



Consumer Data Industry Association  
1090 Vermont Ave., NW, Suite 200  
Washington, D.C. 20005-4905

January 28, 2026

P 202 371 0910

[CDIAONLINE.ORG](http://CDIAONLINE.ORG)

Delegate Kriselda Valderrama  
Chair  
House Economic Matters Committee  
Maryland House of Delegates  
230 Taylor House Office Building  
Annapolis, Maryland 21401

Chair Valderrama, Vice Chair Charkoudian, and Members of the Committee:

On behalf of the Consumer Data Industry Association (CDIA), I am writing to express our concerns regarding provisions in the current statute HB 437 amends that conflict with and are preempted by federal law, specifically 15 U.S.C. § 1681t(b)(1)(F) of the Fair Credit Reporting Act (FCRA). For the reasons outlined below, we respectfully request an amendment to HB 437 that would strike lines 25 through 28 of page 5 to remove 12-1504 (4) and 12-1504 (5) from the existing statute, which restricts the reporting of certain information to consumer reporting agencies and restricts the use of consumer reports, contrary to federal law.

CDIA represents the consumer reporting industry, including nationwide credit bureaus, regional and specialized credit bureaus, background check companies, and more. Since our founding in 1906, we have promoted the responsible use of consumer data to empower financial opportunities, reduce fraud, and manage risk. Through data analytics, our members facilitate fair and secure transactions, foster competition, and expand consumers' access to tailored financial products.

The FCRA establishes a comprehensive framework for the collection, dissemination, and use of consumer information, including credit reporting. A safe and sound credit economy needs a reliable credit reporting system. Suppression of credit reporting leads to increased inaccurate credit files, reduces the reliability of credit scores, and adds greater risk and uncertainty into the lending process. This is why Congress included language in the federal FCRA 15 U.S.C. § 1681t(b)(1)(F) which preempts "any subject matter regulated under...15 U.S.C. § 1681s-2, relating to the responsibilities of persons who furnish information to consumer reporting agencies...".

While CDIA takes no position on the policy goal of HB 237 or the underlying statute, we are concerned by unnecessary continued inclusion of 12-1504 (4) and 12-1504 (5), which attempt to limit reporting of information to CRAs and limit the use of consumer reports, respectively. Congress preempted the states from establishing prohibitions on the furnishing of information to consumer reporting agencies to promote a uniform, national standard that supports complete and accurate consumer reports. As these limitations are inconsistent with the FCRA, they are preempted.

With this in mind, we respectfully request HB 437 be amended such that lines 25-28 on page 5 stricken from the underlying statute. This eliminates any unintended conflict with the FCRA, fully resolves our concerns, and avoids unnecessary legal uncertainties for the consumer reporting system in relation to Maryland law. Thank you for your consideration of our comments and please reach out with any additional questions for CDIA.

Sincerely,

A handwritten signature in black ink, appearing to read "Zachary W. Taylor", is written over a faint, larger version of the same signature.

Zachary W. Taylor  
Director, Government Relations  
Consumer Data Industry Association