

Arkansas Department of Health
Proposed Rules Pertaining to the Medical Marijuana Act of 2016
Rules and Regulations Governing Medical Marijuana Registration, Testing, and Labeling in Arkansas

Public Comments Received

A public hearing was conducted on April 16, 2018 at 9:00 a.m. in the Arkansas Department of Health’s auditorium, located at 4815 W. Markham, Little Rock, Arkansas. Oral comments were received during this meeting. During the public comment period, comments were also received via email. All comments and responses are documented below:

Name	Meeting Comments	Response
1	Robert Brech, General Counsel ADH This hearing is to consider a petition to add Bi-polar Effective Disorder (ICD code F31) submitted 1/30/18. The ADH will take public comments and the Director of ADH will make the final determination if this will be move forward to the rule making phase. The Director has 120 days to decide to go forward. At that time, we will start the rule changing process. This will take 6-7 months.	
2	Storm Nolan – Arkansas Cannabis Industry Association 3% of public suffer from this condition *Amendment 98 set low bar for Section 4, C, 2 - <i>In considering a petition, the department shall add medical conditions or treatments to the list of qualifying medical conditions set forth in § 2 of this amendment if patients suffering from the medical conditions or undergoing the treatments in question would derive therapeutic benefit from the use of marijuana, taking into account the positive and negative health effects of such use.</i> *The study shows that MMJ shows efficacy and lack of side effects. Main study indicates mood stabilization. Typical medication is lithium. Patients often develop renal failure from this medication. *Not considered carcinogenic effect due to many ways of consumption. *Arkansas patients are very agitated, there is no clear time frame for access to MMJ. A denial would feed into the opinion that the state is trying to delay MMJ.	
3	Laree Trece – Mother/Parent Feels like cannabis would help her son who has bipolar disorder.	

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	Name	E-mail Comments	Response
1	Jeremy Brown	<p>Received April 15, 2018</p> <p>To whom it may concern and with all due respect, in my personal experience with bipolar disorder, specifically bipolar 1 disorder, a disorder which is often quite debilitating and potentially life threatening at its extremes of mania and depression, I have found cannabis to be a superior and gentler alternative to the many medications and combinations of medication used to marginally treat the condition. These medications have immediate detrimental effects on the metabolism of the patients using them and have a high risk of toxicity for which patients must be closely monitored. In addition, these meds quite often lose their potency and effectiveness, even if patients comply strictly with their use. Often, due to extremely unpleasant and unbearable side effects, patients quit taking their meds, leading to relapse of symptoms and decline in quality of life and ability to function. I believe medical cannabis is an effective treatment for both extremes of the disorder and a superior maintenance therapy than the pharmaceutical options currently available. Insomnia is the most devastating aspect of the disorder and often occurs at both extremes (mania and depression). Cannabis effectively aids in maintenance of regular sleep cycles, promoting balance and wellbeing, and apart from any initial effects from thc, which wear off rather quickly, there are literally no apparent negative side effects like those found in pharmaceutical drugs. There are many useful and beneficial non psychoactive compounds, such as cbd present in cannabis which many independent studies and trials have confirmed to have medicinal qualities for the treatment of many conditions, including bipolar 1 disorder. Also, there are a vast many different strains of cannabis with varying ratios of cbd to thc, specific to treatment of many conditions, including bipolar disorder. High cbd to low thc ratios are said to greatly diminish any unpleasant or intense effects from thc. As you know, I'm sure, cannabis can be administered and utilized by many methods other than that of smoking it. I hope you will give this matter the due consideration it deserves and make a compassionate and informed</p>	Responded by email – their comments would be added to the public comments

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		decision. Thank you very much! Sincerely, Jeremy S. Brown	
2	Steven Stubblefield	<p>Received April 15, 2018</p> <p>To whom it may concern, I am writing because I understand that Bi Polar Disorder is under consideration to be added to the list of conditions that can be treated with medical cannabis in Arkansas. As a person that has lived with this debilitating condition all my life, I would fully support having cannabis as an option for treatment. I believe there are many other psychological disorders that could effectively be treated with cannabis. But, I'll stay on point. please add Bi Polar Disorder to the list. Sincerely, Steven Stubblefield</p>	Responded by email – their comments would be added to the public comments
3	Jeremy Brown	<p>Received April 16, 2018</p> <p>Hello, again! In addition to what I have already said, in my experience and personal contacts with bipolar patients I have seen the reality that many of the current an available medication while posing grave threats to the body, such as kidney and liver and thyroid dysfunction, along with sexual dysfunction and Chronic states of fatigue and increased risk of diabetes and heart disease make them a very unappealing but often horrifying alternative. 1/3 patients who take lithium over a ten-year period will develop renal failure as a result of their treatment. Also, many of these prescription drugs create a physical dependent which causes painful withdrawal upon discontinuation. In addition, these medications quite often create a flat effect or emotional deadening which greatly decreases the benefits of cognitive behavioral therapy and the ability to learn coping mechanisms and to discuss painful life experiences, which may in themselves ultimately be root causes of the psychological/ emotional imbalance. As a psychiatrist once told me- " psychiatry is akin to voodoo medicine," because psychiatrists really don't know much about how the brain functions in relation to the medications they are prescribing and because the human psyche is so fast and deep and unique as each individual and mostly incomprehensible. A patient may often spin their wheels in therapy without ever gaining the trust and confidence in their therapist to truly open up their</p>	Responded by email – their comments would be added to the public comments

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		inner worlds to them. I'm not saying that I believe medical marijuana will help everyone universally and completely, but I believe it would make a positive impact in the lives of many while greatly lessening negative side effects. Keep in mind that lobotomy was once the leading edge treatment for nearly all mental disorders- effective, yes, with dramatic results while simultaneously robbing patients of a meaningful life quality. - history has already proven the practice barbaric and may yet prove current treatments to be barbaric. Again, thank you for your time! Sincerely, JSB	

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