

Proposed Changes

July 17, 2019

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Section 2. Definitions

Log 01 - Section 2. De	finitions
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification
Proposed Change:	Within the definition of Unfinished, and the break-out of such space, a clarification of
	certain room conditions needs further details.
Reason:	Examples; A Utility Room that contains just enough space by bldg code (and function) of let's say 6'x5' and also contains the required floor surface of rough cement (also by code), may be deemed finished by certain enforcement agencies. In contrast, a Utility Room containing the standard Hot Water Tank and Furnace but the room size is 6'x 20', or similar to Figure 3 in the Standard with a rough cement floor could be stated that the function of the room far exceeds it purpose, and therefore is declared as 'unfinished'. The same situation with the flooring condition of a laundry room. As well, a computer controlled climate for a wine cellar is intentionally different than the general conditions of the remaining portion of the home. While full height walk-in fridges are not the normal, they are encountered for large family homes. It is interesting to note that these rooms and features are nonetheless; 'suitable for year round use' (for the purpose they serve). We do like our wine cellar and jam cellar cooler than the remainder of the house on a year round basis!
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 02 - Section 2. De	Log 02 - Section 2. Definitions	
Submitter:	Jean M. McCarty	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	ANSI defines living area as "suitable for year round use".	
Reason:	Fannie Mae on the other hand addresses heat but not air conditioning. This leaves a judgment call for the appraisers. A room with a permanent heat source qualifies according to Fannie Mae but possibly not according to ANSI. (I really think the error is on Fannie Mae.but I think it needs addressing in some manner in ANSI, or expanding.)	
Substantiating		
Documents:		
Consensus		
Committee Action:		
Modification of		
Proposed Change:		
Reason:		

Log 03 - Section 2. Definitions	
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification
Proposed Change:	Declaration of unauthorized or non-compliant space is always a delicate matter for Realtors when supplying measurement information for their MLS Data Input Form.
Reason:	Areas such as an illegal suite seems pretty well ignored in the Standard and can be part of the total if it is a) finished b) above/at grade. If there is no floor plan accompanying this data, this would minimize a flag by the enforcement agencies. However, should the topic of a converted attached garage be discussed? If it is finished, and if it is above/at grade, is it included as square footage for that level of the home? Does it matter if the garage door is still visible from the exterior? What if it is cladded over from both the interior and exterior side? What if the overhead door still actually works and with click of a electronic garage door opener, the living room becomes fully exposed? It is not an unusual circumstance when compared to motorized windows that open and same for skylights.
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 04 - Section 2. De	finitions
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification
Proposed Change:	Some Real Estate Boards and other Professionals deem it is important to declare a 'room count'. While the ANSI Standard in discussion, has nothing to do with the labelling of rooms, there is no clear and authoritative definition of a 'room'.
Reason:	Must a room contain 4 walls? Can it have two, three or three and a half? Can a room have a sense of enclosure with just a railing or a pony wall divider (half wall)? When a Living Area and Dining Area join together without any structural separation, is that one room, or can it be considered two rooms?
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 05 - Section 2. Definitions	
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification
Proposed Change:	Definitions:

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t p u iii R C P	the NAHBRC be the authoritative agency to lead the real estate industry with sound practices with all residential building matters? Issues with declared room sizes vary from using the extreme width and length of a room, including closets in the bedroom size, ncluding an adjoining hallway with the room size, etc. Users of this data include Realtors, Municipal Licensing offices for Nanny Suites and other permits, Interior Decorators and Space Planners. If this is considered by NAHBRC then it could be blausible to come up with a clear definition of a room at the same time.
Reason: C	Other concerns we have encountered often come down to definitions
Substantiating Documents:	
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Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Section 3. Calculation of Square Footage

