6/28/2015.	No	No requirement imposed (repealed).	0
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(f) The board will award credit toward the classroom hour requirement for initial certification or trainee registration for completion of a course by online education if the course (1) meets the requirements of this section and 12 AAC 70.145(d); (2) requires successful completion of a written final examination that is proctored by an official approved by the presenting college or university, or by the sponsoring organization; (3) is presented to an organized group in an institutional setting with (A) a person qualified and available to answer questions, provide information, and monitor student attendance; (B) a minimum of two classroom hours; (4) meets the requirements for courses established by the Appraiser Qualifications Board; (5) has been presented by a college or university accredited by the Commission on Colleges or a regional accreditation association that offers online education programs in other disciplines; and (6) has received approval (A) repealed 1/16/2005; or (B) of the International Distance Education Certification Center's (IDEC) for the course design and delivery mechanism and either the approval of the (i) Appraiser Qualifications Board through the ACB Course Approval Program; or (ii) licensing or certifying jurisdiction where the course is being offered, for the content of the course.	Yes	Specifies requirements for online education, including proctoring, institutional setting, and external approvals, not required by statute.	6
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(g) The board will not award credit for noninstructional course time except for a maximum of 20 hours spent writing appraisal reports for a course on that subject. The number of hours credited under this subsection may not exceed 50 percent of the total classroom hours awarded for the course for which the appraisal reports were written. The board will award credit under this subsection for no more than one course during an applicant's total classroom hours of instruction.	Yes	Limits credit for noninstructional time and sets maximums, not required by statute.	3
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(h) An applicant's classroom hours of instruction must include coverage of the full scope of the fundamentals of appraisal theory, principles, and practices. A course that is highly specialized or narrow in focus will not be credited toward an applicant's required classroom hours of instruction unless the applicant has also completed sufficient courses to cover the fundamental aspects of appraisal theory, principles, and practices.	Yes	Requires coverage of fundamentals and restricts credit for specialized courses, not required by statute.	2
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(i) The board will not award credit for more than eight classroom hours of instruction per day. If no breakdown of instructional, assignment, and examination hours is given for a course or seminar, the board will award three and one half classroom hours of instruction for the last day of the course or seminar and seven classroom hours of instruction for all other days of the course or seminar.	Yes	Limits daily classroom hours and sets default values, not required by statute.	2
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.140	(j) The board will require additional information if necessary to determine if an applicant's classroom hours of instruction meet the requirements in this section.	Yes	Allows board to require additional information, not required by statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(a) The board will use the standards established in this section to determine if a course or seminar is in a subject related to real estate appraisal and will be credited toward an applicant's total classroom hours of instruction.	Yes	Specifies board standards for course approval, not required by statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(b) The board will review each course or seminar submitted with an individual's application for certification or registration and approve a course or seminar that meets the requirements of this section. The board will require an applicant to submit additional information, including the information required in (e)(3) - (10) of this section, if necessary to determine if a course or seminar meets the requirements in this section.	Yes	Specifies review and approval process and additional information, not required by statute.	2
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(c) The board will review and preapprove a course or seminar that meets the requirements of this section if an individual or organization submits the course or seminar to the board for preapproval under (e) of this section.	Yes	Specifies preapproval process, not required by statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(d) To be approved by the board, a course or seminar must meet the following requirements: (1) the primary focus of the course or seminar must be directly related to the theories, concepts, principles, practices, techniques, methods, or problems applicable to one or more aspects of real property	Yes	Specifies minimum hours, focus, examination, and assignment rules, not required by statute.	4
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(e) An individual or organization wishing to receive preapproval of a course or seminar shall submit	Yes	Specifies detailed application requirements for preapproval.	9
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(f) An individual or organization that has received preapproval of a course or seminar shall notify the board of any change in the information submitted under (e) of this section for an approved course or seminar.	Yes	Requires notification of changes to approved courses, not required by statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(g) Course and seminar approval under this section is valid for three years from the date of approval.	Yes	Specifies approval validity period, not required by statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.310	12 AAC 70.145	(h) The board will maintain a list of courses and seminars approved under this section.	Yes	Requires board to maintain a list of approved courses, not required by statute.	1
—	12 AAC 70.150	(Repealed 4/6/2021)	No	No requirement imposed (repealed).	0
AS 08.87.020; AS 08.87.130; AS 08.87.135	12 AAC 70.160	(a) An applicant for registration as a real estate appraisal management company shall submit (1) a complete notarized application on a form approved by the board and provided by the department that includes (A) the names and addresses of all owners of the company, including natural persons or entities; (B) the name and contact information of the company's agent if applicable under AS 08.87.135(a)(2); (C) a list of all certified real estate appraisers in the state who perform appraisals for the company; (D) a list of all states in which the appraisal management company performs appraisals; (E) the name of the controlling person and evidence satisfactory to the board that the controlling person (i) has an active real estate appraiser certificate in good standing in a state; (ii) has not had a real estate appraiser certificate denied, cancelled, suspended, revoked, put on probation, or surrendered in lieu of a pending revocation, as described in AS 08.87.135(b)(2), and for a substantive cause as determined by the same state that issued the certificate; and (iii) is of good moral character; and (F) certification that the (i) appraisers on the appraiser panel are in compliance with the Uniform Standards of Professional Appraisal Practice (USPAP) and are qualified to conduct federally related transactions under federal law; (ii) owners are in compliance with (b) of this section; and (iii) appraisals are conducted independently and free from inappropriate influence and coercion as required by AS 08.87.135(a)(6); (2) the applicable fees required in 12 AAC 02.370; and (3) a copy of a surety bond in the amount of \$50,000.	Yes	Specifies detailed application, documentation, and certification requirements beyond statute.	15

