

ARIZONA DEPARTMENT OF HEALTH SERVICES

Inter-Office Memorandum

TO: Will Humble, Director
Arizona Department of Health Services

FROM: Cara M. Christ, M.D., Chief Medical Officer 
Arizona Department of Health Services

DATE: January 10, 2014

RE: **Medical Advisory Committee Recommendations to the Agency Director**

As per A.A.C. R9-17-06, the Department accepted petitions from the public in July of 2013 to add debilitating conditions to the list of current qualifying conditions. The Medical Advisory Committee considered three conditions during this submission period, which included Post Traumatic Stress Disorder (PTSD), depression, and migraines. These three petitions had been considered previously by the Department during the January 2012 petition cycle. The Department held a public hearing and accepted public comments regarding these proposals. At your request, we reviewed all of the testimony and evidence received by ADHS prior to making final recommendations.

During this round, since the petitions had been previously researched, the Evidence Reviews provided by The University of Arizona's Colleges of Medicine and Public Health were expanded to include additional search terms and information provided during public comment, and an additional database of medical literature was searched. We acknowledge there is a growing body of evidence concerning the basic science of cannabinoid receptors and the potential effects of cannabinoids in animals and humans. Because marijuana has not been subjected to any high quality, scientifically controlled testing in humans for any of the petitioned conditions, there is a lack of evidence to support adding any of the conditions.

The Committee felt its concerns from the previous petition cycle were still valid. There is the potential for harm to patients, if the Department were to approve marijuana use for these conditions. The risk of using a substance in undiagnosed/misdiagnosed conditions could result in a worsening a more serious condition. Additionally, FDA-approved cannabinoid medications that have undergone rigorous clinical trials contain warnings in their package inserts to use with caution in patients with current or previous psychiatric disorders, as the medications may unmask or exacerbate these illnesses. While the public comments and testimony were powerful, the Committee, in order to maintain the medical foundation of the program, utilized scientific evidence to guide the decisions.

RECOMMENDATIONS

The Committee studied the thorough Evidence Review provided by the University of Arizona and identified and reviewed the most persuasive studies. After careful consideration, the Committee concluded that, based on the scientific evidence currently available, there is insufficient evidence to support adding the conditions to the list of qualifying conditions. The Medical Advisory Committee, by unanimous vote of all members present at the meeting of January 9, 2014, recommended **against** adding:

- Post Traumatic Stress Disorder (PTSD)
- Depression
- Migraine Headaches

The members also unanimously agreed to request the University of Arizona's Colleges of Medicine and Public Health to continue to review any new literature and study results. If new results become available, the Committee may consider reviewing the petition, if warranted.

During the discussion, the Committee expressed that the growing body of evidence concerning the basic science of the potential effects of cannabinoids on PTSD patient raised valid clinical questions that need to be investigated. Given this evidence and that several states have Medical Marijuana provisions for PTSD patients, it is hoped that a randomized, controlled trial may be conducted to further investigate this question.

The members of the Committee acknowledged the impact these conditions have on those suffering from them, as demonstrated by the heartfelt testimony presented at the public hearing and the comments submitted online to the Department. The members expressed concern for these patients, and want them to have access to safe, effective medical treatment. While the Committee could not support a recommendation to add migraines to the list of qualifying conditions, the members still felt migraine sufferers may already qualify for the Medical Marijuana Program through the condition for chronic pain.

This is an ongoing process, and the Medical Advisory Committee encourages continuing review of the literature and submission of petitions. The Department will begin accepting new petitions for adding debilitating conditions on January 27-31, 2014. The members of the Committee discussed that petitions for these conditions could be resubmitted for your consideration when new evidence or research results become available.

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