APPRAISEITNOW

Photo-Based, In-Person and Interested-Party-Suggested Donation Appraisals Compared Against the IRS Independence and Timing Rules (2026)

AppraiseItNow Inc.

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Educational material, not an appraisal.

Scope of this comparison of ways to obtain a Form 8283 donation appraisal

This study is dated 2026. It compares three practical routes a donor or adviser might use to obtain a qualified appraisal for a noncash charitable gift:

- An appraisal prepared from photographs and documents, without a site visit.
- An appraisal that includes an in-person inspection by the appraiser.
- An appraisal prepared by an appraiser suggested by someone with a stake in the gift.

Each route is measured against the federal rules on who may act as the appraiser and when the appraisal must be signed. It is also measured against the professional standard that governs how the appraisal is performed.

The threshold that brings a gift into this territory is set out in the substantiation regulation (Treas. Reg. § 1.170A-16). A deduction of more than $5,000 for one item, or for a group of similar items, generally needs a qualified appraisal and Form 8283 Section B. Similar items count together even when they went to different charities. This study does not address which items are similar items. That question belongs to the donor's tax adviser.

Who publishes this study and what it does not cover

AppraiseItNow Inc. publishes this comparison. AppraiseItNow is a tech-enabled appraisal company headquartered in New York City that prepares USPAP-compliant appraisals of personal property, fine art, machinery and equipment, vehicles, boats, inventory and closely held businesses for clients in all 50 states, remotely and in person. AppraiseItNow does not appraise real estate. AppraiseItNow's website is www.appraiseitnow.com.

Because the publisher is itself one of the providers in this field, the study describes AppraiseItNow only where a published fact supports the description. Otherwise it compares generic option types.

The study does not cover gifts of real property. It does not address whether a deduction is allowed, how much is deductible, which items form a group of similar items, or how any attachment threshold applies to a particular artwork. Those questions belong to the donor's tax adviser. The comparison concerns how the appraisal is obtained, not what the tax result will be.

Terms used in this study

- **Donor**: the person or entity making the noncash gift and claiming the deduction.
- **Charity**: the organization receiving the gift.

- **Photo-based appraisal**: an appraisal in which the appraiser works from photographs, identifiers, receipts and other documents the donor supplies, without visiting the property.
- **In-person inspection**: an appraisal in which the appraiser, or someone working under the appraiser's direction, physically views the property.
- **Stake in the gift**: an interest in how the gift happens or how it is valued. Examples include being the charity receiving the property, the dealer or person who sold or gave it to the donor, a family member, or an employee of any of these.
- **Scope of work**: the appraiser's decision about what research, inspection and analysis the assignment requires.
- **Signing window**: the period during which the appraiser's signature and date on the appraisal must fall.
- **Effective date and report date**: two distinct dates every appraisal carries, explained under the criteria below.

Criteria for measuring a Form 8283 qualified appraisal route

Seven criteria are used. The first four come directly from the tax rules on qualified appraisers and timing. The remaining three come from appraisal practice and the content a qualified appraisal must contain.

Criterion 1: independence of the appraiser from the gift

The regulation defines the qualified appraiser (Treas. Reg. § 1.170A-17). A qualified appraiser has an appraisal designation for that type of property from a recognized organization, or relevant coursework and at least 2 years' experience valuing it, and regularly does paid appraisals. The donor, the charity, whoever sold or gave the donor the property, and anyone related to or employed by them can't be the appraiser.

The second sentence of that definition is the independence test. It names categories of people, not methods. A photo-based appraisal and an in-person appraisal can both pass or fail it depending on who prepares them.

Criterion 2: qualification for the specific type of property

The first sentence of the same definition is the qualification test. It is tied to "that type of property." An appraiser well qualified for one asset class is not automatically qualified for another. The donor or adviser checks the appraiser's designation, or coursework and experience, against the actual property being given. They also confirm that the appraiser regularly does paid appraisals.

Criterion 3: the signing window and delivery deadline

The timing rule is stated in the same regulation (Treas. Reg. § 1.170A-17). The appraiser must sign and date the appraisal no earlier than 60 days before the donation and no later than the due date, with extensions, of the return that first claims the deduction. The donor must have it by that due date too.

