



**State of Vermont
Office of the Secretary of State**

128 State Street
Montpelier, VT 05633-1101
(802) 828-2363

**Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary**

**Office of Professional Regulation
Michael Warren, Interim Director
Tara Grenier, Deputy Director**

March 18, 2025

**To: Hon. Ann Cummings, Chair
Senate Committee on Finance**

**From: S. Lauren Hibbert, Deputy Secretary of State
Jennifer Colin, General Counsel, Office of Professional Regulation**

Re: S.53, An act relating to certification of community-based perinatal doulas and Medicaid coverage for doula services

Dear Committee Members:

Thank you for the opportunity to testify about S.53 regarding certification of Community-Based Perinatal Doulas. In our testimony today, first we will provide a brief overview of our report recommendations. Then we will focus on the fees for application and renewal of the certification, as well as OPR's request for General Funds to implement occupational regulation of the profession.

Overview

As you know, the General Assembly determined in Act 97 of 2024 that it is necessary for public protection for the State to regulate doulas. Act 97 required OPR to conduct a sunrise review of the profession in accordance with 26 V.S.A. §3105(b) to determine the appropriate form of regulation necessary to protect the public. OPR recently completed its review and submitted a [legislative report](#) that is available on the General Assembly's website.

In OPR's sunrise review, we recommend certification of a subset of the doula profession - community-based perinatal doulas - as the least restrictive form of regulation necessary to protect the public. Certification is a voluntary credential that a practitioner may obtain upon meeting certain prerequisite qualifications, such as approved training or educational programs. Certification is not required of all practitioners, and those who obtain the credential are legally entitled to use the term "certified" in conjunction with the title. Community-based doulas serve Vermont's most vulnerable birthing population. Their specialized training and experience assure they have the necessary competencies to serve communities experiencing disparate maternal health outcomes resulting from: systemic biases, structural racism, poverty, substance use disorder, mental health disorders, housing insecurity, trauma histories, developmental disabilities, and the like.

OPR fully supports S.53, as the proposed bill implements the certification program for community-based doulas and potentially allows for future Medicaid coverage of the critical support services that they provide within their own marginalized and under-resourced communities. It is anticipated that the provision of doula services to Medicaid recipients will improve short- and long-term health outcomes and ultimately lower the cost of medical care, as studies and data have shown that doula support substantially reduces c-section deliveries, low birth weight rates, preterm birth, epidural use, birth complications, and postpartum depression and anxiety rates. Doula support also provides better birth experiences for patients, improved maternal outcomes, and better breastfeeding outcomes.

Credential Fees and Implementation Costs at OPR

Initial Application Fee: \$75

Renewal Fee: \$120

Fees cover the cost of administering the program at OPR, including but not limited to:

- Assessing minimum qualifications for entering the marketplace in applications and ongoing qualifications for renewals;
- Assessing training and educational programs;
- Providing assistance to practitioners during application and renewal processes;
- Fielding and answering questions from the public and practitioners about the regulatory program;
- Engaging with advisors and holding public meetings;
- Enforcement expenses (investigators, prosecutors, case managers, paralegal);
- Ongoing legal, public records, and other general counsel-type work.

OPR estimates \$25,000 to implement the program, including but not limited to:

- Stakeholder engagement (which will begin immediately);
- Rulemaking;
- IT system set up;
- Website updates;
- Communications with practitioners and community-based programs.