

STATE OF CONNECTICUT  
DEPARTMENT OF CONSUMER PROTECTION

REAL ESTATE APPRAISAL COMMISSION

14 March 1997

Ronald W. Pepe  
Associate Director for Policy and Programs  
Appraisal Subcommittee  
Federal Financial Institutions Examination Council  
2100 Pennsylvania Avenue, N W  
Suite 200  
Washington, DC 20037

Re: Increase in Continuing Education Credit Hours

Dear Mr. Pepe,

This missive to you is to request your advise and guidance on a particular matter concerning the above referenced subject. I am writing to you on behalf of the Connecticut Real Estate Appraisal Commission as its staff person.

Enclosed please find three letters on the continuing education subject; two from Stephen Williams, Chair of the Appraiser Qualifications Board to me and one from me to him which we find to be somewhat self-explanatory. Our concern here in Connecticut is this; Connecticut is in the process of going through the regulatory procedure, which includes legislative review, of amending our regulations to reflect the recent increases in certification and state-license appraiser education and experience requirements. From what we gather in the letters from Mr. Williams, we have assumed that the certified and state-licensed appraisers will still need to fulfill twenty hours of continuing education (CE) credit before April 30, 1998. Then, before April 30, 2000, they will need twenty - eight hours of CE. We feel more confident with this when Mr. Williams affirmed that the intent of the AQB was not to create any complex blending of one states cycle hours of CE. Since our license period is annually from May 1 to April 30, and the changes in requirements take affect January 1, 1998, that can mean a 'confusing fractional calculation of hours' for our appraisers.

Would our decision of requiring the twenty hours of CE for this continuing education cycle meet with your requirements?

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Importantly, too, we need to ensure that the position we are taking on this does not jeopardize the reciprocal agreements we have with other states and the fact that their cycles may not jibe with ours, and that the certified and state-licensed appraisers who have received appraiser status in Connecticut by reciprocity are safe with other states contrary cycles. Please advise as-soon-as-possible! Your quick response would be greatly appreciated.

Thank you for your time, attention and cooperation. I look forward to your prompt reply.

Sincerely,

Edward J. McMahon, III  
Real Estate Examiner  
860 566 - 3290

Enclosure