

THE INSTITUTE OF BUSINESS APPRAISERS, INC.

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Explaining The Alphabet Soup: Business Appraisal Designations—What They Mean and How Difficult They Are To Obtain

Paul R. Hyde, EA, CBA, BVAL, ASA

The business appraisal profession is unusual. There are four major certifying organizations in the United States – each with its own requirements and designations. The profession lacks a clearly defined entry path—there is no specific college program that must be completed followed by an examination for licensing as is present for professions such as doctors, attorneys, engineers, etc. Business appraisers typically enter the profession from one of several related professions; they generally have a varied background and experience. All of this leads to a confusing set of initials for a variety of certifications after the name of each business appraiser—what Gary Trugman calls "alphabet soup." The purpose of this article is to attempt to explain the alphabet soup—to describe what each of the business valuation credentials means and to provide information indicating the level of difficulty associated with obtaining it. In addition to the four major certifying organizations for business appraisers in the United States, many other organizations exist that have something to do with businesses each with their own designations. It must be remembered that business appraisers come from a variety of backgrounds—the existence of these other designations further complicates the issue of evaluating the credentials of business appraisers. The following is a list I have compiled by reviewing articles written by business appraisers over the last few years. There are undoubtedly more designations held by business appraisers out there than those shown—if I missed one you hold, I apologize!

Please note that the opinions and rankings set forth in this article are the author's and not the opinions of The Institute of Business Appraisers or Business Appraisal Practice.

Abbreviation	Name of Designation	Awarding Organization
ABV	Accredited in Business Valuation	American Institute of Certified Public Accountants (AICPA)
AIBA	Accredited by IBA	Institute of Business Appraisers (IBA)
AM	Accredited Member	American Society of Appraisers (ASA)

ASA	Accredited Senior Appraiser	American Society of Appraisers (ASA)	
AVA	Accredited Valuation Analyst	National Association of Certified Valuation Analysts (NACVA)	
BVAL	Business Valuator Accredited for Litigation	Institute of Business Appraisers (IBA)	
CBA	Certified Business Appraiser	Institute of Business Appraisers (IBA)	
CFA	Chartered Financial Analyst	Association for Investment Management and Research	
CFE	Certified Fraud Examiner	Association of Certified Fraud Examiners	
СРА	Certified Public Accountant	American Institute of Certified Public Accountants	
CVA	Certified Valuation Analyst	National Association of Certified Valuation Analysts (NACVA)	
CBI	Certified Business Intermediary	International Business Brokers Association	
CFM	Certified in Financial Management	Institute of Management Accountants	
CFP	Certified Financial Planner	College of Financial Planning	
CMA	Certified Management Accountant	Institute of Management Accountants	
EA	Enrolled Agent or Enrolled to Practice Before the IRS	Internal Revenue Service	
FASA	Fellow of the American Society of Appraisers	American Society of Appraisers (ASA)	
FIBA	Fellow of the Institute of Business Appraisers	Institute of Business Appraisers (IBA)	
FCBI	Fellow Certified Business Intermediary	International Business Brokers Association	
GVA	Government Valuation Analyst	National Association of Certified Valuation Analysts (NACVA)	

JD	Juris Doctor	Law Schools Around the
		Country
MBA	Master of Business	Various Universities
	Administration	
MCBA	Master Certified Business	Institute of Business
	Appraiser	Appraisers (IBA)
PhD	Doctor of Philosophy	Various Universities

The focus of this article is the four major organizations certifying business appraisers in the United States. A number of charts exist in various publications and on various websites that list and contrast the criteria for professional accreditation by the various organizations—perhaps the best is found on the American Society of Appraisers's website. It was taken from Shannon Pratt's *Judges & Lawyers Business Valuation Update*.

I am a member of the Qualifications Review Committee for The Institute of Business Appraisers. Specifically, I have been the exam grader for those individuals seeking certification by the Institute of Business Appraisers since September 2000. Since then, I have been interested in assessing the difficulty of obtaining certification from each of the four major organizations that award business valuation credentials. Specifically, what percentage of people taking the qualifying exams pass and what percentage of people submitting reports to demonstrate competency pass.