AS 08.87.020; AS 08.87.130; AS 08.87.135	12 AAC 70.160	(b) Owners of the appraisal management company may not have had a real estate appraiser certificate denied, cancelled, suspended, revoked, put on probation, or surrendered in lieu of a pending revocation, as described in AS 08.87.135(a)(7), and for a substantive cause as determined by the same state that issued the certificate. A person who owns at least 10 percent of a real estate management company must be of good moral character as defined in this section.	Yes	Specifies ownership restrictions and moral character requirements beyond statute.	2
AS 08.87.020; AS 08.87.130; AS 08.87.135	12 AAC 70.160	(c) "Good moral character" under this section is defined as a personal history of honesty, fairness, and respect for the rights of others and for state and federal law. A person applying for a registration is ineligible for registration due to failure to satisfy the requirement of good moral character if (1) there is substantial connection between the lack of good moral character of the person and the professional responsibilities of an appraiser, a controlling person, or owner of an appraisal management company; and (2) the finding by the board of lack of good moral character is supported by clear and convincing evidence.	Yes	Specifies definition and criteria for good moral character, not required by statute.	3
AS 08.01.065; AS 08.87.130; AS 08.87.135; AS 08.01.100	12 AAC 70.170	A registered appraisal management company applying for renewal of a registration shall submit (1) a completed renewal application, on a form provided by the department that meets the requirements of AS 08.87.135(e); (2) the renewal fee required in 12 AAC 02.370; and (3) proof of current bonding as described in 12 AAC 70.160(a)(3).	Yes	Specifies renewal application format, fee, and bonding documentation beyond statute.	3
AS 08.87.020; AS 08.87.150	12 AAC 70.180	A registered appraisal management company must retain all records as described in AS 08.87.150 and make the records available to the board or its designee upon request.	Yes	Specifies retention and availability of records beyond statute.	2
AS 08.87.020; AS 08.87.120	12 AAC 70.200	(a) A person or an organization wishing to sponsor a real estate appraisal continuing education course or seminar shall apply for board approval of that course or seminar by submitting (1) a completed application on forms provided by the department; (2) any fees required in 12 AAC 02.370; (3) the following information: (A) a complete course description, including the course or seminar title and a description of the learning objectives; (B) an outline of the major topics covered by the course or seminar and the number of classroom hours allowed for each topic; (C) the name of the course or seminar provider; (D) repealed 6/22/2005; (E) a copy of the attendance policy and a description of the procedures used for keeping a record of attendance; (F) a course syllabus; (G) a list of texts and instructional materials used in the course or seminar; (H) the instructor's résumé that includes the instructor's (i) name; (ii) recognition in the real estate appraisal industry; and (iii) professional designations and affiliations.	Yes	Specifies detailed application, documentation, and approval requirements beyond statute.	8
AS 08.87.020; AS 08.87.120	12 AAC 70.200	(b) An applicant for renewal may petition the board for approval of a course or seminar that the applicant believes will meet the requirements of 12 AAC 70.210.	Yes	Allows petition for approval, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.200	(c) The board will award up to 10 hours of continuing education credit for nonstudent participation in an educational program as provided for in AS 08.87.120(b)(2). To receive credit under this subsection, an applicant for renewal shall provide the documentation necessary to substantiate the applicant's participation and experience, including (1) information on the topics covered and the hours spent in the program; and (2) documentation that the applicant's involvement in the program was in the technical and professional aspects of real estate appraisal and that the primary focus of the program was directly related to the theories, concepts, principles, practices, techniques, methods, or problems applicable to one or more aspects of real property appraisal.	Yes	Specifies documentation and credit limits for nonstudent participation, not required by statute.	3
AS 08.87.020; AS 08.87.120	12 AAC 70.200	(d) Courses and seminars that are not approved by the Appraiser Qualifications Board (AQB) or the International Distance Education Certification Center (IDEC) are valid for three years from the date of initial approval.	Yes	Specifies validity period for non-AQB/IDEC courses, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.200	(e) Courses and seminars approved by the Appraiser Qualifications Board (AQB) or the International Distance Education Certification Center (IDEC) are given an expiration date consistent with the organization's expiration date, as follows: (1) the department will update the course or seminar expiration date if the course provider submits recertification documents, but will not update the course or seminar expiration date if the AQB or IDECC recertification exceeds three years from the date of initial approval; (2) a course or seminar that expires after three years must be re-submitted if the provider requests reapproval.	Yes	Specifies expiration and recertification rules for AQB/IDEC courses, not required by statute.	2
AS 08.87.020; AS 08.87.120	12 AAC 70.200	(f) A person or an organization wishing to sponsor a real estate appraisal continuing education course or seminar that is approved by the Appraiser Qualifications Board (AQB) or the International Distance Education Certification Center (IDEC) shall apply for board approval of that course or seminar by submitting (1) the application and fee required under (a)(1) and (2) of this section; and (2) verification the course is approved by the AQB or the IDECC.	Yes	Specifies application and verification requirements for AQB/IDEC courses, not required by statute.	2
AS 08.87.020; AS 08.87.120	12 AAC 70.210	(a) To be approved by the board, the primary focus of a continuing education course or seminar must be directly related to the theories, concepts, principles, practices, techniques, methods, or problems applicable to one or more aspects of real property appraisal.	Yes	Specifies subject matter focus for approval, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.210	(b) The board will approve a course or seminar on the following topics if the course or seminar meets the requirements of (a) of this section: (1) repealed 9/14/2012; (2) construction cost estimating; (3) ethics and standards of professional appraisal practice; (4) land use planning, zoning, and taxation; (5) property development; (6) real estate appraisal, including valuations and evaluations; (7) real estate financing and investment; (8) real estate law; (9) real estate litigation; (10) real estate appraisal related computer applications; (11) other topics related to real estate appraisal that are approved by the board.	Yes	Specifies approved topics for continuing education, not required by statute.	10
AS 08.87.020; AS 08.87.120	12 AAC 70.210	(c) In addition to the courses approved by the board under 12 AAC 70.200, the following courses are approved for continuing education when they are consistent with (a) of this section and an application provided by the department for course approval is submitted with the appropriate application fee and is approved by the board: (1) courses offered by a member organization of The Appraisal Foundation; (2) courses offered by a regionally accredited junior college, college, or university; (3) courses approved by the Appraiser Qualifications Board Course Approval Program of the Appraisal Foundation; or (4) online education courses approved by the International Distance Education Certification Center (IDEC).	Yes	Specifies additional approved sources for continuing education, not required by statute.	4
AS 08.87.020; AS 08.87.120	12 AAC 70.210	(d) To be approved by the board, a continuing education course or seminar must include a minimum of two classroom hours, that meet the requirements of (a) of this section.	Yes	Specifies minimum classroom hours for approval, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.210	(e) The board will award continuing education credit for completion of a course by online education if the course meets the requirements of 12 AAC 70.140(f).	Yes	Specifies credit for online education, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.210	(f) Course and seminar approval under this section is valid for three years from the date of approval.	Yes	Specifies validity period for approval, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.210	(g) Consistent with Appraiser Qualification Criteria in The Real Property Appraiser Qualification Criteria, adopted by reference in 12 AAC 70.140, the board will award continuing education credit for participation in one in-person or teleconference board meeting each biennial licensing period if participation meets the requirements of this section: (1) the participant is a certified real estate appraiser subject to the requirements of 12 AAC 70.220; (2) the board meeting is a minimum of two hours; (3) the hours claimed for participation do not exceed seven hours; (4) attendance is maintained throughout the duration of the scheduled meeting; (5) participation is documented on a form provided by the department and returned to the board.	Yes	Specifies requirements for board meeting participation credit, not required by statute.	5
AS 08.87.020; AS 08.87.120	12 AAC 70.220	(a) At the time of certificate renewal, an applicant for renewal who has been certified for (1) 24 months or more shall document satisfactory completion of at least 28 hours of continuing education during the concluding licensing period; (2) at least 185 days, but less than 24 months, shall document satisfactory completion of at least 14 hours of continuing education during the concluding licensing period; (3) less than 185 days is not required to meet continuing education requirements for that renewal.	Yes	Specifies continuing education hour requirements and timeframes beyond statute.	3
AS 08.87.020; AS 08.87.120	12 AAC 70.220	(b) The board will not recognize continuing education hours claimed by an applicant for renewal for taking the same, or substantially identical, course more than once during a certification period.	Yes	Restricts duplicate course credit, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.220	(c) Except as provided in (d) of this section, credit is given for classroom and examination hours only and not for hours devoted to class preparation or completion of assignments. A classroom hour is defined in 12 AAC 70.910.	Yes	Specifies what counts as a classroom hour and excludes preparation/assignment time, not required by statute.	2
AS 08.87.020; AS 08.87.120	12 AAC 70.220	(d) Hours required by this section may be obtained through online courses approved under 12 AAC 70.210 or online courses approved under 12 AAC 70.215.	Yes	Allows online courses to satisfy continuing education requirements, not required by statute.	1
AS 08.87.020; AS 08.87.120	12 AAC 70.220	(e) As part of the requirements of (a)(1) of this section, an applicant for renewal of a certificate shall document satisfactory completion of a seven-hour National USPAP Update Course taught by an Appraiser Qualifications Board certified instructor who is a certified appraiser. The board will accept courses determined as equivalent by the Appraiser Qualifications Board Course Approval Program of the Appraisal Foundation. Completion of the 15-hour national USPAP course used for certification under 12 AAC 70.115 may not be used to satisfy the continuing education renewal requirements of the seven-hour USPAP Update Course required in this subsection.	Yes	Specifies USPAP Update Course requirements and equivalency rules, not required by statute.	3
AS 08.87.020; AS 08.87.120	12 AAC 70.220	(f) During the licensing period of July 1, 2019 to June 30, 2021, an unlimited number of the hours required by this section may be obtained through distance education described in (d) of this section.	Yes	Allows unlimited distance education hours for a specific period, not required by statute.	1
AS 08.87.020; AS 08.87.200	12 AAC 70.900	The standards of practice for certified real estate appraisers practicing in the state are those specified in AS 08.87.200(3).	<input checked="" type="checkbox"/> No	Mandated by statute.	0
AS 08.87.020; AS 08.87.110; AS 08.87.120	12 AAC 70.910	(1) Except as provided in 12 AAC 70.145(d)(2)(A) and 12 AAC 70.220(c), one classroom hour equals a minimum of 50 minutes of instruction;	<input checked="" type="checkbox"/> Yes	Defines classroom hour beyond statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.120	12 AAC 70.910	(2) One academic semester credit hour equals 15 classroom hours;	<input checked="" type="checkbox"/> Yes	Defines conversion not specified in statute.	1
AS 08.87.020; AS 08.87.110; AS 08.87.120	12 AAC 70.910	(3) One academic quarter credit hour equals 10 classroom hours.	<input checked="" type="checkbox"/> Yes	Defines conversion not specified in statute.	1

