

130 E. Aurora Ave.
Des Moines, Iowa 50313-3654
March 18, 2017

Jack Whitver
4019 NE Bellagio Cir
Ankeny, IA 50021

Re: SF 470 (formerly SF 282 as amended)
HF 520 (formerly HSB 164 as amended)

Dear Sen. Whitver,

SF 470 (formerly SF 282 as amended) was introduced as a Committee on Human Resources bill on March 7, 2017. SF 470 is the same as HF 520 (formerly HSB 164 as amended) in the Iowa House. The original versions of this bill required the Iowa Board of Pharmacy to place cannabidiol (CBD) products in Iowa schedule 2 if the federal government places them in federal schedule 2. The original version was obviously not carefully written, and it became obvious that the federal government might not ever place cannabidiol (CBD) products in any federal schedule. The new language omits any mention of a specific schedule.

A recent report from the National Academies of Science found:

There is conclusive or substantial evidence that cannabis is effective for the treatment of chronic pain in adults (4-1)

There is no or insufficient evidence to support or refute the conclusion that cannabinoids are an effective treatment for epilepsy (4-6)

<http://www.nationalacademies.org/hmd/Reports/2017/health-effects-of-cannabis-and-cannabinoids.aspx> (pp. S-10, S-11)

On Wednesday, March 8, 2017, I met with Andrew Funk, Executive Director of the Iowa Board of Pharmacy, and Meghan Gavin, Assistant Attorney General of Iowa,

regarding this bill, SF 470. Andrew Funk and Meghan Gavin told me that SF 470 does not give the board any authority the board does not already have.

It's obvious from reading Section 1 of SF 470 that it does not actually create any new authority for the Iowa Board of Pharmacy. All it does is reference the existing authority the board already has. The board says it routinely reschedules products as they are approved by the federal government and does not need any additional authority to do that.

I would like to know why the legislature did not consult the Iowa Board of Pharmacy before drafting this legislation. This bill creates the appearance of favoritism for a drug product manufacturer which would be entirely inappropriate if it actually did create such favoritism.

If the legislature thinks our currently scheduling procedures are inadequate, then rewriting Iowa Code § 124.201 would be the appropriate solution, not adding a new section § 124.201A with two new paragraphs that don't have any new meaning.

I am opposed to this bill on the grounds it was not carefully drafted in consultation with the Iowa Board of Pharmacy. Previous legislatures in Iowa have given the Iowa Board of Pharmacy an advisory role on scheduling, and this bill violates the intent of the act because the board was not consulted in the drafting of this bill.

Thank you very much!

Sincerely,

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