

March 13, 2019

**The Honorable Sen. Mike Crapo
The Honorable Sen. Sherrod Brown
United States Senate Committee on Banking, Housing, and Urban Affairs
Washington, D.C. 20510**

Dear Senator Crapo and Senator Brown:

On behalf of 7.3 million consumers in Idaho, Oregon, and Washington, and the 180 not-for-profit, cooperative credit unions that provide financial services to them, we thank you for your leadership reviewing how the Fair Credit Reporting Act should protect consumers and businesses such as credit unions in this digital age.

The Northwest Credit Union Association is pleased to provide feedback on the collection, use, and protection of sensitive information by financial regulators and private companies. We have analyzed this important matter in collaboration with our member credit unions and the Credit Union National Association. Please consider our input as follows:

- **Any new or amended privacy law should cover both privacy of data and security of that data. Privacy is violated if data is compromised due to breach or theft.**
- **Congress should pass legislation that applies to any company or agency that collects, uses, or shares personal data, including but not limited to technology companies, credit-reporting agencies, and other sectors of the economy. All such entities could be subject to data misuse or breach standards and be held responsible in cases where those standards are not implemented or are compromised.**
- **Data security requirements should be based on protection of data to prevent misuse or breach. Notification or disclosure after the fact is important, however, by the time a breach has occurred, harm may have already been done to hundreds of thousands, if not millions of consumers. Robust protection is paramount to any new or amended legislation.**
- **The law must provide remedies to address the harm that results from privacy and security violations, including data breaches. Increasingly, courts are recognizing the rights of those impacted by such violations, including consumers and businesses such as credit unions. We believe victims should be afforded a private right to hold accountable those who violate the law. Accordingly, regulators need the ability under law to act against entities in violation.**
- **New or amended legislation should create a national standard for all entities engaged in the collection, use, retention, and destruction of sensitive information to follow. The current patchwork of state-level requirements may make it easier for hackers to identify and expose vulnerable targets. We encourage federal legislation that would preempt any requirements issued at the state level, ensuring one standard of compliance and fair protection for all consumers.**

Senators, across our great nation, more than 100 million consumers trust credit unions as their financial services providers. We take this responsibility seriously, and support legislation that enforces accountability to protect consumers and their financial institutions from data and security breaches.

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Data security and privacy must be a national security priority. We thank you for working to address this important topic to help better protect credit union members and all consumers' data. As Northwest credit unions we stand ready to advocate in support of these efforts in order to better serve our region's 7.3 million members.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Stang', with a stylized flourish at the end.

**Troy Stang
President and CEO
NWCUA**

A handwritten signature in black ink, clearly legible as 'Kent Oram'.

**Kent Oram
President and CEO
Idaho Central Credit Union
Vice Chair
NWCUA Board of Directors**