Log 06 - Section 3. Cal	culation of Square Footage - Interior Room Measurements (New)
Submitter:	William Bert Craytor
Requested Action:	Add new as follows
Proposed Change:	Optionally, interior rooms shall be measured to within +/-1 inch. However, since some walls are thicker than normal to support plumbing and air ducts, because some old homes have hidden areas that are walled off, because it is difficult to determine the location and depth of some of these areas, adjustments may have to be made on wall thickness as it is displayed on CAD drawings, in order for the interior dimensions plus wall thickness to add up to the exterior dimensions. These adjustments may be additions or deductions to room dimensions. At the very least, after all adjustments have been made, after interior and exterior measurements have been reconciled, interior room dimensions should be +/- 3 inches accuracy.
Reason:	When appraisers compare sales comparables, adjustments need to be made based on a number of factors including design. Room location, dimensions and area are design issues necessary for making good valuation decisions.
Substantiating	
Documents:	
Consensus Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 07 – Section 3. Ca	Log 07 – Section 3. Calculation of Square Footage - Wall Thickness (New)	
Submitter:	William Bert Craytor	
Requested Action:	Add new as follows	
Proposed Change:	A default exterior and interior wall thickness should be specified +/- 1/4 inch	
	accuracy. For example, exterior wall thickness measured at an entrance door jam might	
	be 6.5 inches and interior wall thickness 4.25 inches.	
Reason:	This accuracy is needed to ensure that interior measurements reconcile to exterior	
	measurements on CAD drawings.	
Substantiating		
Documents:		
Consensus		
Committee Action:		
Modification of		
Proposed Change:		
Reason:		

Log 08 – Section 3. Calculation of Square Footage - Wall Thickness (New)	
Submitter:	William Bert Craytor
Requested Action:	Add new as follows
Proposed Change:	Optionally, default exterior and interior wall thickness should be specified +/- 1/4 inch
	accuracy. For example, exterior wall thickness measured at an entrance door jam might

	be 6.5 inches and interior wall thickness 4.25 inches. If possible, exceptions should be noted, such as where plumbing, air ducts, or hidden areas are known to exist.
Reason:	Wall thickness measurements are needed so that interior measurements reconcile to exterior measurements in CAD drawings.
Substantiating	
Documents:	
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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 09 – Section 3. Ca	Log 09 – Section 3. Calculation of Square Footage - Use of CAD programs (New)	
Submitter:	William Bert Craytor	
Requested Action:	Add new as follows	
Proposed Change:	Optionally, standard CAD programs that provide for area calculations should be used to develop floor-plans that fully document area measurements. A list of approved CAD programs could be provided for guidance; with no requirement that they be required. AutoCad, Chief Architect, Home Designer Pro (also Chief Architect) are examples.	
Reason:	Interior measurements provide an added check on exterior measurements, as CAD programs will quickly indicate discrepancies. CAD programs also provide the best way to calculate living area from room measurements.	
Substantiating		
Documents:		
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Committee Action:		
Modification of		
Proposed Change:		
Reason:		

Log 10 - Section 3. Ca	culation of Square Footage - Ceiling Height
Submitter:	Craig Roberts
Requested Action:	Request for Clarification/Modification
Proposed Change:	The main problem is homeowners finishing rooms above the garages incorrectly or trying to finish areas that were never really intended to be used as finished living area. The standard seems to indicate that the 7ft 50% ceiling height requirement is based on the finished floor area of the room and would include area below 5ft. The diagram appears to indicate that the 7ft 50% ceiling height requirement would be based on a hypothetical 5 ft knee wall. Area below 5 ft not included. Closets- Would the closet be calculated as part of the room. Lets say the actual room
	meets all the ceiling height requirements to be included in the living area but for whatever reason the ceiling height of the closet would disqualify the room from being include in the living area.

