



April 16, 2019

The Honorable Kim Reynolds, Governor of Iowa
The Honorable Members of the Iowa General Assembly
Iowa State Capitol
1007 E. Grand Ave
Des Moines, IA 50319

RE: House File 732

Dear Governor Reynolds and Members of the Iowa General Assembly,

The Iowa Medical Cannabidiol Board was created in 2017 as part of the Iowa Medical Cannabidiol Act. This Board is comprised of physicians, representing a variety of different specialties, and also includes a law enforcement representative. At a meeting of the Board held this morning, the Board reviewed the history of HF 732, and developed a list of recommendations related to patient access to tetrahydrocannabinol (THC) for your collective consideration as the bill moves through the legislative process.

First, the Board wishes to express its appreciation for many of the amendments included in HF 732. Nearly all of the proposed amendments are direct reflections of recommendations made by this Board in its Annual Report filed with the General Assembly. These amendments include:

1. Addition of physician assistants (PAs) and advanced registered nurse practitioners (ARNPs) to the list of health care practitioners that are eligible to certify debilitating medical conditions for patient participation in the program.
2. Removal of felony conviction as a disqualifier for patient participation in the program.
3. Allowing dispensaries to employ pharmacists and pharmacy technicians.
4. Requiring the Department of Public Health to collect and evaluate data on patient outcomes for the purpose of evaluating Iowa's medical cannabidiol program.

At its meeting on April 16, 2019, the Board evaluated the provisions in HF 732 which seek to eliminate the 3% THC cap in medical cannabidiol products and instead regulate patient access to THC by implementing a cap on the amount of THC that can be purchased by patients and their primary caregivers every 90 days. While the Board is supportive of this approach, it has concerns about the number of grams of THC that HF 732 would authorize patients to purchase every 90 days. The current draft of HF 732 would allow patients to purchase up to 25 g (25,000 mg) of THC every 90 days. This is an extremely large amount of THC for a medical program that seeks to avoid becoming a recreational program. The Board is concerned that a 25 g THC cap every 90 days would be perceived as opening a floodgate and could make knowledgeable physicians reluctant to certify patients for participation in the program.

After careful review and thorough discussion of the available medical literature on this topic, the Board makes the following recommendations:

1. Eliminate the 3% THC cap on medical cannabidiol products currently codified in Iowa Code section 124E.2(6). A cap of 3% THC on final products is really not a cap at all. Patients are still

allowed to purchase of an unlimited amount of product and there is no specified dose or minimum interval between doses. The current 3% THC cap also precludes development of a vaporizable product form that would offer more precise titration of dose, thereby diminishing the likelihood of adverse effects.

2. Establish a THC purchase limit for patients of 4.5 g (4,500 mg) THC every 90 days. This is 50 mg/ day of THC which is well into the psychoactive range for all but the most experienced and tolerant patients. It covers the full range of doses supported in the medical literature for Iowa's approved debilitating medical conditions.
3. For pediatric patients under 18 years of age, limit access to THC by allowing pediatric patients to only purchase products with a 20:1 ratio of CBD:THC, and establish a maximum CBD dose for pediatric patients of 10mg CBD/ kg (weight of patient)/ day.

Again, thank you for listening to this Board as HF 732 was developed, and thank you for the opportunity to provide input on the question of patient access to THC. The Board takes its advisory role seriously, and appreciates the opportunity to serve Iowans in this capacity.

Sincerely,



Cpt. Mike McKelvey, Chair, Iowa Medical Cannabidiol Board

Cc: Dr. Robert Shreck, Member, Iowa Medical Cannabidiol Board
Dr. Lonny Miller, Member, Iowa Medical Cannabidiol Board
Dr. Jacqueline Stoken, Member, Iowa Medical Cannabidiol Board
Dr. Ken Cheyne, Member, Iowa Medical Cannabidiol Board
Dr. Stephen Richards, Member, Iowa Medical Cannabidiol Board
Dr. Jill Liesveld, Member, Iowa Medical Cannabidiol Board