AS 08.01.062, AS 08.87.020	12 AAC 70.920	(a) The board or the board's designee in the department will issue a courtesy license to a nonresident who is a certified or credentialed real estate appraiser in another state and who meets the requirements of this section.	<input checked="" type="checkbox"/> Yes	Sets process and criteria not fully specified in statute.	1
AS 08.01.062, AS 08.87.020	12 AAC 70.920	(c) A courtesy license is valid for one appraisal assignment, not to exceed 180 consecutive days. However, upon request the board will grant one 30-day extension. A person may be issued no more than two courtesy licenses in a 12-month period.	<input checked="" type="checkbox"/> Yes	Sets assignment limit, extension, and issuance limit.	3
AS 08.01.062, AS 08.87.020	12 AAC 70.920	(d) An applicant for a courtesy license shall submit (1) a completed application on the forms provided by the department; (2) any fees required in 12 AAC 02.370; (3) evidence of a certificate or an applicant's credentials as a real estate appraiser in good standing from another state; (4) an address for service of process; and (5) evidence of a contract to provide appraisal for the appraisal assignment under (c) of this section.	<input checked="" type="checkbox"/> Yes	Specifies five distinct application requirements.	5
AS 08.01.062, AS 08.87.020	12 AAC 70.920	(f) The board's designee in the department shall issue a courtesy license within five days after receipt of the materials and fees required in (d) of this section unless those application materials indicate disciplinary action in another state.	<input checked="" type="checkbox"/> Yes	Sets timeline not specified in statute.	1
AS 08.01.062, AS 08.87.020	12 AAC 70.920	(g) The board's designee in the department shall forward any courtesy license application and accompanying materials that indicate disciplinary action in another state to the board for its consideration to grant or deny the courtesy license.	<input checked="" type="checkbox"/> Yes	Sets process not specified in statute.	1
AS 08.01.062, AS 08.87.020	12 AAC 70.920	(h) In compliance with 12 U.S.C. 331-3351 (Title XI, Financial Institutions Reform, Recovery and Enforcement Act of 1989), the board or the board's designee in the department will issue a courtesy license to a credentialed nonresident of this state for the purpose of providing appraisal services for federally-related transactions in this state.	<input checked="" type="checkbox"/> No	Mandated by federal law.	0
AS 08.01.062, AS 08.87.020	12 AAC 70.920	(i) In this section, "credentialed" means a licensed or certified appraiser in good standing in another state.	<input checked="" type="checkbox"/> Yes	Defines term not specified in statute.	1
AS 08.01.065, AS 08.87.100, AS 08.87.110	12 AAC 70.930	(a) In compliance with 12 U.S.C. 3338 (Financial Institutions Reform, Recovery, and Enforcement Act of 1989), the board will annually send to the Federal Financial Institutions Examination Council, Appraisal Subcommittee, (1) a roster of all real estate appraisers certified in Alaska at that time; and (2) an amount equal to the amount collected from each certified real estate appraiser listed on the roster identified in paragraph (1) of this section.	<input checked="" type="checkbox"/> No	Mandated by federal law.	0
AS 08.01.065, AS 08.87.100, AS 08.87.110	12 AAC 70.930	(b) At the time of initial certification and at the time of certificate renewal, a certified real estate appraiser shall submit to the department any annual federal registry fee established in 12 AAC 02.	<input checked="" type="checkbox"/> Yes	Sets fee process not specified in statute.	1
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(a) A supervisory appraiser shall (1) be in good standing in this state and not subject to any disciplinary action within any jurisdiction within the last three years that affects the supervisory appraiser's legal eligibility to engage in appraisal practice; a supervisory appraiser subject to a disciplinary action is in good standing three years after the successful completion or termination of the sanction imposed against the appraiser; (2) have been a state-certified appraiser for at least three years before being eligible to become a supervisory appraiser; and (3) comply with the Competency Rule of the Uniform Standards of Professional Appraisal Practice for the property type and geographic location for which the trainee supervisor is being supervised.	<input checked="" type="checkbox"/> Yes	Three distinct eligibility requirements.	3
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(b) A supervisory appraiser may not supervise more than three trainee appraisers at one time.	<input checked="" type="checkbox"/> Yes	Sets supervision limit not specified in statute.	1
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(c) A supervisory appraiser shall be responsible for the training, guidance, and direct supervision of the trainee appraiser by (1) accepting responsibility for a trainee appraiser's appraisal reports by signing each report and certifying that the report is in compliance with the Uniform Standards of Professional Appraisal Practice; (2) reviewing the trainee appraisal reports; and (3) personally inspecting each appraised property with the trainee appraiser until the supervisory appraiser determines that the trainee appraiser is competent, in accordance with the Competency Rule of the Uniform Standards of Professional Appraisal Practice, for the property type.	<input checked="" type="checkbox"/> Yes	Three distinct supervision requirements.	3
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(d) A trainee appraiser shall report to the department, on a form provided by the department, the identity of any supervisory appraiser. A trainee appraiser may have more than one supervisory appraiser. If a trainee appraiser has more than one supervisory appraiser, the trainee appraiser shall report the identity of each supervisory appraiser as required under this subsection.	<input checked="" type="checkbox"/> Yes	Reporting and multiple supervisor requirements.	2
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(e) A supervisor-trainee relationship becomes effective on the date of receipt by the department of the original required form with original signatures.	<input checked="" type="checkbox"/> Yes	Sets effective date not specified in statute.	1
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(f) The supervisory appraiser and the trainee appraiser shall jointly maintain an appraisal log that for each appraisal includes at least (1) identification of the type of property; (2) the date of the report; (3) the address of the appraised property; (4) a description of work performed by the trainee appraiser and the scope of the review and supervision of the supervisory appraiser; (5) the number of actual work hours by the trainee appraiser on the assignment; and (6) the signature and state certification number of the supervisory appraiser; separate appraisal logs shall be maintained for each supervisory appraiser, if applicable.	<input checked="" type="checkbox"/> Yes	Six log elements plus separate logs for each supervisor.	7
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(g) Before supervising a trainee appraiser, a supervisory appraiser shall complete a course that (1) complies with the specifications for course content established by the Appraiser Qualifications Board of the Appraisal Foundation; and (2) is specifically oriented to the requirements and responsibilities of supervisory appraisers and trainee appraisers.	<input checked="" type="checkbox"/> Yes	Two distinct course requirements.	2
AS 08.87.020, AS 08.87.310	12 AAC 70.935	(h) The course that an applicant for certification under 12 AAC 70.125 as a trainee appraiser must take (1) must (A) comply with the specifications for course content established by the Appraiser Qualifications Board of the Appraisal Foundation; and (B) be specifically oriented to the requirements and responsibilities of supervisory appraisers and trainee appraisers; and (2) is not eligible towards the 75 hours of qualifying education required under 12 AAC 70.125.	<input checked="" type="checkbox"/> Yes	Two course content requirements, one eligibility requirement.	3
AS 08.87.020, AS 08.87.300	12 AAC 70.940	(a) An appraiser must prepare a work file for each appraisal, appraisal review, or appraisal consulting assignment. A work file must be in existence before the issuance of a written or oral report. A written summary of an oral report must be added to the work file within a reasonable time after the issuance of the oral report.	<input checked="" type="checkbox"/> Yes	Three distinct work file requirements.	3
AS 08.87.020, AS 08.87.300	12 AAC 70.940	(b) The work file must include (1) the name of the client and the identity, by name or type, of any other intended users; (2) true copies of any written reports, documented on a type of media a photocopy or an electronic copy of the entire signed report transmitted to the client satisfies the requirements of a true copy; (3) summaries of any oral reports or testimony, or transcripts of testimony, including the appraiser's signed and dated certification; and (4) all other data, information, and documentation necessary to support the appraiser's opinions and conclusions and to show compliance with USPAP, or reference to the locations of the documentation.	<input checked="" type="checkbox"/> Yes	Four distinct work file content requirements.	4
AS 08.87.020, AS 08.87.300	12 AAC 70.940	(c) An appraiser must retain the work file for a period of at least five years after preparation or at least three years after final disposition of any judicial proceeding in which the appraiser provided testimony related to the assignment, whichever period expires later.	<input checked="" type="checkbox"/> Yes	Sets retention period not specified in statute.	1
AS 08.87.020, AS 08.87.300	12 AAC 70.940	(d) An appraiser must have custody of the appraiser's work file, or make appropriate work file retention, access, and retrieval arrangements with the party having custody of the work file.	<input checked="" type="checkbox"/> Yes	Custody and retention/access arrangements.	2
AS 08.87.020, AS 08.87.300	12 AAC 70.940	(e) An appraiser having custody of a work file must allow other appraisers with work file obligations related to an assignment appropriate access and retrieval for the purpose of (1) submission to state appraiser regulatory agencies; (2) compliance with due process of law; (3) submission to a duly authorized professional peer review committee; or (4) compliance with retrieval arrangements.	<input checked="" type="checkbox"/> Yes	Four distinct access/retrieval requirements.	4
AS 08.87.020	12 AAC 70.990	(1)-(15) "appraisal experience" includes fee and staff appraisals, ad valorem tax appraisals, appraisal reviews, appraisal analysis, real estate counseling, and feasibility analysis and study, all of which must have been performed in accordance with the Uniform Standards of Professional Appraisal Practices described in 12 AAC 70.900; "board" means the Board of Certified Real Estate Appraisers; "certified real estate appraiser" means a real estate appraiser who is certified in Alaska under AS 08.87; it does not include persons certified by another licensing jurisdiction or organization; "department" means the Department of Commerce, Community, and Economic Development; "holds out as a certified real estate appraiser in any way" includes anyone who performs appraisal services on real estate located in Alaska; "transaction value" means the amount of the federally-related transaction and is not necessarily the value of the property being appraised; "institutional real estate appraiser" means a real estate appraiser employed full-time by a financial institution with an office in the state subject to the limitations set out in AS 08.87.110(e) - (g); "complete application" means an application that includes all documentation and fees required for certification in this chapter; "distance education" means an educational process where a geographical separation exists between the provider and student; "CLEP" means the College-Level Examination Program; "USPAP" means the Uniform Standards of Professional Appraisal Practice, developed by the Appraisal Foundation; "covered transactions" means any consumer credit transaction secured by the consumer's principal dwelling; "classroom" means a traditional classroom or a synchronous or asynchronous online courses; "asynchronous" (A) means non-real time transmission of instruction, classwork, and discussion between an instructor and a student; (B) does not include digital versatile discs (DVDs) or other physical media, except as provided by an instructor as part of course material; "synchronous" means instruction, classwork, and discussion between an instructor and a student is able to occur in real-time.	<input checked="" type="checkbox"/> Yes	Fifteen distinct definitions.	15

Real Estate Appraisers Adopted by Reference Discretionary Requirements:

Document Adopted by Reference	# of discretionary requirements
The Real Property Appraiser Qualification Criteria – May 1, 2018	240
Total:	240

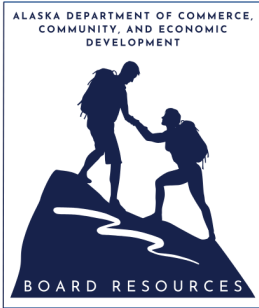
The Real Property Appraiser Qualification Criteria – May 1, 2018: 240