Two limits apply here, an earliest date and a latest date. The latest date depends on a return due date that the donor's tax adviser confirms. A route that makes either limit harder to meet scores lower on this criterion.

Criterion 4: the valuation date

The regulation also ties the valuation date to the signature date (Treas. Reg. § 1.170A-17). If the appraisal is dated before the donation, its valuation date must fall within the 60 days before the donation. If it is dated on or after the donation, the valuation date is the donation date.

The professional standard uses a related concept (USPAP, 2024 edition (The Appraisal Foundation)). An appraisal's effective date is the date the value applies to. It can be current, past (a date of death or donation) or future, and the report states both the effective date and the report date. In a donation assignment, the effective date in the report and the valuation date the tax rule calls for need to line up.

Criterion 5: description and condition evidence

The regulation lists what a qualified appraisal contains (Treas. Reg. § 1.170A-17). A qualified appraisal describes the property and, for physical property, its condition; gives the donation date (or expected date), the valuation date, the method and basis used, and the fair market value; and follows USPAP.

This criterion asks how well each route produces evidence of identity and condition that the appraiser can rely on and the report can describe.

Criterion 6: scope of work, inspection and disclosed assumptions

The inspection question has a short answer in the tax rules (IRS Publication 561 (Rev. December 2025)). IRS rules do not require the appraiser to inspect the property in person.

The professional standard leaves the inspection decision to the appraiser (USPAP, 2024 edition (The Appraisal Foundation)). USPAP does not require an in-person inspection in every assignment. The appraiser decides the scope of work, including how much inspection credible results need, and the report describes that scope.

Where something cannot be confirmed, the standard permits a disclosed assumption under limits (USPAP, 2024 edition (The Appraisal Foundation)). An appraiser may assume an uncertain fact is true (an extraordinary assumption) only when it's needed for credible results,

there's a reasonable basis for it and the analysis stays credible, and the report must say so clearly.

This criterion asks whether a route lets the appraiser choose the scope that credible results require, and whether the report will describe that scope honestly.

Criterion 7: donor preparation and information flow

The last criterion is practical. It covers what the donor must assemble and how easily the appraiser can get it. It also covers how much back-and-forth the route tends to produce, since that back-and-forth eats into the signing window.

The three donation appraisal routes compared

The three routes do not sit on a single axis. The first two describe how the appraiser gathers evidence. The third describes who the appraiser is. A suggested appraiser could work from photographs or inspect in person. The comparison keeps these dimensions separate because the tax rules treat them separately. The rules address who can be the appraiser and when the appraisal is signed. On method, they say only that in-person inspection is not required.

Route 1: an appraisal prepared from photographs and documents

In this route, the donor supplies photographs, identifiers such as serial numbers or hull identification numbers, purchase records, prior appraisals, condition notes and donation documents. A qualified appraiser who is independent of the gift works from that file. The appraiser may ask for more, and the report states what was reviewed and what was not.

This route is common in practice. Of the 1,226 appraisals AppraiseItNow opened between November 8, 2025 and November 8, 2026, 1,137 were done from photographs and documents and 27 in person; the method was not recorded for the other 62. Most AppraiseItNow appraisals are completed remotely from photographs and documents; when an inspection is needed, an appraiser visits the asset in person.

The quality of this route depends heavily on the file. AppraiseItNow's photo requirements by asset type: for vehicles, the outside and inside, plus the mileage for anything motorized; for boats, the outside with the cover off, the helm, the engine and the inside, plus the HIN and engine hours; for machinery, a few photos of each machine, the hours and whether it runs; for fine art, the front, back, signature and frame; for household items, one clear photo per item or group.

Those lists show the logic of a photo-based file. Each item answers a question the appraiser would otherwise answer by standing in front of the property: what it is, how much it has been used, whether it works, and whether it is authentic and intact.

Route 2: an appraisal that includes an in-person inspection

In this route, a qualified appraiser who is independent of the gift physically views the property. The appraiser can open panels, run engines, check the back of a canvas under the frame, measure, and photograph details the donor might not know to capture. In-person work can be done by a local appraiser or by an appraiser who travels to the asset.

