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July 21, 2026

The Honorable Michael J. Rodrigues
Chair, Senate Committee on Ways & Means
State House, Room 212
Boston, MA 02133

Dear Chair Rodrigues,

On behalf of the Massachusetts Medical Society (MMS), representing more than 22,000 physicians, residents, and medical students across the Commonwealth, thank you for your efforts to produce S.3178, *An Act relative to economic development in the Commonwealth*. The MMS commends your leadership in advancing investments that strengthen the Commonwealth's economic competitiveness, foster innovation, and support scientific research.

We believe the following amendment would further the Senate's goals in S.3178 and wish to be recorded in **strong support** of **Amendment #519, Reducing Administrative Duplication for Providers**.

This amendment would extend until July 31, 2029 the implementation timeline of certain state provider disclosure requirements related to network participation, allowed amounts, and facility fees. We appreciate the Legislature's similar prior action, recognizing the need to align with federal standards under the No Surprises Act (NSA). Given that the federal rules are not yet finalized, we urge adoption of this further delay to avert unnecessary administrative burden and confusion. Specifically, lack of action would subject physicians, practices, and health care systems to duplicative and potentially conflicting compliance obligations that would create unnecessary administrative burden while providing no additional benefit to patients.

This extension allows the Commonwealth to pursue a permanent solution to better align state and federal requirements. This action will help reduce unnecessary administrative complexity, allow physicians and practices to focus their resources on patient care, and ensure that patients receive clearer, more consistent, and more meaningful information about their health care costs and coverage. The MMS therefore urges adoption of Amendment #519.

We also wish to be **recorded in support** of the following:

Amendment# 26 – Supporting the Doula Workforce
Doulas play a critical role in improving maternal and infant health outcomes. Expanding access to doula services through private insurance coverage would help ensure that more people across the Commonwealth can benefit from this evidence-based support. Our testimony in support of the underlying legislation is available here.

Amendment #39 – Perinatal Behavioral Health Care Workforce Trust Fund
Expanding and diversifying the perinatal mental health workforce is essential to promoting health equity and eliminating disparities in maternal and infant health outcomes for all birthing individuals. Our full testimony in support of the standalone legislation is available here.

We also wish to be **recorded in opposition** to the following:

Amendments #513 (Removing Barriers to Care for Physician Assistants) and **#514 (Bolstering the Podiatry Workforce)**. The legislature has established a patient-centered framework that relies on the training and expertise of physicians to lead care delivery teams. Amendments #513 and #514 would undermine this framework by weakening physician-led, team-based care, clinical collaboration, and patient safety protections that are foundational to high-quality patient care. Our letter in opposition to the underlying bills is available here.

Thank you for your consideration of these comments.

Sincerely,

Rebecca W. Brendel, MD, JD
President