

Vermont Overdose Prevention Center Operating Guidelines

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I. Introduction

A. Authority

- i. These Operating Guidelines (“Guidelines”) for Overdose Prevention Centers have been developed by the Vermont Department of Health in accordance with Act 178 (2024).

B. Purpose

- ii. These Guidelines apply to all entities establishing or operating an Overdose Prevention Center.
- iii. The purpose of the Guidelines is to establish requirements for operating an Overdose Prevention Center in Vermont, and to provide administrative instructions and best practice recommendations for doing so.

C. Definitions

- i. “ASAM” means the American Society of Addiction Medicine.
- ii. “Code of Conduct” means a set of guidelines that establishes the expected behaviors and standards at the Overdose Prevention Center.
- iii. “De-Escalation” means a set of techniques that Staff may use to reduce Participant agitation or aggression, while also improving Participant-Staff relationships.
- iv. “Department” means the Vermont Department of Health.
- v. “Fixed Site” means an Overdose Prevention Center that operates at a permanent location inside of a building.
- vi. “Grievance” means an expression of dissatisfaction about any matter.
- vii. “Hazardous Waste” means waste that can harm people or the environment if not managed and handled properly and includes, but is not limited to, syringes, needles, blades, razors, unused substances, drug residue, chemicals, radioactive materials, and contaminated containers.
- viii. “Health Care Services” means any treatment or procedure delivered by a licensed health care professional to maintain an individual's physical or mental health or to diagnose or treat an individual's physical or mental health condition, including services ordered by a licensed health care professional, chronic care management, preventive care, wellness services, and medically necessary services to assist in activities of daily living.

- ix. “HCV” means hepatitis C virus.
- x. “HIV” means human immunodeficiency virus.
- xi. “Ineligibility Criteria” means the behaviors, conditions, or other considerations that would make accessing services at an OPC unsafe for the Participant or the staff and the volunteers.
- xii. “Intervention” means providing a treatment, procedure, or other action to prevent harm, reduce potential harm, or treat or improve the health or wellbeing of an individual.
- xiii. “Licensed Health Care Professional” means an individual required by law to hold a license, registration, or certification to provide health care services in Vermont.
- xiv. “Living Experience” means an individual who currently uses substances.
- xv. “Lived Experience” means an individual who has previously used substances.
- xvi. “Medical Director” means the Overdose Prevention Center Staff position with the responsibilities set forth in Section IV.B.ii. herein.
- xvii. “Mobile Site” means an Overdose Prevention Center that can move locations, such as a van or a bus, or a non-permanent unit or short-term unit that operates for less than 180 days.
- xviii. “Observation” and “Observe” mean to view and monitor the condition of a Participant at no more than five-minute intervals during and after the consumption of a substance.
- xix. “Opioid antagonist” means a medication that prevents opioid receptors from being activated in the central or peripheral nervous system and can, thereby, block the effects of opioids and treat an opioid overdose.
- xx. “Overramping” means an overdose-like experience related to stimulants and can include both physical and psychological symptoms.
- xxi. “Overdose Prevention Center” or “OPC” means an organization providing the facilities and services described in 18 V.S.A. § 4256(a).
- xxii. “Overdose Prevention Center Director” or “OPC Director” means the Overdose Prevention Center Staff position with the responsibilities set forth in Section IV.B.iii. herein.
- xxiii. “Overdose Prevention Center Managing Personnel” or “OPC Managing Personnel” means the Medical Director, OPC Director, RPIC, and any other personnel designated by the Administrative Body as a member of the OPC Managing Personnel.
- xxiv. “Participant” means each unique individual using the services provided by an Overdose Prevention Center.

- xxv. “Participant Visit” means each time a Participant enters the Overdose Prevention Center.
- xxvi. “Responsible Person in Charge” or “RPIC” means the Overdose Prevention Center Staff position with the responsibilities set forth in Section IV.B.v. herein.
- xxvii. “Reportable and Communicable Diseases” means identified diseases, syndromes, and treatments identified in the Vermont’s Reportable and Communicable Diseases Rules that must be reported to the Department. The Reportable and Communicable Diseases Rule can be found on the Health Department’s website.
- xxviii. “Staff” means individuals employed by or contracting with the Overdose Prevention Center to provide services at the Overdose Prevention Center.
- xxix. “STI” means sexually transmitted infection.
- xxx. “Termination” means ending the ability for a Participant to access services at the Overdose Prevention Center.
- xxxi. “Total Visits” means the total number of Participant Visits, as that term is defined above.

II. Management

A. Administrative Body

- i. Each Overdose Prevention Center must have an Administrative Body.
- ii. If an established organization is operating an Overdose Prevention Center and the established organization has an existing Administrative Body (e.g., a Board of Directors), the established organization’s existing Administrative Body may serve as the Administrative Body for the Overdose Prevention Center.
- iii. The Administrative Body shall have procedures governing the role and function of the Administrative Body, including procedures establishing a meeting schedule for the Administrative Body.
- iv. Duties
 - 1. Each Overdose Prevention Center shall have an Administrative Body that is ultimately responsible for
 - a. Development and maintenance of the policies and procedures set forth in Section II.B., herein;
 - b. Management and control of the finances and operations of the Overdose Prevention Center;

- c. Assurance of quality care and services;
- d. Compliance with these Operating Guidelines and all other applicable laws; and
- e. Maintenance of all relevant health and safety requirements, including ensuring that the Overdose Prevention Center maintains the necessary levels of qualified Staff, physical resources, financial reserves, equipment, supplies, and services to ensure the health and safety of the Staff, volunteers, and Participants.

