

Why is this Topic Timely?

To learn

status of medicalizing Schedule 1 drugs, others

To prepare

Policy development, renderjudgements

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Controlled Substances • Drug scheduling and Definitions of Abuse Liability • Opioids • Medicalization of psychoactive substances: unmet needs • Marijuana • Hallucinogens How Good is the Science? • Four Challenges and Representative Clinical Trials • Have we learned anything? PHPs and Schedule I drugs • Is it prime time for policy?

| Controlled Substances: Drug Schedules | | | |
|---|--|--|--|
| Schedule I no currently accepted medical use, high abuse potential severe Psilocybin, LSD, Marijuana, MDMA, Peyote, Heroin, Mephedrone, MDPV, cannabinoids | | | |
| Schedule II high potential for abuse, severe psychological or physical dependence, medical use | Cocaine, Methamphetamine, Methadone, Hydromorphone, Meperidine, Hydrocodone, Oxycodone, Fentanyl, Dexedrine, Adderall, Ritalin | | |
| Schedule III moderate to low potential for physical psychological dependence | < 90 mg Codeine per dose (Tylenol with codeine), Ketamine, Anabolic Steroids, Testosterone | | |
| Schedule IV low abuse, addiction potential | Xanax, Soma, Darvon, Darvocet, Valium, Ativan, Talwin, Ambien, Tramadol | | |
| Schedule V lowest potential for abuse | Antidiarrheal, Antitussive, Analgesics, Cough preparations, Lomotil, Motofen, Lyrica, Parepectolin | | |

Eight Factor Analysis Drives Scheduling Required Under CSA (21 usc 811(c)) 1. Actual or relative potential for abuse 2. Known pharmacology 3. Current scientific knowledge of substance

How do Drugs Become Classified in Restrictive Categories?

- 4. History and current pattern of abuse
- 5. Scope, duration, and significance of abuse
- 6. Public health risk
- 7. Psychic or physiological dependence liability
- 8. If immediate precursor of a controlled substance

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How is Abuse Liability Defined?

- Use in amounts that create health or safety hazard (self, others)
- Use of substance on own initiative, not on medical advice
 Significant diversion from legitimate channels
- Substances' actions are like other substances with potential for abuse
- Evidence of actual abuse of substance indicates potential for abuse

Comprehensive Drug Abuse Prevention and Control Act of 1970, H.R. Rep. No 91-1444, 91st Cong., Sess.1 (1970) reprinted in U.S.C.C.A.N. 4566,4603

Medicalization of Psychoactive Substances

Lessons from the past, present

- Opioids
- Marijuana
- Ketamine
- Hallucinogens

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Opioids

- Root Causes
- Current Crisis
- Lessons Learned

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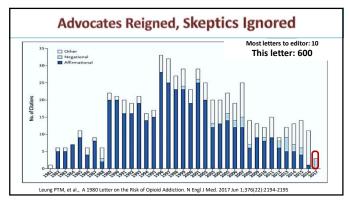
Weak Scientific Literacy

ADDICTION RARE IN PATIENTS TREATED WITH NARCOTICS

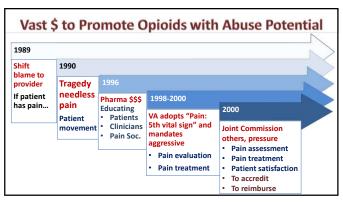
To the Editor: Recently, we examined our current files to determine the incidence of narcotic addiction in 39,946 hospitalized medical patients! who were monitored consecutively. Although there were 11,882 patients who received at least one narcotic preparation, there were only four cases of reasonably well documented addiction in patients who had no history of addiction. The addiction was considered major in only one instance. The drugs implicated were meperidine in two patients, Percodan in one, and hydromorphone in one. We conclude that despite widespread use of narcotic drugs in hospitals, the development of addiction is rare in medical patients with no history of addiction.

