January 6, 2019

Dear [Name]

Subject: Petition to Add Opioid Use Disorder (OUD) as a Qualifying Condition for the Medical Use of Cannabis in the State of Hawaii – Denied

This letter is in response to the petition you submitted on August 12, 2019 requesting the addition of Opioid Use Disorder (OUD) as a qualifying condition for the medical use of cannabis in the State of Hawaii. The petition was reviewed and met the requirements specified in HAR §11-160-7 for DOH to consider adding OUD as a qualifying medical condition.

In addition to reviewing your submission, the Department of Health (DOH) considered verbal and written testimony submitted through the public hearing process, reviewed the laws and policies of medical cannabis programs in the U.S., and assessed the results of a comprehensive medical literature review related to medical cannabis and OUD. DOH finds that:

- Most of the written and oral testimony submitted for public hearing was in support of adding OUD as a qualifying medical condition.

- Of 33 states and U.S. jurisdictions permitting medical cannabis, five states have taken legislative or executive action to add the condition and eight states have rejected cannabis use for the treatment of OUD. States that denied petitions to add the OUD cited the lack of available evidence to support it.

- Peer-reviewed scientific literature related to cannabis treatment and OUD is limited and inconclusive. Numerous studies emphasize the need for more research before conclusions can be made.

Collaborative and strategic efforts through the Hawaii Opioid Initiative are being implemented statewide to increase access and reduce barriers for patients. Many patients in Hawaii are currently able to use medical cannabis to manage opioid use/misuse through evidence-based recommendations because opioid prescriptions have been commonly prescribed to treat severe pain. As of November 30, 2019, 85% or 22,492 of Hawaii’s registered patients were qualified and registered in the Cannabis Patient Registry due to a diagnosis of severe pain.
Medical cannabis may also be used to treat or help alleviate symptoms of severe nausea which is often experienced during opioid withdrawal. There is no prohibition on the use of medical cannabis in conjunction with opioids to treat any of the debilitating medical conditions recognized in Hawaii.

Based on extensive review and careful consideration of the available evidence, DOH has determined there is insufficient evidence to support the use of medical cannabis for OUD. DOH cannot support adding OUD as a qualifying condition for medical cannabis use in Hawaii. Thus, the petition is denied. Should more evidence become available in the future showing the efficacy and safety of cannabis in the treatment of OUD, we would be willing to re-evaluate OUD as a potential qualifying condition.

Sincerely,

Bruce S. Anderson, Ph.D.
Director of Health