



Testimony of

American Property Casualty Insurance Association (APCIA)

Senate Finance Committee

Senate Bill 522 - Workers' Compensation –Evaluation of Permanent Impairments– Licensed Social Workers

March 10, 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 Senate Bill 522.

While APCIA does not object to permitting certain licensed social workers to provide vocational rehabilitation services under the workers’ compensation law. APCIA does **object** to authorizing a licensed certified social worker-clinical to evaluate the mental or behavioral portion of a permanent impairment involving a behavioral or mental disorder. Consistent with current law in Maryland and other states, it is widely accepted that this type of evaluation should only be conducted by **licensed psychologists, psychiatrists and qualified physicians**.

For instance, legislation enacted in California in 2022 – which otherwise authorizes licensed clinical social workers (LCSWs) to furnish certain types of *treatment* to workers’ compensation claimants – pointedly “**does not authorize**” LCSWs to “**determine disability**” for either those claimants or unemployment claimants. See Section 3209.11 of the California Labor Code

For these reasons, APCIA urges the Committee to provide an unfavorable report on Senate Bill 522.

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