The tax rules do not demand this route. What it offers is direct observation where the property's value turns on facts that photographs cannot settle. Examples include hidden damage, operating condition that has to be tested, or authenticity questions that require handling the object.

Route 3: an appraiser suggested by someone with a stake in the gift

In this route, the appraiser's name comes from someone involved in the gift. The suggestion might come from:

- the charity's gift office;
- the dealer or person who sold or gave the donor the property;
- a family member of the donor;
- an employee of any of these.

The suggestion itself is not the issue the rules address. The rules address who the appraiser is. If the suggested person falls into one of the excluded categories, the appraisal fails the independence criterion whatever the method. If the suggested person falls into none of them, the candidate is evaluated like any other, on qualification and on the practical criteria.

There is also a non-legal concern. Someone with a stake may prefer a particular value, and the donor bears the consequences of the appraisal. A suggested appraiser who passes the independence test still deserves the same scrutiny of credentials, scope and timing as an appraiser the donor found unaided.

Criterion-by-criterion comparison of photo-based, in-person and stake-holder-suggested appraisals

Independence compared across the three routes

Photo-based and in-person routes. Method has no bearing on independence. The donor confirms that the appraiser is not the donor, not the charity, not whoever sold or gave the donor the property, and not related to or employed by any of them. That check is the same whether the appraiser visits or not.

Suggested-appraiser route. This route carries the highest independence risk, because the suggestion originates inside the circle the rule is concerned with. The practical step is a direct, documented question to the candidate. Is the candidate the charity, an employee of the charity,

the seller or giver of the property, an employee of the seller or giver, or related to the donor or any of these parties? The answer is kept in the donor's records.

Hypothetical: A collector bought a set of studio pottery from a gallery several years ago and now plans to give it to a university museum. The gallery that sold the pottery offers to prepare the appraisal at the time of the gift. The qualified appraiser fact states that whoever sold the donor the property can't be the appraiser. On that criterion, the gallery's offer fails.

The museum's registrar also hands the collector a short list of outside appraisers. Each name on that list is tested against the same categories. The donor asks whether the candidate is employed by the museum, related to anyone at the museum or gallery, or otherwise within the excluded categories. The list's origin does not decide the question. The candidate's answers do.

The charity's role in the paperwork can be misread as endorsement, which matters for this route. The form allocates the signatures (Form 8283). The qualified appraiser signs Part IV of Section B and the charity signs Part V. The charity's signature does not mean it agrees with the value. A donor should not treat an appraiser suggested by the charity, followed by the charity's signature on Part V, as the charity's confirmation of the value.

Qualification for the property type compared

Photo-based route. The qualification test is the same, but a photo-based route makes it easier to obtain an appraiser whose experience matches the property, because location is not a constraint. AppraiseItNow's appraisers specialize by asset class rather than by geography. Between them, AppraiseItNow's appraisers hold ASA, ISA, AAA, CAGA, NACVA, NEBB Institute, ABV and CFA credentials. The donor still confirms that the individual appraiser signing the report holds a designation for the type of property being given, or has the relevant coursework and experience the rule describes.

In-person route. An in-person inspection by a local appraiser limits the pool to appraisers within reach of the property. For common property types this may not matter. For specialized machinery, an unusual vessel or a niche category of art, the nearest appraiser may not have experience with that type of property. A traveling appraiser widens the pool, at the cost of scheduling.

Suggested-appraiser route. A suggestion often comes with an implied endorsement of expertise ("this appraiser knows these pieces"). That endorsement is not evidence of a designation or of coursework and experience. The donor asks for the candidate's credentials for that type of property and confirms the candidate regularly does paid appraisals.

The signing window compared

Photo-based route. A photo-based file can be assembled and reviewed without coordinating a visit. That gives the donor more control over when the appraisal is signed relative to the donation. The main timing risk is an incomplete file that forces repeated requests while the

window narrows.

