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Greater Harrisburg Association Of REALTORS

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Judith Pachter Schulder, Esquire
State Real Estate Commission
P.O. Box 2649
Harrisburg, PA 17105-2649

Reference No. 16A-5613 (Continuing Education)

Dear Ms. Schulder:

On behalf of the Greater Harrisburg Association of REALTORS® (GHAR) and its related organization, the Greater Harrisburg REALTORS® Institute (GHRI), I am writing to comment on the Proposed Rulemaking amending Chapter 35 of the PA Code 49 dated September 11, 2010.

Subchapter F Real Estate Education Providers §35.359 Course Documentation

GHAR and GHRI is concerned about the proposed provision in §35.359 (b) requiring within 30 days after a continuing education course has ended, the continuing education provider shall provide each licensee who satisfactorily completed/taught the course transcripts/certificates of instruction.

GHRI currently does not issue paper transcripts upon completion of a course; however, we do issue paper transcripts upon request to comply with the State Real Estate Commission's continuing education audit. The GHRI staff handles these requests in a timely and efficient manner. To date, we have not received any complaints on this procedure.

Requiring continuing education providers to issue paper transcripts seems to go against society's efforts to be environmentally conscientious and to "go green". In addition, the requirement to issue paper transcripts is an unnecessary paperwork requirement for continuing education providers. (You acknowledged this in the *Background and Purpose* of the Proposed Rulemaking.) GHRI estimates the requirement to issue paper transcripts would cost us between \$1,500 - \$2,000 each continuing education cycle. This cost estimate does not include staff time to process the transcripts.

GHAR and GHRI request the State Real Estate Commission consider a provision requiring continuing education providers to issue transcripts upon request.

If the State Real Estate Commission insists that continuing education providers "provide" transcripts to students upon completion, we recommend that the Commission consider giving continuing education providers the option to issue either electronic or paper transcripts.

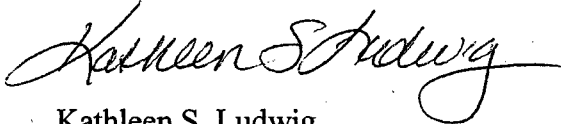


Subchapter D. Licensing Examinations

GHAR and GHRI is seeking clarification on what is meant by "industry organization". What, if any, qualifications will be necessary in order to be approved under this category? We are concerned that the term "industry organization" is vague and may be subject to interpretation. In order to achieve the goal of issuing Pennsylvania credit to designation programs owned and administered by the National Association of REALTORS® during their annual convention and mid-year meetings, perhaps this language should be specific to this entity. We are concerned that unauthorized, self-appointed "industry organizations" will begin to offer these programs without meeting the standards or qualifications of education providers currently in existence by the State Real Estate Commission.

Thank you for the opportunity to comment on the Proposed Rulemaking. Please do not hesitate to contact me if you have any further questions. I can be reached at (717) 364-3200 or by e-mail at kathy@ghar.info.

Sincerely,



Kathleen S. Ludwig
Executive Vice President, GHAR
School Director, GHRI