Summary of Discretionary Requirements

The document is a comprehensive set of **qualification criteria** for real property appraisers, including education, experience, examination, supervision, and continuing education. It includes:

Section	Description	Requirement Count
General Criteria (Education, Experience, Exams, Background)	Applies to all appraiser classifications	65
Trainee Appraiser	Education, supervision, training, logs	22
Licensed Residential Appraiser	Education, experience, scope of practice	18
Certified Residential Appraiser	Education, experience, college-level options	24
Certified General Appraiser	Education, experience, non-residential focus	20

Section	Description	Requirement Count
Supervisory Appraiser	Eligibility, training, supervision limits	12
PAREA (Practical Applications of Real Estate Appraisal)	Simulated experience program requirements	18
Continuing Education	Course content, hours, frequency, delivery	16
Course Development & Delivery	Required content outlines, delivery methods	30
Guide Notes (GN 1–11)	Clarifications and implementation guidance	15



Strategies for Boards to Get the Most Out of the AO 360 Regulatory Review Process

DCCED Boards and Regulations Resources
October 2025

Sara Chambers
Boards and Regulations Advisor
Agency Regulatory Liaison

Introduction

Administrative Order 360 was issued by Governor Dunleavy on August 4, 2025, with the purpose of improving the quality, transparency, and efficiency of the State's regulatory environment by:

- Promoting growth and investment in Alaska by reducing administrative and economic burdens associated with regulatory compliance, including removing barriers, finding solutions, and identifying alternative pathways.
- Streamlining permitting processes and improving coordination and efficiency within all permitting departments.
- Ensuring boards and commissions adjust regulatory structures as necessary to maintain critical consumer protection while eliminating unnecessary barriers to entry for new professionals.
- Engaging stakeholders early and continuously in the regulatory development and reform process.
- Ensuring all regulations are clearly written, legally sound, and supported by a demonstrated need.
- Regularly evaluating existing regulations for effectiveness, redundancy, clarity, and impact.
- Reducing the regulatory burden on all Alaskans.

As a board with regulatory authority, under the AO you are required to engage in a process that includes the steps below to produce the following deliverables:

- By December 29 (LBC, AIDEA, AEA, AOGCC, RCA)/February 13 (CBPL and AMCO): Produce a *Regulatory Reform Plan* to reduce your regulatory requirements by 15% by December 31, 2026, and 25% by December 31, 2027 (cumulative), in accordance with the *Regulatory Reduction Guide*. At a minimum, each proposed plan for regulatory reform must:
 - List each specific regulation identified for reform;
 - Include a decisional document identifying recommendations received, how they were considered for inclusion in the *Plan*, and (if appropriate) reasons for rejection;
 - Propose how the agency will organize the regulations identified for reform into discrete projects for submittal to the Department of Law for preliminary review;
 - Identify whether agency staff will be drafting the revised regulations or whether the agency is requesting drafting assistance from the Department of Law; and
 - Provide a timeline for submitting the draft revised regulations to the Department of Law for preliminary review.

The plan may also include proposed reductions in guidance documents as a means to meet the reduction percentages.

- Propose regulation changes per the Administrative Procedures Act to meet adoption timelines in the board's approved *Regulatory Reform Plan*.
- By September 4, 2026, and periodically prior to publication: Submit updates to guidance documents for Department of Law review per the process outlined in the *Regulatory Reduction Guide*.
- By September 18, 2026: Submit to the Agency Regulatory Liaison their projected regulatory plan that lists all anticipated rulemaking actions for the subsequent state fiscal year

As volunteer boards with many existing time-sensitive responsibilities, this task may seem daunting. However, it is truly an opportunity. This guide will assist you in strategizing -- not only to attain compliance but to produce excellence.

Engage the public, staff, and stakeholders

Cast a wide net for input. Stakeholders will have different perspectives, so invite the spectrum of those who interact with your regulations. These may be people or entities who are regulated, those who receive services, partner agencies or organizations...even those who have been critical of the board in the past. Ask staff for their suggestions; they are the front line in answering calls, processing applications, or investigating complaints.

Ensure your board understands the mission and has the materials to be successful

If you haven't already done so, schedule a 30-minute introduction on AO 360 at your upcoming meeting, or schedule a special meeting to hear this information and strategize how you will wrap your arms around this initiative. The division director, lead staff, or I are happy to walk through our presentation about the goals and timeline and answer questions.

Staff will provide the following information, which you will need to perform your work well and to comply with the governor's deliverables and deadlines:

- *A decisional document listing any public comments received during the listening sessions or via email/mail.*
This document will include space for your board to consider how to respond and to codify your response, which is required.
- *List of regulations and number of discretionary requirements in each section.*
You are required to present an overview of how you plan to change the regulation and to list the number and percentage of reductions expected from this change. You'll also need to indicate whether you expect to need attorney help in drafting, how you plan to package your regulations into manageable projects, as well as your timeline for completion.
- *List of guidance documents and their length.*
You are not required to include reductions in guidance documents as part of your 15% or 25% reductions but streamlining regulations should naturally produce streamlined guidance. Adopting clear and concise regulations reduces the need to explain them. You can use these reductions in guidance documents to help meet these reduction goals.
- *Suggestions for regulatory or guidance document improvements from their perspective.*
Staff should include their ideas for changes, especially to administrative burdens that hold back effective outcomes, outdated or unnecessary requirements, errors, and stumbling blocks that generate confusion.
- *A correct and current copy of your statutes, other agency statutes, regulations, and relevant federal codes that impact your program.*
The assignment includes reviewing all regulations, not just responding to public comments. Having these materials at your fingertips can ease the hunt for applicable information, especially when double-checking what regulations may be discretionary.
- *The Regulatory Reduction Guide issued by the Department of Law, as well as any additional relevant guidance from the Agency Regulatory Liaison.*

Organize according to your board's strengths

Board chairs should think about the strengths, skill sets, and makeup of their team, then suggest an efficient pathway to tackling the regulatory review process. Some ideas:

- *Schedule additional meetings so the entire board engages in the work.* This is most effective with smaller boards when committees might not make sense.
- *Divide and conquer:*
 - *Assign each member a section to analyze and report back to the board.*
This can be successful if the section is linked to type of license or expertise held by the board member. For example, someone holding the engineer or physician seat could review the technical sections that might not be within the knowledge base of a public member. The public member could review the sections relating to investigations or administration, which may relate best to the consumer experience and not require technical expertise.
 - *Form a committee of board members to review the regulations and report back to the board.*

This may be best suited to members who are critical readers and excel at documentation, policies, procedures, etc. They can dig deep and may even enjoy the process. Other members of the board could independently review public-facing guidance documents or pick up work outside of AO 360 to help lighten the load for those serving on the committee.

- *Form a work group of board members and key public persons, such as industry or representatives of certain constituencies.*

The board should identify these members in the motion when they vote to create the work group. While the public should be invited to offer input, not every person who calls in may merit a seat at the table. The work group ensures varied perspectives are presented and heard.

As a reminder, meetings of committees and workgroups must be publicly noticed. To ensure transparency and complete engagement and awareness by all members, your *Regulatory Reform Plan* should be approved by a roll call vote on the record of a public meeting.

Review all regulations with a fresh lens

The initiative provides boards with an opportunity to review all of their regulations afresh; given the myriad complex priorities of a regulatory board, a comprehensive regs review may not be part of an established rhythm. To maximize the value of the project, ensure that members approach it with the goals of AO 360 in mind: Seeking to reduce regulatory burdens, streamline and modernize requirements, and eliminate unnecessary barriers to entry.

Keep in mind that this does not include jeopardizing the safety of the public. However, it does create accountability among boards for using their highest faculties in determining whether existing standards and processes are appropriate. Strategies boards might use to approach this project include:

- Using a framework or system to adhere to the principles of “right-touch regulation.” (If you are unsure what this term means or do not currently use a decisionmaking framework, please contact your Boards and Regulations Advisor.)
- Avoiding the trap of “this is how we have always done it.” Is it necessary? Does it prevent a likely harm? If so, is it reasonable? If not, why require it?
- Ensuring you don’t have requirements that are not actionable, e.g., don’t request criminal background information if you may not take action based on that information.
- Maintaining arbitrary standards and timeframes that are not based on research, proven national standards, or other objective criteria.
- Thinking that a “may” in statute means a “shall”: Just because you have the authority to adopt a regulation doesn’t mean you have to.
- Digging into changes you have always wanted to make—or addressing changes that stakeholders have requested—but the board hasn’t had time to address.
- Updating to modern standards—don’t miss references to fax machines, unnecessarily notarizing documents, defunct organizations, etc.
- Looking for alternative pathways to accomplish similar goals, including attestations instead of submitting documents where that makes sense, identifying steps that can be eliminated because another agency has already checked the information, etc.

Prepare to defend what can’t change:

- Identify baseline public safety standards that can’t be lowered and include a rationale for why they are important.
- Identify statutory or federal requirements that are inflexible. Per the *Drafting Manual for Administrative Regulations*, eliminate repetition of those requirements in regulation unless they provide clarity or are advised by your attorney.

Conclusion

This Administrative Order is ambitious, but it is reachable with organization and intention. Every member will need to set aside additional time to engage with the process. Communicate concerns with your lead staff, who can work with your Agency Regulatory Liaison to answer questions and find solutions.