In-person route. A site visit adds a scheduling dependency. If the property is moved to the charity before the visit, access may become harder. If the visit happens well before the planned transfer and the appraisal is signed soon afterward, the signature date may fall more than 60 days before the donation if the transfer slips.

Suggested-appraiser route. Timing depends on the suggested person's availability and process. A stake-holder's timetable for completing the gift may not be the donor's timetable for the appraisal. The donor keeps control of the signing date regardless of who made the suggestion.

Hypothetical: A donor plans to give a sailboat to a sailing education charity on a planned transfer date. An independent appraiser inspects the boat and signs and dates the appraisal 45 days before that planned date. A survey issue delays the transfer by four weeks. On the new transfer date, the appraisal's signature date falls 73 days before the donation. That is earlier than the "no earlier than 60 days before the donation" limit the regulation states.

The practical response is to raise the delay with the appraiser and the donor's tax adviser before the new transfer date. The goal is that the signed appraisal the donor relies on falls inside the stated window. The same risk exists for a photo-based appraisal signed before the gift. The in-person route is simply more exposed to it, because the visit tends to anchor the work to an earlier date.

The other end of the window matters too. The appraisal must be signed and dated no later than the due date, with extensions, of the return that first claims the deduction, and the donor must have it by that date. Whichever route is chosen, the donor's tax adviser identifies that due date at the start, and the appraisal is scheduled backward from it.

The valuation date compared

All three routes. The valuation date rule depends on when the appraisal is dated, not on how it was prepared or who suggested the appraiser. If the appraisal is dated before the donation, the valuation date must fall within the 60 days before the donation. If it is dated on or after the donation, the valuation date is the donation date.

Practical differences. A photo-based appraisal prepared after the gift has a single, fixed reference point, the donation date. The photographs and documents need to reflect the property's condition as of that date. Photos taken months earlier, before a repair or before damage, can describe a different property. An in-person inspection after the gift may find the property already altered, relocated or in use by the charity. The appraiser then has to reason back to its condition on the donation date and disclose how. A suggested appraiser offers no inherent advantage either way.

Hypothetical: A small manufacturer gives a used lathe and a press brake to a technical college. The appraisal is prepared and signed three weeks after the equipment leaves the shop. Under the valuation date fact, the valuation date is the donation date. The donor's file includes photos of each machine taken on the day of the transfer, the hour meter readings, and a note confirming both machines ran that day. Those items let the appraiser describe condition as of the valuation date rather than as of the day the report is written. The question of whether the two machines are similar items for threshold purposes is left to the donor's tax adviser.

Description and condition evidence compared

Photo-based route. Description and condition evidence comes entirely from what the donor supplies. For many property types, a complete set of photographs, identifiers and records supports a full description. Weaknesses appear where condition is hidden or must be tested: an engine's internal state, structural damage under upholstery or a hull bottom, or the reverse of a canvas still in its frame. The appraiser can ask for specific additional photos, a mechanic's note, or the frame to be opened by a framer and the reverse photographed.

In-person route. Direct observation produces the strongest condition evidence where condition is not visible from the outside or must be confirmed by operating the property. The appraiser's own notes and photographs become part of the record. The limit is that a visit captures one day. If that day is not the valuation date, the appraiser still has to account for any difference.

Suggested-appraiser route. Condition evidence quality depends on the method the suggested appraiser uses, not on the suggestion. There is one additional practical concern. A stake-holder who suggested the appraiser may also be the source of condition information, for example a seller describing the property's history. The appraiser is expected to weigh such information knowing where it came from.

Scope of work and disclosed assumptions compared

Photo-based route. The professional standard leaves the inspection decision to the appraiser, and the tax rules do not require an in-person visit. A photo-based scope is therefore a legitimate choice when it produces credible results. What separates a sound photo-based appraisal from a weak one is honesty about scope. The report should state what was reviewed and, where an uncertain fact had to be assumed, say so clearly as an extraordinary assumption. That is permitted only when the assumption is needed for credible results, has a reasonable basis and leaves the analysis credible.

