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TO: Appraisal Standards Board
The Appraisal Foundation
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<https://www.surveymonkey.com/r/ASBComments>
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RE: Concept Paper: Generative AI and Appraisal Standards

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 concept paper. We have reviewed it and respectfully submit the following comments for your consideration.

GENERAL QUESTION FOR ALL STAKEHOLDERS

- Do you believe additional guidance on the use of Generative AI in appraisal practice is needed at this time?
 - **NAA Comments:** There is a wide range of understanding about AI among practicing appraisers—some are experts, while others have limited or no familiarity with the topic. For those with a basic understanding, we believe the ASB has provided sufficient guidance through Q&A 2024-02, AO-18, and AO-37. However, given the varying levels of knowledge (and recognizing that AO-18 and AO-37 were developed before the widespread emergence of Generative AI), it may be helpful to revise both opinions to explicitly address its use in appraisal practice. Additionally, incorporating this topic into future USPAP continuing education courses would be beneficial.
- What concerns do you have about the use of Generative AI in appraisal practice and its impact on public trust?
 - **NAA Comments:** Generative AI is simply another tool, and when used appropriately, NAA has minimal concern regarding its impact on public trust.
- Are there gaps in existing USPAP requirements and/or guidance that should be addressed to clarify the use of Generative AI in appraisal practice?
 - **NAA Comments:** As noted above, revising AO-18 and AO-37 to specifically address Generative AI would help clarify its appropriate use within appraisal practice.
- Should Advisory Opinion 37 (Computer Assisted Valuation Tools) be revised to address Generative AI, replaced entirely, or kept as is with separate guidance developed to specifically address Artificial Intelligence tools, including those that incorporate automated processes that may inform or shape appraisal-related tasks?
 - **NAA Comments:** Much of the guidance currently provided in AO-37 is applicable to Generative AI. Therefore, revising this advisory opinion to specifically include Generative AI considerations appears to be the most logical approach, avoiding redundancy and maintaining consistency in guidance.

FOR APPRAISERS

- How is Generative AI currently being used, or being considered for use, in your appraisal practice, and what challenges do you face in maintaining compliance with USPAP?
 - NAA Comments: Some of our members are advanced or intermediate users of Generative AI, utilizing it for tasks such as complex analytics and report generation. Others are novice users, applying it mainly to rewrite or reformat text they have already produced. We also have members who have not yet used AI and are unsure how it might be integrated into their practices. It is primarily the latter two groups—novice and non-users—who may be less aware of risks such as confidentiality breaches and inaccurate outputs, and who may face greater challenges in maintaining USPAP compliance.

NAA sincerely appreciates the opportunity to provide feedback on this concept paper 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