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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

January 11, 2000

**VIA FACIMILE**

Kurt West, Regulations Specialist  
Division of Occupational Licensing  
Department of Community and Economic Development  
P.O. Box 110806  
Juneau, AK 99811-0806

Dear Mr. West:

Thank you for providing us a copy of the proposed changes to Title 12 of the Alaska Administrative Code. We understand the amendment, if adopted, would extend the term for which seminars approved by the Board of Certified Real Estate Appraisers ("Board") are valid and would permit the Board to approve online courses for continuing education credit.

While we encourage the recognition of online courses, the amendments, as proposed, do not include the stipulations for online/distance course approval required by Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 ("Title XI"). Pursuant to Title XI, the Real Property Appraiser Qualification Criteria ("Criteria"), promulgated by the Appraiser Qualifications Board ("AQB"), specifies that online/distance courses must be:

- (1) Presented by an accredited (Commission on Colleges or a regional accreditation association) college or university that offers distance education programs in other disciplines;
- (2) Approved for college credit by the American Council on Education's Program on Non-collegiate Sponsored Instruction (ASC/PONSI); or
- (3) Granted approval under the AQB Course Approval Program.

The proposal, therefore, must be amended to incorporate these additional requirements. In addition, should the Board wish to permit the use of online/distance courses toward pre-certification education, the courses must be at least 15 classroom hours in length. Pre-certification courses also must require the student to complete successfully a written examination proctored by an official approved by the presenting entity.

Again, thank you for providing us an opportunity to review your proposal. Please contact us with any questions regarding our comments.

Sincerely,

Ben Henson  
Executive Director