

From: [Robert Worthington](#)
To: [Shareece N. Bates](#)
Subject: RE: NAC 645C Regulation Workshop and Adoption Hearing
Date: Tuesday, April 1, 2025 11:10:28 AM
Attachments: [image002.png](#)

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Hi Shareece,

I am an appraiser intern and I have some ideas/comments for you. I saw your last email about these changes, but I missed my chance to join the video conference because I was on the road for an inspection all the way out in Carlin, near Elko, and so I was gone all day. I live in Sparks and I have been an intern since the end of 2020, and I am on the verge of finally obtaining my Certified General license. I read the proposed changes, and noted that in general, licensing requirements are relaxing. That's both good and bad I guess, since I know we need more appraisers in the state, but then of course we'll be a little less experienced upon licensure. I guess as long as there are good senior appraisers above us, signing reports with us and reviewing the work, things will work out. Here are a couple of additional ideas that I have, that would help ease and improve things, I think:

1. Increase the 50 mile limit for properties that appraiser interns can inspect without a supervising appraiser present. The limit not only removes the ability of interns to appraise in more rural areas, but it even makes it hard to appraise locally. For example, our office is in central Reno, and Fallon is 63 miles away. Stateline (adjacent to South Lake Tahoe) is 52 miles from our office, so it's just *barely* possible to appraise in most parts of Douglas County in the Lake Tahoe basin. Places like Ely, Elko, Winnemucca.. forget it. Maybe consider making it 100 miles? Or divide northern and southern Nevada? Or make the whole state open too all, as long as the supervising appraiser can provide the geographic competency. This will help us as interns be able to gain the geographic competency by the time we're licensed. I was fortunate to have obtained permission from Christy Staffen to exceed the 50 mile limit when my former/local Supervising Appraiser left the company, and I was left with only one option, my boss in Las Vegas, Matt Lubawy, who became my new SA. If it wasn't for this unique situation, I believe the regulation would require that I drive to faraway places to do inspections with a Supervising Appraiser, which is something they don't always want to do since it's so time consuming, and we have to pass the expense on to clients as a result. There's not only travel expense, but opportunity cost to factor in. We usually need to charge an extra \$300-500 to do faraway jobs, and that's just for one appraiser.
2. Remove the requirement to re-take any courses that age past 5 years. I know this will be less of an issue since the overall licensing time requirements are being reduced, but it

has happened to colleagues of mine, and I'm on the verge of having it happen to me. If I have to retake the Basic Appraisal Principals course, it's another \$480 for the class and 30 hours of class time (usually it takes longer if self-paced), and I'm not sure that I would really learn TOO much new information at this point in my career. This suggestion is a little more tailored to my personal situation, but still, something worth considering getting rid of.

I'm sorry I didn't cite the actual regulations for the above, I'm in a bit of a hurry at the moment because I have a report due Friday and I am also trying to study for the National exam for CG licensing. I hope the above makes sense, let me know if you have any questions and thank you for taking the time to read my comments!

Thanks,
Robert



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From: Shareece N. Bates <00000369c10b8286-dmarc-request@LISTSERV.STATE.NV.US>

Sent: Monday, March 31, 2025 5:21 PM

To: APPR_INTERNS@LISTSERV.STATE.NV.US

Subject: NAC 645C Regulation Workshop and Adoption Hearing

Importance: High

Hello everyone,

The Division posted notice of a regulation workshop and adoption hearing for NAC 645C, scheduled for April 22, 2025 (the first day of the CARE commission).

The link to the proposed temporary regulation, small business impact survey and questionnaire noticed on the Division's website are copied here:

https://red.nv.gov/Content/Workshops_and_Adoptions/Main/

Please feel free to provide any comments or feedback on the regulation directly to PublicComments@red.nv.gov or to me at sbates@red.nv.gov . Public comment can also be provided during the regulation workshop.

As always, let me know if you have any questions.

Have a great day

Shareece

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