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Docket No. R-1394 and RIN No. AD-7100-56 I have been a Certified Appraiser licensed in the state of Illinois for more than 10 years. The current housing crisis can not be the fault of a few appraisers and unethical loan officers and lawyers. It was not the appraisers that came up with loans that did not require income verification and loans made to anyone that had a few hundred dollars to pay for a loan application. The ability to make fraudulent loans was basically offered to those without a conscience. People got loans they could not afford because lending requirements were lax. Yet the appraisers were blamed. There is no home loan I know of that closed just on the word of an appraiser without a lenders staff approving all documents including the appraisal. If those in charge of underwriting loans were properly trained, informed and were able to work with appraisers to understand the appraisal process properly, most of those bad loans may have never been made. This all brings us to the current situation with the HVCC in which management companies are running the entire mortgage loan process. These AMC's are not protecting anyone. They are really nothing more than cash cows for big banks and those that were or are able to set a management company up and get clients. They are middlemen with no knowledge of the appraisal or loan process and demand unrealistic fees on the backs of the professionals that actually do the work. We, the appraisers, are being forced to work for fees well below what is fair just to support one of the newest and most profitable new "businesses" to be created. AMC's say consumers will be paying more if appraisers are paid fairly. Currently "appraisal fees" the consumers are paying by using AMC's are higher than they were prior to the HVCC!! All so these AMC's make huge profits for nothing. Look into what kind of income these AMC's are reporting I am sure it will be shocking. This is all profit for no reason. There is no AMC that is able to spot a fraudulent appraisal!! They would not even understand the appraisal if they were to actually read it. Obviously the general public accepts paying fees of \$400 and into the \$600 range for a residential appraisal. Therefore I feel it is obvious that the qualified appraiser should be paid at least the

\$400 per appraisal with, if they are to be continued to be used, a flat AMC fee that is openly listed on the HUD1 of every loan and not hidden as an appraisal fee. Currently the reported appraisal fee is misleading as the appraiser gets only a fraction of the fee listed. AMC "contracts" with appraisers demand that the appraisers agree that they NOT DISCUSS appraisal fees with the home owners. This is because the home owners think that \$400-\$600.00 is going to the appraiser. Prior to the HVCC and AMC's I, as an appraiser, would seek work from businesses I felt had my same ideals on work ethic and professionalism. I would demonstrate my ability through appraisals I provided to them. If they felt my work was of good quality I gained a client and was paid based on what I quoted. If the potential client did not feel I could meet their needs or not provide work that was equivalent to or above the level of other appraisers they would not become a client of mine. There were always plenty of calls from loan officers telling me I could "get a lot of work" if I could always "hit a value for them". These were not the kind of client I felt comfortable with and never accepted work from. Appraisers have always been selected based on performance and ability. At this time with AMC's running the show, the appraiser willing to work for the least amount of money and provide a "report" in as little time as possible get work. It no longer matters what I know or how well I can do my job. All that matters is how little I am willing to take and how fast can I get it done. The home owner does not get a discount for a lower fee appraiser they still pay a fee far above the appraisers fee for an appraisal. Due to this a certified appraiser with 20 years of experience and knowledge is put at the same level as a newly certified or licensed appraiser that may have been appraising for the minimal amount of time and quite possibly lacked the proper mentoring needed to complete an accurate appraisal. This is very wrong! AMC's have been around longer than I have been working as an independent appraiser. When I started I had one client which really did not support me but I felt my hard work would reward me in the end. It did and I gained a number of very good respectable clients and did very well for my self due to my hard work and dedication to quality work. I did take a look at AMC's when I started as it was a way to get work without cold calling new clients. Even back then LSI and others were offering work if I was willing to give up about half of the appraisal fee. At that time, as well as now, they (AMC's) would take anyone that applied no matter what. If you applied and agreed to low fees you would get work. I was willing to work for my money and wanted my full fee which paid off, until the HVCC started. Back before the AMC was required the appraisal community saw appraisers willing to work for AMC's as those who could not survive the "real world" of appraising and were unable to get their own clients usually due to inexperience or bad reputation. Now the least experienced and most desperate appraisers are being rewarded with work and are supporting a new industry that is not needed. Require AMC's to pay the current fees, the fees home owners believe appraisers are getting. Require everyone involved in the loan process to be licensed and names of all people involved to be on all loan documents and appraisals. Finally require AMC fees to be separate from appraisal fees on the HUD 1.