B. Required Policies and Procedures

- i. In consultation with community partners, individuals with Living and Lived Experience, OPC Management Personnel, and others, the Administrative Body shall develop new policies and procedures or adapt and revise existing policies and procedures to address the following topics as they relate to the Overdose Prevention Center:
 - 1. Employment and Staff Contracting, including
 - a. Job descriptions for OPC Staff that include, at a minimum, the responsibilities set forth in Section IV, herein;
 - b. Qualifications, education, training, and experience Staff members must hold to provide care to a Participant, specific, where necessary, for each service provided at the Overdose Prevention Center and consistent with Section IV, herein;
 - c. A determination of whether to perform criminal background checks and state and federal registry checks and, if so, how to account for results in hiring determinations; and
 - d. Codes of ethics and conduct for volunteers and employees.
 - 2. Quality assurance and assessment, including evaluations of Staff competence, Overdose Prevention Center compliance with these operating guidelines, and Overdose Prevention Center responsiveness to community needs;
 - 3. Volunteer roles and training requirements;
 - 4. The Medical Director role, including number of hours required to be present at the OPC site and on-call responsibilities;
 - 5. Conflict of interest policy and protocol for the Administrative Body, Staff, and volunteers;

6. Budget development, fiscal management, and financial record keeping;
7. Fiscal audits and oversight;
8. Services to be provided at the Overdose Prevention Center, which shall include those services set forth in Section VI, herein;
9. Participant orientation, including the timing of such an orientation and a process for obtaining a Participant's informed consent for services, as needed;
10. Participant-to-Staff ratios for each Overdose Prevention Center space, ensuring there is at least one Overdose Prevention Specialist for every four Participants in consumption and post-consumption spaces;
11. Environmental management and establishment of environmental controls to assure a safe, comfortable, sanitary environment. Such a policy shall include requirements addressing the cleaning of surfaces that may be contaminated with leftover drug residue and/or hazardous waste and the infection control procedures set forth in the OPC's Infection Control and Infectious Disease Prevention policies;
12. Infection control and infectious disease prevention, as informed by the Medical Director, in compliance with state and federal laws, and including those requirements set forth in Section III.D., herein;
13. Reporting of Reportable and Communicable Diseases to the Health Department, consistent with the Reportable and Communicable Diseases Rule;
14. Participant navigation of the Overdose Prevention Center spaces, as informed by the Overdose Prevention Center Director;
15. Security measures for the Overdose Prevention Center, which shall address the unique needs of Participants, Staff, and volunteers and shall include those requirements set forth in Section III.G.;
16. Hazardous waste management, handling, and disposal;
17. Emergency response, including responding to overdoses for opioids, stimulants, and other substances;
18. Coordination with local emergency medical services ensuring that the policy and procedure are agreed upon with local emergency medical services;

19. Coordination with local hospitals that may receive transported Participants, ensuring that the policy and procedure are agreed upon with the local hospitals;
20. Engagement with local fire and law enforcement services, ensuring that local fire and law enforcement have been consulted about how the Overdose Prevention Center will engage with local fire and law enforcement;
21. Collection of Participant information and assignment of a non-identifiable Participant ID in accordance with Sections II.C., V.C., and VI;
22. Staff access to Participant records, including how often and for what purposes Staff may access a Participant's records. Such a policy shall limit Staff access to Participant records to the minimum necessary to provide safe and effective services to the Participant and to protect the Staff;
23. Participant record keeping requirements, including those requirements set forth in Section II.C.v.1. and those set forth in VI.ii., regarding referrals;
24. Confidentiality requirements, including those requirements set forth in Section III.c.i.;
25. Data collection and reporting requirements, including those requirements set forth in Section II.C.;
26. Data sharing to inform the Department of Health's evaluation efforts as set forth in Section II.C.;
27. Data security measures including safeguarding against security breaches;
28. Participant Ineligibility Criteria and Participant screening, including those requirements set forth in Section V.B.;
29. Provision of services to Participants younger than 18-years-old, ensuring compliance with state and federal laws regarding access to and the provision of medical and nonmedical treatment for substance use for minors;
30. A Code of Conduct governing Participant conduct in the OPC while participating in OPC services;
31. Consequences for violating the Code of Conduct, striving to ensure Participants remain eligible for Overdose Prevention Center services whenever possible;
32. Termination of Participant access to Overdose Prevention Center services;
33. Grievance processes for Staff, volunteers, and Participants, including processes for Participants who have been excluded

- from receiving Overdose Prevention Center services due to a violation of the Code of Conduct;
34. Observation, as that term is defined herein, of Participants during and after use of a substance;
 35. Responding to Participants' carrying guns and violence in the Overdose Prevention Center;
 36. Community Service Assessment requirements, including those requirements set forth in Section II.C.iv.;
 37. Community outreach to ensure effective and ongoing community engagement;
 38. Business internal control documentation;
 39. Participant storage requirements, abandoned property, and unclaimed property;
 40. Drug disposal by Participants and for drugs left behind; and
 41. Adoption of new policies, protocols and procedures, including those identified by OPC Management Personnel.