Reason:	I've seen appraisers and realtors do it both ways. I guess you could do it based on a hypothetical 5 ft knee wall as long as its disclosed but I don think that's the correct way according to ANSI.
Substantiating	No
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 11 - Section 3. Cal	culation of Square Footage – Ceiling Height
Submitter:	Jean M. McCarty
Requested Action:	Request for Clarification/Modification
Proposed Change:	5' walls on sloping ceilings
Reason:	95% of appraisers measure to 5' mark and then add for the studs. ANSI does not specifically address adding for the studs and this needs clarifying. The American Measurement Standard specifically says you do not add for the studs. Following ANSI principles minutely says they should not add for the studs but it is not specifically stated. The illustrations indicate stopping at the 5' mark and not allowing for the studs. The problem with applying ANSI as a valuation tool or even a construction tool is that it penalizes the house when stopping at the 5' level on the ceiling. It penalizes the house on the Cost approach because the cost of construction is still there and on the sales approach because use of space under a 5' wall is still functional. Consumers do not view the space with a ceiling height of less than 5' so dysfunctional as not to add to value. Our problem of creating a line item separate on the sales grid to account for heated/cooled space in this circumstance is more confusing to the consumers and users of appraisals.
Substantiating	
Documents:	
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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 12 - Section 3. Cal	Log 12 - Section 3. Calculation of Square Footage – Ceiling Height	
Submitter:	Jean M. McCarty	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	How do we account for the room count in our appraisal forms when the only bath or only bedroom or the kitchen does not have a ceiling height of 7'. Do we not count those rooms in the room count that ties to the gla stated? Or do we separate the gla but go ahead and put the full room count in the grid as if the whole house is traditional and counted in the gla? Or do we make an exception for the house that has major rooms with ceiling heights under 7'?	
Reason:	Appraisers are having a horrible time with older properties that do not have a least a 7' ceiling height, the oddball houses, A-frames, dome houses, tiny houses, etc. Either they need to be excluded from ANSI or clarification made.	

Substantiating	We had an instructor tell us to state what is above ground, what is below ground, what is under the 7' ceiling height, but use the total square footage of all of those 3 scenarios and the full room counts in our grids. This is a good alternative but without that being stated in ANSI, that method is left up to individual interpretation and application. We adopted ANSI so appraisers would get on the same page and our liability and threat of lawsuits over SF would be diminished. Applying ANSI to the letter of the regulation makes appraising extremely hard and it is penalizing houses on their sales prices by separating out square footage as if the market would recognize the difference when it doesn't.
Documents:	
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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 13 - Section 3. Cal	culation of Square Footage – Ceiling Height
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification
Proposed Change:	When applying the concept of limited ceiling heights with the 5 foot/7 foot/50% rule, clarify this is applied to the entire floor, or on a room-by-room basis.
Reason:	The 5 foot rule is fairly clear; nothing below that height is included. However, the 7 foot/50% rule describes the procedure for a room in Figure 5. Since there are non-room heights to consider such as bathrooms, closets and hallways, the outcome will differ depending on whether the rule is applied to individual rooms, or the entire floor.
Substantiating	
Documents:	
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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 14 - Section 3. Calculation of Square Footage – Living Area	
Submitter:	Craig Roberts
Requested Action:	Request for Clarification/Modification
Proposed Change:	Heated area- half bathrooms, laundry rooms, bathrooms, and large closets. These areas
	really aren't listed as rooms on appraisals.
Reason:	Bathrooms are listed separately. I've seen large closets that should probably be heated but did not have an HVAC return duct that were counted in the living area. I've seen half bathrooms that have HVAC return vents and some that do not, the same thing goes for full bathrooms.
Substantiating	
Documents:	

