



7113 San Pedro Ave, Suite 508  
San Antonio, TX 78216  
(210) 570-4950  
[info@naappraisers.org](mailto:info@naappraisers.org)  
[www.naappraisers.org](http://www.naappraisers.org)

April 25, 2023

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: Fifth Exposure Draft – USPAP**

Chair Bradley and Members of the Appraisal Standards Board-

The National Association of Appraisers (NAA) would like to thank you all for your hard work on the latest version of USPAP. We have reviewed the fifth exposure draft issued March 30, 2023, and respectfully submit the following comments for your consideration.

As stated in the Preamble of USPAP, *the Appraisal Standards Board promulgates USPAP for both appraisers and users of appraisal services. The foreword states Advisory Opinions are a form of guidance issued by the ASB to illustrate the applicability of USPAP in specific situations.... The USPAP Advisory Opinions are a reference for appraisers, enforcement officials, users of appraisal services and the public.* Advisory Opinions 39 and 40 are written in such a manner that the intended purpose of USPAP is not being served. In particular, the typical appraiser, user of appraisal services and state investigator would not have the resources to locate or interpret the citations of federal and case law listed in the footnotes of both AOs. These AOs appear to speak to those in the legal realm, as opposed to offering straightforward and concise guidance to appraisers wishing to clearly understand their obligations under USPAP.

While AOs 39 and 40 could serve well as the basis for a course on the topics of Antidiscrimination Laws and Nondiscrimination, it is our recommendation that the AOs be edited to show actual applicability and illustrations, thus making them more meaningful to appraisers who are required to comply with USPAP.

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