Statutory Proposals Update

Board Business

Report Highlights

Why DLA Performed This Audit

The audit was performed to determine if there is a continued need for the board and if its termination date should be extended. The board is set to sunset on June 30, 2026, and will have one year from that date to conclude its administrative operations.

What the Legislative Auditor Recommends

1. The Office of the Governor, Boards and Commissions director should continue to work with the board to identify potential applicants to fill board seats in a timely manner.
2. The board should continue to seek a statutory change to address the Appraisal Subcommittee findings.
3. DCCED's commissioner should work with policy makers to improve the recruitment and retention of investigators.

A Sunset Review of the Department of Commerce, Community, and Economic Development (DCCED), Board of Certified Real Estate Appraisers (board)

April 14, 2025

Audit Control Number 08-20148-25

REPORT CONCLUSIONS

The board served the public's interest by conducting meetings in an effective manner, actively amending regulations, and effectively licensing real estate appraisers and registering appraisal management companies. The audit also concluded that one board position had been vacant for 56 months as of January 2025, statute changes may be necessary to address federal oversight findings, and board related investigations were not consistently conducted in a timely manner.

In accordance with AS 08.03.010(c)(20), the board is scheduled to terminate on June 30, 2026. We recommend that the legislature extend the board's termination date six years to June 30, 2032, which is two years less than the maximum allowed by statute. The extension recommendation takes into consideration the audit findings and the fact that the board is also subject to federal oversight.

ALASKA STATE LEGISLATURE

LEGISLATIVE BUDGET AND AUDIT COMMITTEE

Division of Legislative Audit



P.O. Box 113300
Juneau, AK 99811-3300
(907) 465-3830
FAX (907) 465-2347
legaudit@akleg.gov

May 20, 2025

Members of the Legislative Budget
and Audit Committee:

In accordance with the provisions of Title 24 and Title 44 of the Alaska Statutes (sunset legislation), we have reviewed the activities of the Board of Certified Real Estate Appraisers and the attached report is submitted for your review.

DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT
BOARD OF CERTIFIED REAL ESTATE APPRAISERS
SUNSET REVIEW

April 14, 2025

Audit Control Number
08-20148-25

The audit was conducted as required by AS 44.66.050(a). Per AS 08.03.010(c)(20), the board is scheduled to terminate on June 30, 2026. We recommend the legislature extend the board's termination date to June 30, 2032.

We conducted this audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Fieldwork procedures utilized in the course of developing the findings and recommendations presented in this report are discussed in the Objectives, Scope, and Methodology.

A handwritten signature in black ink, appearing to read "Kris Curtis".

Kris Curtis, CPA, CISA
Legislative Auditor

ABBREVIATIONS

ACN	Audit Control Number
AS	Alaska Statute
AMC	Appraisal Management Company
board	Board of Certified Real Estate Appraisers
CISA	Certified Information Systems Auditor
CPA	Certified Public Accountant
DCBPL	Division of Corporations, Business and Professional Licensing
DCCED	Department of Commerce, Community, and Economic Development
DLA	Division of Legislative Audit
FIRREA	Financial Institutions Reform, Recovery, and Enforcement Act
FY	Fiscal Year
SB	Senate Bill
U.S.C.	United States Code

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Exhibit 5: Board of Certified Real Estate Appraisers,
Schedule of Revenues and Expenditures, FY 22 through
January 31, 2025

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ORGANIZATION AND FUNCTION

Board of Certified Real Estate Appraisers (board)

The board was established under AS 08.87.010 to respond to Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act (FIRREA) (12 United States Code 3331–3355). The board is authorized to certify general, residential, and institutional real estate appraisers. The board also certifies appraiser trainees and supervisors, and issues temporary courtesy licenses to appraisers who are certified or licensed in other states. Additionally, the board registers real estate appraisal management companies (AMC).

Exhibit 1

Board of Certified Real Estate Appraisers Members as of January 31, 2025

Mae Hayes, Chair
Certified Residential Real Estate Appraiser

Vacant
Certified General Real Estate Appraiser

Valery Kudryn
*Certified Residential Real Estate Appraiser,
Member at Large*

William McKean
Mortgage Banking Executive

Jenny Buswell
Public

Source: Office of the Governor, Boards and Commissions website.

The board is comprised of five members, with four members designated as follows: a certified general real estate appraiser, a certified residential real estate appraiser, a mortgage banking executive, and a member of the general public. The fifth board position is undesignated in Alaska Statutes and is commonly referred to as the “at large” position.

Per AS 08.87.020, the duties of the board include:

1. establishing examination requirements for certification as a real estate appraiser;
2. adopting rules of professional conduct;
3. adopting regulations as necessary to comply with the requirements of federal law;¹

¹ Title XI, FIRREA, the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the Truth in Lending Act.

-
-
4. adopting regulations to establish registration procedures and standards for real estate AMCs; and
 5. reporting relevant information regarding an AMC's operations to the Appraisal Subcommittee established under federal law.

**Department of
Commerce, Community,
and Economic
Development's Division
of Corporations, Business
and Professional Licensing
(DCBPL)**

DCBPL provides administrative and investigative assistance to the board. Administrative assistance includes budgetary services and functions, such as collecting fees, maintaining files, receiving application forms, publishing notices for meetings and exams, and assisting with board regulations.

Alaska Statute 08.01.087 gives DCBPL authority to act on its own initiative or in response to a complaint. DCBPL may:

1. Conduct an investigation to determine whether a person has violated a law.
2. Bring an action in Superior Court to enjoin the act.
3. Examine or have examined the books and records of a person whose business activities require a business license or licensure by a board listed in AS 08.01.010, or whose occupation is listed in AS 08.01.010.
4. Issue subpoenas for the attendance of witnesses and records.

BACKGROUND INFORMATION

Appraisal Overview

An appraisal is a decision-making tool used to facilitate a real estate transaction. The primary role of appraisals in the loan underwriting process is to provide evidence that the collateral value of the property is sufficient to avoid losses on loans if the borrower is unable to repay the loan.

In response to the 1980s savings and loan crisis, Congress enacted the Financial Institutions Reform, Recovery, and Enforcement Act (FIRREA). Congress set out provisions in Title XI of FIRREA that were intended to ensure that appraisals for federally related transactions were performed by real estate appraisers who meet minimum qualification criteria and were conducted in compliance with uniform standards.

The regulatory objective of Title XI of FIRREA was to protect the federal deposit insurance funds, and by extension mortgage lenders, from avoidable losses related to appraiser incompetence or fraud. The regulatory framework established is comprised of private (the Appraisal Foundation), federal (the Appraisal Subcommittee), and state appraiser licensing and regulatory entities, as described on the following pages.

In response to the 2008 financial crisis, Congress enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act which amended Title XI of FIRREA to add oversight of appraisal management companies (AMC). An AMC is an external third-party entity that recruits or contracts with appraisers to perform appraisal assignments, manage the appraisal process, and review completed work.

Federal and state law does not prohibit uncertified individuals from appraising real estate for compensation as long as individuals do not misrepresent themselves as a certified appraiser and the appraisal is not required by federal law.

Appraiser Regulatory Framework

Private Entity: The Appraisal Foundation

The Appraisal Foundation is a not-for-profit corporation, which sets the congressionally-authorized standards and qualifications for real estate appraisers. The foundation established two independent boards:

- The Appraisal Standards Board creates, updates, and promotes the Uniform Standards of Professional Appraisal Practice. These are the congressionally authorized standards for real property appraisers.
- The Appraiser Qualifications Board sets the qualification criteria for state licensing, certification, and recertification of real property appraisers. According to Title XI of FIRREA, all state licensed and certified appraisers must meet the minimum education, experience, and examination requirements put forth by the board.

Federal Entity: The Appraisal Subcommittee

The Appraisal Subcommittee was established to monitor the real estate appraisal industry and enforce standards. The Appraisal Subcommittee:

- monitors and reviews the practices, procedures, activities, and organizational structure of the Appraisal Foundation. The Appraisal Subcommittee is also authorized to grant funds to the Appraisal Foundation to support the Appraisal Standards and the Appraiser Qualifications boards;
- monitors the requirements set by federal financial regulatory institutions² regarding appraisal standards;
- monitors the requirements established by states for the certification and licensing of appraisers and appraisal management companies. The Appraisal Subcommittee monitors each state's compliance with

² Per 12 U.S.C. 3350(6), federal financial regulatory institutions include the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency, the Office of Thrift Supervision, and the National Credit Union Administration.

the requirements of Title XI of FIRREA and is authorized to take action against non-complying states; and

- maintains a national registry of state licensed and certified appraisers and appraisal management companies who may perform appraisals in connection with federally related transactions.

State Entity: Board of Certified Real Estate Appraisers (board)

Title XI relies on states to certify and license real estate appraisers, register appraisal management companies, and monitor appraisers' compliance with requirements. The board is the state entity charged with this function. The Appraisal Subcommittee reviews states' appraiser and appraisal management company regulatory programs for compliance with the requirements of Title XI at least biennially. The board's most recent review by the Appraisal Subcommittee covered August 2022 through June 2024.

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REPORT CONCLUSIONS

In developing our conclusion regarding whether the Board of Certified Real Estate Appraisers' (board) termination date should be extended, its operations were evaluated using the 11 factors set out in AS 44.66.050(c), which are included in Appendix A of this report. Under the State's "sunset" law, these factors are to be considered in assessing whether an entity has demonstrated a public policy need for continuing operations.

