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July 12, 2018

TO: Appraisal Standards Board
The Appraisal Foundation
1155 15th Street, NW, Suite 1111
Washington, DC 20005

RE: First Exposure Draft of Proposed Changes for the 2020-2021 Edition of the *Uniform Standards of Professional Appraisal Practice*

Ladies and Gentlemen-

The Government Affairs Committee of the National Association of Appraisers (NAA) has reviewed the First Exposure Draft of Proposed Changes for the 2020-2021 Edition of the Uniform Standards of Professional Appraisal Practice dated May 22, 2018 and respectfully provides the following comments for your consideration.

- **Section 1: Reporting Options**
The NAA is in support of the proposed changes to STANDARD 2: REAL PROPERTY APPRAISAL, REPORTING
- **Section 2: SCOPE OF WORK RULE**
NAA is supportive of these changes; particularly removal of DISCLOSURE OBLIGATIONS from this section.
- **Section 3: Comments in Standards Rules**
NAA is in agreement with the rationale for moving into the Standards Rule itself most of the Comments that contain requirements. We encourage, however, that the language in the comment on lines 385-388 (or language similar to it) be moved to the USPAP Preamble:
Perfection is impossible to attain, and competence does not require perfection. However, an appraiser must not render appraisal services in a careless or negligent manner. This Standards Rule requires an appraiser to use due diligence and due care.
- **Section 4: Definitions**
NAA generally supports changes and additions to Definitions, however, we respectfully request that the clarifying language “Physical characteristics are not assignment results” on line 609 remain somewhere within USPAP if not within the definition of Assignment Results.

We also wish to request clarification for the need of the parenthetical phrase “(DATE OF VALUE)” on line 633 as this appears to have the potential to create confusion.

*While we are supportive the addition of a definition of **INSPECTION** beginning on line 658, we request careful thought and consideration to the final language in this definition to avoid confusion among practitioners, users of appraisal services and regulators regarding real property inspection requirements and allowable reliance upon data provided by third party inspectors.*

- **Section 5: Other edits to improve clarity and enforceability of USPAP**

NAA is supportive of the rationale and changes proposed in Section 5 of this exposure draft.

NAA sincerely appreciates the opportunity to provide feedback on this exposure draft and your consideration of our input.

Sincerely,

John Dingeman, MNAA
President, National Association of Appraisers