The four major organizations certifying business appraisers in the United States with both the designations they award and the most commonly seen designation are listed below:

American Society of Appraisers (ASA)²

Designations Offered: Accredited Member (AM)

Accredited Senior Appraiser (ASA)

Fellow of the American Society of

Appraisers (FASA)

Most Commonly Seen Designation: Accredited Senior Appraiser (ASA)

The Institute of Business Appraisers (IBA)³

Designations Offered: Accredited by IBA (AIBA)

Certified Business Appraiser (CBA)

Master Certified Business Appraiser

(MCBA)

Fellow of the Institute of Business

Appraisers (FIBA)

Business Valuator Accredited for

Litigation (BVAL)

Most Commonly Seen Designation: Certified Business Appraiser (CBA)

National Association of Certified Valuation Analysts (NACVA)⁴

Designations Offered: Accredited Valuation Analyst (AVA)

Certified Valuation Analyst (CVA)

Government Valuation Analyst (GVA)

Most Commonly Seen Designation: Certified Valuation Analyst (CVA)

American Institute of Certified Public Accountants (AICPA)⁵

Designation Offered: Accredited in Business Valuation (ABV)

As illustrated, most of these organizations offer more than one designation. Typically, each of them has an "entry" level designation, their "regular" designation, and a designation or designations for recognizing special service or experience. In order to fairly compare the designations awarded by each of these organizations, the most commonly seen designation (the "regular" designation) from each organization has been compared.

The "regular" designations from each organization are compared below using the following categories:

Prerequisites

Experience Requirement

Courses & Exams Required

Examination Pass/Fail Ratio

Report Review Requirement

Report Review Pass/Fail Ratio

Continuing Professional Education Requirement

Number of Certified/Accredited Members versus Members of the Organization

Prerequisite Comparison:

	ASA	CBA	CVA	ABV
Prerequisite:	College degree or equivalent	Four years of college or	Hold a valid CPA license	AICPA member with
	or equivalent	equivalent	and be a member in good standing with NACVA	current CPA license

Each of the organizations essentially requires a four-year college degree or equivalent. The CVA and ABV designations require the individual be a certified public accountant; the other two do not, but in order to qualify for certification, the individual

must have a strong accounting and financial skills background. Holding a certified public accountant license in and of itself does not qualify an individual to perform business appraisals, as evidenced by the fact that only two of the available designations require that license as a prerequisite.

Valuation Experience Requirement Comparison:

	ASA	CBA	CVA	ABV
Valuation	ASA-Five years	Five years of	None.	Involvement in
Experience	full-time or	full-time		at least ten
Requirement:	full-time-	experience or		business
	equivalent work	equivalent OR		valuation
	(2,000 hours	90 hours		engagements
	constitutes one	appraisal		that
	year full time	education of		demonstrate
	equivalent).	which at least		substantial
	One year's	24 hours must		experience and
	credit is granted	be in courses		competence.
	to holders of a	offered by the		
	CPA, CFA, or	IBA. Perform		
	CBI	at least two		
	designation	business		
	with five years	appraisals.		
	of practice in			
	that field.			

The experience requirement for the ASA designation is by far the most stringent—the applicant must prove that he or she has five years of full time or full time equivalent experience as a business appraiser. Both the CBA designation and the ABV designation require some experience or substantial education in the field before the designation can be awarded. The CVA designation has no experience requirement other than the prerequisite that applicants hold a certified public accountant license.

Courses & Exams Required:

	ASA	CBA	CVA	ABV
Courses &	Completion of	90 hours	Complete a five	No classes are
Exams	four courses of	appraisal	day training	required. A
Required:	three days each,	education of	program and	two day ABV
	with successful	which at least	pass	Exam Review
	completion of a	24 hours must	a four-hour	Course is
	proctored one	be in courses	proctored exam	offered by the
	half-day exam	offered by the	and a 40 to 60	AICPA.
	following each	IBA or meet the	hour take-	Applicants
	class, or	five year	home/in-office	must pass a
	successful	experience	comprehensive	proctored one-
	completion of	requirement.	exam which	day exam.
	an all-day	Applicants	incorporates a	
	challenge	must pass a	case study.	
	exam. An	proctored four		
	ethics exam and	hour exam.		
	a USPAP exam			
	also must be			
	passed.			