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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 15 - Section 3. Calculation of Square Footage – Living Area	
Submitter:	Craig Roberts
Requested Action:	Request for Clarification/Modification
Proposed Change:	Area under the stairs- I included the area under stairs with the first floor living area even
	though the area is likely comprised of unfurnished area, but if the area has access and is
	finished, like a coat closet, then I would include it in the first floor living area.
Reason:	
Substantiating	
Documents:	
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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 16 - Section 3. Cal	culation of Square Footage – Living Area
Submitter:	Jean M. McCarty
Requested Action:	Request for Clarification/Modification
Proposed Change:	Stairs to no where.
Reason:	We have many new constructed houses that have bonus rooms in the plans but not actually finished out at the time of sale. Only the stairs are finished out to the door of the bonus room. Do you count the stairs as the only finished area on the 2nd level or not? We had a two hour discussion on this the other day with 50-50 either way. Some said ignore the stairs on the 2nd level because they do not descend from finished area. Others said "On the other hand, ANSI says to count the stairs to unfinished basements on the level from which they descend". Why count stairs going down to the unfinished basement when you can't count stairs going up to unfinished space. This needs clarifying.
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 17 - Section 3. Cal	Log 17 - Section 3. Calculation of Square Footage – Living Area	
Submitter:	Lily Chien	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	I would like to know if a built-in elevator in a single-family house should be included in	
	the finished area square footage, or if you have any addendum that covers the topic?	
Reason:	I read through ANSI Z765-2013, and the elevator & shaft kind of fall under "Openings to Floor Below" as it does not have a floor on each level, but it also seems to fit the situation when "the hearth is on the first level and the chimney extends to the second level without a hearth on the second level, no deduction is made from the finished sqft of the second level."	
Substantiating		
Documents:		
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Committee Action:		
Modification of		
Proposed Change:		
Reason:		

Log 18 - Section 3. Cal	culation of Square Footage – Living Area
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification
Proposed Change:	1. Treatment of Laundry Chute, based on 2'x2'x3 levels is 12 sq.ft.
	2. Treatment of Dumb Waiters, based on the same above is 12 sq.ft.
	3. Treatment of Elevators, based on 6'x6'x3 levels is 108 sq.ft.
Reason:	In practise, these spaces above, are included in the floor area calculation, in much the
	same way any vertical duct is included, however, we recommend that this be clearly
	addressed, and verified it is in fact included in the Standard.
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 19 - Section 3. Cal	Log 19 - Section 3. Calculation of Square Footage – Living Area	
Submitter:	Michael Long	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	Specific cut-off point for an Open-to-Below space; should it be inside of railing, outside of railing, or lip of the floor.	
Reason:	Based on a difference of the two extremes is four inches x 25 linear feet or, about 8 sq.ft. In some cases, we have encountered the difference from the exterior side of a railing to the extended lip of the floor is 8 inches. In other cases, the exterior side of the railing is beyond the lip of the floor due to the method of mounting the railing to a fixed solid structure.	

Substantiating	
Documents:	
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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 20 - Section 3. Cal	culation of Square Footage – Living Area
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification
Proposed Change:	It is clear that a 'sitting' style Bay Window or Box Window is not included in the area calculation and a 'walk-up' Bay Window or Box Window is included, if the space provides clearance from "floor to ceiling". Clarification is needed in the case of a Bay Window/Box Window protrusion located across from the kitchen sink and counter.
Reason:	Even if the exterior view of the design and appearance show this is a true walk-up into the bay, the interior view shows structural obstacles such as the counter/sink and built- in cabinets which make it impossible to either be a walk-up, or contain "floor to ceiling" clearance. Photographs and/or diagrams of the assorted types of bay windows would be helpful.
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 21 - Section 3. Cal	culation of Square Footage – Living Area
Submitter:	John Hatfield
Requested Action:	Request for Clarification/Modification
Proposed Change:	The living area description in the ANSI Standard Z765 needs to be updated on energy efficient homes.
Reason:	Since the wall thickness exceeds standard 2X6 framing in energy efficient and PassivHaus design area is added to buildings that is not habitable space. This throws area calculations off and is reported as a larger floor area than present. Example is an ICF house with 18-1/2 inch thick walls with a 42 by 50 interior foot print the exterior measurement is 350 feet larger than actual habitable space. PassiveHaus walls are commonly at 12 inch cavity exterior of the structural wall that is only insulation materials. Real estate professionals list these properties with exterior square footage measurements are liable for over stating the habitable space.
Substantiating	No
Documents:	
Consensus Committee Action:	

Modification of	
Proposed Change:	
Reason:	