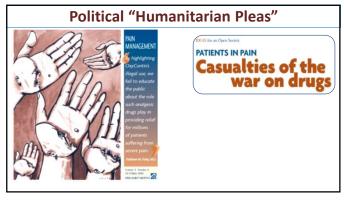
lane Porter, Hershel Jick, M.D. Addiction Rare in Patients Treated with Narcotics. N Engl J Med 1980; 302:123
Portenoy RK, and Foley KM. Chronic use of opioid analgesics in non-malignant pain: report of 38 cases. Pain 1986; 25: pp. 171-18

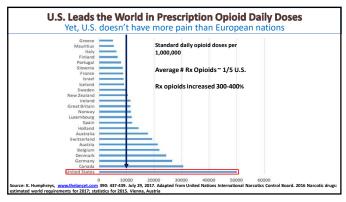
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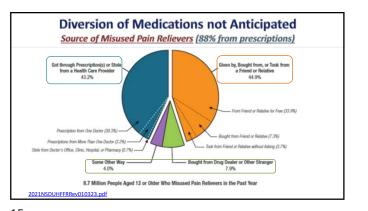


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| Legal Marijuana |
|-----------------|
| |

| What Has Happened? More Products More use More Associated | | | |
|--|---|--|--|
| □ Illicit production □ Unregulated potency High %THC □ THC analogs □ Routes of delivery: Vaping, edibles, beverages, creams □ Advertising, "dispensaries" □ vaping, edibles, beverages, creams | Daily by teens Among adults of child-bearing years By elderly By pregnant women | Psychosis (ED) Violence Traffic accidents, fatalities Child poisonings Hyperemesis syndrome Addiction, even among users for medical purposes | |

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Were these Qualifying Medical Conditions Proven by Quality Clinical Trials? NO

Cannabis has been disingenuously hyped as a treatment/cure for

opioid addiction, glaucoma, disease of cancer, Crohn's disease, PTSD, Parkinson's disease, Alzheimer's, Autism, ALS, hydrocephalus, or use "any other medical condition" such as pain, sleep, depression, anxiety,

and many other conditions for which evidence does not exist

| Does Marijuana Fulfill FDA Criteria? | | | |
|---|--|--|--|
| Purity: NO A specific medical condition to use marijuana NO | | | |
| Dose, Standard doses: NO | What patients may benefit; tested in children NO | | |
| | Reported adverse effects – acute and chronic NO | | |
| Quality control: NO | How the drug should be taken (eat, drink, vape?) NO | | |
| Clinical trials: LIMITED | A safe drug dose for a specific medical condition NO | | |
| | How the drug is made (pill, liquid) NO | | |
| Safety, side effects: NO | Active and inactive ingredients NO | | |

FDA Has Approved Cannabinoids

- Marinol: AIDS appetite; cancer chemotherapy
- Nabilone: AIDS appetite; nausea for cancer chemotherapy
- Syndros (dronabinol oral solution): cancer and AIDS
- Sativex (THC/CBD): Other nations, multiple sclerosis-not in United States
- Epidiolex (CBD): Rare forms of epilepsy

NO BOTANICAL MARIJUANA APPROVED

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Hallucinogens in Medicine Intersection of Science, Policy, Reality

Large public health burden: chronic brain disorders

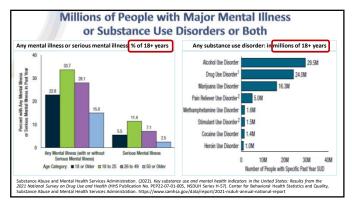
Treatment needs: inadequate or unmet

Indications: "conditions of internalizing disorders"

Drug Policy: All premises now questioned

Vivien Felser

Vivien Felse



How Effective are Conventional Anti-depressants?

effective, but...imperfect

1. Responders and non-responders

- Non-responders with MDD: ~33%-50% don't respond to anti-depressants
- Partial responders: some
- Treatment-resistant depression (TRD): unresponsive to 2 or more antidepressants

2. Time to respond is long

• ~3-4 weeks to alleviate MDD symptoms

3. Side effects

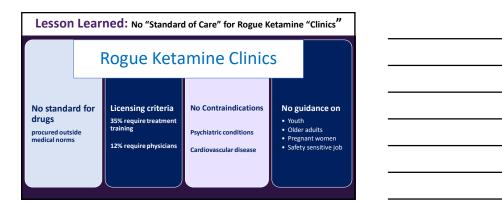
• headache, gastrointestinal symptoms, anxiety, agitation, sexual dysfunction

