November 22, 2019

A Matter of Record (301) 890-4188

Min-U-Script® with Word Index

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| 8 spend a little time trinking about a step back from |
| 9 this and what we might want to see happen as next |
| |
| 10 steps. So in the back of your head, be thinking |
| II about are there studies that here to be done, of |
| 12 Psychedelics 88 12 papers that need to be written, or meta-analyses, 12 ratio 12 papers that need to be written, or meta-analyses, |
| 13 vaccines 127 13 or data mining that needs to occur going forward. |
| 14 General discussion, including agents not 163 14 Any questions about any of that; any |
| 15 specifically considered, consensus and 15 thoughts, points? |
| 16 next steps 16 DR. KOSTEN: To follow up on yesterday, when |
| 17 Adjournment19617 will the slides and things like that actually |
| 1818 be transcript, I understand that takes a while, |
| 1919 but are the slides going to be available like |
| 20 20 tomorrow? |
| |
| 21 DR. STRAIN: Not tomorrow, no. Dr. Dworkin |
| 2121DR. STRAIN: Not tomorrow, no. Dr. Dworkin2222 is |

ACTTION - BEYOND THE MU OPIOID SYSTEM FOR

| | TTION - BEYOND THE MU OPIOID SYSTEM FOR EATING OUD (B-MOST-O) | | November 22, 2019 |
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| | Page 5 | | Page 7 |
| 1 | DR. TURK: Two things. One is that those | 1 | I think as you're making comments, you may |
| 2 | people who presented, you need to make sure there's | 2 | want to think about am I saying, the design of the |
| 3 | nothing in your slides you don't want to be in | 3 | study, this is a study that we'd need to be |
| 4 | there. So you have the first right to remove any | 4 | thinking about adding into a medication-assisted |
| 5 | of those things. Then it could be a month until it | 5 | treatment. |
| 6 | actually gets up on the website. However, if you | 6 | Ryan, did you have any preliminary thoughts |
| 7 | wanted to talk to one of your colleagues about | 7 | that you would want to convey, given you've thought |
| 8 | getting access to their slides, and they're | 8 | a lot about this? |
| 9 | willing, they could provide them to you. But it | 9 | DR. VANDREY: I don't think so. I think I |
| 10 | takes us at least a month to get them mounted on | 10 | said everything I needed to say yesterday. |
| 11 | the ACTTION website. | 11 | (Laughter.) |
| 12 | DR. STRAIN: Yes, that was my sense of it. | 12 | DR. STRAIN: Well, for the group as well, |
| 13 | And I think the transcript takes even longer, to be | 13 | what do you think would be a good design for a |
| 14 | honest. | 14 | trial of a cannabinoids to see if it could help |
| 15 | DR. KOSTEN: Then if we wanted to use any of | | opioid-use disorder in patients with or without |
| | these slides to educate the rest of the world, | 16 | maintenance on, say, methadone or buprenorphine? |
| 17 | what's the procedure for that? | 17 | DR. VANDREY: To add to that, I think one of |
| 18 | DR. STRAIN: I would contact the presenter; | 18 | my big questions coming into this because, |
| | go to the presenter and make sure that they're | 19 | |
| 20 | comfortable with that. | | the cannabinoids for treating opioid-use disorder |
| 21 | DR. KOSTEN: I was going to steal all of | | was a bad idea. |
| 22 | Kyle's slides, for example. I'd never want to do | 22 | DR. STRAIN: Okay. |
| | Page 6 | | Page 8 |
| 1 | that myself. | 1 | DR. VANDREY: So I guess the question to the |
| 2 | DR. STRAIN: Kyle is flattered. | 2 | opioid-use disorder experts in the room is how do |
| 3 | (Laughter.) | 3 | you think cannabinoids could help? What would be |
| 4 | DR. STRAIN: Any other general questions? | 4 | the most interesting research questions, and where |
| 5 | (No response.) | 5 | do you think there's clinical promise? Then that |
| 6 | Group Discussion - Cannabinoids | 6 | might help inform discussion about design issues |
| 7 | DR. STRAIN: If not, we're going to start | 7 | and measurements. |
| | with cannabinoids, cannabinoids and related | 8 | DR. LEVIN: I don't remember if you |
| | compounds. This is a chance for us to think about | | mentioned it yesterday. I don't think you did; |
| | what kinds of design trials, outcomes, benefits, | | maybe you did that. At Columbia, we did a study in |
| | and risks that we need to be thinking about. As | | which we gave dronabinol as an idea to help with |
| | I've thought about cannabinoids for the treatment | | withdrawal. I mean, it's not all the other |
| | of opioid-use disorder, there are two things that | | products of marijuana. It was found to help with |
| | come to mind, just to frame it; and I'll come back | | withdrawal. |
| | to each category to give this thought. | 15 | But the problem with the study was that |
| 16 | It seems to me they're somewhat unique | 16 | after they left, the induction and the retention in |