C. Data Reporting and Evaluation.

- i. Within 10 business days of a request by the Department, the Administrative Body shall provide to the Department the policies and procedures developed by the Administrative Body pursuant to Section II.B.
- ii. In the interest of ensuring data quality and effective program evaluation, Overdose Prevention Centers shall collect data (e.g., the data specified in Section III.B.) in a manner that is consistent with and aligns with evaluation efforts.
- iii. Upon request from the Department, the Administrative Body shall provide to the Department a budget and budget narrative of the initial 12-month period of an Overdose Prevention Center. The budget and budget narrative shall include at least the applicable line items from the Division of Substance Use Programs Invoice Template, which can be found on the Department's website or can be requested from the Department.
- iv. Service Assessment
 1. Prior to opening and operating, an Overdose Prevention Center shall engage individuals with Living Experience from the geographic region to be served through the Overdose Prevention Center to inform the structure and organization of the Overdose Prevention Center's operation.

- a. Individuals with Living Experience should be compensated by the Overdose Prevention Center for their time participating in the service assessment process.
 - b. Individuals with Living Experience should be asked the following questions:
 - i. What services would be helpful at the Overdose Prevention Center to help them reduce their risk of overdose?
 - ii. How far would you be willing to travel to use an Overdose Prevention Center?
 - iii. What model would be most accessible: fixed site or mobile site?
 - iv. What location would be best for a fixed site Overdose Prevention Center (if applicable)?
 - v. What locations would be best for a mobile Overdose Prevention Center to be accessed (if applicable)?
 - vi. What days and hours of operation would be ideal for an Overdose Prevention Center?
 - vii. What is your preferred method of consuming substances?
 - viii. What safety measures would need to be in place to ensure a welcoming and accessible environment for an Overdose Prevention Center?
 - ix. What would be the best ways to spread the news or advertise that the Overdose Prevention Center was available?
2. Following the initial engagement with individuals with living experience, an organization shall engage with community partners and other interested parties to help inform the Overdose Prevention Center's operation. The following sectors shall be engaged through this process:
- a. Local social service providers;
 - b. Mental health providers;
 - c. Substance use treatment and recovery providers;
 - d. Harm reduction agencies serving the same geographic region;
 - e. Individuals with Lived Experience;
 - f. Law enforcement and public safety agencies;

- g. Emergency medical services agencies;
 - h. Local hospitals;
 - i. Restorative justice organizations;
 - j. City or town government officials;
 - k. City or town employees, including grounds, road maintenance, sanitation, and park and recreation staff;
 - l. Community-Creating Providers, including, but not limited to, health care providers who support lesbian, gay, bisexual, trans and queer communities, Black, Indigenous, and People of Color communities, disability communities, and veteran communities; and
 - m. Public transportation providers.
3. Summary findings from these engagement sessions should be documented in a Service Assessment Report, which shall be submitted to the Health Department 90 days prior to opening an Overdose Prevention Center.
- a. The summary findings must include:
 - i. Summary responses to and findings from the questions asked to individuals with Living Experiences;
 - ii. Summary findings of the engagement sessions with community partners and other interested parties;
 - iii. A list of community partners and other interested parties engaged as part of this process;
 - iv. A description of the target Participant population;
 - v. The potential number of Participants based on local harm reduction service information;
 - vi. Identification of area(s) to locate an Overdose Prevention Center;
 - vii. Type of Proposed Overdose Prevention Center Site (i.e., fixed, mobile, both)
 - viii. Anticipated impact of an Overdose Prevention Center on the community; and
 - ix. Services to be provided at the Overdose Prevention Center.
 - v. *Administrative Records and Reports.*
 - 1. The Overdose Prevention Center shall maintain administrative records, which shall include the following deidentified data.

The data shall be specific to each day the Overdose Prevention Center is open and each day's data shall be separately documented in the record.

- a. Number of visits
 - i. Number of Participant Visits (by Participant ID number)
 - ii. Number of Total Visits (by Participant ID number)
 - iii. Total number of visits per day
- b. Number of Participants by consumption method
- c. Numbers of services used, including but not limited to:
 - iv. Drug-checking
 - v. HIV/HCV/STI screening
 - vi. Safer-smoke supplies provided
 - vii. Safer-injection supplies provided
 - viii. Safer-snort supplies provided
 - ix. Wound-care supplies provided
 - x. Wound-care first aid provided
 - xi. First aid provided
- d. Participant Visit times of check-in and check-out
- e. Overdoses
 - xii. Number of non-fatal overdoses
 - xiii. Number of fatal overdoses
 - a. In Overdose Prevention Center
 - b. During transportation to the local hospital
 - xiv. Number of opioid antagonists used for each overdose (if applicable), including full or partial doses
 - xv. Number of non-opioid antagonist interventions used for opioid overdoses and type of interventions
 - xvi. Number of and type of interventions used for overamping
 - xvii. Number of times emergency services called for an overdose response
 - xviii. Number of times Participant transported to hospital
 - xix. Drug(s) suspected to have resulted in the overdose
- f. Number of referrals broken down by referral type.

