



**Testimony of**

**American Property Casualty Insurance Association (APCIA)**

**House Economic Matters Committee**

**HB1455 Workers' Compensation - Average Weekly Wage - Multiple Employers**

**March 11, 2025**

**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 90% percent of Maryland's workers' compensation market. APCIA appreciates the opportunity to provide written comments in opposition to House Bill 1445.

House Bill 1455 allows a claimant with a temporary partial or temporary total disability to combine or stack income from multiple employers for purposes of determining the claimant's average weekly wages for benefit calculations. APCIA opposes stacking of income levels because we object to benefit calculations that require the insurer to pay for risks/losses that the insurer did not collect premium for. In the case of concurrent employments, insurers collect premiums on the basis of the claimant for the employer where the injury took place. HB 1455 would force insurers to pay benefits based on all the employments of the claimant as a result of aggregating wages even though the insurer is collecting no premium from the other employments. Similarly, from the employer perspective, the employer should not have to pay indemnity benefits based on wages from other employers.

For these reasons, APCIA urges the Committee to provide an unfavorable report on House Bill 1445.

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