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Sent on: Wednesday, November 26, 2025 10:32:07 PM

To: Obersteadt, Anne <AObersteadt@naic.org>

Subject: Updated Title Insurance Shopping Tool Template Exposed- Comments Requested by Nov. 26

Good afternoon,

Sharing the comments from the title agency audit team in Michigan. Thank you for the opportunity to provide our comments. Wishing you a wonderful Thanksgiving!

- The note on RESPA compliance for ABAs is a nice addition. How about adding a practical example of what a kickback could look like from the consumer's perspective?
- When it mentions "... your policy protects you against title issues for as long as you own the property" on page 8, how about adding something like "including heirs that retain an interest in the property"?
- The tool does not seem to emphasize timeliness (that is when the title agency/settlement agent should execute each task)
- On page 4, when it mentions "enhanced owner's policy", how about adding alternate terms such as homeowner's title insurance policy, ALTA homeowner's policy, or eagle policy which are used by the underwriters in their rate filings?
- On page 11 "Steps to Stay Safe" the guide notes that there are tools like CertifID or ClosingLock used in the title industry. Would it be better to avoid naming the tools and making the step "Choose title insurance companies that offer fraud-prevention tools" to avoid promoting specific companies? We are concerned about this issue in Michigan since it could be seen as an endorsement of the companies, when the founders are also owners of title agencies.
- On page 13, "How to File a Title Insurance Claim" the guide does not dive into the types of issues that might constitute a title claim. Could there be some additional details added to clarify what would not be covered? (e.g., Buyer finds damage to property after closing that they did not know about before closing) (e.g., if a neighbor builds a fence that encroaches onto your property after the policy is issued, there would be no coverage since the defect arose after the policy date.) Also, how about adding a link to a directory or creating a directory of each state/province governing body that deals with title insurance and the site on where to file a claim? This could be a centralized website where you can input a zip code and it will show you the appropriate agency/department info and also the site to file a complaint.
- Cost Comparison Chart on page 16 - a fillable pdf or a checkable excel worksheet would be nice for some users who do not print paper and fill out forms with physical pen or pencil on real physical paper.

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