2. Each Overdose Prevention Center shall report the above data in aggregate to the Department, monthly for the first 3 months of operation, and then quarterly thereafter. Data shall be reported by the 15th of the month following the end of the reporting period.
- vi. *Act 178 Study*
 1. Overdose Prevention Centers shall support the Department of Health and its associated contractors in their effort to complete the study described in Act 178, Section 3 (2024) and other evaluation initiatives. Overdose Prevention Centers shall strive to provide data to the Department of Health in a timely manner and to collect the data and additional information requested by the Department and its contractors.
 - vii. *Annual Reporting Requirements*
 1. As required by 18 V.S.A. Sec. 4256(d), the Overdose Prevention Center shall publicly post the following data annually on or before January 15th:
 - a. Number of program Participants;
 - b. Deidentified demographic information of program Participants;
 - c. Number of overdoses and the number of overdoses reversed on-site;
 - d. Number of times emergency medical services were contacted and responded for assistance;
 - e. Number of times law enforcement were contacted and responded for assistance; and
 - f. The number of Participants directly and formally referred to other services and the type of services.

III. Operations

A. Hours of Operation

- i. The hours of operation for Overdose Prevention Centers shall be informed by the following:
 1. Engagement of anticipated Participants through the needs assessment process described in Section II.C.iv. of these Guidelines;
 2. Trend data on non-fatal and fatal overdoses as identified by the Health Department; and

3. Staffing levels, to ensure appropriate implementation of services and consumption supervision.
- ii. The hours of operation shall be posted conspicuously on the door of the Overdose Prevention Center, online, and on VT Helplink.
 1. Any changes to the hours of operation shall be identified and communicated two weeks in advance to Participants, posted on the door of the Overdose Prevention Center, online, and on VT Helplink.
 2. If, during an emergency, the Overdose Prevention Center needs to change the hours of operation and cannot provide two weeks' notice, the Overdose Prevention Center shall provide as much notice as possible and shall post updated hours of operation conspicuously on the door of the Overdose Prevention Center, online, and on VT Helplink.

B. Records Content and Maintenance.

- i. Overdose Prevention Centers shall maintain a record for every Participant in accordance with the policies and procedures adopted pursuant to Section II herein.
 1. A Participant's name shall never be included in their Participant record. The Participant record shall include the non-identifiable Participant ID, assigned in accordance with the policy adopted pursuant to Section II.B., herein.
 2. Records and all the data contained therein shall be confidential and maintained in accordance with Section III.C.
- ii. Overdose Prevention Centers shall attempt to collect the following information, at a minimum, at the time of the Participant's orientation, and to confirm or update the information at intervals determined by the Overdose Prevention Center:
 1. Consideration of whether any of the Ineligibility Criteria apply to the Participant;
 2. The following demographic information:
 - a. Date of birth
 - b. Race(s)
 - c. Ethnicity or ethnicities
 - d. Gender
 - e. Housing status
 - f. Town in which they typically sleep
 - g. Town in which they spend most of their waking hours
 - h. Sexual Orientation

- iii. All information from Participants should be collected through self-report by the Participant, through informed consent, and with the understanding that accessing services will not be denied for refusal to provide the information requested.
- iv. Overdose Prevention Centers shall collect the following information at each Participant Visit:
 - 1. The services provided to the Participant;
 - 2. If a referral was provided; and
 - 3. Any emergency services provided.
- v. Staff shall strive to collect data and maintain records in a manner that is minimally intrusive and burdensome for Participants.

C. Confidentiality

- i. Overdose Prevention Centers shall collect, store, and disclose protected health information, data, and other Participant information and records in compliance with 42 C.F.R. Part 2, HIPAA, and all other applicable state and federal laws.
- ii. Overdose Prevention Centers shall comply with all state and federal laws regarding notification and reporting of breaches of protected health information.

D. Infection Control

- i. The Infection Control policy and procedures adopted in accordance with Section III.D. herein, shall include provisions governing the following topics:
 - 1. Infection surveillance;
 - 2. Reporting occurrences of Reportable and Communicable Diseases and other infections in accordance with federal and state law;
 - 3. Sanitization or disinfection of all Participant areas, as appropriate, including a process for ensuring sanitization of consumption spaces between Participants;
 - 4. Handling and disposal of hazardous and medical waste and contaminants;
 - 5. A process for responding to, reporting, and monitoring accidental needlesticks or other injuries from used drug tools; and
 - 6. Evaluating occurrences of infection to assess ways to prevent recurrent infections

E. Physical Space

i. *Fixed Location*

1. Overdose Prevention Centers shall have the following areas in their fixed site locations:
 - a. Registration and waiting area where Participants are greeted, wait for an available consumption area, and receive their orientation;
 - b. Supplies area where supplies, including safer use supplies and tools, are made available to Participants for use in the consumption spaces and for use outside of the Overdose Prevention Center;
 - c. A non-smoking consumption area for other methods of consumption, observed in accordance with the Observation policy adopted pursuant to Section II.B.i.32. herein;
 - d. Post-consumption area, observed in accordance with the Observation policy adopted pursuant to Section II.B.i.32. herein;
 - e. Medical intervention area where Staff and volunteers can provide additional health services, such as first aid and wound care first aid;
 - f. Private consultation areas for Staff and volunteers to meet with Participants for referrals and other needs; and
 - g. A secured area accessed only by Staff and volunteers for storage of supplies and equipment and other needs, such as a Staff break room.
2. All consumption areas shall be laid out to ensure Overdose Prevention Specialists can Observe Participants in accordance with the OPC's Observation Policy.
3. The spaces within the Overdose Prevention Center shall permit unimpeded access for emergency medical services. This shall include ensuring all doorways, hallways, and walkways are wide enough for ambulance stretchers and wheelchairs.
4. The medical intervention area shall be able to accommodate multiple emergency responses at one time.
5. The Overdose Prevention Center's interior and exterior space shall be compliant with the Americans with Disabilities Act.

