March 12, 2014

Rick Doblin, Ph.D.
Multidisciplinary Association for Psychedelic Studies (MAPS)

Dear Dr. Doblin:

Thank you for the resubmission of the proposed, privately funded study, “Placebo-Controlled, Triple-Blind, Randomized Crossover Pilot Study of the Safety and Efficacy of Five Different Potencies of Smoked or Vaporized Marijuana in 50 Veterans with Chronic, Treatment-Resistant Posttraumatic Stress Disorder (PTSD).” The United States Department of Health and Human Services (HHS) conducted a second scientific review of the study to determine whether to recommend to the National Institute on Drug Abuse (NIDA) the release of research-grade marijuana to your organization.

The review committee notes some significant changes in the resubmission.

- A number of modifications were made to improve subject safety. As a result, the University of Arizona Institutional Review Board (IRB) approved the study in October 2012.
- Supplemental information about the research expertise of the study team was provided to HHS and additional investigators were recruited for the study.

Based on these changes, the proposed study is cleared for the purchase of research grade marijuana from NIDA. Notification of approval will be made to NIDA and FDA within two business days.

While clearance is not contingent on the suggestions provided below, the review committee strongly encourages your consideration of them in order to strengthen the study.

- Use a definition of ‘treatment resistant’ that is consistent with current clinical practice, such that the sample includes individuals who have attempted appropriate medications and CBT. An alternative is to include the subjects with the histories described in the proposal, but avoid describing the study population as ‘treatment resistant.’
- Employ an outside entity to implement independent data management, study coordination, and data analysis, to avoid conflicts of interest and assure study integrity.
- Simplify the study protocol to increase the likelihood of producing clear results, e.g., reduce the number of dosages and assure consistent dosing. Such a change might obviate the need to increase the sample size, and the resulting cost savings could be directed to an external data management mechanism.
Please obtain IRB approval for the final protocol and submit a revised protocol to the FDA, referencing the same IND number used for the original submission. It is recommended that you contact the NIDA drug supply program coordinator at hsingh@ngmssmtp.nida.nih.gov to obtain updated information on the specific material required for your research, and include this information in the IND submission. Lastly, you will need to register with the DEA. Information on the registration process can be found at www.deadiversion.usdoj.gov.

Good luck with your research in this important area. Please contact me with any questions at sarah.wattenberg@hhs.gov.

Sincerely,

Sarah A. Wattenberg, MSW
Senior Advisor for Substance Abuse Policy
Chairperson, Public Health Service Marijuana
Research Review Committee

Cc: Suzanne Sisley, M.D.
NIDA, Drug Supply Program
FDA, Center for Drug Evaluation and Research, Controlled Substance Staff