



**Statement of the Massachusetts Bankers Association Regarding  
H.2119 & S.1286, An Act Regulating the Use of Credit Reports by Employers  
Joint Committee on Labor and Workforce Development  
June 10, 2025**

On behalf of our 120 commercial, cooperative and savings banks and federal savings banks and savings and loan association members with more than 72,000 employees located throughout the Commonwealth and New England, the Massachusetts Bankers Association (MBA) appreciates the opportunity to provide the Committee with our concerns regarding **H.2119 & S.1286, *An Act Regulating the Use of Credit Reports by Employers***, which were recently heard before the Committee.

As you know, banks are highly regulated at the state and national levels. Bank employees handle sensitive customer financial and personal information on a daily basis and many employees have access to significant amounts of customer and bank funds. Our member institutions take their responsibility to protect their customers *extremely* seriously and as part of that effort, many employees or applicants are subject to background checks, credit checks and other screening prior to and during their employment.

Federal and state laws and regulations also require many bank personnel to be bonded to protect the institution from potential criminal or negligent activity by an employee. In most cases, background and credit checks are part of the bonding process and restricting the use of credit information may make it impossible to bond certain employees. Therefore, MBA believes an appropriate and clear exemption for bank and financial institution employees is *necessary*, as were present in past session's bills, to include before enactment.

Specifically, in SECTION 2, MBA would request the language be amended by inserting after the definition of "Employment purposes" the following words:

**"Financial institution", a trust company, state or federally chartered savings bank, state chartered cooperative bank, national banking association, state or federally chartered savings and loan association, state or federally chartered credit union, insurance or surety company, investment advisor, broker-dealer, bank holding company, financial holding company or an entity registered with the United States Securities and Exchange Commission or a direct or indirect subsidiary of any of them.**

And by inserting after the words "security clearance" the following words:

**or financial institution.**

Thank you for the opportunity to provide our views on these bills. If you have any questions or need additional information, please contact Brad Papalardo at [bpapalardo@massbankers.org](mailto:bpapalardo@massbankers.org) or (617) 523-7595.