

STATE OF CONNECTICUT

DEPARTMENT OF CONSUMER PROTECTION REAL ESTATE APPRAISAL COMMISSION

26 March 1997

Ben Henson
Executive Director
Appraisal Subcommittee
2100 Pennsylvania Avenue, N W
Suite 200
Washington, D C 20037

Re: Increase in Continuing Education Credit Hours

Dear Mr. Henson,

As Chairman of the Connecticut Real Estate Appraisal Commission, I want to thank you very much for your letter to Mr. McMahon dated March 18, 1997 concerning the above referenced topic. This communication is a tremendous help to our Commission.

I am writing to you now on behalf of the Commission to again ask for your support. I think it will be helpful if I explain, in brief, the process CT must follow to get the increase in requirements into our regulations in order to maintain compliance with Federal guidelines. Unlike other states who have written into their law that if the Appraisal Qualifications Board should make changes to certification or state-license requirements, they will automatically go along with it. Connecticut has no such language nor do we feel comfortable considering such statements. For us to amend our statutes and regulations is quite a process. First, a draft of the proposed changes from us is presented to the Commissioner of the Department of Consumer Protection (DCP). It then goes to the governor's office. If approved, the pop publishes the proposals in the CT Law Journal. It is also sent to at least one Legislative Committee. A public hearing is then held. If any changes were acknowledged at the hearing, they are added to the proposal. It then is forwarded to the Office of the Attorney General for review. If it is signed by the AG, it is sent to the Legislative Regulation Review Committee. If approved there, we get it back and file the amended regulation with the Secretary of State for CT. As you can surmise, this takes months. And with each change in requirements that you all make, we must go through the regulation amendment process again.

Also, importantly, since Connecticut has always maintained a bi-annual continuing education cycle, we may discuss your encouragement of an annual requirement similar to what other states have in place.

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We remain confident that by allowing our appraisers to submit twenty (20) hours of continuing education for their 1998 renewal that they will be in compliance with federal guidelines. And that for the renewal of 2000, the twenty-eight (28) hours will be necessary.

In closing, you mention in the last sentence of the last paragraph of your letter that you will be reviewing this increase in continuing education issue in a larger context and may be issuing guidance in the near future. Please keep us in mind when you do issue advise and guidance and inform us accordingly.

Again, thank you for your patience, time, attention and cooperation with this subject. We just want to get it right for all concerned. If you feel the need for further input into our process, please contact us right away.

Sincerely,

Donato D. Maisano
Chairman
Connecticut Real Estate Appraisal Commission
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DDM:ejm

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