- 17 because cannabinoid compounds could be layered into 17 treatment was no different. But part of it was a
- 18 existing medication treatments like methadone or
- 19 buprenorphine if there was some efficacy, depending
- 20 upon what the outcome is; or they could be proposed
- 21 as having unique characteristics that could be
- 22 stand-alone medications for opioid-use disorder.

18 lot of these patients are using marijuana, and what

20 that were on marijuana actually stayed more; that

21 there's some signal of some sort -- if you use too

22 much or too little, it wasn't helpful, but if you

19 they found as a secondary outcome was the patients

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| | Page 9 | | Page 11 |
| 1 | used a certain amount, it actually kept people in | 1 | somebody does not want to go on methadone or |
| 2 | treatment more, which was an interesting finding. | 2 | buprenorphine, could it be helpful? Sure, maybe. |
| 3 | But the dronabinol didn't help because the | 3 | But again, I think, in my mind, I'd want to see |
| 4 | dronabinol they were still using it wasn't | 4 | comparative efficacy data. How well does |
| 5 | exclusionary for them to be able to use marijuana | 5 | dronabinol or smoked cannabis attenuate withdrawal |
| 6 | once they left the inpatient program. | 6 | compared to lofexidine, compared to some other non |
| 7 | People have noticed this clinically, that | 7 | opioid medication? |
| 8 | some marijuana isn't the worst, even though | 8 | So I think that might be where we start, and |
| 9 | somebody who does cannabis it's sort of an | 9 | then if you see something there, then you can start |
| 10 | interesting signal that may be there. | 10 | getting excited and start thinking about, okay, |
| 11 | DR. WINCHELL: I guess my question is why | 11 | well, what's the right dosing and what's the right |
| 12 | are we asking the question that way; how do we | 12 | regimen, and then we could consider that. |
| 13 | design trials with cannabis for whatever? Are we | 13 | DR. COMER: I think two areas that are of |
| | saying that cannabis is somehow different than any | 14 | potential interest are for the withdrawal; really, |
| | drug X, which could be administered once a day, or | | not so much detox but for transition to Vivitrol, |
| | throughout the day, or at different doses? How is | | for example. Lofexidine is a great medication for |
| | cannabis or is cannabis really different than any | | treating withdrawal, but it has issues with blood |
| | other drug X that we might look at? | | pressure and all that kind of stuff. |
| 19 | We see this stuff all the time, and people | 19 | |
| | propose all kinds of interesting designs, and it's | | different, but its abuse liability is pretty low, |
| | not about any particular class of drugs | | and it has certain advantages. So I think in that |
| 22 | necessarily. So is there something unique about | 22 | clinical scenario, it would be useful. As Frances |
| | | | |
| | Page 10 | | Page 12 |
| 1 | Page 10 cannabis compared to anything else, is really my | 1 | Page 12 said, even though we do have buprenorphine, and |
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| | cannabis compared to anything else, is really my | 2 | said, even though we do have buprenorphine, and |
| 2 | cannabis compared to anything else, is really my question. DR. STRAIN: Sandy? | 2 3 | said, even though we do have buprenorphine, and methadone, and naltrexone, the relapse rates are |
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| 2 3 4 5 | cannabis compared to anything else, is really my question. DR. STRAIN: Sandy? DR. COMER: My question is similar, | 2 3 4 | said, even though we do have buprenorphine, and methadone, and naltrexone, the relapse rates are pretty high long term. So if we can prevent relapse, then that's a really great place to use it. |
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| | Page 13 | | Page 15 |
| | 1 Experimental work in patient populations, in | 1 | question is, is the first step to ask patients what |
| | 2 pain populations, on top of opioid use, do people | | they think about using cannabis in some way, or a |
| | 3 use less opioids, that's something I'd like to see | | cannabinoids |
| | 4 more work on. | 4 | DR. McCRAE-CLARK: Well, we know. |
| | 5 DR. BOGENSCHUTZ: We've talked about it | 5 | (Laughter.) |
| | 6 several times, but the cannabis is not a thing and | 6 | DR. STRAIN: What's that? |
