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HB17-1367 - Authorize Marijuana Clinical Research

Dear Representatives Pabon and Arndt and Senators Jahn and Baumgardner:

The Colorado Psychiatric Society strongly supports rigorous, ethically-conducted medical research on the safety and efficacy of Colorado-grown strains of marijuana.

We support the concept of HB 1367 - Concerning marijuana research authorization, which would create a marijuana research and development license or endorsement to an existing license that allows the production and processing of Colorado grown marijuana for research purposes. However, the **research review process and patient/subject protections should be consistent**, regardless of whether or not the research involves a public entity or public money.

There are readily available, established scientific research standards to ensure that human subjects are protected, the research is well-designed, and the outcome of the research will be meaningful and valid. We request that the bill sponsors include language in HB 17-1367 that includes such safeguards. We propose that **CDPHE work with stakeholders and utilize experts such as local Institutional Review Boards (IRBs)** so that both public and private research is held to standards similar to those specified in C.R.S. 25-1.5-106.5, which established the medical marijuana health research grant program. IRBs are committees that evaluate, approve, monitor and review research to ensure that the rights and safety of human subjects are protected. There are private IRBs in addition to ones affiliated with institutions of higher education.

Physicians base their decisions on scientific evidence and this bill authorizes research that will provide data to help make good medical care and public policy decisions. We support giving Colorado scientists the ability to study the efficacy of Colorado-grown strains of medical marijuana because the THC levels of cannabis used in most studies in the United States are not comparable to Colorado products. Scientific research should be based on the cannabis people are consuming.

CPS and other medical groups have opposed adding additional diagnoses to the Medical Marijuana Registry based on insufficient medical evidence due to the lack of research in this area. Allowing research on high-potency marijuana will provide Colorado policymakers with additional information about potential effects on public health and safety. This bill places Colorado as a leader in the nation, which underscores the importance of establishing a safe and valid process for marijuana research. It would also benefit the economy by attracting more scientists to Colorado to conduct research.

Public and private research should be held to the same standards when human patients/subjects are involved. We request that HB 1367 be amended to ensure that an IRB process is enumerated in the bill and that consistent research standards involving human patients are applied to both public and private research studies.

Sincerely,

Jennifer Hagman, MD
 CPS Co-Legislative Chair

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Marijuana	1970's	1990's	2012	Colorado MMJ	Colorado Dabs	U of Mississippi/ NIDA cannabis grown for research
THC content	<1%	4%	>12%	6% - 28%	Up to 95%	Low = <1%; Medium = 1-5%; High = 5-10%

¹ <http://www.colorado.edu/today/2016/12/16/cu-boulder-researchers-receive-state-grant-study-high-potency-marijuana-effects>

² http://www.mdedge.com/currentpsychiatry/article/130324/addiction-medicine/risks-increasingly-potent-cannabis-joint-effects?oc_slh=67ad63e9e0829ecdb0c4dc52cfc517d10e5c2cfa62afc941c5ce7c56001833b&utm_source=Clin_CP_eToc_020117&utm_medium=email&utm_content=Risks%20of%20increasingly%20potent%20Cannabis:%20The%20joint%20effects%20of%20potency%20and%20frequency