

The Chicopee Group

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Mr. Dennis Green
Appraisal Policy Manager
2000 K Street, NW, #310
Washington, D.C. 20006

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Dear Mr. Green:

I am writing to you regarding another education provider issue, this time with the State of Missouri. We have had courses approved in Missouri for several years and we have conducted a few classes in their state. This year, Missouri changed their approval process and requested that all course providers prepare special renewal forms and submit them in June. This we did. After a lengthy period of time, we were informed that all of our course renewals were rejected.

Ms. Kolb informs me that the "new" Board was concerned about the amount of hours we have for USPAP education, since it exceeded the typical 15 hours I have included for your review an attachment explaining our USPAP education which we have been offering in several states for many years. Please note that only four of these USPAP courses were submitted to Missouri and previously approved. It is our philosophy that in order for appraisers to appreciate that USPAP is LAW, requires education to assimilate USPAP into their every day appraisal activity.

Missouri has also written a regulation requiring that "all qualifying education must be taught by a Missouri licensed/certified appraiser". Knowing this, I requested (in writing) a "waiver" to be allowed to teach these courses to Missouri appraisers. Our concern is not primarily with non-licensed appraisers, but instead with appraisers who wish to upgrade their license classification. As you know, our courses are approved in many states for both upgrading credit and continuing education credit.

Although I was not officially informed, Ms. Kolb has told me that my waiver request has been denied. The problem is, she also told me that the appraiser organizations are not required to submit courses for approval from her Board, nor are they required to employ Missouri licensed/certified appraisers to teach their classes.

You and I have had this discussion before regarding preferential treatment of the appraiser organizations in education approval matters. There has never been any data to support the belief that appraisers belonging to these organizations present less of a threat to the public with regards to appraisal activity. In fact, the presentation at the AARO Conference in Denver in April by Mr. Disney and Mr. Brenan regarding "flips", implied the contrary. They stated that although no actual correlation could be made of their data, there was also no evidence to believe that designated appraisers from these organizations were more likely to be involved in "flips".

In spite of their prominent status with the Foundation and AARO, the organizations find themselves losing members at a record rate. An unofficial count shows that only 25% of the appraisers in the country belong to these organizations. It appears no one wishes to ask the appraisers why they no longer wish to belong to these organizations. Instead, State Boards typically made up of appraiser organization designated members tend to promote their organizations through their positions on the Board.

As you probably are aware, in most states the course approval process is different for the appraiser organizations than it is for independent course providers. In many states, only the independent course providers are required to present their material for review and sometimes even pay application fees.

We respectfully request that you please review this matter. We feel that if nothing else, it falls under Statement #7 of the ASC Policies. We also believe that this matter may even fall under other unfair competition or restraint of trade issues of the Federal Trade Commission. We would like to handle this through the ASC and the State and not take it on to the Federal Trade Commission, but it is our belief that the situation is worsening around the country.

We regret having to involve you in such matters. All we are looking for is a level playing field and fair competition. Also as an appraiser, I believe that since my license which makes me eligible to perform appraisals for "**federally related transactions**" requires that I attend education meeting the AQB criteria, and additionally, this education is already approved in one jurisdiction, then it should be acceptable wherever it is taken.

Thank you for your time.

A handwritten signature in black ink, consisting of a stylized initial 'C' followed by a long, sweeping horizontal line that tapers to the right.