

# CREDIT UNIONS

Testimony on HB3533  
House Commerce and Consumer Protection  
March 11, 2025

I am submitting this testimony on behalf of Oregon Credit Unions and the GoWest Credit Union Association.

As we review HB3533 we had several questions. Section 2 states: *(2)(a) A person that advertises consumer goods or consumer services for sale in this state may not in the advertisement and during the course of any sale that is conducted electronically or by telephone display or quote a price for the consumer goods or consumer services that does not include or disclose every fee that the consumer must pay to complete the sale of the consumer goods or consumer services.*

Financial products and services are already subject to advertising requirements that adequately address the issue. The Truth in Savings Act, governed by our federal regulator, the National Credit Union Administration, specifies how CUs must advertise deposit accounts, including when fees must be disclosed. The Truth in Savings Act relates to how credit unions have to disclose and advertise deposit accounts.

It also prohibits advertisements that are misleading, such as calling an account free if it has a service charge attached to it. Similarly, Reg. Z has advertising requirements specific to various types of credit – a set of rules for closed end car loans, another set of rules for credit cards, another set of rules for HELOCs, and another set of rules for mortgages. All of these rules specify disclosures regarding pricing, including fees. These rules already adequately protect the public in this area.

TRID – TILA RESPA Integrated Disclosures – Effective in 2018, combined disclosure requirements from the Truth in Lending Act (TILA) and those of Real Estate Settlement Procedures Act (RESPA). As mentioned, the whole reason for TRID came out of the Dodd-Frank act and requires all mortgage lenders to use the same type of disclosures which provide information about fees and other costs so consumers can shop around.

Additional Questions from our Members -

- What is the “price” of a service like a deposit account from a financial institution? If the CU advertises a rate on a deposit account, that is clearly not a “price” that is paid by the member for the service.
- If a CU advertises a rate on a deposit account, does that mean they have to disclose fees as well?
- There is no indication or consideration of what fees must be disclosed because they are “necessary to complete a sale of . . . the service.” For example, what about the cost of ordering checks (which varies based on what checks the member chooses)?
- For something like a mortgage loan, there are lots of associated fees and costs, many of which can only be estimated because they may vary with property location, property value, loan amount, etc. That’s the whole reason why we have to give out TRID (what is this?) disclosures – so people can shop for a loan based on meaningful disclosure of all related costs, which is actually based on the member’s credit and the property in question.

We look forward to supporting an upcoming amendment.

### **Background on Oregon Credit Unions**

2.3 million Oregonians – 55% of the population – trust credit unions as their financial partners. Credit unions’ not-for-profit, member-owned, cooperative structure inherently holds them accountable to the people and communities they serve. As not-for-profit cooperatives, credit unions’ commitment to the community is in their everyday DNA. Across the state, credit unions look out for consumers’ financial well-being, by providing financial education, helping them to save for a brighter future, and by making the loans that help them get the keys to their dream homes, open businesses on MainStreet, and buy the autos that help them get to work and school.

Respectfully,

**Pam Leavitt**

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