

Public Comment Regarding Proposed Regulation LCB File No. R087-26

Amendment to NAC 361.567 – Continuing Education Requirements for Certified Property Tax Appraisers

I support the concept of allowing carryover of excess continuing education hours; however, I recommend that the Department clarify how course repetition restrictions apply when carried-forward hours extend the education cycle.

The Appraisal Institute permits limited carryover of qualifying education credits within defined parameters, recognizing that education completed beyond the minimum requirement has continuing professional value.

Under the proposed amendment, an appraiser may complete 72 hours of education during one education cycle, with 36 hours satisfying the current cycle and 36 hours carried forward to satisfy the following cycle. The appraiser would then enter the next cycle needing additional education. Because the carried-forward hours affect which courses are applied to which cycle, the current language could allow an appraiser to receive credit again for a course that was completed within the prior three fiscal years.

The purpose of restricting repeated coursework is not simply to prevent duplicate credit within an assigned cycle; it is to ensure that continuing education represents ongoing professional development. A course completed recently should not become eligible for repeat credit merely because carryover caused the course to be applied to a different education cycle.

I recommend that the Department clarify that the limitation on repeated courses should be based on the date the course was completed, rather than solely on the education cycle to which the hours were applied. For example, an appraiser should not receive credit for substantially identical coursework completed within the previous three fiscal years unless the Department determines that the course materials have been significantly revised or updated.

This approach preserves the benefit of carryover while ensuring that continuing education remains focused on maintaining current competency and exposure to evolving appraisal practices. It recognizes the value of advanced education while preventing an unintended outcome where recently completed coursework may be repeated solely because carryover changed the cycle in which the hours were applied.

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AI Continuing Education: An Overview

Carryover Points

Points earned in excess of those required in the current continuing education cycle may not be carried forward into the next continuing education cycle except as follows:

1. All points earned in excess of those required in the current continuing education cycle may be carried forward into the next continuing education cycle if such points were earned during the last six months of the current cycle.
2. Points earned in excess of those required in the current continuing education cycle **from [advanced education](#)** may be carried forward into the next continuing education cycle if such points were earned during the last 12 months of the current cycle.