Hypothetical: A donor gives a mid-century oil painting to a regional museum. The donor's photographs show the front, the back, the signature and the frame. A label on the back suggests the work was exhibited decades ago, but the exhibition record cannot be confirmed before the appraisal must be signed. The appraiser considers whether assuming the exhibition history is needed for credible results and whether there is a reasonable basis for it. If the appraiser

proceeds on that basis, the report says so clearly. If the assumption cannot meet those conditions, the appraiser changes the scope, for example by seeking further documentation or inspecting the work. Whether a copy of the appraisal must be attached to the return because of the art's value is a question for the donor's tax adviser.

In-person route. An in-person inspection reduces the number of facts that must be assumed. It does not eliminate the scope-of-work decision. The report still describes what was inspected and how. An inspection that consisted of viewing the property from a distance is a narrower scope than one that included testing and close examination, and the report should reflect that.

Suggested-appraiser route. A stake-holder might press for a narrower or broader scope than credible results need, for instance by discouraging an inspection that could reveal problems. The professional standard places the scope decision with the appraiser. The donor can reinforce that by communicating directly with the appraiser rather than through the party who made the suggestion.

Donor preparation and information flow compared

Photo-based route. This route places the most preparation on the donor, because the file is the evidence. The figures that follow are general AppraiseItNow figures across its appraisals, not figures for photo-based donation appraisals alone. Of 867 appraisals AppraiseItNow reviewed between October 27, 2025 and September 23, 2026, 31% needed something more from the client and 24.6% went through a formal request for missing details. 93% of the 363 questions appraisers sent back to AppraiseItNow between November 2024 and September 2026 asked for something the client could have provided at the start.

For donations specifically, the gift details are part of the file. For a donation appraisal, AppraiseItNow requires, once the gift has happened, the charity's legal name and street address, the date of each contribution, which items went to which charity, and whether anything was received in return or attached as a condition; the charity's EIN and its written acknowledgment help but are not required. AppraiseItNow collects what the appraiser needs before the appraisal starts, and asks only for what the appraiser needs.

In-person route. The donor's preparation shifts from photography to access. That means arranging a time, ensuring the property is available and operable, and having records on hand at the visit. The gift details and ownership records are still needed. The visit does not replace documentation of the contribution date or of which items went to which charity.

Suggested-appraiser route. Information may flow through the stake-holder rather than directly between donor and appraiser. That can be convenient, but it adds a layer where details can be lost or filtered. The donor keeps copies of everything sent to the appraiser. This includes the photographs and records, and the information on what was received in return or attached as a condition, which a stake-holder may describe differently from the donor.

Summary table of donation appraisal routes against the IRS independence and timing rules

Criterion	Photo-based appraisal (independent appraiser)	In-person inspection (independent appraiser)	Appraiser suggested by a party with a stake
Independence	Depends on who the appraiser is; method is irrelevant	Depends on who the appraiser is; method is irrelevant	Highest risk; candidate tested against the excluded categories
Qualification for the property type	Pool not limited by location; credentials still checked	Local pool may be narrow; traveling appraiser widens it	Suggestion is not evidence of credentials; checked directly
Signing window	Donor controls timing; risk is an incomplete file	Visit scheduling can push signing early or late	Stake-holder's timetable may differ from donor's
Valuation date	Photos must reflect condition on the valuation date	Visit date may differ from valuation date	No inherent effect; depends on method used
Description and condition	Strong for visible condition; weaker for hidden or operating condition	Strongest for hidden or operating condition	Depends on method; watch the source of condition information
Scope and assumptions	Legitimate when credible; assumptions must be disclosed clearly	Fewer assumptions; scope still described	Stake-holder may press on scope; donor deals with appraiser directly
Donor preparation	Heaviest file preparation, because the file is the evidence	Access and scheduling; gift records still needed	Information may pass through a third party; donor keeps copies

Choosing among photo-based, in-person and suggested appraisers for a gift over $5,000

The comparison yields a sequence of decisions rather than a single winner. Independence and timing are pass-or-fail questions under the rules. Method is a matter of professional judgment within those rules.

