

COMMONWEALTH OF MASSACHUSETTS

21-2609-17

SUFFOLK, ss.

SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
No. SJ-2021-0408

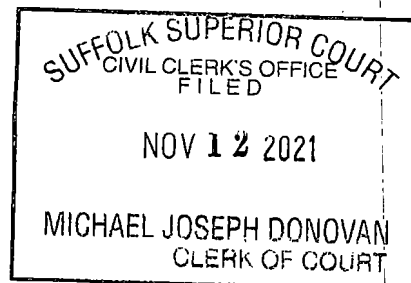
Ronald Geddes, AC, and RAR,
each on their own behalf and
on behalf of a class of similarly situated
individuals,

Plaintiffs,

v.

City of Boston; Boston Police Department;
Boston Public Health Commission; Kim M.
Janey, in her capacity as the Mayor of the City of
Boston and individually; Gregory P. Long, in his
Capacity as the Acting Commissioner of the
Boston Police Department and individually; and
Bisola Ojikutu, in her capacity as Executive
Director of the Boston Public Health Commission
and individually,

Defendants.



AFFIDAVIT OF DEVIN LARKIN, DIRECTOR OF BOSTON PUBLIC HEALTH COMMISSION'S BUREAU OF RECOVERY SERVICES

1. My name is Devin Larkin and I am the director of the Boston Public Health Commission's Bureau of Recovery Services.
2. I have worked for the Boston Public Health Commission for a combined 11 years.
3. The Mayor's Office of Recovery Services and the Boston Public Health Commission's Bureau of Recovery Services are strategically integrated under the banner of Recovery Services to provide a unified approach to substance use advocacy, prevention, treatment and recovery, and to elevate substance use as a priority issue for the City of Boston.
4. Recovery Services provides advocacy, prevention, treatment and recovery services for residents impacted by substance use disorders across 14 programs housed in four Divisions: Direct Services cover the continuum of care including education, overdose prevention and Narcan distribution, street outreach, day-time low-threshold spaces, drop-in access to care services for treatment, transitional and long-term residential programming, outpatient services, youth substance use prevention and a peer recovery

center. The Recovery services programs most active in the area around Mass Ave and Melnea Cass Boulevard include:

- a. AHOPE: Provides Sexually Transmitted Infection and hepatitis testing, needle exchange, supported referrals to medical care and treatment for substance use disorders, and overdose prevention services, including naloxone. Services are offered at 774 Albany Street and through a Mobile Street Outreach Team.
 - b. Overdose Prevention Services: The Community Prevention Team provides overdose prevention trainings and naloxone training and distribution to families, treatment providers, law enforcement, hospitals, health centers, housing developments, sober homes, and correctional facilities. Training is available in English and Spanish.
 - c. Mobile Sharps Unit: Staff canvasses the city and responds to 311 calls for discarded syringes.
 - d. Engagement Center: Drop-in center for people struggling with homelessness, substance use and mental health issues to spend time during the day and connect to services and medical support.
 - e. Neighborhood Street Outreach Team: Canvass the Mass/Cass neighborhood to engage with people on the street and provide supplies, referrals, and collect syringes.
 - f. Safe and Sound Recovery Center: Open 35 hours a week, offering two daily recovery groups. The center provides a safe space to access phones, computers, and social support, with a focus on supporting returning citizens.
 - g. PAATHS: Walk-in service to assess people for substance use disorder treatment needs and placements. Facilitates access to treatment programs including transportation, drug screening and insurance support.
 - h. 311 for Recovery Services/and 1-800 #: A confidential 24/7 referral center for access to treatment and recovery services.
5. All Recovery Services programming remained open and operational throughout the COVID-19 pandemic, making significant program modifications including social distancing and expanding space to reduce transmission risk in accordance with CDC, state, and city guidelines. The office moved harm reduction drop-in services entirely outdoors, and continued to provide safer use supplies and naloxone, testing and referrals. Despite the need to reorganize programming, AHOPE served 5,058 unique participants and reported 1,416 reversals at a time when there was an increase in overdose rates.
 6. Recovery Services has recently doubled capacity with state funding for the street outreach team in Mass Ave/Melnea Cass neighborhood.
 7. Starting in 2021, the Street Outreach Team includes outreach not only from recovery workers, but also nurses, psychiatrists, and housing navigators.
 8. Within the BPHC Bureau of Recovery Services, the Street Outreach Team canvasses the Mass Ave/Melnea Cass neighborhood engaging with people on the street and transporting vulnerable individuals to area services for support.
 9. The Street Outreach Team conducts outreach daily from 6am to 6pm. Engagement includes conducting safety checks, transporting individuals directly to recovery services

or to their family, referring individuals to medical care, providing harm reduction supplies, responding to overdoses in the area, collecting syringes, coordinating with homeless shelters. Recent outreach in advance of encampment removal efforts included:

- a. Outreach from 10/29 - 11/1/2021 notified individuals and offered services ahead of the 11/1 encampment removal.
 - b. Outreach from 11/1-11/3 notified individuals and offered services to individuals ahead of the 11/3 encampment removal.
 - c. Outreach from 11/3-11/5 notified individuals and offered services to individuals ahead of the 11/5 encampment removal.
10. Shelter and housing placement outcomes related to these efforts include:
- a. In conjunction with Homeless Services, 28 individuals agreed to move into a bed in shelter.
 - b. ORS placed 33 individuals from Mass & Cass in residential treatment program settings from 10/25-10/31.
 - c. ORS placed 32 individuals from Mass & Cass in residential treatment program settings from 11/1-11/5
 - d. 2 individuals from the Mass & Cass encampment were moved into housing from 10/25-10/31 through ORS partnership with housing providers working on street
 - e. 13 individuals from the Mass & Cass encampment were moved into housing from 11/1-11/5 through ORS partnership with housing providers working on street
11. Outreach staff are not instructed to make any threat of arrest or detention. No arrests have been made in connection with outreach efforts conducted since October 19th, 2021.
12. After ISD posts a "Notice of Removal" for an encampment, the Street Outreach team notifies individuals of the removal date and offers connections to services. This includes connecting individuals interested in treatment with detox placements and connecting individuals interested in housing with housing navigators.

Signed under the pains and penalties of perjury this 8th day of November, 2021.

/s/ Devin Larkin

Devin Larkin, MSW, MPH, LICSW
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Boston Public Health Commission
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