



February 12, 2018

Ms. Monica Jackson  
Office of the Executive Secretary  
Consumer Financial Protection Bureau  
1700 G Street, NW  
Washington, DC 20552

**Re: Request for Information regarding Consumers' Experience with Free Access to Credit Scores**

**Docket No. CFPB-2017-0037**

Dear Ms. Jackson:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau (CFPB) request for information (RFI) on consumers' experience with free access to credit scores.

Many card issuers, companies, and financial institutions (including credit unions) voluntarily offer free access to consumer credit scores and also provide tools to help manage consumer finances. We appreciate the CFPB's effort to learn more about the experience consumers are having with access to free credit scores. Financial education is vital to empowering consumers to manage their finances and to take control over their financial lives.

As indicated by the CFPB, the purpose of the RFI is to gather information to identify the most valued educational content and potential content that could be developed to help consumers better understand credit scores and credit reports. The RFI will also be used to gain an understanding of industry practices that help educate and support consumers.

HCUA supports initiatives that educate consumers to increase financial literacy. Credit unions were established to help the members and communities they serve. Financial education is a critical resource that credit unions provide to ensure financial empowerment of its members. Many credit unions provide financial counseling and financial resources to individuals to help provide them with the financial knowledge and tools necessary to succeed.

We encourage voluntary efforts of easy access to credit scores that help increase the financial well-being of credit union members. As such, we urge the CFPB and other agencies to provide financial institutions with guidance intended to achieve this goal but not to go so far as to prescribe unnecessary requirements. Many companies and financial institutions, including some credit unions, already provide free credit scores to their consumers. However, this consumer perk may not be feasible for others to offer.

6800 College Boulevard  
Suite 300  
Overland Park, KS 66211

223 Madison Street  
Jefferson City, MO 65101

2055 Craigshire Road  
Suite 200  
Saint Louis, MO 63146

901 SW Topeka Boulevard  
Topeka, KS 66612

2544 North Maize Court  
Suite 100  
Wichita, KS 67205

TF 800 392 3074

[HeartlandCUA.org](http://HeartlandCUA.org)

As always, we appreciate the opportunity to review this issue regarding the CFPB's RFI on consumers' experience with access to credit scores. We will be happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Bradley D. Douglas". The signature is written in a cursive style with a large initial 'B' and 'D'.

Brad Douglas  
President/CEO