



Testimony of
American Property Casualty Insurance Association (APCIA)
House Economic Matters Committee

House Bill 148 Consumer Protection and Labor and Employment - Surveillance-Based Price and Wage Setting – Prohibition

February 10, 2026

Support with Amendments

The American Property Casualty Insurance Association (APCIA) is a national trade organization whose members write approximately 71% of the Maryland property-casualty insurance market. House Bill 148 is intended to provide new consumer protections against certain surveillance pricing and certain employer practices. Importantly, Subsection (B) on line 17 of the bill provides a general exception if the price reflects the differences in the cost to provide the good or service. This is an important exception and one that should be maintained. However, the bill does not specify certain exemptions for industries already regulated under the Maryland Code. APCIA appreciates the opportunity to provide written comments and suggested amendment to House Bill 148.

Insurance pricing is already comprehensively regulated pursuant to the Insurance Article. Insurance rates are submitted to the Insurance Commissioner for review and approval. For example, Section 11-306 of the Insurance Article requires that insurance rates not be excessive, inadequate or unfairly discriminatory. To avoid any possibility of confusion on standards applicable to insurers and insurance producers and any possible reading of a less stringent standard for insurers and producers, we urge a more specific carve out for that reflects this comprehensive and strict insurance regulation as follows on line 17 of the bill:

Insert:

This section does not apply to:

(1) AN INSURANCE COMPANY AUTHORIZED TO DO BUSINESS IN THE STATE OR INSURANCE PRODUCER LICENSED BY THE STATE,

The amendatory language is based on the language relating to insurance that is included in the exception language in Section 13-104 of the Commercial Law Article. So, there is precedent for our request and the way we suggest it be implemented.

For these reasons, APCIA urges the Committee to adopt this amendment.

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