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TO: Appraisal Standards Board  
The Appraisal Foundation  
1155 15th Street, NW, Suite 1111  
Washington, DC 20005  
<https://www.surveymonkey.com/r/ASBComments>  
[ASBcomments@appraisalfoundation.org](mailto:ASBcomments@appraisalfoundation.org)

**RE: First Exposure Draft – Proposed New Advisory Opinion 41, Use of Technology in an Appraisal or Appraisal Review Assignment**

Chair Pilz and Members of the Appraisal Standards Board-

The National Association of Appraisers (NAA) would like to thank you all for your work on this exposure draft. We support adoption of Advisory Opinion 41 and the retirement of AO-18 and AO-37. After reviewing the draft, we respectfully submit the following answers to the questions posed for your consideration.

**1. Appraiser Responsibilities - Does the proposed guidance clearly articulate the appraiser's responsibilities when using advanced computer technology in appraisal assignments?**

NAA believes proposed AO-41 adequately emphasizes that the use of a tool cannot replace an appraiser's professional judgment and that appraisers are ultimately responsible for compliance with professional standards. It is equally well-emphasized that tool output must not be misinterpreted as assignment results.

**2. Risks - Are there specific risks that you believe require additional clarification within the proposed guidance?**

NAA believes the draft addresses most currently known risks. Relevant guidance has been provided on the use of technology where appraisers have limited visibility into the inner workings of the system (black box), acknowledging that some advanced tools may have embedded assumptions or biases, emphasizing caution on over-reliance on technology without competency or professional judgement, and protecting confidential information.

NAA applauds examples such as those provided on lines 111-133 by taking technology most appraisers utilize regularly (spreadsheets) and contrasting them with technology they may not be as familiar with such as machine learning and artificial intelligence to illustrate how the guidance applies.

**3. Public Trust - Does the proposed guidance appropriately maintain USPAP requirements and public trust while addressing the use of this technology?**

NAA believes the AO clearly reaffirms appraiser accountability, ethical obligations, confidentiality, impartiality and independence which maintains USPAP'S purpose of fostering public trust.

**4. Additional Issues** - *Are there additional issues the ASB should consider when using emerging technologies?*  
Technology is advancing rapidly and we encourage the ASB to provide supplemental examples or FAQs as technology evolves. As always, we also encourage the ASB to promote consistent interpretation and enforcement by state regulators.

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

Sincerely,

Laurie Egan, MNAA on Behalf of NAA  
Association Manager/Chair, Government Affairs Committee  
National Association of Appraisers