October 12, 2020

The Honorable Bev Clarno
Secretary of State
900 Court Street NE
Capitol Room 136
Salem OR 97310-0722

Dear Secretary Clarno:

The American Academy of Child and Adolescent Psychiatry (AACAP), a national physician organization representing over 9,800 child and adolescent psychiatrists, residents, and medical students, opposes Oregon Ballot Measure 109: The Psilocybin Mushroom Services Program Initiative, which would make available psilocybin to treat mental health disorders.

The U.S. Food and Drug Administration (FDA) has designated psilocybin for breakthrough therapy status only for the use of Major Depressive Disorder, after limited, early trials. This does not indicate it is a safe and effective treatment for such a diagnosis. However, Ballot Measure 109 would make psilocybin available to anyone who self-refers seeking treatment for addiction, depression, anxiety disorders, among others, without requiring a specific mental health diagnosis. Oregonians should not be misled in believing psilocybin can safely and effectively treat mental health disorders without scientific evidence as to its effects.

AACAP believes patients are best served by evidence-based standards of care when receiving mental health care, which would not occur under Ballot Measure 109. Without approval by the FDA for any therapeutic use, and therefore lacking scientific evidence gained through clinical trials, no state should bypass the FDA drug approval process and make legal for medical use a drug such as psilocybin. While Ballot Measure 109 states patients only above 21-years-of-age could legally access psilocybin, science indicates brain development continues through the age of 26. Without FDA guidance, administering a controlled substance unapproved by the FDA could risk healthy brain development.

AACAP agrees with the American Psychiatric Association, the Oregon Council of Child & Adolescent Psychiatry, the Oregon Psychiatric Physicians Association, and the Oregon Medical Association that the Oregon Health Authority should not devote resources, during a global pandemic, to establish a new licensing and training program for psilocybin centers and non-medically licensed “facilitators” with unknown credentials who would administer psilocybin. Concerning is the fact that Ballot Measure 109 would lead to someone other than a physician or licensed mental health professionals to administer psilocybin. Physicians, particularly
psychiatrists, have medical training necessary to diagnose and treat patients with mental health and substance use disorders, often complex patients, on multiple medications with co-occurring diagnosis. No one lacking medical training should administer a controlled substance.

Oregonians must know the risks associated with Ballot Measure 109.

Sincerely,

Gabrielle A. Carlson, MD
President, AACAP