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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

February 13, 2006

Delaware Council on Real Estate Appraisers  
Division of Professional Regulation  
Cannon Building, Ste 203  
861 Silver Lake Blvd.  
Dover, DE 19904

Dear Members:

Thank you for giving us a copy of your January 2006 newsletter, which included proposed amendments to your regulations. We understand that these proposals, in large part, are intended to implement the Appraiser Qualifications Board's ("AQB") January 1, 2008 criteria. We have reviewed the proposals and have the following comments.

- Change § 2.1.2 to reflect the Appraisal Foundation's new address at 1155 15<sup>th</sup> Street, NW; Suite 1111; Washington, DC 20005;
- Please add the phrase, or its equivalent as determined through the AQB Course Approval Program or by an alternate method established by the AQB" after the words, "seven (7) hour National USPAP Course";
- Specify in § 2.3.5 that continuing education credit may be awarded for participation in field trips, conferences, and trade association meetings if those activities specifically relate to real estate appraisal education;
- Rewrite § 2.3.7 to state that the Delaware Council on Real Estate Appraisers may approve the content of a distance education course after approval of the delivery mechanism is approved from one of the following sources:
  1. AQB approved organizations providing approval of course design and delivery, such as the International Distance Education Certification Center ("IDECC");
  2. A college that qualifies for content approval that awards academic credit for the distance education course; or
  3. A qualifying college for content approval with a distance education delivery program that approves the course design and delivery that incorporates interactivity;
- Correct an apparent typographical error in § 4.2.4 by replacing "with" with "within"; and

- Correct the typographical error in § 7.1.1 by replacing “it” with “its” in referring to the successor organization of the Appraisal Foundation.

Please contact us if you have any questions.

Sincerely,

Ben Henson  
Executive Director