CERTIFICATION 25

All five sentences, word for word, next to the old format's certification (March 2005).

THE ONE IDEA

The list and the consent rule date to March 2005. Three sentences are new.

	THE NEW REPORT, CERTIFICATION 25	THE OLD FORMAT, MARCH 2005
1	The lender/client may disclose or distribute this appraisal report to: the borrower; another lender at the request of the borrower; the mortgagee or its successors and assigns; mortgage insurers; government sponsored enterprises; other secondary market participants; data collection or reporting services; professional appraisal organizations; any department, agency, or instrumentality of the United States; and any state, the District of Columbia, or other jurisdictions.	**SINCE MARCH 2005** The same list, word for word. In 2005 the sentence went on: "...without having to obtain the appraiser's or supervisory appraiser's (if applicable) consent."
2	Any of the foregoing persons or entities who receive this appraisal report may choose to store, copy, reproduce, analyze, use and distribute the data in the appraisal report for internal or external purposes without having to obtain the appraiser's or supervisory appraiser's (if applicable) consent.	**NEW** Not in the 2005 certification.
3	Consent must be obtained before this appraisal report may be disclosed or distributed to any other party (including, but not limited to, the public through advertising, public relations, news, sales, or other media).	**SINCE MARCH 2005** 2005: "Such consent must be obtained before this appraisal report may be disclosed or distributed to any other party (including, but not limited to, the public through advertising, public relations, news, sales, or other media)."
4	A person or entity who receives a copy of an appraisal report does not become an intended user, unless the appraiser identifies such person as an intended user.	**NEW** Not in the 2005 certification.
5	The appraiser and supervisory appraiser (if applicable) shall have no liability for any use of this appraisal report not related to the mortgage finance transaction and related activities for which this appraisal report was prepared.	**NEW** Not in the 2005 certification.

Sources: Appendix C-1, URAR v1.3 (March 10, 2026), Certification 25 (report field 29.046); the old format's Appraiser's Certification, March 2005.

SCORE YOUR CALLS

Call 1: B. A data collection or reporting service on the list does not become an intended user unless you identify it as one (Certification 25; USPAP, comment to Standard 2).

Call 2: B. "Additional Appraiser Certifications cannot be contrary to the original Appraiser Certifications." (Appendix C-1 v1.3, page 43, report field 29.052). The rule makes no exception for a client's agreement.

YOUR CHECKLIST

- [ ] Read Certifications 24, 25 and 26 in a new report, word for word.
- [ ] Name any other intended users on purpose. The report already names the lender/client; a copy doesn't make anyone else an intended user.
- [ ] Additional Appraiser Certifications can't be contrary to the standard ones (they're for things like those required by law).
- [ ] Worried? Ask your E&O carrier or an attorney before you take the order. Scope questions: Fannie Mae and Freddie Mac.

BEFORE YOU SIGN

What the sources say about USPAP, and a reply for the homeowner who asks.

WHAT THE SOURCES SAY

CERT 24

You certify you are "also subject to the provisions of the Uniform Standards of Professional Appraisal Practice that pertain to disclosure or distribution by me."

Appendix C-1, URAR v1.3, Certification 24

ETHICS RULE

An appraiser must not disclose confidential information or assignment results to anyone other than the client; parties specifically authorized by the client; state appraiser regulatory agencies; third parties as may be authorized by due process of law; or a duly authorized professional peer review committee (except when such disclosure would violate applicable law or regulation).

USPAP ETHICS RULE, Confidentiality, as restated in Advisory Opinion 41 (ASB, April 23, 2026)

TAF

"Regarding USPAP, the Confidentiality section of the ETHICS RULE governs disclosures made by the appraiser. Providing the appraisal report to the client and any other intended users identified as part of the assignment does not, by itself, violate USPAP. A client's subsequent disclosure or use of the report is not an action by the appraiser and is not governed by USPAP, although the lender/client may be subject to applicable federal or state privacy and data-protection requirements." Working RE reports it also said it cannot give legal advice, and that scope questions belong with Fannie Mae and Freddie Mac.

The Appraisal Foundation, written response posted by appraiser Desiree Mehbod, as reported by Working RE, October 6, 2026

RISK

OREP, an E&O insurer that publishes Working RE: in 20 years of claims it has not seen a single claim around this issue, but Certification 25 "removes the appraiser's 'I didn't authorize that specific use' defense, if a claim were ever to surface."

Working RE, Isaac Peck, October 6, 2026

A REPLY YOU CAN SEND WHEN A HOMEOWNER ASKS WHO WILL SEE THE PHOTOS

Subject: Re: who sees the photos from the appraisal

Hi [name],

Good question. The photos go in the appraisal report I prepare for the lender. The report's certifications let the lender share it with the parties involved in the mortgage, including the borrower, mortgage insurers, Fannie Mae and Freddie Mac, other secondary market participants, data collection or reporting services and government agencies, and those parties may store and use the report's data. The appraiser's consent is required before the report goes to anyone else, including the public through advertising or the news.

If you have concerns about the photos, let me know before the inspection and I'll tell you what the assignment requires.

[your name], [license]

SOURCES

Fannie Mae and Freddie Mac: Appendix C-1, URAR without Report Field IDs v1.3 (March 10, 2026), Certifications 24 to 26 and Additional Appraiser Certifications (page 43, report field 29.052); Appendix B-1, URAR Implementation Guide v1.4 (report field 29.046). At fanniemae.com/uad. The old format's Appraiser's Certification, March 2005.

USPAP 2024 Edition, Standard 2, comment on intended users; Advisory Opinion 41, Use of Technology in an Appraisal or Appraisal Review Assignment (Appraisal Standards Board, April 23, 2026).

HousingWire, Brooklee Han, November 2, 2026. Working RE, Isaac Peck, "Certification 25: The 20-Year Fight Over Who Gets to Use Your Data," October 6, 2026.