



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

October 6, 2025

P 202 371 0910

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

Representative Mark Johnson  
Chair  
House Commerce & Labor Committee  
Ohio House of Representatives  
Room 113, State Capitol  
1 Capitol Square  
Columbus, OH 43215

Chair Johnson, Vice Chair Lear, and Members of the Committee:

On behalf of the Consumer Data Industry Association (CDIA), I am writing to express our concerns regarding provisions in HB 152 that conflict with and are preempted by federal law, specifically the Fair Credit Reporting Act (FCRA). For the reasons outlined below, we respectfully request an amendment to the bill that would strike the reference to “consumer reporting agency” in Section 1320.06 (E) at line 362 on page 13, which would restrict the reporting of certain information to consumer reporting agencies.

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. The FCRA imposes obligations on companies (“furnishers”) that provide (“furnish”) information to consumer reporting agencies (“CRAs”). These obligations are in 15 U.S. Code § 1681s–2, responsibilities of furnishers of information to consumer reporting agencies. The FCRA has extensive preemption provisions that prohibit state regulation in many areas of law relating to consumer reporting, including provisions that impact furnishing requirements.

While CDIA takes no position on the policy goals of HB 152, we are concerned by unnecessary restriction on reporting of information to consumer reporting agencies in Section 1320.06 (E). A safe and sound credit economy needs a reliable credit reporting system. Suppression of credit reporting leads to increasingly inaccurate credit files, reduces the reliability of credit reports and scores, and adds greater risk and uncertainty into the lending process. This is why Congress preempted the states from establishing prohibitions on the furnishing of information to consumer reporting agencies. As this limitation on furnishing information is inconsistent with the FCRA, it is preempted at 15 U.S.C. § 1681t(b)(1)(F).

With this in mind, we respectfully request that the reference to “consumer reporting agency” at line 362 on page 13 in Section 1320.06 (E) be removed from the bill should it move forward. This minor, technical amendment would eliminate any unintentional conflict with the FCRA, fully resolve our concerns, and avoid unnecessary legal uncertainties for consumer reporting agencies in relation to Ohio 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", written over a white background.

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