Log 22 - Section 3. Cal	culation of Square Footage – Above and Below Grade
Submitter:	Jean M. McCarty
Requested Action:	Request for Clarification/Modification
Proposed Change:	Below grade space
Reason:	I had to separate out a whole room from the above grade gla the other day because about 1 foot of it was below grade. The house was tri-level following the grade of the lot that sloped from right to left of the lot. Yet one corner of that space was below grade. That penalized the house by excluding that room from the gla. (It is atypical in the south to have basements. Most houses are 1-3 levels built on sloping lots. The above grade and below grade rule penalizes houses in the appraisal process because so few houses are built that way and appraisers cannot find comparables. Fractious lenders today insist that we find comparables to compare that below grade to and we don't have it. None of this below grade space is recognized as a basement here – just multi-level houses built to grade, with some of it below. Fannie Mae allows us to follow local custom; FHA does not in deciding whether GLA is below grade. ANSI makes us separate it out even if that one foot is all that is below the grade. It's very confusing to the consumer and lenders. A survey of our appraisers here indicate only about 67% of them separate the GLA. That leaves a significant number of appraisers differing considerably on the GLA in these situations. I think "basement" needs to be more strictly defined, as being under the floor of the living space or significantly under grade.
Substantiating	
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Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 23 - Section 3. Cal	culation of Square Footage – Above and Below Grade
Submitter:	Christine Lynn
Requested Action:	Request for Clarification/Modification
Proposed Change:	The standards as stated in the publication are not specific enough to address some
	important issues, specifically related to homes built on a steep incline with large
	portions of above grade building transitioning to portions below grade.
Reason:	I do not feel that the current standards properly protect the real estate agents as we strive to accurately and professional measure and list properties on behalf of our clients. I feel that the vagueness in the current standards leaves us open to fines and suspension of our licenses, as well as opens our clients up to legal action if a buyer feels square footage was inaccurately reported.
	As professionals, we all desire to have standards set before us and to rise to those standards with the utmost in integrity and professionalism. Not having a clear guideline for the measuring of mixed level above and below grade square footage leaves all parties in a precarious position.

	I am eager to be a part of a solution to revise the current standards to more specifically reflect and reveal the true conditions of homes in this and other circumstances, so buyers accurately know what they are purchasing and so that sellers know how to accurately reveal the true features and value of their homes.
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Log 24 - Section 3. Ca	culation of Square Footage – Above and Below Grade
Submitter:	Susan McVeigh
Requested Action:	Request for Clarification/Modification
Proposed Change:	Above Grade vs Below Grade Finished Areas.
Reason:	As you probably know, when applying for a home loan or refinance of a home loan, a home appraisal is required for inclusion in the loan application. I am sure that you are also aware that the value of the home depends on, among other things, square footage of the home. In Calculating the value of a home, the square footage is broken down into two halves, above grade and below grade. Above grade square footage is worth more in the calculation than below grade square footage is (I would love to know who came up with this theory). This is where I start to have issues with the process. First, I understand in building the need to differentiate between above and below grades, but when it comes to what is considered above grade and what is considered below grade, well I don't think the line is so black, and white.
	My house is located on a mountain, with sweeping views of 3 counties, we can see for miles, almost all the way to Washington DC. The house has a ground entrance front door and a two car garage on the same ground level. The family room and bedroom on the first level all command the same gorgeous views from their tremendous windows, as does the living room and one of the bedrooms on the second floor. The first floor, by no means, looks like a basement. There is one master staircase that leads from the front foyer to the upper level. Because it has the mountain butting up to the back side of the house, the entire floor is considered below grade. But the house is not all below grade, in fact the other 3 sides are above grade. To me, it's like calling a glass half empty instead of half full. Why should the entire ground floor be considered below grade when it is not? Isn't there any compensation when a house does not follow what should be considered the norm of below grade classification?
	I realize that this is not within the scope of ANSI, but there is such a large difference in market value of square footage between the two grades when it comes to real estate and the banks that finance their loans. Why wouldn't a finished area on one floor be worth the same as the finished area on another floor? As far as value goes, it makes no sense. I could maybe see the standard value of a lower floor of a house be worth less, maybe, if it didn't have any windows, but then I have seen some pretty awesome homes with actual basements that have a tiny window well, that utilizes the lower level as amazing in home theaters. Why should the value of this type of living space be worth less than any other? Makes no sense, but this is another issue altogether.