6. All areas of the Overdose Prevention Center shall be well lit, except for areas serving Participants in need of dimly lit spaces. The Overdose Prevention Center shall have an emergency lighting system to ensure appropriate levels of light in the event the primary source of electricity is disrupted.
 7. Overdose Prevention Centers shall be designed such that Participants are not visible to people located outside the building.
 8. Overdose Prevention Centers shall have a secure storage area for Participants to use.
- ii. Smoking Consumption Area
1. Within twelve months of opening an Overdose Prevention Center, an Overdose Prevention Center shall have a smoking-consumption area that complies with the requirements of these guidelines.
 - a. If an Overdose Prevention Center is unable to complete the work of building a compliant smoking-consumption area within this twelve-month period, the Overdose Prevention Center shall provide the following notice to the public and the Department:
 - i. The Overdose Prevention Center smoking-consumption area is not complete; and
 - ii. The specific date the compliant smoking-consumption area in the Overdose Prevention Center will be complete, which shall be no later than twelve months after the original twelve-month period.
 2. The smoking consumption area shall include:
 - a. Non-porous and non-permeable chair and counter or table; and
 - b. Hazardous waste disposal receptacles.
 3. If the smoking consumption area is inside of the building, there must be a mechanical ventilation system that runs at all times the Overdose Prevention Center is open for Participants or is occupied by Staff.
 - a. The mechanical ventilation system serving the smoking-consumption area shall be separate from the ventilation system serving the rest of the Overdose Prevention Center building.
 - b. The mechanical ventilation system for the smoking-consumption area shall be designed to ensure smoke

- does not move into the non-smoking spaces of the building when people enter and exit the smoking-consumption area.
- c. The air from the smoking-consumption area shall be ventilated directly outside of the building. Air from the smoking consumption area shall not be recirculated through the Overdose Prevention Center building.
 - d. The smoking-consumption area shall be sufficiently separated from non-smoking areas of the Overdose Prevention Center such that smoke from the smoking-consumption area does not negatively impact the air quality for the surrounding, non-smoking areas.
4. If the smoking-consumption area at the OPC is not inside of the OPC building, the OPC shall ensure that the smoking consumption of substances at the OPC does not impact the air quality for the rest of the Overdose Prevention Center's fixed-site location, for neighboring buildings, or for the public.
- iii. *Mobile Location.*
 1. Mobile units shall adhere to the standards described in parts 2-4 and 6-8 of Section III.E.i., herein.
 2. Staff in mobile units shall be able to observe Participants in accordance with the OPC's Observation policy adopted pursuant to Section II.B.i.32. herein.
 3. Mobile units shall ensure that they have a potable source of water and sufficient plumbing for handwashing for Participants.
 4. Mobile units shall ensure that phone service is available at all locations where the unit stops in the event emergency services must be called to serve Participants.
 5. Smoking-consumption is not permitted inside of a mobile unit.

F. Equipment and Supplies

- i. Overdose Prevention Centers shall have the following equipment on site:
 1. Safer-smoke supplies
 2. Safer-snort supplies
 3. Safer-injection supplies including syringes
 4. Drug-preparation tools
 5. Saline and distilled water for drug preparation
 6. Naloxone

7. Self-inflating bag valve mask
 8. Pulse-oximeters
 9. Automated external defibrillator (AED)
 10. Handwashing stations
 11. Personal protective equipment for Staff and volunteers
 12. Hospital-grade disinfectant cleaning supplies to be used in all areas of the Overdose Prevention Center
 13. Hazardous waste disposal equipment, including sharps disposal and fire-proof ash disposal for smoking-consumption areas
 14. Ash and other smoking litter disposal equipment
 15. Fire extinguishers
 16. Drug-checking equipment, including test strips or Fourier-transform infrared spectroscopy and associated materials and
 17. Appropriate equipment to effectively log required Participant data.
- ii. Drug-checking services must be in compliance with the Vermont Community Drug-Checking Program Guidelines.
 - iii. All furniture in consumption and medical intervention areas of the Overdose Prevention Center must be nonporous and nonpermeable.
 - iv. All equipment shall be stored in a safe manner, including storage of oxygen tanks away from sources of heat and flame.
 - v. Handwashing stations shall be readily available to Participants throughout the Overdose Prevention Center. The non-smoking consumption area shall have sufficient handwashing stations to allow Participants to use the stations while not disrupting the flow of the Overdose Prevention Center.

G. Security

- i. Overdose Prevention Centers shall comply with policies for security and coordination with emergency medical services, hospitals, fire and law enforcement agencies, as developed in accordance with Section II.B., herein.
- ii. Security measures shall, at a minimum, address the following:
 1. Ensuring Participants can enter and exit the Overdose Prevention Center safely;
 2. Ensuring entrances to the consumption areas are secured to ensure Overdose Prevention Center Staff and volunteers can

- control the entrance and exit of Participants for the safety and well-being of all Participants, Staff and volunteers;
- 3. Ensuring Participants have a safe location in the Overdose Prevention Center to store personal items when accessing the consumption and post consumption areas of the Overdose Prevention Center; and
- 4. The location and use of security and panic alarms.
- iii. Staff and volunteers shall wear an identification badge with a photo that states at a minimum their name and position at the Overdose Prevention Center.
 - 1. The Responsible Person in Charge for each shift shall include on their identification badge that they are serving in that position.
- iv. The Overdose Prevention Centers shall establish a process for Participants entering and exiting the Center.

