This past summer, DVHA explored parity in hubs and spokes and brought the concept to our two review boards, the Clinical Utilization Review Board (CURB) and the Drug Utilization Review Board (DURB). The recommendation from both advisory groups was to not create parity because hubs have different regulations and provide more oversight for complex individuals. Additionally, if parity in the spokes becomes law, removal of the X waiver will mean that providers that don't have a lot of experience prescribing medication for opioid use disorder (MOUD) will be able to prescribe up to 24mg in the spokes.

The Department's concern is that there will not be enough time to provide adequate education for these providers. We are asking the committee to modify the effective date so that there is time to provide education to providers.

## Sec. 11. EFFECTIVE DATES

This act shall take effect on passage, except that Sec. 7 (medication for opioid use disorder) shall take effect on September 1, 2023 and that Sec. 8b shall take effect on July 1, 2024.

**Ginger Irish** (<u>she/her</u>) | Director of Communications and Legislative Affairs Department of Vermont Health Access (DVHA)