	What faction came up with the values for above and below grade living space?
Substantiating	
Documents:	
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Committee Action:	
Modification of	
Proposed Change:	
Reason:	

Commentary

Submitter: Jean M. McCarty Request for Clarification/Modification Request for Clarification/Modification Proposed Change: Can rooms with either bare or painted concrete floors be included in the calculated square footage accorded to ANSI Z765-2013? Reason: The only reference in the Standard to bare and painted concrete floors is found in the ANNEX, page 4 of 11, in the 8th paragraph. The Committee (our coalition committee that addresses ANSI questions) spent several hours on this one issue as there were mixed opinions among the members of the committee as whether or not bare or painted concrete floors are disqualified as finished components of a house according to ANSI 2765-2013. The debate centered around the first paragraph of the Annex that clearly said the Annex is not considered part of the Standard and that it not intended to be enforced. We appraisers have encountered painted concrete. Ne have encountered laundry rooms of older homes, especially in rural areas, that are heated and cooled but have no floor coverings, dens with bare or painted concrete, recreational homes with several rooms with bare or painted concrete. We constantly encounter houses selling "as is" where the carpet and floor covering to ANSI, because we passed a state law saying that appraisers had to measure houses either by the ANSI standard or the American Measurement Standard. We thought we were doing agood thing getting appraisers on the same page but trying to apply ANSI to everyday appraisals that are supposed to mirror market behavior and perceptions has prove challenging. The job of our committee is to try to "marry" ANSI Rules to everyday valuation protocol. Once we determine whether or not the ANSI Standard Z755-2013 legitimately and enforceably disqualifies bare or painted concrete floors as cal	Log 25 - Commentary	– Flooring Requirements
Requested Action: Request for Clarification/Modification Proposed Change: Can rooms with either bare or painted concrete floors be included in the calculated square footage accorded to ANSI Z765-2013? Reason: The only reference in the Standard to bare and painted concrete floors is found in the ANNEX, page 4 of 11, in the 8th paragraph. The Committee (our coalition committee that addresses ANSI questions) spent several hours on this one issue as there were mixed opinions among the members of the committee as whether or not bare or painted concrete floors are disqualified as finished components of a house according to ANSI Z765-2013. The debate centered around the first paragraph of the Annex that clearly said the Annex is not considered part of the Standard and that it not intended to be enforced. We appraisers have encountered painted concrete floors as a decorative finish designed to enhance the aesthetic appeal of the décor more than once. We have encountered laundry rooms of older homes, especially in rural areas, that are heated and cooled but have no floor coverings, dens with bare or painted concrete, recreational homes with several rooms with bare or painted concrete. We constantly encounter houses selling "as is" where the carpet and floor covering has been removed. Of course we know there used to be floor covering there and there will be again, but our job is to appraise it "as-is" at that date and measure according to ANSI ta beame time. We can't simply disregard measuring according to ANSI to everyday appraisals that are supposed to mirror market behavior and perceptions has proven challenging. The job of our committee is to try to "marry" ANSI Rules to everyday valuation protocol. Once we determine whether or not the ANSI Standard 2765-2013 legitimately and enforceably disqualifies bare or painted concrete floors as cal		
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Log 26 - Commentary – Ceiling Height	
Submitter:	Michael Long
Requested Action:	Request for Clarification/Modification

Proposed Change:	The diagram in Figure 5 shows a horizontal marker referring to the 5 foot threshold.
Reason:	Some believe that the limit is closer to 4 foot 7 inch if a wall is placed along this exact threshold of the 5 foot height. While this is not the case, the diagram incorrectly shows
	the hatch is set back to a lower height from the horizontal marker showing 5 feet.
Substantiating	
Documents:	
Consensus	
Committee Action:	
Modification of	
Proposed Change:	
Reason:	