



House Bill 642

Committee: Economic Matters

Date: February 3, 2021

Position: **Unfavorable**

This testimony is offered on behalf of the Maryland Multi-Housing Association (MMHA). MMHA is a professional trade association established in 1996, whose members consist of owners and managers of more than 210,000 rental housing homes in over 958 apartment communities. Our members house over 538,000 residents of the State of Maryland. MMHA also represents over 250 associate member companies who supply goods and services to the multi-housing industry.

House Bill 642 requires the Commissioner of Financial Regulation to adopt regulations that would require additional information matching before a public record may be included in a report from a consumer reporting agency. Specifically, the public record must match the *full* social security number of the consumer or the *full* date of birth plus another characteristic such as gender, race, ethnicity, or physical description of the consumer.

MMHA fully supports a housing industry in which there are **no** barriers to obtaining housing or employment due to gender, race, or ethnicity. As public records do not normally include full social security numbers or dates of birth, MMHA is concerned that HB 642 will require businesses to request information that may be prohibited by federal law, including gender, race, or ethnicity.

Maryland's Office of the Commissioner of Financial Regulation recently concluded a two-year rulemaking process for credit reporting agencies that was designed to promote accuracy in consumer reports. Included within this rulemaking was a requirement for credit reporting agencies to "devise procedures to identify inaccurate information in consumer credit information submitted to it by a person who furnishes information to a credit reporting agency."¹ Moreover, the rules provide the Commissioner of Financial Regulation with additional investigative tools and a system for receiving complaints. These new rules provide extensive protection to Maryland's consumers and further ensure the accuracy of reports.

Due to concerns about collecting information that may be prohibited by federal law and with consideration to the Commissioner of Financial Regulation's recent rulemaking that ensures consumer protection, MMHA respectfully requests an unfavorable report from the committee on HB 642.

¹ COMAR § 09.03.07.01.