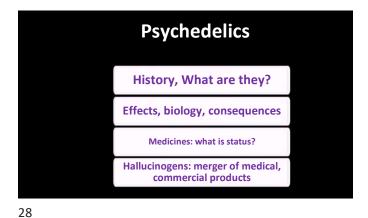
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Hallucinogens • Ketamine • Phencyclidine (PCP, angel dust) • Psilocybin (magic mushrooms) • Mescaline/peyote • LSD • DMT/ayahuasca (N,N-dimethyl-tryptamine) • MDMA (Ecstasy, hallucinogen-stimulant) • Salvinorin A • Ibogaine (dissociative)

| Ketamine for Major Depressive Disorder, TRD | | | |
|--|---|--|--|
| Ketamine i.v. Surgical anesthetic: humans, animals, Anti-depressant | Systematic review, meta-analysis of 7 RCTs, 12 open label trials positive effect of ketamine on MDD (OR at 7 days: 6-33 | | |
| FDA-approved TRD Esketamine nasal spray (Spravato) Marwaha S, Palmer E, Suppes T, Cons E, Young AH, Upther | Systematic review of 5 RCTs (3 RCTs) assessed outcome at 28 days significant positive effect relapse-prevention: positive effect open-label, long-term trial: positive effect on TRD limited to medical facilities, used as nasal spray patients wait 2 h medical facility potential side effects | | |

Symptoms improve after 24 hours, effects wane at 7 days May endure in some people for 6 weeks FDA requires drug maker to develop Risk Evaluation and Mitigation Strategy (REMS) Inpatient Healthcare Setting Certification in REMS required to treat patients Certification in REMS required to treat patients Pharmacy Outpatient Healthcare Setting Certification in REMS required to treat patients Certification in REMS required to treat patients Certification in REMS required to treat patients Outpatient Healthcare Setting Certification in REMS required to treat patients Certification in REMS required to treat patients





What are Psychedelics/Hallucinogens?

Hallucinogens

- change/distort perception of surroundings
- sensations and images that seem real but are not
- change/distort their internal thoughts and feelings
- Distort sensory reality: synesthesia, visual hallucinations

Psychedelics are hallucinogens...and some able to

- "mind-revealing": some describe as spiritual, mystical
- "ego dissolution": decreased boundary between self/world; connectedness

Nichols DE, Hallucinogens. Pharmacology & Therapeutics 2004;101(2):131-181.

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Network Increased 5-HT2A receptor activity Increased cortical glu transmission Increased neuroplasticity Network Decreased brain modularity Changed network connectivity Increased neuroplasticity Network Decreased brain modularity Changed network connectivity Insight Increased prain modularity Increased prain mo

Do Hallucinogens Have Long Term Effects?

(infrequent)

Persistent Psychosis: continuing mental problems, including:

- visual disturbances
- · disorganized thinking
- paranoia
- mood changes

Hallucinogen Persisting Perception Disorder (HPPD):

- reoccurrences of hallucinations, other visual disturbances
- without warning, a few days or >year after drug use
- both more often with history of mental illness
- can happen to anyone, even one time use

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Early Use of Hallucinogens in Psychiatry

Symptoms: anxiety, depression, neuroses, distress, AUD, schizophrenia

- Repeated low LSD doses to reveal unconscious traumatic memories
- Unconscious content reflected orientation of the therapist

Uncontrolled case series

- Osmond and Hoffer: 50% of patients given LSD remained alcohol abstinent 6 months
- Some reported 70% symptom improvement neurotic disorders
- Some reported LSD reduced anxiety, distress in terminal cancer

Critics argued studies too small, poorly controlled, biased outcomes

Positive results not replicated in later controlled trials

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EFFECTS OF MESCALINE AND LYSERGIC ACID (d-LSD-25)¹ PAUL H. HOCH, M.D., JAMES P. CATTELL, M.D.,

HARRY H. PENNES, M.D.