H. Emergency Protocols

- i. Overdose Prevention Centers shall comply with policies for responses to emergencies and for coordination with emergency medical services, hospitals, fire, and law enforcement agencies, as developed in accordance with Section II.B., herein.
- ii. Emergency policies and procedures shall clearly indicate the necessary steps to treat an overdose, including when to provide oxygen, to administer an opioid antagonist, and to call emergency services.
 - 1. Emergency policies and procedures shall address how to safely move a Participant from a smoking-consumption area to a non-smoking area of the building prior to use of oxygen.
- iii. All Overdose Prevention Center Staff and volunteers shall receive sufficient training on all emergency policies and procedures to ensure a safe environment for Participants, volunteers, and Staff members.
- iv. Overdose Prevention Centers shall develop a process to ensure Participants agree, prior to engagement in services at the Overdose Prevention Center, to comply with and adhere to the emergency protocols and procedures.

IV. Staff and Training

A. Staffing

- i. During operating hours, Overdose Prevention Centers shall have trained professionals present in the building or mobile facility who can provide, at a minimum, basic medical care, such as CPR, overdose interventions, first aid, and wound care, and who can perform medical assessments of Participants to determine if there is a need for emergency medical service response.
- ii. Overdose Prevention Center Staff and volunteers, who provide services at an Overdose Prevention Center that require a state or federal license or registration to provide, shall hold the required license or registration. The license or registration shall be current and in good standing.

B. Staff

- i. Generally
 1. Overdose Prevention Centers shall employ or contract with a Medical Director, and shall employ an OPC Director and Overdose Prevention Specialists in accordance with these Guidelines and the policies adopted pursuant to Section II.B.
 2. Overdose Prevention Specialists
 - a. Each Overdose Prevention Center shall maintain appropriate numbers of trained Overdose Prevention Specialists during operating hours.
 - b. Overdose Prevention Centers shall maintain a ratio of Overdose Prevention Specialists that meets the requirements of the policy adopted in Section II.B. but there shall never be more than four Participants for every one Staff member in a consumption and post-consumption area.
 3. Responsible Person in Charge (RPIC)
 - a. An Overdose Prevention Center shall ensure that there is a Responsible Person in Charge identified and present at the Overdose Prevention Center the entire time the Overdose Prevention Center is open.
 - b. Any Staff member meeting the qualifications established in the policies developed pursuant to Section II.B.i.1., herein, may serve as the RPIC. Volunteers shall not serve as the RPIC.

ii. Medical Director

1. The Medical Director shall be a physician licensed in accordance with 26 V.S.A. Chapter 23 or 26 V.S.A. Chapter 33, an advanced nurse practitioner licensed in accordance with 26 V.S.A. Ch. 28, or a physician assistant licensed in accordance with 26 V.S.A. Ch. 31.
2. The Medical Director shall be present at the Overdose Prevention Center at least five (5) hours per week and available for on-call responsibilities in accordance with the policy adopted pursuant to these Guidelines.
3. The Medical Director shall provide general supervision to OPC Staff providing services to Participants.
4. The Medical Director shall be responsible for the following within the Overdose Prevention Center:
 - a. Developing training plans for each Overdose Prevention Center Staff member with direct Participant contact, including initial and ongoing training requirements;
 - b. Ensuring each Overdose Prevention Center Staff member and volunteer is proficient in:
 - i. Recognizing signs of overdose of opioids, stimulants, and other substances;
 - ii. Responding to overdoses of opioids, stimulants, and other substances;
 - iii. Infection control and infectious disease prevention protocols and practices; and
 - iv. Other relevant trainings as required in policies established in accordance with Section II.B., herein.
 - c. Assisting with medically complex cases and providing support for wound care for Participants;
 - d. Supporting the Administrative Body with the development and implementation of policies, protocols, and procedures; and
 - e. Development of overdose response policies, protocols, and procedures.

iii. OPC Director

1. The Overdose Prevention Center Director shall be proficient in operations, financial management, records management, personnel management, community development, and overdose response.

2. The Overdose Prevention Center Director is responsible for the following:
 - a. Day-to-day operations of the Overdose Prevention Center;
 - b. Managing Staff, ensuring the appropriate Staffing levels for each day, and adjusting Overdose Prevention Center Participant flow if there is a reduced Staffing capacity;
 - c. Developing Staff and volunteer orientation policies, protocols, and procedures;
 - d. Ensuring all Staff and volunteers have completed required trainings prior to working directly with Participants;
 - e. Maintaining security measures for Participants, Staff, and volunteers; and
 - f. Receiving and responding to community concerns.
- iv. Overdose Prevention Specialists
 1. Overdose Prevention Specialists shall be responsible for
 - a. Observing Participants in consumption areas, in accordance with the Observation policy adopted pursuant to Section II.B.;
 - b. Observing Participants in post-consumption areas, in accordance with the Observation policy adopted pursuant to Section II.B.;
 - c. Responding to overdoses in the Overdose Prevention Center in accordance with the policies adopted pursuant to Section II.B.; and
 - d. Providing harm reduction, overdose prevention, infectious disease, sexually transmitted infections, drug tool disposal, and first aid education to Participants.
- v. *Responsible Person in Charge*
 1. There shall be a Responsible Person in Charge assigned and present during all hours of operation of the OPC.
 2. The Responsible Person in Charge is responsible for the following during their shift:
 - a. Monitoring the ratio of Overdose Prevention Specialists to Participants in consumption and post-consumption spaces to ensure that the number of Participants never exceeds four for every one specialist;
 - b. Monitoring the Overdose Prevention Center to ensure Participants' needs are met and to minimize, to the

