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October 8, 2010

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:

I am writing on behalf of the School Directors within the Pennsylvania Association of REALTORS® (PAR) who met two weeks ago while attending the PAR Business Meetings.

A few questions were posed relating to the Proposed Rulemaking document dated September 11, 2010. We would appreciate your clarification of the following proposed amendments:

(1) **Section 35.359 – Course documentation.** *“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 that contain the information in § 35.360 (a)(5)(i) – (viii) signed by the provider.”*

Can you please define the word “provide”? Does this amendment require every student to receive a paper transcript/certificate or will an electronic version satisfy the requirement? Will an original signature and School seal be required on every transcript/certificate? If a paper transcript is required, this amendment will have a financial impact on education providers due to increased administrative and operating costs. In addition, reverting back to paper transcripts will compromise our efforts to remain environmentally conscious.

(2) **Subchapter D. Licensing Examinations.** Can you please define the words “industry organization”? What, if any, qualifications will be necessary in order to be approved under this category? Confusion was expressed with the term “industry organization” in that it is vague and may be subject to interpretation. 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 Real Estate Commission.

As a group, we are willing to assist with creating a list of qualifications or provide additional feedback to reach our mutually desired outcomes. We appreciate this opportunity to offer our comments and look forward to your response.

Very truly,

Anne Marie Matteo, CAE, RCE  
School Director

cc: School Directors