



MASSACHUSETTS MEDICAL SOCIETY

Every physician matters, each patient counts.

TESTIMONY IN SUPPORT OF STANDARDS FOR PREVENTION OF HEAT ILLNESS BEFORE THE JOINT COMMITTEE ON LABOR & WORKFORCE DEVELOPMENT June 18, 2025

The Massachusetts Medical Society (MMS) wishes to be recorded in support of H. 2172 and S.1367, An Act to prevent heat-related illness in public sector outdoor workers

The Massachusetts Medical Society is a professional association of over 25,000 physicians, residents, and medical students across all clinical disciplines, organizations, and practice settings. The Medical Society is committed to advocating on behalf of patients, to give them a better healthcare system, and on behalf of physicians, to help them provide the best care possible. In recognition of the increasing frequency of extreme heat events, the Medical Society has adopted policy supporting the development of a Massachusetts heat standard to protect outdoor and indoor workers from excessive heat and the development of heat illness prevention programs.

There currently are no federal or Massachusetts state standards protecting outdoor workers from the increasing risks of heat related injury or illness. While no regulatory action on heat illness has taken place in Massachusetts, the state recognizes the urgency of the issue. The [Massachusetts Climate Change Assessment](#), as well as the recently released [ResilientMass](#) plan, both identify the risks extreme heat presents to human health and wellbeing as one of the most urgent impacts of climate change for Massachusetts to address.

Independent efforts are underway; members of the Medical Society's Committee on Environmental and Occupational Health (CEOH) have been collaborating with the Department of Labor Standards (DLS), Massachusetts Municipal Association (MMA) and MassCOSH to develop educational resources and voluntary guidelines for the prevention of heat injury/illness. While these resources and guidelines are valuable tools, absent enforcement authority they leave outdoor workers exposed to the rising temperatures brought on by climate change and the increased threat of injury or illness.

Outdoor workers, particularly those performing physically demanding work, are at risk of experiencing heat exhaustion and heat stroke. Heat exhaustion, characterized by heavy sweating, fatigue, dizziness and weakness, can increase the risk of accidents and injuries and lead to more serious medical problems if not identified early and managed effectively. Heat stroke, characterized by mental confusion in addition to the symptoms of heat exhaustion, is a life-threatening medical emergency with a high mortality rate.

While data collection on heat illness and injury is inconsistent, estimates suggests as many as 170,000 cases of occupational heat-related illness or injury and more than 600 heat-related

deaths among workers occur annually in the U.S.¹ Evidence suggests that a heat illness prevention program for municipal workers can significantly reduce the occurrence of heat illness from an annual rate of 30/1000 to 0 over 6 years.²

H.2172 and S.1367 represent an important first step to addressing heat illness by creating protections for public sector outdoor workers and a framework for other outdoor employers to adopt for their workers. The bill lays out standards to address the key elements of heat illness prevention, the provision of shade, access to water, increases in rest breaks, implementing acclimatization protocols calling for a gradual increase in the time exposed to heat for workers, as well as training workers and supervisors in heat illness prevention and management. The goal is to ensure that no workers reach the point of heat exhaustion. However, the standards are intended to be flexible to allow employers to design and tailor their heat illness prevention programs to best suit their employees and their jobs.

In August of 2024, the Occupational Safety and Health Administration (OSHA), the federal agency responsible for ensuring safe and healthful working conditions for workers, announced a [proposed rule](#) on heat injury and illness prevention in outdoor and indoor work settings. The rule is currently in the public hearing process which is open through July 2, 2025. While this is a significant step toward a federal heat standard to protect workers, it could take years to implement. The Maryland Occupational Safety and Health (MOSH) issued the final version of its Heat Stress [Standards](#), which became effective on September 30, 2024, becoming the first state on the East Coast to adopt a heat standard and joining others such as California, Colorado, Minnesota, Oregon, and Washington in doing so. The standards take a sweeping approach to regulating heat injury and illness issues, requiring employers to develop heat-related illness prevention and management plans, monitor temperatures at worksites, train employees, and implement other measures such as breaks and acclimatization programs.³ Massachusetts should follow their example and take action to protect our public sector outdoor workers.

The impacts of climate change are growing, and as the average temperature climbs, the number of days of extreme heat will increase. This legislation lays the foundation to guarantee that the process started by Department of Labor Standards will produce an effective, fair, evidence-based standard in a timely manner and create common sense, flexible standards to protect public sectors from the increased risks of extreme heat and from preventable heat illnesses such as heat exhaustion and

¹ Juley Fulcher. Boiling Point: OSHA Must Act Immediately to Protect Workers From Deadly Temperatures. Jun 28, 2022 <https://search.issuelab.org/resource/boiling-point-osh-must-act-immediately-to-protect-workers-from-deadly-temperatures.html>

R. Jisung Park. Patrick Behrer. Temperature, Workplace Safety, and Labor Market Inequality. Nora Pankratz, A.. IZA DP No. 14560. <https://docs.iza.org/dp14560.pdf>

² Ronda B McCarthy 1, Frances S Shofer, Judith Green-McKenzie. Outcomes of a Heat Stress Awareness Program on Heat-Related Illness in Municipal Outdoor Workers. J Occ Med. 2019 Sep;61(9):724-728. <https://pubmed.ncbi.nlm.nih.gov/31274674/#:~:text=Results%3A%20Of%20the%20604%20workers,compensation%20costs%20decreased%20by%2050%25.>

³ <https://www.morganlewis.com/pubs/2024/10/maryland-joins-growing-number-of-states-issuing-heat-illness-prevention-standards#:~:text=Unlike%20the%20California%20standard%20and,Maryland%20rise%20again%20next%20year.>

heat stroke. **We therefore ask the Committee to report H. 2172 and S.1367 out favorably.**
Thank you for your attention to this important matter.