The ASA designation requires the most education and experience. An eight hour comprehensive "challenge" examination is available, however, unless the appraiser is highly qualified and very knowledgeable, it is unlikely that he or she will pass. Historically, the pass/fail ratio for this accreditation challenge examination was 64%. The pass/fail ratio for the current accreditation challenge examination is 50%. An applicant may also challenge each of ASA's four classes by examination in lieu of taking the class. The classes are challenging and very well done. Each successive class requires the applicant to have passed the examination for the previous class. For the year 2001, the pass/fail ratio for the exam given after the first ASA course, called BV 201, was 68%. Subsequent class pass/fail ratios are higher as the first class screens out some candidates who are less likely to succeed in the future classes. The 2001 pass/fail ratio for BV 202 was 80%, for BV 203 it was 98%, and for BV 204 the pass/fail ratio was 81%. Overall in 2001, 847 individuals took examinations for these classes during the year. 659 or 78% of them passed; 188 or 22% failed the examinations.⁶ Both examinations for the CBA and ABV designations require considerable business valuation knowledge—the CVA designation requires a five-day course from NACVA as part of the program.

Examination Pass/Fail Ratio Comparison:

	ASA	CBA	CVA	ABV
Examination	Historically	The qualifying	The pass/fail	The first few
Pass/Fail	64% of the	examination	ratio is roughly	years the
Ratio:	people taking	was modified in	between 70%	pass/fail ratio
	the 8-hour	February 1999.	and 75%.9	was 75%. It
	accreditation	Prior to this		has been
	examination	date, 82% of		between 71%
	pass the exam;	the applicants		and 72% for the
	36% fail. The	passed. Since		last few years. 10
	current	this date, 46%		
	challenge exam	of applicants		
	has a 50%	pass this exam.8		
	pass/fail ratio. ⁷			
	Those not			
	attempting a			
	challenge of the			
	final exam in			
	lieu of taking			
	the courses,			
	must pass the			
	four courses			
	BV201,			
	BV202, BV			
	203 and BV204			
	with grades of			
	75%. Each			
	course may be			
	challenged.			

The ASA designation clearly has the most difficult examination process of the four credentials. Since February 1999, the CBA designation's examination has become considerably more difficult than it had previously been. A similar percentage of applicants pass the examination for both the CVA and ABV designations.

Report Review Requirement Comparison:

	ASA	CBA	CVA	ABV
Report Review	Submission of	Submission of	None	None
Requirement:	two actual	two business		
	appraisal	appraisal		
	reports to the	reports		
	satisfaction of	demonstrating		
	board	professional		
	examiners	level of		
		competence		

The report review requirement provides the best evidence of the competence of a business appraiser as the actual product of the appraiser is reviewed by some of the best and most experienced appraisers in the industry. Both the ASA and CBA designations require applicants to submit two appraisal reports. Both organizations are noted for being tough on the review process—however, in talking with a number of applicants for both designations, I feel that the demonstration report review process for obtaining the CBA designation is the most difficult. Neither the CVA nor the ABV designation require business appraisal reports be submitted for review.

Report Review Pass/Fail Ratio Comparison:

	ASA	CBA	CVA	ABV
Report Review	60% of the	28% of those	Not Applicable.	Not Applicable.
Pass/Fail	individuals	submitting		
Ratio:	submitting	demonstration		
	reports for peer	reports pass on		
	review pass the	the first time.		
	review. 40%	Others are		
	fail and are	required to		
	required to	revise and		
	resubmit new	resubmit the		
	reports. ¹¹	reports. If the		
		second		
		submission of a		
		report does not		
		pass, the		
		applicant is		
		required to		
		submit an		
		appraisal report		
		for another		
		company. 12		

While both appraisal reviews are challenging, these figures tend to support my belief that the CBA appraisal review process is more difficult than the review process to obtain the ASA designation.