New York City

HOCH PH, CATTELL JP, PENNES HH. Effects of mescaline and lysergic acid (d-LSD-25). Am J Psychiatry. 1952 Feb;108(8):579-84.

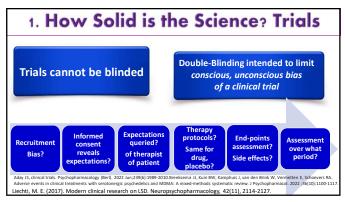
- Mental symptomatology markedly aggravated
- Disorganizes psychic integration of a person
- More apparent in schizophrenics than normal

drugs are very important in producing schizophrenic-like reactions in normal individuals, in magnifying the schizophrenic structures in schizophrenic patients, and in studying the personality structure of different individuals

do not believe that the evidence available today would permit their reliable use for any of these clinical approaches. It is unde-niable that the drug precipitates an overt schizophrenic psychosis in some individuals







| 1. How So | lid is Recent | Science? | (Trials |
|-----------|---------------|----------|---------|
|-----------|---------------|----------|---------|

Inclusion/exclusion criteria, Selection bias, Generalizability?

Recruited subjects

- Intrigued with hallucinogens? prior hallucinogen use 1.9-100%
- choose 50/1000
- Diversity?
- Caucasian, educated, urban

 Aware of expected outcomes

Excluded subjects

- Co-morbid psychosis
- Suicidality
- Known risk factors
- Family history
- Preexisting psychiatric condition

limit true risk of drugs

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| Prior Hallucinogenic Use | | | | |
|---|-----------------|-------------------|------------|-----------|
| Study | Туре | Condition | Test Drug | Prior Use |
| Mitchell et al 2021 | RCT III | PTSD ^a | MDMA | 39% |
| Mithoefer et al 2019 | RCT II | PTSD | MDMA | 30% |
| Wolfson et al 2020 | RCT | EOLAb | MDMA | 56% |
| Carhart-Harris et al. 2021 | RCT II | Depression | Psilocybin | 27% |
| Davis et al. 2020 | RCT | MDDc | Psilocybin | 1.9% |
| Carhart-Harris et al. 2016, 2018 | Open-label | TRDd | Psilocybin | 35% |
| Ross et al, 2016 | RCT | EOLA | Psilocybin | 60% |
| Grob et al, 2011 | RCT | EOLA | Psilocybin | 67% |
| Johnson et al 2014 | Open-label | Tobacco cessation | Psilocybin | 67% |
| Moreno et al 2006 | Dose-escalation | OCD ^e | Psilocybin | 100% |
| Schmid et al. 2020 | Observation | EOLA | LSD | 39% |
| *Post-traumatic stress disorder; bEnd of life anxiety cMajor depressive disorder freatment-resistance depression *Obsessive-compulsive disorder | | | | |

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Subject Expectancy EffectsGiven obvious psychoactive effects of psychedelic drugs

those receiving drug likely know they received drug

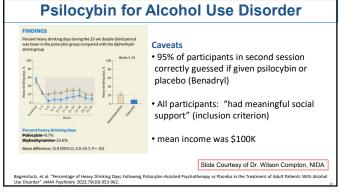
•may show greater treatment response

those receiving placebo may know they received placebo

• disappointment may decrease their placebo response

Sumner, McMillan, Spriggs, . . . Muthukumaraswamy. Ketamine Enhances Visual Sensory Evoked Potential Long-term Potentiation in Patients With Major Depressive Disorder. Biol Psychiatry Cogn Neurosci Neuroimaging 5, 45-55 (2020).





