

Concept Paper – Examination Only Pathway

December 3, 2025

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Introduction

This Concept Paper is the second of two released by the AQB on December 3, 2025, in conjunction with, but separate from, the First Exposure Draft that proposed changes to the Real Property Appraiser Qualification Criteria. Along with that Exposure Draft, the Board also issued Concept Paper 1 – Skills Based Pathway on a potential skills-based experience pathway. Both concept papers address topics the AQB examined during the development of the Exposure Draft but did not advance as proposed changes to the *Criteria*.

This second Concept Paper focuses on the idea of an examination-only pathway. Although the Board considered the topic during its deliberations, it was not included in the proposed revisions. The AQB is therefore presenting the issue in a standalone format to describe the questions and considerations identified in discussion and to seek public comment. Nothing in this paper represents a proposed change to the *Criteria*; its purpose is to invite feedback on whether this concept warrants further exploration and, if so, what concerns or conditions would need to be addressed.

The AQB invites all interested parties to review these proposed revisions and provide written comments. The Board values detailed, evidence-based feedback and encourages commenters to reference specific sections of the draft when possible.

Thank you in advance for your comments. If you have any questions, please contact the Board at AQB@appraisalfoundation.org

Jerry Yurek
Chair, Appraiser Qualifications Board

Join the Conversation

The AQB will also accept verbal comments at a webinar on January 22, 2026, at 1:00 PM ET. You may register [here](#).

Send Your Comments by March 3, 2026

All interested parties are encouraged to comment in writing to the AQB before the deadline of March 3, 2026. Each member of the AQB will thoroughly analyze and consider all comments.

When commenting on various aspects of the concept paper, it is very helpful to explain the reasons for concern or support, provide examples or illustrations, and suggest any alternatives or additional issues the AQB should consider.

To submit comments, please visit: <https://www.surveymonkey.com/r/AQBComments>

While for ease of processing, we prefer you use the SurveyMonkey for your comments, if you are unable to provide your comments via SurveyMonkey, you may also email AQB@appraisalfoundation.org.

All written comments will be posted for public viewing, exactly as submitted, on the Foundation’s website. Names may be redacted upon request. The Foundation reserves the right not to post written comments that contain offensive or inappropriate statements.

Overview

During its reassessment of the *Real Property Appraiser Qualification Criteria*, the AQB discussed the idea of creating an examination-only pathway to a credential. Under this concept (if such a model were ever pursued) candidates could move directly to a comprehensive examination without any predetermined requirement regarding qualifying education (QE). The AQB has not determined whether QE would, or would not, be required in an examination-only pathway. Some stakeholders refer to this as a “Super-Exam.”

Earlier in this *Criteria* reassessment project, the AQB indicated that it would explore the “Super-Exam” concept in more detail. That internal work has now occurred. After reviewing the idea and considering it, the AQB concluded that it will not pursue an examination-only pathway in this *Criteria* revision. The primary reasons relate to the AQB’s definition of minimum qualifications, the current structure of appraisal regulation, and the number of major questions that would have to be addressed before a “Super-Exam” could be responsibly designed.

At the same time, the Board recognizes that stakeholders have not yet had a formal opportunity to comment on this topic. Therefore, the AQB is providing this concept paper so that interested parties can respond to the ideas, offer their perspectives, and help the Board understand whether this is an area that should be studied more deeply in the future.

Background: Why the Idea Surfaces

When the AQB looks back over past meetings, public comments, and informal discussions, it sees that an examination-only pathway has been mentioned from time to time, often in connection with concerns about access to supervisors and experience opportunities. In many of these discussions, the idea was described as “QE first, then a Super-Exam,” but the AQB now recognizes that this reflects only one possible model. This concept paper removes that assumption entirely and seeks comment on whether QE should play any role in an examination-only pathway.

What has been less clear in these mentions is the underlying structure and goal of that proposal. The 2026 *Criteria*, for example, assumes that a credential holder is deemed minimally qualified only after demonstrating the ability to pass the national examination and complete appraisal assignments in a manner that complies with USPAP. Under the present system, qualifying education, the national examination, and all the various experience pathways work together to ensure candidates can apply appraisal theory to real situations, develop workfiles, and produce USPAP-compliant appraisal reports.

Experience, whether obtained through a supervisor/trainee relationship, Practicum program(s), or PAREA, is where candidates confront incomplete or inconsistent data, client expectations, legal and regulatory requirements, and the many practical decisions that affect an assignment's credibility. When an examination-only pathway is proposed, the immediate question is how those same expectations would be met in a different structure.

What the Current Examination Does and Does Not Do

The existing national examination is built to test understanding of appraisal theory and practice concepts. It is a time-limited, multiple-choice exam. Within that format it can measure whether a candidate understands principles, methods, and standards at the level described in the Examination Content Outlines.

What it cannot do, by design, is observe a candidate actually developing and reporting a USPAP-compliant appraisal assignment. It does not see the person assemble a workfile, respond to real-world data limitations, or write and reconcile an actual report. Those competencies are addressed through the experience pathways, not through the exam.

