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Comments:

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I am for the proposed rule changes to Docket No. R-1390 Regulation Z; Truth in Lending that will revamp the way reverse mortgages are advertised and implemented. Requiring face-to-face meetings should be number one when dealing with the vulnerable population. Often time?s senior citizens are targets of fraudulent activity and can be coerced into doing things against their will. As an ex-financial institution employee, I remember receiving a death certificate in the mail for one of our customers who had a reverse mortgage and while going through this members account I realized that the date of death was before this members reverse mortgage proceeds had been dispersed. After investigating the situation, it had been discovered that the members? granddaughter had utilized her grandmothers? information to obtain the loan.

Face-to-face meetings will help to reduce some of these issues. However, coercion will always be a factor. I know that part of the rules may implement a requirement that the consumer of reverse mortgages must seek counseling first and as a financial counselor, I believe that this is an excellent revision. During my counseling sessions, I found that people rarely understand the documents they signed and often indicated that they felt pressure by the organization to hurry up and complete the transaction. I am suggesting that a 30-day cooling off period be implemented as well before the consumer can complete their reverse mortgage process after they have completed their counseling sessions. This may assist with some of those pressure issues.

In addition, in relation to the credit insurance and debt protection disclosures I believe that it is important that consumers know that they do not have to purchase the financial institutions products. Other companies can offer them the same products and services at possibly more reasonable rates. This rule does not stop financial institutions from collaborating with other financial services organizations such as financial advising firms and insurance companies to offer credit protection products and services. It has been my experience that when financial institutions try to become a one stop shop it

becomes messy for the consumer. Therefore, I support your rule changes to Regulation Z.

Sincerely,

P. Caldwell