



Chair C.T. Wilson  
Room 231  
House Office Building  
Annapolis, Maryland 21401

January 26, 2022

**HB251:** Consumer Protection - Maryland Consumer Reporting Act - Registration of Consumer Reporting Agencies and Regulations

**Testimony on Behalf of** MD|DC Credit Union Association

**Position:** Favorable w/ Amendment

Chairman Wilson, Vice-Chair Crosby, and Members of the Committee:

The MD|DC Credit Union Association, on behalf of the 70+ Credit Unions and their 2.2 million members that we represent in the State of Maryland, appreciates the opportunity to testify on this legislation. Credit Unions are member-owned, not-for-profit financial cooperatives whose mission is to educate and help members achieve financial well-being. We are **favorable with an Amendment**.

We support the intent of the bill. This bill creates requirements similar to Section 372 (The Financial Institution Data Match (FIDM) program) of The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). With the passage of PRWORA, this type of personal information was deemed necessary to help track down persons delinquent in child support payments due to a rapid increase in these numbers in prior decades. While we understand the need for accurate data matching by consumer reporting companies, we voiced a concern that financial institutions that are complying with these requests should be protected if the information is used in an unintended manner, or the entity requesting the information is breached.

In response to our concern, the Sponsor has agreed to amend the bill to create a limitation on liability similar to that of Section 466(a)(17)(C) of the Social Security Act. The requested amendment language states,

“Under the federal Social Security Act, §466(a)(17)(C), a financial institution that complies with the requirements of this section shall not be held liable for any disclosure of information to the agency or for any other action taken in good faith to comply with the requirements of this section.”

Please do not hesitate to contact me at 443-325-0774 or [jbratsakis@mddccua.org](mailto:jbratsakis@mddccua.org), should you have any questions. Thank you for your consideration.

Sincerely,

John Bratsakis  
President/CEO – MD|DC Credit Union Association