An examination-only pathway appears to assume a different kind of exam. If the goal is still to be confident that a credentialed individual can produce a USPAP-compliant report, then an examination-only pathway would likely need to assess applied performance in a way that goes well beyond what the current multiple-choice exam is designed to do.

Relationship to Existing Pathways

At present, there are three pathways that allow candidates to gain experience and demonstrate applied competence:

- The log-based supervisor/trainee way of gaining experience
- Practicum programs that involve end-to-end assignments on real properties
- PAREA programs that simulate practice and require candidates to complete multiple USPAP-compliant assignments with review and feedback

These pathways are not theoretical. They produce work products that can be reviewed, they operate within regulatory guardrails, and they are already delivering results. PAREA, in particular, has shown a one hundred percent National Exam pass rate for participants who reach the end of the program, and several Practicum programs are in various stages of development and implementation.

From the Board’s viewpoint, these newer pathways are still gaining momentum. Additional PAREA programs are being developed, and more practicum models are emerging. At this point in time, it appears prudent to allow these options to mature and expand, since they are specifically designed to bridge the gap between theory and practice and to show that candidates can produce USPAP-compliant work.

How a Examination-only Pathway Might Need To Be Studied

If an examination only pathway should be pursued, it would not be as simple as just deciding to offer it. It would likely require a staged research effort to fully understand its feasibility, and to answer questions such as:

- What exactly would be the goal of an examination-only pathway? Would the aim still be to confirm that a new credential holder can produce USPAP-compliant appraisal reports, or is a different definition of minimum qualification that is being proposed?
- What type of exam format could reasonably assess that goal? For example, would it involve extended case studies, multi-day capstone assignments, or other forms of performance assessment rather than only selected response questions?
- How would such an exam be created, maintained, and updated over time, including the practical questions of who owns the specifications, who is responsible for revisions, and how continuity would be assured across years?
- How would a program of this type be supported on an ongoing basis, given the size of the profession and the need for substantial, dedicated long-term funding, staffing, psychometric support, and administrative capacity?

These examples are not presented as tasks for commenters to solve. They are simply the kinds of issues the AQB would have to investigate if an examination only pathway became a priority. In many ways, this would resemble the early stages of the PAREA effort, which began as a concept and then moved, step by step, through multiple rounds of research, stakeholder engagement, design work, and finally, after all unknowns are known, adoption of the concept.

Open Question Regarding Qualifying Education

A central issue on which the AQB specifically seeks comment is the role of qualifying education in any examination-only pathway. The Board has not determined whether QE should be required, optional, modified, or removed entirely. This concept paper therefore does not assume

any sequencing or necessity of QE, and invites stakeholders to describe how, if at all, QE should fit into an examination-only model.

Key Concerns from the AQB's Perspective

In its internal discussions, several themes shaped the Board's current view:

- The AQB's responsibility is to protect the public trust by setting criteria that result in minimally qualified appraisers. For the Board, a central part of that definition is the ability to produce USPAP-compliant work, not just to answer questions about theory.
- The current experience pathways provide observable evidence of that ability. Supervisors, practicum instructors, and PAREA mentors can see and evaluate actual work products. Regulators can audit files and programs when concerns arise.
- An examination-only pathway would need a different mechanism to give that same level of confidence. At this time, the AQB has not identified a clear path for how a single exam could fully substitute for the range of judgments, decisions, and responsibilities that are now demonstrated through supervised, practicum, or PAREA experience.

For those reasons, the Board is not proposing an examination-only pathway in this *Criteria* revision.

Context: The Current National Examination and State Authority

Under Title XI, states retain full authority to administer their own licensing examinations. Title XI does not require the AQB to develop any particular exam, including the current national examination. Historically, each state created its own exam for each credential level. However, developing and maintaining a legally defensible licensing exam requires substantial psychometric expertise, structured validation, and ongoing resources areas where many states reported difficulty.

With long-standing support from the Appraisal Subcommittee (ASC), the AQB has contracted with PSI, an established credentialing exam developer, to build and maintain the national examinations in accordance with widely accepted professional standards. These exams are routinely updated, validated, and made available to states at no cost. States may use them or may develop their own exams.

Because stakeholders sometimes reference a "Super Exam," it is important to clarify that if an examination-only pathway were ever permitted, Title XI would not obligate the AQB to develop

that exam. A state, a coalition of states, or another authorized entity could theoretically create such an exam. However, given that all states currently rely on the AQB-supported national exam (and none independently develops even the existing, more limited exam) it is reasonable to question whether states would take on designing and maintaining an exam far more complex than the current national examination.

To understand what some stakeholders may mean by “Super Exam,” the AQB reviewed how such a concept compares to the current exam. Today’s exam consists of roughly 100 scored multiple-choice questions assessing appraisal principles, methods, and USPAP requirements. It can be administered within a few hours and is not designed to serve as the sole method for determining whether a candidate can develop or report a USPAP-compliant appraisal.

