

March 9, 2026

The Honorable Kriselda Valderrama, Chair  
House Economic Matters Committee  
231 Taylor House Office Building  
Annapolis, Maryland 21401

**Re: NAMIC Opposition to HB 1486 - Workers' Compensation - Average Weekly Wage - Multiple Employers**

Chair Valderrama and Members of the Committee,

Thank you for the opportunity to provide written testimony on HB 1486 - Workers' Compensation - Average Weekly Wage - Multiple Employers. On behalf of the National Association of Mutual Insurance Companies (NAMIC), we must respectfully oppose HB 1486 and request an unfavorable report.

The National Association of Mutual Insurance Companies (NAMIC) is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies—including local and regional insurers as well as some of the nation's largest carriers—NAMIC members collectively write \$467 billion in annual premiums, representing 61% of the homeowners and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.

HB 1486 would require workers' compensation benefits to be calculated using combined average weekly wages from all concurrent employers, regardless of where the injury occurred. This expands average weekly wage (AWW) calculations far beyond the narrow, limited framework of the prior rule in §9-602(l), which applied only to low-hour, seriously disabled workers. The new §9-602(a-1) is not limited by hours or injury severity, meaning indemnity severity will increase broadly across claims, not just exceptional cases. The bill also applies concurrent-employment aggregation to occupational disease claims via the "last injurious exposure" trigger, introducing new disputes over which employer is liable as the "last injuriously exposed" party and increasing litigation and cash-flow risk for the employer (and insurer) initially required to pay full benefits based on aggregated wages.

While HB 1486 directs the Subsequent Injury Fund (SIF) to reimburse employers for certain permanent partial or total disability payments tied to these combined wages, this mechanism does not prevent substantial upfront exposure. Because SIF is funded through insurer assessments, shifting incremental concurrent-employment costs to SIF will ultimately increase system-wide insurer costs through higher assessments. This bill substantially broadens liability, heightens litigation risk, and replicates last year's HB 1455 without addressing the structural concerns previously raised.

For these reasons, we respectfully request an unfavorable report on House Bill 1486.

Sincerely,



Gina Rotunno  
Regional Vice President, Mid-Atlantic