



**Testimony of**  
**American Property Casualty Insurance Association (APCIA)**  
**Senate Finance Committee**  
**House Bill 669 - Workers' Compensation – Benefits- Hearing Loss**  
**February 21, 2024**

**Unfavorable**

The American Property Casualty Insurance Association (APCIA) is a national trade organization whose members write approximately 67% of the U.S. property and casualty insurance market, including 89% percent of Maryland’s workers’ compensation market. APCIA appreciates the opportunity to provide written comments in opposition to House Bill 669, which would unduly lower the standards for testing and compensating workers’ compensation claimants for hearing loss.

House Bill 669 would weaken the current standards that account for normal, non-occupational hearing loss that naturally occurs as people age, which would significantly increase the number of hearing loss claims filed in the workers’ compensation system. It is also very concerning that tinnitus would be considered as part of a covered employee’s hearing loss, since tinnitus is highly subjective and fairly common among adults (up to 25% of the population). Allowing employees to claim hearing loss attributable to tinnitus without first having a compensable claim for hearing loss would be particularly unwarranted in view of the requirement in the American Medical Association’s (AMA) *Guides to the Evaluation of Permanent Impairment* – which Maryland’s workers’ compensation system has adopted – that there be measurable hearing loss before the tinnitus can be rated.

Taken collectively, the proposed amendments would significantly increase the number and cost of hearing loss claims, and the impact would need to be factored into workers’ compensation premiums paid by Maryland employers.

For these reasons, APCIA urges the Committee to provide an unfavorable report on House Bill 669.

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