MDMA-assisted Therapy for PTSD • MDMA vs. placebo for severe PTSD (n=90) • MDMA sessions at weeks 1, 5, 9 (18 weeks) • MDMA reduced PTSD symptoms and social disability • 33% on MDMA achieved remission vs. 5% on placebo • No SAEs in MDMA group, heart conditions were excluded • 90% correctly guessed if they were given MDMA or placebo Mitchell JM. et al. Nature Medicine (2021)

Psilocybin for Treatment Resistant Depression

3 dose trial in 233 patients

Effectiveness: Depression Scores Reduced 25 mg dose (not 10 mg) reduced depression score significantly more

than 1 mg dose at 3 weeks

Secondary end points: not significant

- Response: ≥50% reduction from baseline to week 3 • Remission: total score ≤10 week 3
- sustained response: weeks 3 through 12
- Response not sustained at 12 weeks



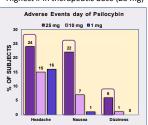
Goodwin, et al. NEJM (2022)

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Psilocybin for Treatment Resistant Depression: Adverse Events

Adverse events day of use

• Headaches, nausea, dizziness • Highest # in therapeutic dose (25 mg)



- Serious adverse events

 Suicidal ideation, self-injury, hospitalization

 Four (5%) in 25 mg, 10 mg dose; 1 in low-dose group



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Trial of Psilocybin versus Standard of Escitalopram for Depression

Exclusion criteria

- · Immediate family or personal history of psychosis
- · History of serious suicide attempts
- Previous use of escitalopram excluded
- · But previous use of psilocybin allowed
- Suspected, known preexisting psychiatric condition that could jeopardize rapport

Conclusions

- Results: no significant difference in antidepressant effects psilocybin, escitalopram
 Secondary outcomes: generally favored psilocybin, but analyses lacked correction for multiple comparisons

Carhart-Harris R, Giribaldi B, Watts R, Baker-Jones M, Murphy-Beiner A, Murphy R, Martell J, Blemings A, Erritzoe D, Nutt DJ. Trial of Psilocybin Escitalopram for Depression. N Engl J Med. 2021 Apr 15;384(15):1402-1411.

| Can Protocols be Scaled with Fidelity? FDA approval: Contingent on same conditions as clinical trials, REMS | | | |
|---|--|--|--|
| Academic setting: Expectations outlined Session: lasts up to eight hours Intensive care: supportive, psychotherapy, contacts Therapist-monitors: 1-2 with human relation skills Therapist-monitors: know altered states Cattling | SET (person's mindset) • Mood • Background • Psychology unique to subject • Physiology unique to subject | | |
| Setting: Living-room, headphones, blinders, music Set/setting: appropriate for diverse populations? Next day session: guides talk experience, help patients "make sense of it Potential risks: outside protocol? Baychinder et al. Diagnostic conversion from unipolar depression to bipolar disorder. Sublicipationals, or Audionaticate disorder. A nationaide princeptive 15-year register study on 41-46 in patients. Bioplat Blook 2005 Sep;216(5.85-95). Rubbi-fabrait et al. Fosttamantic Stores Disorder Mars. J. Cales Report. J Add Mars. J. C | SETTING (environment) • Music playlist • Living room, sofa • Earphones • Hand-holding | | |

Scalability Screening

• few chosen are carefully selected; in clinical practice?

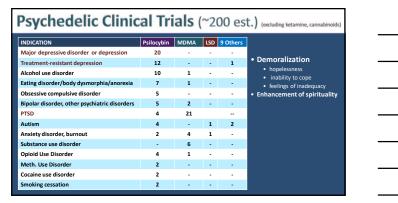
High selectivity ratio

• recruited subjects believe will respond; in clinical practice?

In naturalistic setting

• will recruitment be as cautious?

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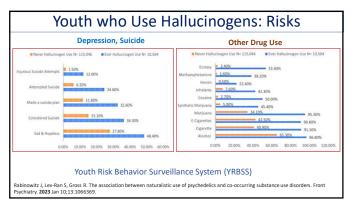
| 3. Reality of Unintended Consequences? Legalization Movement Piggy-backing on Medical Research |
|--|
| Will states follow California MMJ? From ballot to physicians recommend? Will advocates promote compassionate access without FDA approval? |
| Will psychedelics get ahead of efficacy, safety evidence? |
| Prediction? Majority of states will legalize psychedelics by 2034 - 2037 |
| Siegel JS, Dally JE, Perry DA, Nicol GE. Psychedelic Drug Legislative Reform and Legalization in the US. JAMA Psychiatry. 2023 80(1):77-83. |

