



**To: House Human Services Committee**  
**From: Jill Sudhoff-Guerin, VMS**  
**Date: April 25, 2023**  
**RE: H.72, Overdose Prevention Site Policy**

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On behalf of the 2,500 physician and PA members of the Vermont Medical Society, we thank the House Human Services for considering our comments on H.72, and for your dedication to pursuing strategies to reduce the rate of Vermonters dying from opioid use.

On February 1, 2023, after the VMS Board had extensive discussion regarding overdose prevention centers, heard testimony from Vermont Department of Health Commissioner Mark Levine, and considered the legal status of overdose prevention sites across the nation, the Board adopted this policy:

*“With the current increase in opioid-related deaths, the VMS Board took a position in favor of supporting overdose prevention sites as part of a comprehensive harm reduction strategy and supported further exploration of the feasibility of establishing sites in Vermont. However, given limited funding and staffing resources, the Board also believes that there are other harm reduction strategies, such as increasing access to take home methadone doses, increasing transportation to hubs and mobile methadone units, improved transitions of care after incarceration, and reducing regulatory requirements on community MOUD prescribers, that should be a more immediate priority.”*

Overall, our position is consistent with [Commissioner Levine’s](#) testimony regarding employing a multitude of harm reduction strategies, as the primary goal is to prevent as many opioid-related deaths as possible. Our Board flagged staffing as a key concern, as almost every health care facility in Vermont is struggling to fill positions, and ideally overdose prevention centers would be distributed across the State and would be staffed with MOUD treatment providers who could offer Rapid Access to MOUD (RAM) treatment upon request.

VMS members also agree with Commissioner Levine that evaluation of current overdose prevention sites is critical, and we urge evaluation of existing programs and learning more about the evidence-based success of employing this harm reduction strategy. We also support robust stakeholder involvement, including from current MOUD prescribers, in the creation and implementation of any overdose prevention centers in Vermont.

Thank you for considering our feedback and please reach out to me at [jsudhoffguerin@vtmd.org](mailto:jsudhoffguerin@vtmd.org) with any further questions.