



Cannabis Research at UCLA

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Research Policy and Compliance

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Cannabis - Legal Landscape

- State law:
 - Proposition 215 (1996) – Medical Marijuana
 - State Bill 566 (2013) – Legalized Cultivation of Industrial Hemp
 - Proposition 64 (2016) – Adult Recreational Use
- Federal law:
 - Marijuana (*Cannabis Sativa L*) regulated under the Controlled Substances Act (CSA) of 1970
 - Most possession, distribution, cultivation (manufacturing) is prohibited under the CSA

Cannabis Use

- With limited exceptions* possession, distribution, and cultivation of *Cannabis sativa L.* (aka marijuana) *is still prohibited* under the federal Controlled Substance Act
- UC Guidance on Use and Possession of Marijuana on UC Property states **marijuana use remains prohibited on UC property and at UC events** except for approved academic research
- All research conducted under the auspices of the University of California (regardless of where the research is conducted) that uses Cannabis must comply with all federal, state, and local regulations, as well as UC policies. Researchers must also comply with a California requirement for review by the Research Advisory Panel of California (RAPC)

*including an exception permitting certain research to be conducted in compliance with applicable regulations and policies of the Drug Enforcement Agency (DEA), the Food and Drug Administration (FDA), and the National Institute on Drug Abuse (NIDA)

Cannabis Research

- Research involves the use, cultivation, distribution, possession, procurement, or administration of Cannabis
- Includes derivatives of *Cannabis sativa L*, extracts and purified constituents (including those extracted or purified from Hemp)
- Federal controlled substances law regulating *Cannabis sativa L* also applies to controlled substance analogs intended for human use even if prepared through a de novo chemical manufacturing process
- It does *not* include research where there is no direct use, cultivation, distribution, possession, procurement or administration of cannabis, such as observational studies, policy research, or review of public records related to marijuana use

Use of Cannabis in Research

- Cannabis research requires DEA Schedule I registration
- Use of Cannabis in human subject research also requires approval from the IRB and the FDA (animal research requires ARC approval)
- Marijuana product for use in research must be obtained from an NIDA approved grower (currently the University of Mississippi)
- Under State law, any planned research to be conducted in California requiring the use of a Schedule I or Schedule II Controlled Substance as its main study drug, must be submitted to the Research Advisory Panel of California in the California Attorney General's Office for review and approval

Use of Cannabis in Research

- Research support (i.e. contracts, grants, or gifts) from individuals or entities whose funds are derived from the marijuana industry, should be evaluated before being accepted to ensure UC is not inadvertently violating laws on money laundering, or is accused of aiding and abetting an illegal activity
- UCLA will be establishing a process for conducting these evaluations
- In the interim, these reviews are being conducted by the UC Research and Graduate Studies Office, which may seek advice from the UC Office of General Counsel

Cannabis - Legal Landscape

- Evolving “gray” areas:
 - Questions about how Federal laws apply in some areas;
 - Uncertainly about degree of Federal scrutiny and enforcement actions;
 - Confusing, sometimes inconsistent definitions;
 - Questions about obtaining viable seeds for industrial hemp research;
 - Questions about UC’s risk tolerance;
 - Accepting support from individuals or entities in the Cannabis industry, and conducting research for the Cannabis industry; and
 - Concerns about licensing UCLA Intellectual Property to the Cannabis industry.

Current Review and Approval Process

- Questions for UCOP should be addressed to **Agnes Balla**, Research Policy Manager, UC Research Policy Analysis and Coordination (RPAC), UCOP
agnes.balla@ucop.edu | (510) 987-9987
- For assistance with DEA registrations to use Controlled Substances (including Cannabis) at UCLA, contact **Alyssa Leiva**, UCLA EH+S
controlledsubstances@EHS.ucla.edu | (310)795-5013

References

- RPAC Memo 17-01 “Information for Researchers on the Effect of Proposition 64 on Marijuana Research at the University of California”:
<https://researchmemos.ucop.edu/php-app/index.php/site/document?memo=UIBBQy0xNy0wMQ==&doc=3663>
- COGR Cannabis Research Frequently Asked Questions:
<https://www.cogr.edu/sites/default/files/FAQ.pdf>
- UC Guidance on Use and Possession of Marijuana on UC Property: <https://www.ucop.edu/marijuana-and-drug-policy/>

Questions?

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