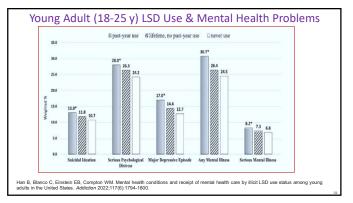


PERSISTENT HALLUCINOSIS FOLLOWING REPEATED ADMINISTRATION OF HALLUCINOGENIC DRUGS 1.2 SAUL H. ROSENTHAL, M.D.1 Early reports on the side effects of the billucinogenic drugs emphasized their paramoid reactions are occasionally seen, short-term effects and their relative safety. These experiences usually last only while In a review of the literature and poll of experiences usually last only while In a review of the literature and poll of the experiences in 1980, Obertal 27 partent drugs are provided to the patient is under the influence of the experiences in 1980, Obertal 27 partent drugs are provided some and the patient is under the influence of the experiences in 1980, Obertal 27 partent drugs are provided some and the patient of the patient is under the influence of the patient is under the patient is under the patient is under the patient is under the

Hallucinogen Use is Increasing Past Year Hallucinogen use: 12 y and older % Past Year Drug Use Among 12th graders Marijuana Rx Pain Reliever Misuse Hallucinogens 7.4M vulitizer or Sedative Misuse Cocaine 4.8M Rx Stimulant Misuse 3.7M Methymphotogica 3.5M DRUG PREV. Alcohol 46.5% 31.5% Vaping, Any 30.5% Marijuana/Hashish Hallucinogens 4.1% Methamphetamine 2.5M LSD 2.5% Inhalants 2.2M MDMA (Ecstasy) 1.1% 10M 20M 30M 40M 50M 60M Number of Past Year Users Ketamine 0.9% PCP 0.7% Salvia 0.6% Patrick ME et al (2022). Monitoring the Future Panel Study annual report: National data on substance use among adults ages 19 to 60, 1976-2021.

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Medical Community Steps Up

- July 2022 American Psychiatric Association position: "clinical treatments should be determined by scientific evidence in accordance with applicable regulatory standards; not by ballot initiatives or popular opinion."
- Legislative initiatives have minimal involvement of physicians: contrast to FDA regulation of esketamine, which includes extensive guidelines regarding medical diagnosis prior to initiation and oversight during treatment.

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The United States failed to prevent conflation of biomedical and commercial marijuana enterprises. The pattern should not be repeated with hallucinogens. Nevertheless, it is provocative that these agents show some short-term benefit for depression in selected populations. Interest in the field is likely to remain high, particularly because the development of antidepressants targeting the "hallucinogenic" 5-HT_{2A} receptor without eliciting hallucinations may be achievable.¹⁴

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Why is Medicalization of Psychedelics a Crucial Topic For NOAP?

Psychedelic effects

• can be intoxicating, psychotomimetic, many hours

Safety-sensitive positions

• Health professionals are in safety-sensitive positions

Safety-sensitive workers

• are obligated ethically, legally to mitigate identifiable safety risks

| Why is Psychedelic Medicalization a Crucial Topic for NOAP? Only FDA-approved Medications Should be Acceptable | | | |
|--|---|--|--|
| FDA approval | No psychedelic FDA-approved for any medical condition-except eskatamine | | |
| Psychedelic complex challenges | can use be balanced with safety/cognitive facilities/advocacy? | | |
| Fitness to work | • Is hallucinogenic use compatible with monitoring, safe practice? | | |
| PHP obligations to others | Compatible with patient safety? | | |
| Physicians in position to counsel youth, others on hallucinogens | • What to say? | | |

- 'the chemical opening of doors into the Other World', and belief that drugs can procure 'what Catholic theologians call a gratuitous grace'.
 ...Aldous Huxley
- Chemically induced hallucinations, delusions and raptures may be frightening or wonderfully gratifying
 in either case they are in the nature.
- in either case they are in the nature of confidence tricks played on one's own nervous system. ...Arthur Koestler

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A Sobering View Dr. Jerry Rosenbaum, Director, Center for the Neuroscience of Psychedelics Massachusetts General Hospital

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