- extent possible, the waiting time for Participants at the consumption spaces;
 - c. Monitor compliance with Overdose Prevention Center policies and procedures by Participants, Staff, and volunteers;
 - d. Ensuring the appropriate procedures are observed when Staff respond to an overdose; and,
 - e. Maintaining appropriate safety of Participants, Staff, and volunteers.
 - 3. This role shall be integrated into all emergency and operational procedures for the Overdose Prevention Center.
 - vi. Other Staff
 - 1. The Overdose Prevention Center may employ other Staff, as needed, including peers, case managers, medical professionals, and mental health counselors.
 - 2. Licensed Health Care Professionals
 - a. If a licensed health care professional is employed by, contracts with, or volunteers at an Overdose Prevention Center to provide health care services within the scope of that licensed health care profession, the licensed health care professional shall hold a current license in that profession, in good standing, and in Vermont.
 - b. Licensed health care professionals employed by, contracting with, or volunteering at an Overdose Prevention Center shall practice competently, provide safe and acceptable care to Participants, and provide care that conforms to the essential standards of acceptable and prevailing practice.

C. Training

- i. Required Training for All Staff
 - 1. All Overdose Prevention Center Staff and volunteers are required to satisfactorily complete training in the following areas as part of their orientation and at regular intervals, thereafter, as determined by the Administrative Body, Medical Director, and Overdose Prevention Center Director in the policy established pursuant to Section II.B., herein:
 - a. Proper use of the equipment and supplies listed in Section III.F.
 - b. CPR

- c. AED use
 - d. Administration of opioid antagonists
 - e. De-escalation
 - f. Stigma related to substance use
 - g. Translation services
 - h. Monitoring and assessing oxygen levels
 - i. Infection control and infectious disease prevention
 - j. Collection, disposal, and transportation of hazardous waste
 - k. Storage and handling of drug tools and other drug use equipment
 - l. Obtaining informed consent
 - m. The ASAM levels of care
 - n. Substance use and mental health resources in Vermont, including use of VT Helplink's website
 - o. Participant confidentiality, including 42 CFR Part 2, HIPAA, and other applicable Federal and State laws
 - p. Any other trainings as determined by the Administrative Body, Medical Director, or Overdose Prevention Center Director.
- ii. Required Training for Medical Director, Overdose Prevention Center Director, and Overdose Prevention Specialists:
1. In addition to the trainings set forth in subsection (i), the Medical Director, Overdose Prevention Center Director, Overdose Prevention Specialists, and any other positions engaging with Participants in consumption and post-consumption areas shall complete training in the following areas in accordance with the policies adopted pursuant to Section II.B., herein:
 - a. Harm-reduction practices and safer-use skills
 - b. How to educate Participants on harm reduction practices and safer use skills
 - c. Identification and response to overdoses of all drug classes and of different complexities
 - d. Mental health first aid
 - e. First aid and wound-care first aid
 - f. Overdose safety assessments, including assessing when a Participant can safely leave the Overdose Prevention Center without risk of overdose from consumption at the Overdose Prevention Center
 - g. Safer sex practices
 - h. How to educate Participants on safer sex practices

- i. How to conduct HIV, hepatitis, and sexually transmitted infections screenings and communicating results
- j. How to report communicable diseases to the Health Department in alignment with the Reportable and Communicable Diseases Rule
- k. Community drug-checking and result delivery in accordance with state and federal laws
- l. Withdrawal management when an opioid antagonist is administered to a Participant on site
- m. Culturally appropriate care
- n. Trauma-informed care
- o. Person-centered approaches

V. Provision of Services

A. Rights of Participants

- i. Code of Conduct.
 - 1. The Code of Conduct developed by the Administrative Body, in accordance with Section II.B., herein, shall be posted within the Overdose Prevention Center in a conspicuous location.
 - 2. A written copy of the Code of Conduct and the consequences of failing to observe the Code of Conduct shall be provided to each Participant during their orientation. Overdose Prevention Specialists or other specified Staff shall review with the Participant the Code of Conduct and the potential consequences of violating the Code of Conduct.
 - 3. The Code of Conduct shall be translated into at least the following languages:
 - a. Arabic
 - b. Burmese
 - c. Dari
 - d. French
 - e. Kirundi
 - f. Nepali
 - g. Pashto
 - h. Somali
 - i. Spanish
 - j. Swahili
 - k. Vietnamese
- ii. Grievance Policies and Procedures

1. Grievance policies and procedures developed by the Administrative Body, in accordance with Section II.B., herein, shall be posted in a conspicuous location within the Overdose Prevention Center.
2. Grievance policies and procedures shall be provided to Participants during their orientation to the Overdose Prevention Center.

