



CBA Access Members: Sharing Credit Report Data

The CBA Access program allows members to access soft inquiry credit reports for financial counseling and/or coaching and hard inquiry reports for loan underwriting. If you are participating in this program, reviewing and ensuring compliance with the ways that you may and may not use these credit reports is essential.

If you signed the CBA Access Services Agreement for CBA members to access **soft inquiry credit reports**, we understand you may:

Actions	TransUnion	Experian	Equifax
Use for coaching counseling	yes	yes	yes
Share report information with clients during sessions	yes	yes	yes
Use for outcome tracking with credit coaching/counseling	yes	yes	yes
Use for qualifying clients for financial products	no	no	no
Share VantageScores with clients during sessions	yes	yes	yes
Share FICO® scores with clients during sessions through FICO® Open Access	yes	yes	yes
Share a physical copy of the report during sessions	yes	yes	yes
Share report information (individual, personal, aggregate, or anonymous data) with any third-party including affiliates, researchers, and evaluators	no	no	no
Use soft inquiries for anything outside the contracted permissible purpose of credit coaching/counseling and when permitted outcome tracking	no	no	no

If you signed the CBA Access Services Agreement for CBA members to access **hard inquiry credit reports** for underwriting, we understand you may:

Actions	TransUnion	Experian	Equifax
Use hard inquiry for underwriting	yes	yes	yes
Share the score and model for a credit denial or change in terms, as part of the adverse action notice, if the report/score is a deciding factor	yes	yes	yes
Use hard inquiries for anything outside the contracted permissible purpose of underwriting	no	no	no
Use hard inquiries for underwriting business/commercial loans	yes	yes	no

Disclaimer:

This guidance document is not intended to provide legal advice and may not be used as legal advice. You, as a CBA Access Member, should only request and share information for the permissible purpose(s) permitted under the Fair Credit Reporting Act (**FCRA**) and in compliance with requirements outlined in your end-user agreements signed with the credit bureaus. CBA encourages you to carefully review all contracts signed with the bureaus to fully understand your responsibilities and restrictions. Failure to adhere to bureau policies and CBA Access Service Agreement could impact your ability to access reports.

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