



Testimony of

American Property Casualty Insurance Association (APCIA)

House Economic Matters Committee

HB1486 Workers' Compensation - Average Weekly Wage - Multiple Employers

March 11, 2026

Unfavorable

The American Property Casualty Insurance Association (APCIA) is a national trade organization whose members write approximately 71% of the U.S. property and casualty insurance market, including 89.1% percent of Maryland's workers' compensation market. APCIA appreciates the opportunity to provide written comments in opposition to House Bill 1446

House Bill 1486 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 1486 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. Although benefits for certain injuries would be reimbursed via the Subsequent Injury Fund, this is no solution because insurers and employers fund the SIF and, thus, insurers and employers would still be financing the expanded benefits.

House Bill 1486 would also encourage Maryland employers to prohibit their employees from working additional jobs. No employer would be willing to pay indemnity benefits for a second employment held by a worker. Were stacking of benefits to be permitted under HB 1486, it would encourage employers to make the prohibition of second jobs a term of employment. In today's economy, many workers need to work an extra job, but this bill might make that an alternative no longer available to many workers.

For these reasons, APCIA urges the Committee to provide an unfavorable report on House Bill 1486.

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