

Barry, Ann (DPL)

From: Thomas Sudol
Sent: Friday, July 31, 2015 11:53 AM
To: Barry, Ann (DPL)
Subject: Fwd: recent meeting to revise regulations

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From: Thomas Sudol
To: AnnBarry <AnnBarry@state.ma.us>
Sent: Fri, Jul 31, 2015 11:47 am
Subject: recent meeting to revise regulations

Good afternoon

I did not become aware of the meeting which was recently held to revise unnecessarily burdensome regulations until today, which is unfortunately after the deadline for input.

However, based upon my own experience, which may be fairly unique, I have a suggestion which I would like to submit for consideration.

I have been disabled for a period of ten years, and as a consequence, have not been actively practicing Real Estate Appraisal. My licence status is inactive as a consequence. I was licensed for over fifteen years and have been an appraiser for nearly twenty years prior to my disability.

Due to continuing education requirements as presently configured, I am required to receive two hundred and seventy hours of continuing education in order to reactivate my license. This is a very onerous burden for a person who is trying to transition from disability to gainful employment, and in fact exceeds by a considerable amount the number of hours for initial licensing. This is making it very difficult for me to reenter the field, as my current source of income is SSI and Social Security and I am the single parent of an eleven year old child who also is disabled.

I understand the reasoning behind requiring persons who have temporarily left the field to complete outstanding continuing educational requirements but at some point in time the overall effect it to become so burdensome that it is practically impossible to accomplish. There are probably not that many hours of different courses available to Real Estate Appraisers.

I have recently completed fifty seven hours of continuing education, taking every online course available from MBREA, and am now contemplating taking Appraisal Institute courses totaling one hundred fifty hours, which will only give me one hundred and ninety two hours, and I am asked to provide about two hundred and seventy hours to meet continuing education requirements.

A cap of some amount, beyond which this regulation requires these hours to be performed would make the regulations less burdensome and would allow the few persons such as myself who find themselves in this position to return to gainful employment much more manageable.

Thomas Sudol