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Appraisal Subcommittee

Federal Financial Institutions Examination Council

December 19, 2001

Nancy Dixon, Policy Specialist
Department of Consumer and
Industry Services
Bureau of Commercial Services
P.O. Box 30018
Lansing, MI 48909-7518

Dear Ms. Dixon:

Thank you for providing us a copy of proposed changes to your Real Estate Appraiser Rules (“Rules”). We reviewed the proposed changes and have one comment.

The Appraiser Qualifications Board (“AQB”) recently adopted changes to its criteria for distance education courses that affect the proposed amendment to § R339.23309(2). Effective November 1, 2001, AQB Criteria require distance education courses **not** sponsored by a college/university or endorsed by the American Council on Education through its ACE/Credit Program to have its course design and delivery mechanism approved by the International Distance Education and Certification Center (“IDECC”). Course content may be evaluated and approved through either the AQB Course Approval Program **or** the licensing/certifying jurisdiction where the course is being offered. The Rules should be amended to conform to these revised criteria. A copy of the new distance education interpretation to the AQB Criteria is enclosed.

Again, we appreciated the opportunity to review the proposal.

Sincerely,

Ben Henson
Executive Director

cc: Judy Dennis, Licensing Administrator

Enclosure