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

RE: Fourth 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 Fourth Exposure Draft of Proposed Changes for the 2020-2021 Edition of the Uniform Standards of Professional Appraisal Practice dated December 12, 2018 and respectfully provides the following comments for your consideration.

- **Section 1: STANDARDS (Reporting Options and Comments in Standards Rules)**
 - *We are supportive of the proposed changes to Standards addressed in Section 1 of the fourth exposure draft.*
- **Section 2: SCOPE OF WORK RULE**
 - *NAA is supportive of the proposed changes in Section 2 of the fourth exposure draft.*
- **Section 3: COMPETENCY RULE**
 - *We support the proposed changes to the Competency Rule.*
- **Section 4: Definitions**
 - *NAA applauds removal of the definition of AT THE TIME OF ASSIGNMENT.*
 - *On line 2589 within the definition of **MISLEADING**, NAA recommends replacing the word “relevant” with the word “material”. We feel the word “relevant” is fairly ambiguous and something may be “relevant” without being “material”. As an example, it is relevant that a residential property has quartz countertops rather than granite, but it is likely not material as misstating one surface for the other would likely have no impact on an appraiser’s conclusions.*
 - *Black’s Law Dictionary defines these words thusly:*
 - **Relevant** - *Evidence...that directly relates to the issues disputed or discussed.*
 - **Material** - *Important; more or less necessary; having...effect; having to do with matter.... An allegation is material when it forms a substantive part of the case.... Evidence...is material when it...goes to the substantial matters...or has a legitimate and effective influence or bearing on the decision....*
 - **MISLEADING: Intentionally or unintentionally misrepresenting, misstating, or concealing material ~~relevant~~ facts or conclusions.**

- **Section 5: Other edits to improve clarity and enforceability of USPAP**
 - *Please see NAA's comments regarding the definition of AT THE TIME OF ASSIGNMENT in section 4.*
- **Section 6: Proposed Revisions to ADVISORY OPINION 1, Sales History**
 - *NAA is supportive of the changes proposed to AO-1 in Section 6.*
- **Section 7: Proposed Revisions to ADVISORY OPINION 2, Inspection of Subject Property**
 - *NAA supports the proposed revisions to AO-2.*
- **Section 8: Proposed Revisions to ADVISORY OPINION 3, Update of a Prior Appraisal**
 - *NAA is supportive of the proposed revisions to AO-3.*
- **Section 9: Proposed Revisions to ADVISORY OPINION 28, Scope of Work Decision, Performance, and Disclosure**
 - *NAA supports the proposed revisions to AO-28.*
- **Section 10: Proposed Revisions to ADVISORY OPINION 31, Assignments Involving More than One Appraiser**
 - *NAA is supportive of the proposed revisions to AO-31.*
- **Section 11: Proposed Revisions to ADVISORY OPINION 32, Ad Valorem Property Tax Appraisal and Mass Appraisal Assignments**
 - *NAA supports this proposed revision.*
- **Section 12: Proposed Revisions to ADVISORY OPINION 36, Identification and Disclosure of Client, Intended Use, and Intended Users**
 - *NAA supports the proposed revisions to AO-36.*
- **Section 13: ADVISORY OPINION 38, Content of an Appraisal Report and Restricted Appraisal Report.**
 - *NAA is supportive of these revisions and due to the substantive changes it would create, we respectfully request that this topic be an area of focus in 2020-2021 USPAP update courses.*
- **Proposed Retirement of ADVISORY OPINION 4, Standards Rule 1-5(b); ADVISORY OPINION 11, Content of the Appraisal Report Options of Standards Rules 2-2, 8-2, and 10-2; and ADVISORY OPINION 12, Use of the Appraisal Report Options of Standards Rules 2-2, 8-2, and 10-2**
 - *NAA is in support of retirement of these advisory opinions.*

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