Continuing Professional Education Requirement Comparison:

	ASA	CBA	CVA	ABV
Continuing	Every five	Every two	Each CVA	Every three-
Professional	years each ASA	years each	must maintain	year period
Education	must submit	CBA must	their CPA	each ABV must
Requirement:	proof of 100	submit proof of	credential and	provide
	hours of	24 hours of	participate in	evidence of five
	continuing	continued	NACVA's	business
	professional	professional	Quality	valuation
	education.	development.	Enhancement	engagements
			program.	and 60 hours of
				related
				continuing
				professional
				education.

Each of the four organizations requires ongoing professional education in order to maintain the business appraisal designation.

Number of Certified/Accredited Members versus Members of the Organization Comparison:

	ASA	CBA	CVA	ABV
Number of	The	The	The NACVA	The AICPA
Certified	organization	organization	was formed in	began its
Members	began	was formed in	1993. As of	business
versus	accrediting	1978. As of	November	valuation
Members of the	members in	November	2001, there are	specialty
Organization:	business	2001, there	approximately	accreditation in
	valuation in	were 276	4,000 Certified	1997. As of
	1981. As of	Certified	Valuation	November
	November	Business	Analysts	2001, there
	2001, there	Appraisers	(CVA). As of	were 1,307
	were 735	(CBA), 13	the same date,	people holding
	Accredited	Master	there were	the Accredited
	Senior	Certified	approximately	in Business
	Appraisers	Business	5,000 members	Valuation
	(ASA), 100	Appraisers	of NACVA. Of	(ABV)
	Accredited	(MCBA) and	the 1,000	designation.
	Members	36 Accredited	members who	The AICPA has
	(AM), and 5	by IBA	were not CVAs,	over 330,000
	Fellows	(AIBA). IBA	not all are CVA	members—it is
	(FASA) for a	has	candidates;	unknown how
	total of 840	approximately	some hold the	many are
	Accredited	3,400	Accredited	pursing the
	Members.	members. ¹⁴	Valuation	ABV
	There were also	(To be fair,	Analyst (AVA)	designation or
	1,148	many members	or Government	are doing
	Candidates and	join to have	Valuation	business
	303 applicants	access to the	Analyst (GVA)	valuation
	working	IBA database	designations or	work. ¹⁶
	towards	and some of the	are candidates	
	meeting the	members may	for them. 15	
	requirements to	not be working		
	be a Candidate	toward		
	member	certification).		
	(passing the			
	Ethics and			
	USPAP tests). ¹³			

The number of people who have been awarded these business appraisal professional designations compared to the number of members seeking them provides some indication of the difficulty in achieving the designation. The American Society of Appraisers began accrediting individuals in business valuation in 1981. As of November 2001, there were only 840 accredited members in business valuation by the American Society of Appraisers and as of November 2001, there were 1,451 people pursing the designation. As of the same time, there were only 276 Certified Business Appraisers with 3,400 members of the Institute of Business Appraisers, Inc. This designation has been available since 1978—yet only 276 people had received it as of November 2001. Obviously, as mentioned above, not all of the approximately 3,400 non-certified members are actively seeking the designation, but it is reasonable to assume that many are. The National Association of Certified Valuation Analysts (NACVA) was formed in 1993. Of its approximately 5,000 members, 4,000 hold the Certified Valuation Analyst (CVA) designation. Some of the 1,000 difference, hold the other two designations offered by the organization. The American Society of Certified Public Accountants (AICPA) began accrediting members in business valuation in 1997—as of November 2001, there were 1,307 holders of the Accredited in Business Valuation (ABV) designation. comparison seems to indicate that the CVA designation and the ABV designations are much easier to earn than are the CBA and ASA designations.

