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Appraisal Subcommittee

Federal Financial Institutions Examination Council

November 20, 2009

Dear State Appraisal Program Professionals:

It has come to the attention of the Appraisal Subcommittee (ASC) that some confusion exists regarding the Appraiser Qualifications Board (AQB) requirements pertaining to distance education. Specifically, clarification is needed on the course delivery mechanism approval requirement when a secondary course provider is delivering the course.

Current AQB Real Property Appraiser Qualification Criteria requires course delivery mechanism approval to be obtained from one of the following sources:

- i. AQB approved organizations providing approval of course design and delivery; or
- ii. a college that qualifies for content approval that awards academic credit for the distance education course [content approval is obtained from the AQB, a state licensing jurisdiction, or an accredited college, community college, or University that offers distance education programs and is approved or accredited by the Commission on Colleges, a regional or national accrediting agency that is recognized by the U.S. Secretary of Education]; or
- iii. a qualifying college for content approval with a distance education delivery program that approves the course design and delivery that incorporate interactivity.

The only currently approved organization for course delivery mechanism is the International Distance Education Certification Corporation (IDECC).

Primary course providers frequently sell or license their courses to secondary providers. These secondary providers are the companies that actually deliver the course to the students. In several cases, both the primary and secondary course providers have been led to believe, or are assuming, that the IDECC approval transfers from the primary course provider to the secondary course provider. This is not accurate. **Secondary course providers are responsible for requesting and receiving their own approval from IDECC for their specific course delivery mechanism. The primary course provider's IDECC approval does not transfer.** It is important to note that approval for the delivery mechanism must be obtained even if the course is "housed" with the primary provider. The secondary provider is still responsible for ensuring the delivery and student-to-instructor interaction meet AQB Criteria requirements.

If your State allows distance education courses, your program must ensure that each course from each provider has the appropriate delivery mechanism (IDECC) approval. A copy of the course delivery mechanism (IDECC) approval verification must be maintained in the State's file. If you are aware of courses that have been approved without the appropriate delivery mechanism approval you must immediately discontinue allowing those courses to be used for appraiser education. Additionally, you should contact all approved course providers (both primary and secondary) in your State to alert them to this issue. Appraisers who have completed courses, or are currently enrolled in courses, that do not have the appropriate IDECC approval will not be eligible to receive credit for the course(s). This requirement is effective immediately upon your receipt of this letter. Going forward, States are required to disallow

any hours received by students who complete unapproved courses. The ASC Policy Managers will be checking to ensure that States adhere to this requirement.

If you have any questions regarding this clarification, please do not hesitate to contact me or your Policy Manager.

Sincerely,

James R. Park
Executive Director

Cc: Gary Taylor, Chair, Appraiser Qualifications Board