

# STATE OF COLORADO

## BOARD OF REAL ESTATE APPRAISERS

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September 15, 2000

Ben Henson  
FF1EC Appraisal Subcommittee  
2000 K Street, N.W.  
Suite 310  
Washington, DC 20006

Re: Response to general letter on distance education

Dear Mr. Henson:

The Colorado Board of Real Estate Appraisers wishes to respond to your June 29, 2000 general letter to the FIRREA Title XI licensing jurisdictions regarding distance education.

In that letter you chide the states for accepting distance education courses that do not conform to the criteria promulgated by the Appraiser Qualifications Board of The Appraisal Foundation. We submit that the states are acting in the best interest of their citizens and licensees by accepting courses that do not conform to excessively restrictive criteria imposed by the AQB.

Distance education, in all its varieties, is an increasingly popular format for people seeking entry and continuing training in many professions. The advantages of reduced cost, flexible timing, wide variety of topics, and, above all, accessibility, are undeniable. The accessibility issue is of special interest to Colorado, where over 85 per cent of the population resides in a strip along the Front Range comprising only 2.6 per cent of our land area. The rest of the state is thinly populated- 27 of 63 counties have fewer than 10,000 residents, 7 counties lost population in the last decade. Present and future appraisers based in these rural areas need access to distance education.

We believe the AQB's acceptance of only those colleges and universities with distance education programs in other disciplines acts to eliminate many four and more- year institutions which could serve the public well. The exclusion of junior and community colleges eliminates participation by the most vibrant and responsive segment of the higher education community. Junior and community colleges are also the leaders in serving minority, female, senior and handicapped populations.




We believe the costs and delays associated with acceptance of distance education programs through the American Council on Education's College Credit Recommendation Service inhibit use of this route to acceptance. Further, the ACE/CCRS program is intended to determine whether courses meet the criteria necessary for acceptance for credit in college degree programs. This level of review exceeds what is needed for real estate appraisal education.

The cost and delay issues also arise when a provider seeks approval through the Course Approval Program of the Appraiser Qualifications Board. The high costs and time delays can act to inhibit organizations from developing distance education courses which maybe of interest to a limited audience, or address a fast rising but short lived topic. These factors may well act to exclude local or regional level providers, while acting to favor the large national level providers which can distribute costs over a larger customer base.

Sincerely yours,

COLORADO BOARD OF REAL ESTATE APPRAISERS

A handwritten signature in black ink, appearing to read "Larry S. Massey", written over a faint, larger version of the same signature.

Larry S. Massey  
Chair