The audit concluded that the board served the public's interest by conducting meetings in an effective manner, actively amending regulations, and effectively licensing real estate appraisers and registering appraisal management companies (AMC). The audit also concluded that one board position had been vacant for 56 months as of January 2025, statute changes may be necessary to address the federal oversight findings regarding non-compliant state law, and board related investigations were not consistently conducted in a timely manner.

In accordance with AS 08.03.010(c)(20), the board is scheduled to terminate on June 30, 2026. We recommend that the legislature extend the board's termination date six years to June 30, 2032, which is two years less than the maximum allowed by statute. The extension recommendation takes into consideration the audit findings and the fact that the board is also subject to federal oversight.

Detailed report conclusions are as follows:

The board generally conducted its meetings effectively and did not duplicate the efforts of other entities.

The board met 22 times from July 2021 through January 2025. A review of six board meetings and five subcommittee meetings found that meetings were appropriately publicly noticed and allowed time for public comment. The audit found that the general real estate appraiser board seat had been vacant for 56 months as of January 2025. (See Recommendation 1) Despite the extended vacancy, quorum was maintained for all meetings reviewed.

As the only government entity authorized to license, register, and regulate real estate appraiser professionals and AMCs, the board does not duplicate the activities of another agency.

The board actively amended regulations.

The board issued and amended regulations to implement statutory changes and improve the licensing process. Significant regulation changes included:

- increasing the number of credit hours for professional education courses that could be obtained online and clarifying related terminology. These changes increased access to continuing professional education;
- requiring applicants for a courtesy license submit evidence of an appraisal contract. This change allowed the board to confirm the appraisal assignment for which a courtesy license was sought and clarified existing requirements; and
- implementing a statutory change that established a temporary military courtesy license to allow qualified active-duty military members and spouses to practice as a general real estate appraiser, residential real estate appraiser, trainee appraiser, or institutional real estate appraiser. This change expedited the license process for military members and spouses.

Board statutes may not fully comply with federal law.

As described in the Background Information section of this report, the board is subject to oversight by the federal Appraisal Subcommittee. The Appraisal Subcommittee reviewed the State's regulatory program for compliance and found that certain Alaska statutes did not fully comply with federal AMC regulatory standards and should be amended. The Appraisal Subcommittee findings, along with the relevant Alaska statutes, are summarized in Exhibit 2 on the following page.

Exhibit 2

Appraisal Subcommittee Findings For the Period August 2022 through June 2024

Federal Finding	Alaska Statute
The State’s statute requires federally regulated AMCs to report information that is not consistent with the AMC rule.	AS 08.87.160(2)(B)
The State’s statute regarding ownership limitation for an owner who has had an appraiser license or certificate refused, denied, cancelled, surrendered in lieu of revocation, or revoked in any state for substantive cause is not consistent with the AMC rule.	AS 08.87.155(a)(2) AS 08.87.155(b)

Source: Appraisal Subcommittee correspondence.

According to the board chair, curative legislation addressing the findings in Exhibit 2 had not been introduced because the board had been unable to find a sponsor. (See Recommendation 2)

Board related investigations were not consistently conducted in a timely manner.

A total of 64 board related cases were open or opened from July 2021 through January 2025. The audit identified that 19 of the 64 cases were open for over 180 days during the audit period, and three of the 19 cases were open more than 1,000 days. Auditors reviewed five of the 19 cases that were open for over 180 days and identified unjustified periods of inactivity in all five cases ranging from 165 to 575 days. (See Recommendation 3)

The board issued licenses in compliance with Alaska statutes and regulations.

Exhibit 3, on the following page, shows that, as of January 2025, there was a total of 362 active licenses representing an overall increase of 39 percent when compared to the prior 2017 sunset audit.³

³ Based on the prior sunset audit license counts as of March 31, 2017, per sunset audit ACN 08-20106-17.

The increase was primarily attributable to legislation establishing registration of AMCs that became effective in 2019 (SB 155). There was also a 23 percent increase in the number of general real estate appraisers. The board chair noted that the increase in general real estate appraisers was primarily from out-of-state applicants.

Exhibit 3

Board of Certified Real Estate Appraisers License, Registration, and Certification Activity FY 22 through January 31, 2025				
	New Issued (Exclusive of Renewals)			Total Active as of January 31, 2025
	FY 22	FY 23	FY 24	
Appraisal Management Company Registration	10	2	3	72
Certified General Real Estate Appraiser	11	23	11	139
Certified Residential Real Estate Appraiser	11	10	9	122
Real Estate Appraiser Courtesy License	41	51	46	13
Registered Trainee	11	6	3	16
Totals	<u>84</u>	<u>92</u>	<u>72</u>	<u>362</u>

Source: Compiled from the Division of Corporations, Business and Professional Licensing (DCBPL) licensing database.

Auditors tested a sample of 17 new and 12 renewal licenses, certificates, and registrations issued during the audit period and found all were issued in compliance with statutes and regulations. Additionally, the audit found DCBPL staff appropriately reported licenses, certificates, and registrations to the Appraisal Subcommittee national registry.

License fees were sufficient to cover board operations.

The board’s schedule of revenues and expenditures for FY 22 through January 2025 is shown in Exhibit 5 on page 12. The board mainly receives its revenue from certification, licensing, registration, and renewal fees. Renewals are conducted on a biennial

basis, creating a two-year cycle in board revenues. During the audit period, the board was allocated \$11,550 of general funds to replace revenue lost due to the pandemic related license fee freeze mandated by the governor. As of January 2025, the board had a surplus of \$86,278. The board's schedule of fees from FY 22 through January 2025 is shown in Exhibit 4.

Exhibit 4

Board of Certified Real Estate Appraisers License, Registration, and Certification Fees FY 22 through January 2025

Real Estate Appraisers and Registered Real Estate Appraiser Trainees Fees

Nonrefundable application fee for initial:	
Certification, license, or registration	\$150
Courtesy license	100
Certification fee for all or part of the initial biennial certification period	350
Biennial certification renewal fee	350
Real estate appraiser trainee registration fee	150
Real estate appraiser trainee renewal fee	150
Courtesy license fee	150
Course approval fee	400
Annual federal registry fee	40

Real Estate Appraisal Management Companies Fees

Nonrefundable application fee for initial registration	500
Registration fee for all or part of the initial biennial registration period	700
Biennial registration renewal fee	700
Change in controlling person, owner, employee, director, officer, or agent	250
Annual federal registry fee for each appraiser on the appraiser panel performing one or more federally related transactions in the preceding calendar year	25

Source: DCBPL regulations.

Exhibit 5**Board of Certified Real Estate Appraisers
Schedule of Revenues and Expenditures
FY 22 through January 31, 2025
(Unaudited)**

	FY 22	FY 23	FY 24	July 1, 2024 - January 31, 2025
Revenues				
Licensing Fees	\$ 62,165	\$ 224,750	\$ 75,640	\$ 37,640
General Funds Received	9,845	1,594	111	-
Other Sources	3,600	-	-	-
Total Revenues	75,610	226,344	75,751	37,640
Direct Expenditures				
Personal Services	121,467	96,343	90,594	50,465
Travel	4,519	13,770	8,131	4,220
Services	6,125	8,040	5,410	4,615
Commodities	-	10	-	-
Total Direct Expenditures	132,111	118,163	104,135	59,300
Indirect Expenditures	50,683	43,760	39,303	19,652*
Total Expenditures	182,794	161,923	143,438	78,952
Annual Surplus (Deficit)	(107,184)	64,421	(67,687)	(41,312)
Beginning Cumulative Surplus (Deficit)	238,040	130,856	195,277	127,590
Ending Cumulative Surplus (Deficit)	\$ 130,856	\$ 195,277	\$ 127,590	\$ 86,278

Source: DCBPL management.

* Estimated based on the indirect allocation for July 1, 2024, through December 31, 2024.

FINDINGS AND RECOMMENDATIONS

The prior 2017 sunset audit made two recommendations:

1. Division of Corporations, Business and Professional Licensing's (DCBPL) director should continue to improve administrative support to the Board of Certified Real Estate Appraisers (board).
2. DCBPL's director, in consultation with the board, should reduce fees to address the surplus.

The first recommendation was associated with three administrative deficiencies: 1) incorrect reporting in the Appraisal Subcommittee national registry, 2) unjustified periods of inactivity for investigative cases, and 3) board meetings not adequately publicly noticed. The deficiencies regarding Appraisal Subcommittee national registry reporting and public notice of board meetings were resolved; however, unjustified periods of inactivity related to investigations was not resolved, and the unresolved portion of the finding is reiterated below as Recommendation 3.

The second recommendation relating to fees was resolved. Fees were reduced and the surplus decreased.

This sunset audit makes two new recommendations.

Recommendation 1:

The Office of the Governor, Boards and Commissions director should continue to work with the board to identify potential applicants to fill board seats in a timely manner.

As of January 31, 2025, the general real estate appraiser seat had been vacant for 56 months. According to the Boards and Commissions director, the general real estate appraiser seat is difficult to fill due to a limited pool of qualified candidates and a general lack of interest in serving on the board.

Per AS 08.87.010, the board is composed of five members appointed by the governor and approved by the legislature. The Office of the Governor, Boards and Commissions director is responsible for actively recruiting, interviewing, and vetting board applicants. Vacant board seats may limit the board from efficiently conducting business with sufficient input and perspective.