B. Participant Eligibility

- i. The Overdose Prevention Centers shall develop a policy regarding Ineligibility Criteria in accordance with Section II.B.
- ii. The Overdose Prevention Center shall also establish a process for screening Participants to determine whether any of the Ineligibility Criteria apply.
- iii. Participants shall not be asked to present identification to be eligible for services.
- iv. The Ineligibility Criteria and screening process developed pursuant to Section II.B. shall be posted conspicuously at the registration area of the Overdose Prevention Center.
- v. When a Participant arrives at an Overdose Prevention Center, they shall first be screened for Ineligibility Criteria by a Staff person, who has been trained in accordance with these operating guidelines and Overdose Prevention Center policies.
 1. After completion of the screening process, the Staff person who conducted the screening will determine whether the Participant is eligible for services at the Overdose Prevention Center.
 2. If the Staff person conducting the screening determines the Participant is not eligible for services, the Participant may file a grievance in accordance with the grievance policies and procedures established by the Overdose Prevention Center.
 3. If the Participant is deemed eligible for services, the Participant shall be provided with a Participant orientation.
 4. A Participant deemed ineligible for services may be deemed eligible for services at a later date.
- vi. The policy for denial of services developed in accordance with Section II.B., herein, shall include protocols for addressing the needs of Participants who cannot self-inject or who are overly intoxicated and other circumstances that make a Participant ineligible for services. The policies shall consider the personal and professional

liability of the individual Staff and the whole Overdose Prevention Center.

C. Participant Orientation

- i. After a Staff member determines that a Participant is eligible to receive services from the Overdose Prevention Center, an orientation to the Overdose Prevention Center and services shall be provided by the Overdose Prevention Center Staff to the Participant.
- ii. The orientation shall include the following:
 1. The mission and value statements of the Overdose Prevention Center
 2. Services provided at the Overdose Prevention Center
 3. Services available through consultation and referral
 4. Participant Code of Conduct and potential consequences for violating the Code of Conduct
 5. Overdose Prevention Center policies and procedures, including
 - a. Emergency Procedures
 - b. Drug usage and sharing policy
 - c. Disposal of paraphernalia
 - d. Confidentiality and anonymity
 - e. Participant termination criteria and Grievance process
 - f. Security
- iii. Participants shall agree to the Emergency Procedures prior to receiving services.
- iv. Participants shall receive their Participant ID following completion of their orientation.
 1. The Participant ID is intended to allow anonymity of the Participant while allowing the Overdose Prevention Center the ability to track the Participant's Overdose Prevention Center use and medical and other referrals. This will facilitate effective follow-up and wrap around support of Participants.

VI. Required Services

- i. General
 1. Overdose Prevention Centers shall provide the following services, at a minimum:
 - i. Observation of consumption of pre-obtained substances through injection, snorting, or ingestion;

- ii. In accordance with III.E.ii.1, observation of pre-obtained substances through smoking; and
 - iii. Post-consumption observation and assessment of safety following consumption.
- 2. Overdose response including observing oxygen levels, administering opioid antagonists, responding to overheating and seizures, and calling emergency medical services;
- 3. Education on safer use, harm reduction, and overdose prevention practices;
- 4. Education on overdose responses including responses to opioid, stimulant, and multi-substance overdoses;
- 5. Provision of supplies for safer use and harm reduction practices including:
 - i. Safer-smoke supplies
 - ii. Safer-snort supplies
 - iii. Safer-injection supplies, including syringes
 - iv. Drug-preparation tools
 - v. Opioid antagonists
- 6. Education on disposal of use tools including syringes;
- 7. Collection and secured disposal of hazardous materials, including hypodermic needles and syringes, other injection equipment, and other drug-consumption tools;
- 8. Education on safer sex practices;
- 9. Provision of safer sex supplies, including condoms and lubrication;
- 10. Infectious disease education;
- 11. HIV, HCV, and STI screenings;
- 12. First aid;
- 13. Wound-care first aid;
- 14. Drug-checking;
- 15. Support using VT Helplink services; and
- 16. Referrals to:
 - i. Substance use treatment services
 - ii. Substance use recovery services
 - iii. Harm reduction organizations
 - iv. Wound care services
 - v. Primary care, dental, infectious disease providers, and other medical services
 - vi. Housing, nutritional support, and other social services

- vii. Legal aid services
- viii. Mental health service

ii. Referrals

1. Overdose Prevention Centers shall establish direct referral processes through which the Overdose Prevention Center contacts the agency being referred to on behalf of the Participant to reduce the burden on the Participant to initiate the engagement.
2. The direct referral processes shall include informed consent by the Participant and align with federal regulation regarding sharing of protected health information.
3. The Overdose Prevention Center shall maintain a record of referrals made on behalf of a Participant. The record shall be maintained separately from the Participant's Overdose Prevention Center record. The record shall contain the Participant's ID, the Participant's name, and any other information needed to make the referral. The record shall be maintained in accordance with the Confidentiality policy established pursuant to Section II.B. of these Guidelines and subject to Section III.C herein.
4. Overdose Prevention Centers shall establish direct referral processes with at least the following service providers in their geographic region:
 - i. Hub provider
 - ii. Infectious disease provider
 - iii. Mental health agency
5. Overdose Prevention Centers shall establish an evaluation process with direct referral agencies to identify the number of direct referrals made by the Overdose Prevention Center that resulted in at least one appointment by the Participant.
6. Overdose Prevention Centers shall have an established shared response protocol with the mental health crisis team serving in the Center's geographic region.