Authoritative Books in the Profession

Another method of determining which credential(s) are given the most weight in the business appraisal industry suggested by Michele Miles, Attorney At Law and author of <u>The Business Appraiser and Litigation Support</u> is to look at who wrote the books considered authoritative in the profession and examine what credentials are held by the writers. The books Ms. Miles recommends as books on the required reading list written by business appraisers with their authors and the author's business valuation credentials (some with College of Fellows designations have been changed to reflect the "regular" designation for comparison purposes) are listed below:

Basic Business Appraisal, by Raymond C. Miles, CBA, ASA published by IBA Press.

Business Valuation Body of Knowledge, by Shannon P. Pratt, CBA, ASA published by John Wiley & Sons.

<u>Guide to Business Valuations</u>, by Jay E. Fishman, ASA, CBA and Shannon P. Pratt, CBA, ASA published by Practitioner's Publishing Company.

<u>Handbook of Advanced Business Valuation</u>, by Robert F. Reilly, ASA, CBA and Robert P. Schweihs, ASA published by John Wiley & Sons.

Quantifying Marketability Discounts, by Z. Christopher Mercer, ASA published by Peabody Publishing.

<u>Understanding Business Valuation</u>, by Gary Trugman, ABV, CBA, ASA published by the American Institute of Certified Public Accountants.

<u>Valuing Small Businesses and Professional Practices</u>, by Shannon P. Pratt, CBA, ASA, Robert F. Reilly, ASA, CBA, and Robert P. Schweihs, ASA published by John Wiley & Sons

<u>Valuing a Business: The Analysis and Appraisal of Closely Held Companies</u>, by Shannon P. Pratt, CBA, ASA, Robert F. Reilly, ASA, CBA, and Robert P. Schweihs, ASA published by John Wiley & Sons.

As this list illustrates, the authors of the books considered authoritative in the industry hold the Certified Business Appraiser designation awarded by The Institute of Business Appraisers and/or the Accredited Senior Appraiser designation awarded by the American Society of Appraisers. Of the authors on this list, only Gary Trugman holds the Accredited in Business Valuation (ABV) designation—he is also a Certified Business Appraiser and an Accredited Senior Appraiser. None of the authors hold the Certified Valuation Analyst (CVA) designation.

The following is my ranking of the difficulty in obtaining for the four "regular" business appraisal designations along with the reasons for this ranking:

Rank – From Most Difficult to Easiest	Designation	Reasons for Ranking
First (Most Difficult)	ASA	The four courses that must either be taken or successfully challenged, each with its own exam at the conclusion of the three day class, are rigorous. Each class screens out some applicants who do not master its material. The accreditation "challenge" examination historically excluded 36% of the applicants—the current challenge examination was failed by 50% of applicants. Further, each applicant must submit two actual appraisal reports prepared for clients for a peer review—40% fail this process and must resubmit reports. Also, each applicant must submit evidence verifying five years full time business appraisal experience or four years experience with one-year credit for some other experience. This program is clearly the most challenging of the four business appraisal designations.
Second	CBA	This designation requires five years experience or 90 classroom hours from a business valuation organization of which 24 hours must be in courses offered by the IBA. The qualifying examination was modified in February 1999. Prior to this date, 82% of the applicants passed. Since this date, 46% of applicants pass this exam. The report review requirement has always been the most difficult aspect of achieving this designation. Data from October 1990 to present indicates that only 28% of applicants pass on the first review. Those failing the review and a first submittal of corrections, must submit new reports for review—further fixing of the first submitted reports is not allowed. The difficulty of the demonstration report requirement for peer review qualifies this designation as the second most difficult to obtain in my opinion.