If an examination-only pathway were intended to replace all forms of experience, the exam would need to assess a broader range of competencies, including ethical judgment, independence, practical decision-making, and the ability to produce work that meets USPAP standards. Stakeholder descriptions suggest that such an exam might require multi-stage performance tasks, extended case-based assessments, or completion of full appraisal reports under exam conditions. These assessment types require substantially more infrastructure, psychometric design, and administrative oversight than the current multiple-choice exam.

The AQB’s exploratory observations are not conclusions about what an examination-only model must include. Rather, they illustrate why preliminary reviews suggest that such an exam might require significantly greater resources than stakeholders realize, particularly if it were intended to substitute entirely for supervised or programmatic experience. This is one of the reasons the AQB is seeking public comments to understand what stakeholders envision, how they believe such a model would function, and whether they think the profession and its regulatory structure could reasonably sustain it.

Preliminary Research Undertaken

In preparing this concept paper, the AQB conducted a high-level review of the foundational components necessary for an examination-only model. This included consideration of:

- the structural and psychometric rigor required for an exam intended to replace all experience;
- the developmental and maintenance demands of performance-based or applied-judgment examinations, which differ greatly from the current multiple-choice model;
- the cost and staffing requirements inherent to large-scale exam development and administration;
- the feasibility of sustaining such an exam within a profession of this size;
- whether an examination-only pathway reflects an actual need or interest within the aspiring appraiser population, rather than an assumption that a model used in other professions would translate effectively to appraisal;

- the likely significant cost to aspiring appraisers;
- the profession’s current reliance on ASC funding to maintain even the existing national exam.
- While exploratory rather than exhaustive, this review was sufficient to confirm that an exam designed to replace all experience would require an infrastructure far beyond anything currently maintained in the appraisal profession. This is not a statement that such a model is impossible—only that its scope and resource needs are significantly greater than typically described when stakeholders reference a “Super Exam.”

Current View

In summary, the AQB has:

- Considered the idea of an examination-only pathway, sometimes referred to as a “Super Exam.”
- Determined that it will not pursue such a pathway in the proposed *Criteria* changes because the AQB has not seen how an exam-only model could provide the same assurance of USPAP-compliant performance that current pathways provide. Preliminary research also indicates that an exam intended to replace experience would require extensive structural, developmental, and operational systems far beyond what the profession has historically maintained.
- Chosen to present this concept paper so stakeholders can see the issues the AQB reviewed and may provide informed comment.

At this stage, the AQB’s perspective is rooted in its responsibility to ensure that every new credential holder is minimally qualified. A fundamental component of minimal qualification is the demonstrated ability to complete USPAP-compliant appraisal assignments. Under the current framework, that capability is learned and demonstrated through experience (whether through Supervisor/Trainee experience, Practicum, or PAREA) because it is in those settings that applicants encounter real judgment decisions, ethical pressures, incomplete data, market uncertainties, and the practical demands of producing credible appraisal work.

When stakeholders suggest an examination-only pathway, the AQB must therefore consider how judgment, independence, ethics, and applied USPAP practice would be evaluated if experience were removed. That remains an open question. The AQB is not asserting that such an evaluation is impossible, but rather that no mechanism has yet been described that provides equivalent confidence and feasibility compared to existing experience pathways.

If stakeholder feedback presents clear, well-supported reasons to reexamine this idea, including perspectives on feasibility, structure, and how an examination-only model could credibly assess the applied competence that current experience pathways develop, the AQB is open to revisiting the concept. For now, the AQB considers the matter closed but will always reopen discussion if substantive feedback provides a sound basis for further study.

Questions for Comment

Although the AQB is not proposing an examination-only approach at this time, it is interested in stakeholder views on the broader concept. Written comments that address questions such as the following will be especially helpful:

1. Do you agree that a key part of minimum qualifications for a new credential holder is the ability to complete appraisal assignments in a USPAP-compliant manner. If you would define minimum qualifications differently, please explain how?
2. When you think of an examination-only, what do you picture. Is the exam intended to show applied competence comparable to what is now demonstrated through experience, or do you envision a different purpose?
3. How important do you believe it is for the Board to devote time and resources to designing and studying an examination-only pathway, and why, given the existence of PAREA, practicum, and the traditional supervisor/trainee pathway?
4. Are there approaches from other professions that you believe could reasonably be adapted to appraisal in a way that would still protect the public and align with USPAP and the current regulatory structure?
5. Some stakeholders compare the idea of an examination-only pathway to the licensing examinations used in professions such as law or accounting. If you believe those models are relevant to the appraisal profession, please explain why. In offering your perspective, please consider that these professions have very different preparation structures, including degree-based education or multi-year apprenticeships in the states that do not require a degree. Both fields introduce ethical reasoning and applied judgment throughout their training, well before candidates sit for their licensing exams. Given the size and limited resources of the appraisal profession, the absence in the U.S. college or university offering a degree specific to appraising, and the purpose of supervisor/mentor/instructor guided work in appraisal, how do you see those models translating to an appraisal context?

Commenters are not expected to address every issue outlined in this paper. Any insight into how you define the goals of an examination-only pathway, and how you think it should relate to USPAP compliance and public trust, will assist the Board in deciding whether and how this topic should be studied in the near future.