



# Utah Society of Addiction Medicine

*A Chapter of American Society of Addiction Medicine*

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February 12, 2021

The Honorable Luz M. Robles Escamilla  
350 North State Street  
State Capitol, Suite 320  
Salt Lake City, UT 84114

The Honorable Raymond P. Ward  
350 North State Street  
State Capitol, Suite 350  
Salt Lake City, UT 84114

Dear Senator Escamilla and Representative Ward,

On behalf of the Utah Society of Addiction Medicine (UTSAM), the medical specialty society representing physicians and other clinicians in Utah who specialize in the prevention and treatment of addiction, I would like to take this opportunity to provide UTSAM's opposition to provisions in SB170 that would allow certain clinicians to recommend cannabis without registering with the Department of Health as a "qualified medical provider." If such an exemption were to be allowed, then these clinicians would no longer be required to undergo critically important continuing education relevant to recommending cannabis in Utah. In addition, said clinicians would be allowed to own, or be employed by, a cannabis production establishment, a medical cannabis pharmacy, or a medical cannabis courier. With instances of substance use disorder surging in Utah, likely due to the COVID-19 pandemic, now more than ever, Utah needs clinicians who are trained and prepared to manage their patients' use of controlled substances, including cannabis,<sup>i</sup> and who are appropriately distanced from the cannabis industry.

Cannabis use has been shown to be associated with cognitive decline, impaired educational or occupational attainment, risk of other substance use disorders, and poor quality of life.<sup>ii</sup> It has also been shown to be associated with impaired driving and fatal vehicle crashes, cannabis-related emergency room visits, psychosis, and psychiatric comorbidity.<sup>iii</sup> Cannabis use disorder (CUD) has been associated with disability<sup>iv</sup> and strongly and consistently associated with other substance use and mental disorders.<sup>v</sup> Use of high potency cannabis has been associated with increased frequency of use, cannabis use-related problems, and increased likelihood of anxiety disorder.<sup>vi</sup>

Furthermore, there is limited evidence of the efficacy of medical cannabis in the treatment of many health issues. A 2017 review by the National Academies of Sciences, Engineering, and Medicine found conclusive or substantial evidence that cannabinoids are effective in only three conditions: chemotherapy-induced nausea and vomiting, multiple sclerosis-related spasticity, and chronic pain.<sup>vii</sup> According to a Cochrane review, the effectiveness of cannabis-based medicines for neuropathic pain was small and may be outweighed by potential harms.<sup>viii</sup> A systematic review of 43 randomized controlled trials found that cannabis-based medicine might be effective for chronic pain based on limited evidence, primarily for neuropathic pain, and that, due to small effect sizes, the clinical significance is uncertain.<sup>ix</sup> It is important to note that to date, the Food and Drug Administration (FDA) has only approved medications derived from cannabis and its components, including cannabidiol (CBD) for the treatment of chemotherapy-associated nausea and vomiting, loss of appetite and weight loss in HIV/AIDS patients, and for the treatment of seizures associated with Lennox-Gastaut syndrome, Dravet syndrome, or tuberous sclerosis.

Notwithstanding the foregoing, UTSAM respects the decision to establish a state medical cannabis program. Unfortunately, however, SB170 would remove integral safeguards in that very program. Given that cannabis is a controlled substance that is not approved by the FDA for any medical indication and is a growing, for-profit industry, passage of such legislation would unnecessarily jeopardize patient safety and public health in Utah.

UTSAM shares the state's goal of providing access to high-quality, evidence-based healthcare to all Utahans. Thus, UTSAM must oppose SB170 in its current form. Please do not hesitate to contact myself at 412-915-8409 or [Javier.ballester@hsc.utah.edu](mailto:Javier.ballester@hsc.utah.edu), Dr. Katie Carlson at [katiecarlson801@gmail.com](mailto:katiecarlson801@gmail.com) or 801-599-2785 and Dr. Amy de la Garza at [amydelagarza@mac.com](mailto:amydelagarza@mac.com) or 801-910-6189 if UTSAM can offer further guidance on this bill. Thank you for your dedication to the health and safety of Utahans.

Sincerely,  
Javier Ballester Gonzalez, MD  
President – Utah Society of Addiction Medicine

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<sup>i</sup> American Medical Association. (2020). "Issue brief: Reports of increases in opioid- and other drug-related overdose and other concerns during COVID pandemic." Available at: <https://www.ama-assn.org/system/files/2020-12/issue-brief-increases-in-opioid-related-overdose.pdf>

<sup>ii</sup> Hasin DS, Kerridge BT, Saha TD, et al. Prevalence and Correlates of DSM-5 Cannabis Use Disorder, 2012-2013: Findings from the National Epidemiologic Survey on Alcohol and Related Conditions-III. *Am J Psychiatry*. 2016;173(6):588-599. doi:10.1176/appi.ajp.2015.15070907

<sup>iii</sup> Hasin DS. US Epidemiology of Cannabis Use and Associated Problems. *Neuropsychopharmacology*. 2018 Jan; 43(1): 195–212. Free full text: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5719106/>

<sup>iv</sup> Ibid.

<sup>v</sup> Hasin DS, Kerridge BT, Saha TD, et al. Prevalence and Correlates of DSM-5 Cannabis Use Disorder, 2012-2013: Findings from the National Epidemiologic Survey on Alcohol and Related Conditions-III. *Am J Psychiatry*. 2016;173(6):588-599. doi:10.1176/appi.ajp.2015.15070907

<sup>vi</sup> Hines LA, Freeman TP, Gage SH, et al. Association of High-Potency Cannabis Use With Mental Health and Substance Use in Adolescence [published online ahead of print, 2020 May 27]. *JAMA Psychiatry*. 2020;e201035. doi:10.1001/jamapsychiatry.2020.1035

<sup>vii</sup> National Academies of Sciences, Engineering, and Medicine. 2017. *The Health Effects of Cannabis and Cannabinoids: The Current State of Evidence and Recommendations for Research*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/24625>.

<sup>viii</sup> 8 Mücke M, Phillips T, Radbruch L, Petzke F, Häuser W. Cannabis-based medicines for chronic neuropathic pain in adults. *Cochrane Database of Systematic Reviews* 2018, Issue 3. Art. No.: CD012182. DOI: 10.1002/14651858.CD012182.pub2

<sup>ix</sup> Aviram J, Samuelly-Leichtag G. Efficacy of Cannabis-Based Medicines for Pain Management: A Systematic Review and Meta-Analysis of Randomized Controlled Trials. *Pain Physician*. 2017;20(6):E755-E796.