



# Maryland's Office of Overdose Response

Wes Moore, Governor · Aruna Miller, Lt. Governor · Emily Keller, Special Secretary of Overdose Response

March 10, 2026

The Honorable Heather Bagnall  
Chair, House Health Committee  
240 Taylor House Office Building  
Annapolis, MD 21401

**RE: House Bill 1477– Public Health – Ibogaine Clinical Research Grant Program – Establishment  
(Veterans Mental Health Innovations Act)**

Dear Chair Bagnall:

Maryland's Office of Overdose Response (MOOR) respectfully submits this letter of opposition to House Bill (HB) 1477, which would establish the Ibogaine Clinical Research Grant Program within the Maryland Department of Health. The grant program would be supported by an annual appropriation of \$500,000 from the Opioid Restitution Fund (ORF) for fiscal years 2028 through 2030. The grant program would be awarded to eligible research institutions to conduct a certified clinical trial overseen by the U.S. Food and Drug Administration on the use of ibogaine for the treatment of opioid use disorder (OUD) or "any other neurological condition for which ibogaine demonstrates efficacy."

In 2024, Governor Moore delegated oversight of the ORF to the Lt. Governor, with MOOR advising and administering the funds. Pursuant to Maryland's opioid settlement State-Subdivision Agreement, participating local governments receive approximately 70% of the settlement funds acquired through litigation pursued by the Office of the Attorney General (OAG), while the state receives approximately 30%. It is the position of the Lt. Governor and MOOR that the ORF is intended to be, first and foremost, dedicated to communities that are directly affected by the overdose crisis.

In 2022, Maryland established the ORF Advisory Council to provide recommendations regarding the use of ORF funds by the state. Maryland Law Article State Finance & Procurement, Section 7-331, describes the allowable uses of the ORF. It states that the ORF may be used to provide funds for substance use disorder prevention, treatment recovery, or harm reduction pilot programs or demonstration studies that are not evidence-based on the condition that they are at least evidence-informed and only if the ORF Advisory Council, established under §7.5-902 of Health – General Article, has determined that "emerging evidence supports the distribution of money for the pilot program or that there is a reasonable basis for funding the demonstration study with the expectation of creating an evidence-based program; and approves the use of money."

In this spirit, MOOR believes that the best way to allocate the ORF funds is through the recommendations of the ORF Advisory Council in accordance with the current statute and in response to current data.

The opioid settlements and the ORF present a unique opportunity to enhance Maryland's overdose response efforts, but the funds are limited, and the state is required to make available grant funding equal to 50% of the state's portion of the ORF. It is worth considering that any appropriation made utilizing the ORF would reduce the amount of money the state has to align spending with the recommendations Maryland's ORF Advisory Council has already made.

HB 1477 is similar to the PTSD/TBI Alternative Therapies Act (Chapter 731, Maryland Laws, 2022), which established a nonlapsing fund for veterans to study effectiveness of and improving access to alternative therapies for post-traumatic stress disorder and traumatic brain injuries. MOOR is concerned that creating a new special fund, which studies the efficacy of ibogaine to treat neurological disorders, could be duplicative of these efforts. Additionally, research for other neurological conditions besides OUD would not be an allowable use of the ORF, as ORF funds must be focused exclusively on opioid abatement activities.

If you would like to discuss this further, please do not hesitate to contact Benjamin Fraifeld, Associate Director for Policy & Advocacy at MOOR, 443-346-3013.

Sincerely,

A handwritten signature in cursive script that reads "Emily Keller". The signature is written in black ink and is positioned to the left of the typed name.

Emily Keller  
Special Secretary of Overdose Response

---