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TO: Appraisal Standards Board
The Appraisal Foundation
1155 15th Street NW
Washington, DC 20005
asb@appraisalfoundation.org

RE: Scope of Work

The National Association of Appraisers (NAA) would like to express concern regarding an unusual and problematic interpretation that the steps involved in Scope of Work are tied to individual assignments and therefore must be repeated for subsequent assignments.

For example, it has been suggested that for a mortgage lending assignment, an appraiser would be required to revisit a comparable sale which was used in a prior assignment because the step of viewing the sale “belonged” to the prior assignment. The use of information from one assignment to another as always been acceptable (provided there is no violation of confidentiality) and to repeat this step is not only impractical, it is unnecessary; every day that passes renders a sale less representative of how it existed at the time of sale.

The concept described above brings negative consequences to appraisers, users of appraisal services and the public by adding additional time (therefore expense) for the completion of assignments. NAA respectfully requests that The Appraisal Foundation/Appraisal Standards Board provide clarification to dispel this misinterpretation.

Sincerely,

Laurie Egan, MNAA on behalf of NAA
Association Manager/Chair, Government Affairs Committee
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