



August 30, 2017

Rick Johnson, Chairperson
Michigan Medical Marijuana Licensing Board
Bureau of Medical Marijuana Regulation
611 W. Ottawa
P.O. Box 30004
Lansing, MI 48909

Dear Chair Johnson and Members of Medical Marijuana Licensing Board:

On behalf of the Epilepsy Foundation and our Michigan affiliate, Epilepsy Foundation Michigan, we urge you to ensure access to medical cannabis is not disrupted during the transition to new licensing regulations in the coming year. Current dispensaries should remain open and appropriately regulated while new regulations are being promulgated and the new licensing system is being implemented. While we appreciate your concerns and support compliance with the Michigan Medical Marijuana Act, it would be extremely harmful to many in the state if no dispensaries were operating for a period of time. Relying exclusively on caregivers to produce cannabis for patients is less safe and reliable than most existing dispensaries.

The Epilepsy Foundation is the leading national voluntary health organization that speaks on behalf of at least 3.4 million Americans with epilepsy and seizures. We foster the wellbeing of children and adults affected by seizures through research programs, educational activities, advocacy, and direct services. Epilepsy is a medical condition that produces seizures affecting a variety of mental and physical functions. Approximately 1 in 26 Americans will develop epilepsy at some point in their lifetime. There is no “one size fits all” treatment for epilepsy, and more than one third of people living with epilepsy suffer from drug-resistant or intractable seizures. Many more live with significant side-effects, despite available treatments. This is why some people living with uncontrolled seizures turn to medical cannabis when other options have failed.

The Epilepsy Foundation is committed to supporting physician-directed care, and to exploring and advocating for all potential treatment options for epilepsy, including medical cannabis. People with uncontrolled seizures live with the continual risk of serious injuries and loss of life. If a patient and their health care providers feel that the potential benefits of medical cannabis outweigh the risks, then families need to have that legal option. Nothing should stand in the way of patients gaining access to this potentially lifesaving treatment.

Currently, the majority of states have enacted laws to authorize state-run medical cannabis programs. In states where medical use of cannabis is legal as a treatment option for epilepsy, a number of people living with epilepsy report beneficial effects, including a decrease in seizure activity. The Epilepsy Foundation supports state regulated cultivation, production and dispensing of medical cannabis to ensure safe and legal access to this treatment option. Comprehensive

licensing requirements are critical to the development of an effective and meaningful medical cannabis program.

We look forward to the new licensing regulations next year and are confident that access and reliability will improve in Michigan with these new rules; however, it is critical to ensure a practical transition for existing patients who rely on these therapies. While not everyone with epilepsy should or would consider medical cannabis and further research is needed, medical cannabis, when prescribed by a treating physician, may be the best alternative for some individuals living with drug-resistant epilepsy. People living with epilepsy who have their treatments switched, or who experience a delay in accessing their treatments, are at a high risk for developing breakthrough seizures and related complications, including death.

The Epilepsy Foundation and our affiliate in Michigan urge you to ensure as seamless of a transition as possible to the new licensing system for medical cannabis in the state, and to proceed with caution as to not disrupt patient care. Please do not hesitate to contact Angela Ostrom, Chief Legal Officer and Vice President Public Policy at our national office at 301-918-3766 or aostrom@efa.org with any questions.

Sincerely,



Brianna Romines, MPA
President
Epilepsy Foundation of Michigan



Philip M. Gattone, M.Ed.
President & CEO
Epilepsy Foundation

CC: Governor Rick Snyder, Attorney General Bill Schuette