



State of Vermont
Office of the Secretary of State
Office of Professional Regulation
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Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary
Jennifer B. Colin, Director

To: Senate Committees on Government Operations, Health and Welfare, Finance, and Appropriations; and House Committees on Government Operations and Military Affairs, Health Care, Appropriations, and Ways and Means
From: Office of the Secretary of State, Office of Professional Regulation
Date: November 13, 2025
Re: Update on Community-Based Perinatal Doula Rules Development and Request to Delay Rulemaking as Required by Act 50 (2025)

Dear Members of the General Assembly:

The Office of Professional Regulation (OPR) respectfully submits this update regarding promulgation of the Community-Based Perinatal Doula Rules required under Act 50 of 2025. Since passage of Act 50, OPR has worked collaboratively with the Department of Vermont Health Access (DVHA) and stakeholders within the doula community to develop a framework for the certification and regulation of doulas in Vermont. We have engaged in stakeholder meetings, reviewed local and national trends, and prepared draft rules with the intent to balance accessibility, public protection, and professional recognition for Vermont doulas, and the ability to bill for services under Vermont Medicaid.

During continued engagement, OPR learned from DVHA that it plans to seek an extension until 2027 of its requirement under Act 50 to amend the state plan from the Centers for Medicare and Medicaid Services (CMS). The purpose of that amendment is to allow Vermont Medicaid to provide doula reimbursement. It has become clear that advancing rulemaking prior to that approval would be premature and operationally untenable, potentially resulting in a regulatory structure that does not align with the eventual reimbursement model required by Act 50 of 2025.

As much as OPR wants to advance certification for doulas given the well-documented health benefits identified by experts, we must also recognize our current operational limits. OPR lacks the capacity and resources at this time to prioritize rulemaking for an initiative that may not receive funding or that could require a duplicative regulatory process if the reimbursement or administrative framework changes. OPR, thus, respectfully requests authorization to delay initiation of the formal rulemaking process until after the 2026 legislative session.

Although it is disappointing, OPR understands DVHA's request for an extension and shares the commitment to implementing a sustainable and equitable doula program. OPR also remains committed to continued collaboration with DVHA and stakeholders within the doula community during this interim period and will be ready to proceed promptly with rulemaking once the reimbursement plan is finalized.

Thank you for your consideration and for your continued partnership in advancing accessible and safe health care across Vermont.

Respectfully,

Signed by:
Jennifer Colin
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Jennifer B. Colin, Director
Office of Professional Regulation