



February 28, 2017

The Honorable Jim Steineke, Chair
Assembly Committee on Rules
Wisconsin State Capitol
2 East Main St.
Madison, WI 53703

Dear Chair Steineke and Members of the Assembly Committee on Rules:

On behalf of the Epilepsy Foundation and our Wisconsin affiliates, the Epilepsy Foundation Heart of Wisconsin, the Epilepsy Foundation Western Wisconsin, and the Epilepsy Foundation Southeast Wisconsin, we urge you to support Senate Bill 10, which would expand existing law to allow use of cannabidiol (CBD) with a recommendation by a physician for treatment of any medical condition, as well as, ensure that any therapy derived from CBD that is approved by the Food and Drug Administration (FDA) will be available in Wisconsin.

The Epilepsy Foundation is the leading national voluntary health organization that speaks on behalf of more than three 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 about a third of people living with epilepsy suffer from uncontrolled or intractable seizures, with many more living with significant side-effects, despite available treatments. Uncontrolled seizures can lead to disability, injury, and even death. This is why people living with uncontrolled seizures turn to treatment options like CBD and cannabis, when other options have failed.

While we support SB 10, we also encourage you to explore a comprehensive, state-regulated CBD and/or cannabis program. The current status quo falls short of ensuring Wisconsinites with epilepsy are able to safely access CBD because it does not establish a licensing structure for manufacturing and dispensing of CBD. Currently, CBD is legally available in the majority of states for treatment of epilepsy for individuals who have failed to gain seizure control after trying FDA-approved treatment options. In the states where medical use of CBD and/or cannabis is legal as a treatment for epilepsy, a number of people living with epilepsy report beneficial effects, including a decrease in seizure activity. Not everyone with epilepsy should or would consider cannabis, including CBD, as a treatment option, and further research is needed on the connection between cannabis and seizures. Nevertheless, cannabis, including CBD, when recommended by a treating physician, may be the best alternative for some individuals living with drug resistant epilepsy and uncontrolled seizures.

Senate Bill 10 also includes a provision that will ensure access for Wisconsinites to therapies derived from CBD that are approved by the FDA. The FDA is currently reviewing at least one

CBD derived therapy that shows promise for the treatment of Dravet and Lennox Gastaut syndromes (LGS), tuberous sclerosis complex (TSC) and potentially other rare epilepsies. This potential treatment option has both Orphan Drug Designation and Fast Track Designation from the FDA and could be approved as soon as early 2018. After FDA approval, the federal Drug Enforcement Administration (DEA) would schedule the therapy through administrative action and the medication would become available for patients. However, since CBD is currently a Schedule I substance under the Wisconsin state drug schedule, state action is needed to ensure proper rescheduling of FDA-approved treatments derived from CBD. Unless Wisconsin acts, patients will not have access to these new treatments, which would be available in neighboring states that have taken action. This is an issue of creating access to FDA-approved, prescription therapies. Access to new therapies is particularly important for the epilepsy community due to the significant unmet need and often debilitating side-effects to the currently available medications.

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

The Epilepsy Foundation, the Epilepsy Foundation Heart of Wisconsin, the Epilepsy Foundation Western Wisconsin, and the Epilepsy Foundation Southeast Wisconsin thank you for your careful consideration of these issues and urge your support of SB 10. We look forward to working with the legislature to ensure safe, reliable, and legal access to CBD for Wisconsinites living with epilepsy and uncontrolled seizures. Please reach out to Art Taggart at 608-442-5555 or ataggart@epilepsywisconsin.org with any questions or concerns.

Sincerely,



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Epilepsy Foundation Heart of Wisconsin



Tina Anderson
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Richard Wallin
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