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INDEPENDENT REGULATORY  
REVIEW COMMISSION

**Pennsylvania  
Association of  
REALTORS®**

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October 9, 2009

Steven Wennberg, Regulatory Unit Counsel  
Bureau of Professional and Occupational Affairs  
PO Box 2649  
Harrisburg, PA 17105-2649

Dear Mr. Wennberg:

On behalf of the more than 30,000 members of the Pennsylvania Association of REALTORS® (PAR), we welcome the opportunity to comment on the proposed rulemaking relating to appraiser trainees, initial and continuing education, supervised experience and practice standards (16A-7015) published in the September 19, 2009 edition of *The Pennsylvania Bulletin*.

The proposed rulemaking establishes a regulatory plan for the appraiser trainee license, revises initial and continuing education and supervised experience requirements for certified appraisers, clarifies appraiser practice standards relating to supervision and use of titles, and revises requirements for certified Pennsylvania evaluators to coincide with those for certified appraisers.

In general, PAR supports the new rulemaking and applauds the Board for providing a set of feasible standards regarding appraiser trainees that follow the Appraiser Qualifications Board (AQB). PAR believes the application fee of \$75 to be reasonable and encourages the Board to keep cost at a minimum as this is a major concern with our members. PAR also supports the limit on the number of times a trainee licensee can renew his/her license. We believe this will encourage trainees to become certified instead of being life-long apprentices.

PAR approves of the requirement that the longer of the two experience timeframes be used. If the supervising appraiser were allowed to be the sole determinant of when the assistant is competent, abuse of power may ensue resulting in the assistant working independently before adequate experience has been logged. This requirement ensures that the assistant will log a minimum of 300 hours.

PAR approves allowing all candidates for licensure to use distance education to meet initial and continuing education requirements. This method adds a convenient manner for candidates to gain their credits from educational providers across the Commonwealth.

We appreciate the opportunity to share our views on this proposed regulation. Should you have any questions, please feel free to contact us.

Sincerely,

Derenda Updegrave, Director  
Government Affairs