Step 1: settle independence and qualification before method

Before deciding how the appraisal will be done, the donor or adviser confirms who will do it. The test is the qualified appraiser definition. The candidate needs a designation for that type of property from a recognized organization, or relevant coursework and at least 2 years' experience valuing it, and must regularly do paid appraisals. The candidate must also fall outside the excluded categories: the donor, the charity, whoever sold or gave the donor the property, and anyone related to or employed by them.

A candidate suggested by someone with a stake in the gift goes through this step like anyone else, with the questions put to the candidate directly and the answers kept.

Step 2: fix the dates that govern the appraisal

The donor's tax adviser identifies the due date, with extensions, of the return that first claims the deduction. The donor and appraiser identify the actual or expected donation date. If the appraisal will be signed before the gift, everyone involved knows that the signature must not fall earlier than 60 days before the donation, and that a delayed transfer can move it outside that window. If the appraisal will be signed on or after the gift, the valuation date is the donation date. The evidence gathered should describe the property as of that day.

Step 3: choose the method the property requires

Method follows the property. The questions below help the appraiser and donor decide whether photographs and documents will support credible results or whether an inspection is warranted:

- Can the property's identity be confirmed from photographs of markings, labels, plates or identifiers?
- Is the property's condition visible from the outside, or does it depend on internal or hidden features?
- Does value depend on whether the property operates, and can operation be documented by the donor (hour readings, a video, a service record)?
- Are there authenticity or attribution questions that require handling the object?
- Would any uncertain fact have to be assumed, and if so, would that assumption be needed for credible results, have a reasonable basis and leave the analysis credible?
- Will the property remain accessible in its donation-date condition long enough for an inspection, if one is needed?

The tax rules do not require in-person inspection, and the professional standard leaves the inspection decision to the appraiser. For most property where these questions have clear answers from a good file, a photo-based appraisal is a reasonable scope. Where several answers point to hidden, operating or authenticity issues, an inspection strengthens the condition evidence the qualified appraisal must contain.

Step 4: build the file the appraiser will need

Regardless of method, the donor assembles the donation details at the outset:

- the charity's legal name and street address;
- the date of each contribution;
- which items went to which charity;
- whether anything was received in return or attached as a condition.

Where available, the charity's EIN and written acknowledgment are also useful. For a photo-based appraisal, the donor follows the photo requirements for the asset type and adds identifiers, records and condition notes. For an in-person appraisal, the donor arranges access and has the records available at the visit. In either case, supplying everything at the start reduces the need for requests for missing details, which would otherwise consume time in the signing window.

Step 5: read the report against the content requirements

When the appraisal arrives, the donor or adviser checks that it does each of the following:

- describes the property and, for physical property, its condition;
- gives the donation date (or expected date) and the valuation date;
- states the method and basis used and the fair market value;
- follows USPAP;
- states both the effective date and the report date;
- describes the scope of work, including what was and was not inspected;
- discloses clearly any extraordinary assumption.

The qualified appraiser's signature in Part IV of Section B and the charity's signature in Part V complete the form's appraisal-related signatures. The charity's signature is not agreement with the value.

Review questions for donors and advisers

1. Is the proposed appraiser the donor, the charity, the seller or giver of the property, or related to or employed by any of them?
2. Does the appraiser hold a designation for this type of property, or have relevant coursework and at least 2 years' experience valuing it, and regularly do paid appraisals?
3. Who suggested the appraiser, and does all communication about the property and its condition go directly between the donor and the appraiser?
4. What is the donation date, and will the appraisal's signature date fall no earlier than 60 days before it?
5. What is the due date, with extensions, of the return that first claims the deduction, and will the donor have the signed appraisal by then?

6. Do the photographs and documents reflect the property's condition on the valuation date?
7. Does any part of the property's value depend on facts that photographs cannot show, and has the appraiser decided whether an inspection is needed?
8. Has the donor's tax adviser addressed the questions this study leaves to the adviser, such as which items are similar items and how any attachment rule applies?

AppraiseItNow prepares every appraisal in accordance with USPAP, the Uniform Standards of Professional Appraisal Practice. The routes compared here apply equally to any appraiser a donor considers. The independence and timing rules are fixed. The method is the appraiser's professional judgment. The file the donor assembles largely determines whether that judgment can rest on photographs and documents or needs an inspection.