We recommend the Boards and Commissions director continue to work with the board to identify potential applicants to fill board seats in a timely manner.

Recommendation 2:

The board should continue to seek a statutory change to address the federal Appraisal Subcommittee findings.

The Appraisal Subcommittee is the federal entity responsible for monitoring the State's licensing and registration process for compliance with federal law. The Appraisal Subcommittee formally identified during July 2024 that certain State statutes for appraisal management companies (AMC) were inconsistent with federal regulatory standards. The board agreed that a statute change was necessary, but was unable to facilitate the change. According to the board chair, there was a lack of interest in sponsoring legislation.

Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act, as amended by the Dodd-Frank Wall Street Reform and Consumer Protection Act, authorized federal standards to be established for appraisal management companies (12 U.S.C. 3353) and authorized the Appraisal Subcommittee to monitor state law for compliance with these federal standards (12 U.S.C. 3332). When state law is not compliant with federal standards, the Appraisal Subcommittee is authorized to make findings of non-compliance as well as impose interim actions, suspensions, and sanctions (including derecognition) (12 U.S.C. 3347). State law that is non-compliant with federal appraisal standards may undermine federal regulatory objectives to ensure that AMCs are appropriately regulated. The State statutes relating to AMCs for which amendment may be required are set out in AS 08.87.

We recommend the board continue to seek a statutory change to address the federal Appraisal Subcommittee findings.

Recommendation 3:

**Department of
Commerce, Community,
and Economic
Development's (DCCED)
commissioner should
work with policy
makers to improve
the recruitment and
retention of investigators.**

Auditors reviewed five of the 19 cases that were open for over 180 days and identified unjustified periods of inactivity for all cases reviewed with periods of inactivity ranging from 165 to 575 days. According to DCBPL management, turnover and vacancies of investigative staff contributed to the periods of inactivity. Additionally, the delay in one case, totaling 575 days, was due to untimely board member review.

Per AS 08.01.050(a)(19), DCBPL is responsible for providing investigative services to occupational boards. Investigations and complaints that sit idle for extended periods could impact public welfare.

We recommend DCCED's commissioner work with policy makers to improve the recruitment and retention of investigators.

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OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Title 24 and 44 of the Alaska Statutes, we have reviewed the activities of the Board of Certified Real Estate Appraisers (board) to determine if there is a demonstrated public need for its continued existence.

As required by AS 44.66.050(a), this report shall be considered by the committee of reference during the legislative oversight process in determining whether the board should be reestablished. Currently, under AS 08.03.010(c)(20), the board will terminate on June 30, 2026, and will have one year from that date to conclude its administrative operations.

Objectives

The three central, interrelated objectives of our audit are to:

1. Determine if the termination date of the board should be extended and for how long;
2. Determine if the board is operating in the public's interest; and
3. Determine the status of recommendations made in the prior sunset audit.

Scope

The assessment of operations and performance of the board was based on criteria set out in AS 44.66.050(c). Criteria set out in this statute relates to the determination of a demonstrated public need for the board. We reviewed the board's activities from July 1, 2021, through January 31, 2025. Financial data is presented, unaudited, for the same period.

Methodology

During the course of our audit, we reviewed and evaluated the following:

- The prior sunset audit report (ACN 08-20106-17) to identify issues affecting the board and to identify prior sunset audit recommendations.

-
- Applicable statutes and regulations to identify board functions and responsibilities, determine whether statutory or regulatory changes enhanced or impeded board activities, and help ascertain if the board operated in the public interest.
 - The State's Online Public Notices System to verify board meetings were adequately public noticed in compliance with state law.
 - Expenditures, revenues, and fee levels for the board to determine whether fee levels covered the costs of operations.
 - Board meeting minutes to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, and whether board vacancies impeded operations.
 - Board annual reports to gain an understanding of board activities.
 - Various Alaska news websites to identify complaints against the board or other board related concerns.
 - Various websites for potential duplication of board activities.
 - The Appraisal Subcommittee's compliance reviews of the State's appraiser and appraisal management company regulatory programs to assess compliance with federal law.
 - Board investigation data for cases open or opened from July 1, 2021, through January 31, 2025, to assess the efficiency of the investigative process.

Internal controls over the licensing and investigative processes were assessed to determine if controls were properly designed and implemented. Additionally, to identify and evaluate board activities, we conducted interviews with State agency staff and board members. Specific areas of inquiry included: board operations, statutory duties, duplication of effort, fee levels, board and staff vacancies, and complaints against the board.

The audit utilized the following samples:

- A judgmental sample of six of 14 board meetings and five of eight committee meetings held from July 1, 2021, through January 31, 2025, was reviewed to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, whether the meetings were public noticed, and whether board vacancies impeded operations. Test results were not projected to the population.
- A total of 64 board related cases were open or opened between July 1, 2021, and January 31, 2025, of which 19 were open six months or longer. Five of the 19 cases open longer than six months were reviewed for unjustified periods of inactivity. Auditors judgmentally selected three investigations, one intake, and one complaint open the greatest number of days. Test results were not projected to the population.
- Samples of 15 out of 110 new and 10 out of 180 renewal license applications received from July 1, 2021, through January 31, 2025, were selected to assess compliance with statutes and regulations. The sample size was based on low control risk, low inherent risk, and moderate audit risk. Additionally, samples of two out of 16 new and two out of 56 renewal appraisal management company registrations were assessed for statutory and regulatory compliance. Test results were not projected to the population.

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APPENDIX SUMMARY

Appendix A provides the sunset criteria used in developing the conclusions regarding whether the Board of Certified Real Estate Appraiser's termination date should be extended.

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APPENDIX A

Analysis of Public Need Criteria AS 44.66.050(c)

A determination as to whether a board or commission has demonstrated a public need for its continued existence must take into consideration the following factors:

1. the extent to which the board or commission has operated in the public interest;
2. the extent to which the operation of the board or commission has been impeded or enhanced by existing statutes, procedures, and practices that it has adopted, and any other matter, including budgetary, resource, and personnel matters;
3. the extent to which the board or commission has recommended statutory changes that are generally of benefit to the public interest;
4. the extent to which the board or commission has encouraged interested persons to report to it concerning the effect of its regulations and decisions on the effectiveness of service, economy of service, and availability of service that it has provided;
5. the extent to which the board or commission has encouraged public participation in the making of its regulations and decisions;
6. the efficiency with which public inquiries or complaints regarding the activities of the board or commission filed with it, with the department to which a board or commission is administratively assigned, or with the office of victims' rights or the office of the ombudsman have been processed and resolved;
7. the extent to which a board or commission that regulates entry into an occupation or profession has presented qualified applicants to serve the public;

APPENDIX A (Continued)

8. the extent to which state personnel practices, including affirmative action requirements, have been complied with by the board or commission in its own activities and in the area of activity or interest;
9. the extent to which statutory, regulatory, budgetary, or other changes are necessary to enable the board or commission to better serve the interests of the public and to comply with the factors enumerated in this subsection;
10. the extent to which the board or commission has effectively attained its objectives and purposes and the efficiency with which the board or commission has operated; and
11. the extent to which the board or commission duplicates the activities of another governmental agency or the private sector.

Agency Response from the Office of the Governor



OFFICE OF THE GOVERNOR
Governor Mike Dunleavy
STATE OF ALASKA

July 17, 2025

Ms. Kris Curtis
Legislative Auditor
Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811-3300

RECEIVED
JUL 18 2025
LEGISLATIVE AUDIT

RE: Confidential preliminary Audit, Department of Commerce, Community, and Economic Development (DCCED), Board of Certified Real Estate Appraisers

Dear Ms. Curtis,

Recommendation 1: The Office of the Governor, Boards and Commissions director should continue to work with the board to identify potential applicants to fill the vacant board seat in a timely manner.

The Office of the Governor, Director of Boards and Commissions has reviewed and concurs with recommendation number one.

The Office of the Governor, Director of Boards and Commissions concurs with recommendation number one. Alaska's pool of real estate appraisers is small and there is a lack of interest in serving on the Board; nevertheless, the Boards and Commission office maintains standing public notice of opportunities to serve to ensure a suitable candidate is presented to the Governor as soon as practicable.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jordan Shilling".

Jordan Shilling
Director, Boards and Commissions

cc: Cheri Lowenstein, Administrative Director, Office of the Governor

550 West 7th Avenue, Suite 1700, Anchorage, AK 99501

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Agency Response from the Department of Commerce, Community, and Economic Development



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce,
Community, and Economic
Development

OFFICE OF THE COMMISSIONER
Julie Sande, Commissioner

P.O. Box 110800
Juneau, Alaska 99811-0800
Main: 907.465.2500
Fax: 907.465.5442

July 24, 2025

Kris Curtis
Legislative Auditor
Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811

RECEIVED
JUL 25 2025
LEGISLATIVE AUDIT

Dear Ms. Curtis:

Thank you for the June 30, 2025, Confidential Preliminary Report, Department of Commerce, Community, and Economic Development (DCCED), Board of Certified Real Estate Appraisers (board) Sunset Review. I concur with all six conclusions and all three recommendations. Please see the following comments regarding the recommendations:

Recommendation #1: The Office of the Governor, Boards and Commissioner director should continue to work with the board to identify potential applicants to fill board seats in a timely manner.