Third	ABV	This designation is available only to Certified Public Accountants. Candidates must be "involved in at least ten business valuation assignments. No specific education in business valuation is required but a two day review class for the examination exists. The pass rate for the exam for the first few years was 75%. The pass rate for the last few years has dropped to 72%. This designation has been rated as the third most difficult to obtain based on discussions with a number of people who hold it as well as the CVA designation. I have been informed by these people that the examination for the ABV credential is much more difficult than the examination for the CVA. No requirement for a peer review of demonstration appraisal reports is required for this designation. This, in my opinion, makes this designation much easier to obtain than either the ASA or the CBA.
Fourth (Easiest to Obtain)	CVA	This designation is available only to Certified Public Accountants. Applicants must pass a five-day training program and pass a two part exam. The first part is a half-day test and the balance is a take home case study. This is the easiest of the designations by far. This is verified by the large number of people holding the designation—4,000 as of November 2001 versus 5,000 members some of whom hold the other designations awarded by this organization.

I recommend that those serious about business valuation work pursue the two designations that require peer review of their appraisal reports as part of the certification process. There is certainly nothing wrong with the CVA and ABV designations—they simply do not go far enough in my opinion to ensure that the holders are truly competent in the field. The Certified Business Appraiser (CBA) designation awarded by The Institute of Business Appraisers, Inc., in my opinion is geared primarily to the appraisal of small to medium sized closely held businesses. The Accredited Senior Appraiser (ASA) designation awarded by the American Society of Appraisers is geared primarily to the appraisal of medium to large size closely held businesses. In order to do the very best job for your clients, I feel that business appraisers should obtain both the CBA and the ASA designations. I further recommend that appraisers take each of the courses offered by both

The Institute of Business Appraisers and the American Society of Appraisers that teach what is needed to pass all of the required examinations—they are excellent. Once certification and accreditation are achieved, business appraisers are required to take continuing education classes. Even if this was not a requirement, those serious about their profession would choose to do so anyway. The field is constantly changing and requires a lot of reading and ongoing participation in classes to keep up—it is also very interesting and a lot of fun!

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References:

www.byappraisers.org/why hire/accred chart.pdf.

² www. byappraisers.org/why hire/accred chart.pdf and www.byappraisers.org/why hire.

³ bvappraisers.org/why_hire/accred_chart.pdf. and www.instbusapp.org/certify.asp.

⁴ bvappraisers.org/why_hire/accred_chart.pdf. and www.nacva.com/Info/Provider/Certific.htm.

⁵ bvappraisers.org/why_hire/accred_chart.pdf. and www.aicpa.org/members/div/mcs/abvfaq.htm.

⁶ E-mail dated December 20, 2001 from Jerry Larkins, Director of Membership and Customer Service and from Dr. Patrick Christoff, Director of Education with the American Society of Appraisers.

⁷ E-mail dated December 7, 2001 from Jerry Larkins, Director of Membership and Customer Service with the American Society of Appraisers.

⁸ E-mail from Ave Pollock with the Institute of Business Appraisers, Inc. dated November 29, 2001 and E-mail from Steven F. Schroeder, Chairman of the Qualifications Review Committee dated November 26, 2001

⁹ E-mail dated November 28, 2001 from Doug Kirchner, Director of Marketing and Quality Control with the National Association of Certified Valuation Analysts.

¹⁰ E-mail from and phone call to Madelaine Feldman, Examinations Coordinator-Accreditations with the AICPA on November 28, 2001.

¹¹ E-mail dated December 7, 2001 from Jerry Larkins, Director of Membership and Customer Service with the American Society of Appraisers.

¹² E-mail from Ave Pollock with the Institute of Business Appraisers, Inc. dated November 29, 2001 and a phone call to Ave Pollock dated December 11, 2001.

¹³ E-mail dated December 7, 2001 from Jerry Larkins, Director of Membership and Customer Service with the American Society of Appraisers.

¹⁴ E-mail from Ave Pollock with the Institute of Business Appraisers, Inc. dated November 29, 2001.

¹⁵ E-mail dated November 28, 2001 from Doug Kirchner, Director of Marketing and Quality Control with the National Association of Certified Valuation Analysts.

¹⁶ E-mail from Madelaine Feldman, Examinations Coordinator-Accreditations with the AICPA on November 28, 2001.

¹⁷ Michele G. Miles. <u>The Business Appraiser and Litigation Support</u>. (New York: John Wiley & Sons, Inc., 2001), p. 51.