

April 13, 2026

The Appraisal Foundation
Attn: Nicholas D. Pilz
Chair, Appraisal Standards Board
1155 15th Street NW, Suite 1111
Washington, DC 20005

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

Dear Mr. Pilz:

On behalf of the National Association of REALTORS® (NAR), we thank the Appraisal Foundation for the opportunity to comment on the Appraisal Standards Board's (ASB) second exposure draft, "Proposed New Advisory Opinion 41, Use of Technology in an Appraisal or Appraisal Review Assignment." Appraisals are the bedrock of the housing finance system, and credible independent valuations of real property are critical to the health of the overall real estate industry. Ensuring credible assignment results with the use of emerging technology is key to the long-term success of the market.

The National Association of REALTORS® is America's largest trade association, including NAR's five commercial real estate institutes and its societies and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,200 local associations or boards, and 54 state and territory associations of REALTORS®. NAR represents a wide variety of housing industry professionals, including over 20,000 licensed and certified appraisers, committed to the profession's development of credible independent valuations of real property, which are critical to the health of the overall real estate industry.

NAR is encouraged by the ASB's work to further clarify this proposal to add guidance on adhering to USPAP while using advanced technological tools, emphasizing the need for appraiser competency in order to achieve credible assignment results.

Clarity in Understanding USPAP

The first exposure draft of Proposed AO 41 included some language which NAR cited as potentially confusing in its comment letter. Specifically, lines 98 – 101 of that version had the instruction that, "Appraisers must also be competent to recognize when the design or training of advanced tools" may result in characteristics that "reflect assumptions, limitations or embedded biases". This section, now states (lines 117-121): "Appraisers must also be competent to recognize that advanced tools such as generative artificial intelligence tools, may contain assumptions, limitations, or embedded biases, and may produce incomplete, inaccurate or unsupported information..." With this understanding, appraisers are further instructed that they are responsible for determining the relevance of a tool's output in the context of the assignment's intended use and given examples of how they can do that. NAR

appreciates the ASB's consideration in making this and other clarifying changes in the document, to clearly explain appraisers' responsibilities.

Conclusion

NAR is committed to maintaining the success of the appraisal profession and preserving access to homeownership and is encouraged by the ASB's proposal to add guidance on USPAP adherence while using rapidly evolving technological tools. The added clarity in the second exposure draft helps ensure that appraiser responsibilities are understood.

If you have any questions or comments, please feel free to reach out to Keisha Wilkinson, NAR's Senior Policy Representative for Valuation Policy, at KWilkinson@NAR.Realtor.

Sincerely,



Kevin Brown
2026 President, National Association of REALTORS®