The department will continue to support the governor's office in filling vacant board seats, as appropriate.

Recommendation #2: The board should continue to seek a statutory change to address the Appraisal Subcommittee findings.

While the Division of Corporations, Business and Professional Licensing works with the board and provides advice and guidance, the board is not under the purview of the department. The board will determine how it wishes to proceed regarding ongoing efforts to find a sponsor for necessary statutory changes.

Recommendation #3: DCCED's commissioner should work with policy makers to improve the recruitment and retention of investigators.

The department concurs that recruitment and retention challenges exist throughout state government and will continue to engage with the Office of the Governor, Department of Administration, the Legislature, and other stakeholders as appropriate to identify holistic solutions.

The division works diligently to keep the investigations team staffed. With one of the largest investigations units in the state (26 PCNs), we try to emphasize the opportunities that size affords staff in

an effort to improve retention. We are currently working to reclass the supervisory staff in investigations to create a clearer career ladder within the unit which we believe will improve staff retention.

Additionally, we offer staff a great deal of training. All investigators attend the National Certified Investigator and Inspector Training offered by the Council on Licensure, Enforcement and Regulation (CLEAR). Additionally, they are all trained in interviewing techniques, and all receive training on how to conduct investigations on their specific programs if available, (e.g., chiropractors, physicians, nurses, social workers, etc.). We feel that investing in staff through training ensures staff are confident in their ability to carry out their duties, improving job satisfaction and increasing retention. When we have turnover, we submit the vacant positions for posting within days of learning of them to minimize periods of short staffing.

Again, thank you for the opportunity for the department to provide input on this matter. If you have any questions, please feel free to contact me.

Sincerely,

DocuSigned by:
5BAE8EAA5D47472
Julie Sande
Commissioner

Agency Response from the Board of Real Estate Appraisers



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community,
and Economic Development

BOARD OF CERTIFIED REAL ESTATE APPRAISERS

550 West 7th Avenue, Suite 1500
Anchorage, Alaska 99501-3567
Main: 907.269.7140
Fax: 907.269.8156

July 21, 2025

Ms. Kris Curtis
Legislative Auditor
333 Willoughby Avenue, 6th Floor
PO Box 113300
Juneau, AK 99811-3300

RECEIVED

JUL 22 2025

LEGISLATIVE AUDIT

Ms. Curtis,

I agree with the reported conclusions and the recommendations in the preliminary audit report dated 04/14/2025.

The board will continue to seek a legislative sponsor and recruit board members. Further, I recommend an EA be hired for the board and our intention is to seek the statutory change required to do so. An EA is appropriate given the unique federal involvement our board has by the ASC.

Additionally, we would like to seek a statutory change to increase the number of residential appraisers on the board as there are few general appraisers who live in the state to fill the seat that has been vacant for 56+ months.

I believe these actions will reduce the workload of the board members which will aid in lowering delays in investigations and increase interest in member recruitment as the board is known for a relatively high amount of member involvement.

Finally, the board may consider outsourcing some investigative reviews to reduce the number of days the investigations take.

Sincerely,



Mae Hayes
Board Chair
Board of Certified Real Estate Appraisers

PEREA Email and Work Experience - Discussion

From: [REDACTED]
To: [Board of Real Estate Appraisers \(CED sponsored\)](#)
Subject: Clarification on Acceptance of PAREA Program for Experience Hours
Date: Saturday, September 27, 2025 12:03:50 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Alaska Board of Certified Real Estate Appraisers,

I am writing to request clarification regarding the acceptance of the Practical Applications of Real Estate Appraisal (PAREA®) program as an alternative to the traditional supervisor/trainee model for fulfilling experience hours.

From my understanding, Alaska has acknowledged PAREA as a potential pathway in public guidance materials, but it is not entirely clear whether the Board has formally adopted PAREA for credentialing purposes. Could you please confirm:

1. Whether Alaska currently accepts PAREA to fully or partially satisfy the required experience hours for appraiser licensure;
2. If accepted, for which license levels (Trainee, Licensed Residential, Certified Residential, Certified General);
3. If not yet adopted, whether there is a timeline or pending rulemaking process for its consideration.

I greatly appreciate your guidance as I plan the education and training path that will best align with Alaska's requirements.

Thank you for your time and assistance.

Sincerely,

[REDACTED]

[REDACTED]

Pearson Vue Email – Testing Policy Change

From: [Andrew Bacon](#)
To: [Rogers, Lorina L \(CED\)](#)
Subject: Important ID policy updates coming soon
Date: Monday, September 29, 2025 6:21:20 AM
Attachments: [Outlook-25motydp.png](#)

You don't often get email from andrew.bacon@pearson.com. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Alaska Appraisers,

It isn't often we make significant changes to our ID policy. After carefully reviewing what's no longer working or adding value to our candidate identification process, there are two important changes we plan to implement in approximately 60 days. The good news is that both changes provide more leniency — while maintaining security — so as we update client guides, correspondence, etc., we expect candidates will not be startled when they show up for testing.

Change #1 – Acceptance of digital IDs

First, as most people recognize, the pace of technological evolution in the modern world has and will only continue to accelerate. One such area is the emergence of a new form factor for government issued IDs: the digital ID. Pearson VUE will continue our longstanding policy of accepting government-issued forms of identification from candidates for exam delivery, which now include both traditional/physical and digital forms of government-issued identification.

A digital ID is an electronic representation of a government-issued identification credential. Like many of their physical counterparts, they vary from one locale to another. Digital IDs are typically encrypted and stored on a mobile device, and may be further protected by none, some, or all of the following: biometric authentication access control, and/or through validation via QR codes, cryptographic signatures, or third-party verification portals. Examples include mobile driver's licenses, digital passports, and national ID apps. When we share our updated policies and test center procedures with you, we'll provide examples that you can use to help guide your candidates.

Comparison: Digital vs. physical IDs

The table below outlines key differences across relevant risk categories:

Risk Category	Physical ID	Digital ID
Privacy exposure	High; all printed data visible	Low; selective data disclosure possible
Tamper resistance	Moderate; forgery possible	High; cryptographically signed
Impersonation risk	Higher; relies on visual match	Lower; biometric authentication and/or centralized portal validation

Remote compatibility	Limited digital transmission and/or validation	High; e.g., potential to integrate with remote registration and/or proctoring
Audit trail availability	Manual logs	Digital logs with biometric match

Whether a candidate presents a physical or digital ID, our procedures at check-in will remain largely unaffected in the immediate term. Likewise, electronic devices will still be prohibited inside the testing room. We will share our modified ID policy and test center process adjustments once finalized, along with the implementation date.

Change #2 – Eliminating the requirement for signatures on IDs

We will also discontinue the requirement that candidate IDs, primary or secondary, include a signature. It has long been part of our process to verify the signature on the presented ID with the candidate's digital signature upon accepting the candidate rules, so we did not come to this decision lightly. The main factors that influenced our decision are the following:

- Historically, comparison of candidate signatures almost never resulted in a candidate being turned away
- Some government-issued IDs (both physical and digital) do not carry a signature
- More and more secondary IDs (e.g., credit cards) do not have a signature

As we reviewed the data, we found we weren't improving our security but more often turning away valid candidates for reasons that weren't defensible. Given our decision to begin allowing digital government IDs, we felt the timing was right to make the signature requirement change as well. Please note that we will continue to require candidates to acknowledge the candidate rules agreement via signature (digital or otherwise).

Updates to policies, procedures, and candidate documentation

Removing the requirement for an ID (primary or secondary) to have a signature will likely require updates to your candidate-facing communications and/or documentation. Similarly, as mentioned above, we will provide the revised ID policies, along with our procedures. Once all those aspects are finalized, we'll update all confirmation emails that contain the ID policy to reflect these changes.

We are confident these changes will improve the candidate experience without degrading exam security. If you have any questions, please let me know.

--

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Client Program Manager

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Learn more at www.pearson.com

Public Listing for Trainee Supervisors - Discussion

Schedule 2026 Board Meetings and
AO-360 Meeting (Dec/Jan)

State of Alaska 2026 HOLIDAY CALENDAR

State Holidays

Date	Holiday
01/01/2026	New Year's Day
01/19/2026	MLK Jr.'s Birthday
02/16/2026	Presidents' Day
03/30/2026	Seward's Day
05/25/2026	Memorial Day
06/19/2026	Juneteenth Day
07/04/2026	Independence Day (observed 07/03/2026)
09/07/2026	Labor Day
10/18/2026	Alaska Day (observed 10/19/2026)
11/11/2026	Veterans' Day
11/26/2026	Thanksgiving Day
12/25/2026	Christmas Day

Please refer to appropriate collective bargaining unit agreement for more information regarding holidays.

 Holiday



JANUARY

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

JULY

S	M	T	W	T	F	S
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5	6	7	8	9	10	11
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19	20	21	22	23	24	25
26	27	28	29	30	31	

FEBRUARY

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AUGUST

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23	24	25	26	27	28	29
30	31					

MARCH

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15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

SEPTEMBER

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26	27	28	29	30		

APRIL

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OCTOBER

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MAY

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31						

NOVEMBER

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22	23	24	25	26	27	28
29	30					

JUNE

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14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

DECEMBER

S	M	T	W	T	F	S
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6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

Pending Board Ballots

Adjournment