| | 7 there are a lot of things inside of it. It's going | 7 | DR. McCRAE-CLARK: I think we know that, and |
| | 8 to depend strongly on which cannabinoids we're | 8 | given the fact that there is such interest, it's |
| | 9 talking about. For example, CBD, we don't know | 9 | sort of |
| 1 | o exactly what it does, but in animal models, it's | 10 | DR. STRAIN: For opioid-use disorder, you |
| 1 | 1 not just like something you would take as a quasi | 11 | think that |
| 1 | 2 replacement or dampening it. It's something that | 12 | DR. McCRAE-CLARK: I think there is. |
| 1 | 3 may have persisting effects on reward systems and | 13 | DR. STRAIN: But for what purpose? I guess |
| 1 | 4 drug-seeking behavior. | 14 | that's |
| 1 | 5 So it might not be something that you would | 15 | DR. McCRAE-CLARK: I think if you look at |
| 1 | 6 be taking as a maintenance or as a substitution to | 16 | the press, it's all over the place. I think people |
| 1 | 7 blunt withdrawal symptoms. It might be something | 17 | are saying |
| 1 | 8 that you would take in the context of an inpatient | 18 | DR. STRAIN: Aimee is speaking, by the way. |
| 1 | 9 treatment for some period of time or persistently, | 19 | DR. McCRAE-CLARK: the need for opioids |
| 2 | o but we just don't know. But it's not | 20 | reduces the risk of overdose. There's so much out |
| 2 | 1 necessarily it could be very different models | 21 | in the press about it, that I think that given that |
| 2 | 2 because of its mechanisms, which might be quite | 22 | public perception, there does need to probably be |
| | Page 14 | | Page 16 |
| | 1 different. | 1 | some good, well-designed trials so that we can |
| | 2 DR. STRAIN: Kit? | 2 | actually get some answers. |
| | 3 DR. BONSON: Remember, though, FDA does | 3 | DR. STRAIN: Dennis? |
| | 4 welcome botanical applications. So if you wanted | 4 | DR. TURK: As an outsider to this topic, I |
| | 5 to study cannabis as cannabis, that is a | 5 | just want to sit back. And what I've been hearing |
| | 6 possibility. You don't need to necessarily have an | 6 | is there are different types of agents, chemical |
| | 7 isolated cannabinoid, But there needs to be a | 7 | components of different cannabinoids, so that |
| | 8 specific cultivar, and it needs to be all grown | 8 | potentially has to be split apart. There are |
| | 9 similarly. There are standards that one has, but | 9 | different populations that you're thinking of; |
| 1 | o it isn't that you can't do cannabis as botanical | 10 | problems that you're thinking of using them for. |
| 1 | 1 potentially, or any other botanical. | 11 | For example, we've mentioned for a chronic |
| 1 | 2 DR. STRAIN: So it's kind of interesting. | 12 | pain patient, that might be quite different what |
| 1 | 3 As I'm hearing the comments, a couple of minutes | 13 | you're looking for than to reduce withdrawal in an |
| 1 | 4 ago, I was thinking, well, maybe the first question | 14 | opioid-use disorder patient. I almost could see a |
| 1 | 5 is should there actually be research done on this | 15 | table in which you say all the potential uses and |
| 1 | 6 topic, the use of either marijuana or a cannabinoid | 16 | all the relevant outcomes, because the outcomes are |
| 1 | · · | 17 | going to be different. For the chronic pain |
| 1 | | 18 | patient, the opioid sparing criteria might be |
| 1 | 9 it maintenance in lieu of methadone; be it an | 19 | important. For the opioid-use disorder patient, it |
| | o add-on to methadone to help anxiety, or depression, | 20 | o |
| 2 | 1 or sleep, or some ancillary symptom. | 21 | So I think the issues are, one, what's the |
| 1 | I think the track white we have been dear the model. | 100 | an encode Characteristic de la Caracteria de la consecta de la Caracteria de la C |

- I think that might go back to maybe the real
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22 population; what's the issue or the question that

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| 1 | you're trying to think about using this for; what's | 1 | experimental work, clinical experimental work in |
| | the appropriate agent you're thinking of evaluating | | this area. I don't think we need to do a whole |
| 3 | for that purpose; and what's the appropriate | 3 | lot I mean, there's research going forward on |
| | outcome for that? It seems to me those are going | 4 | all these angles, including what's happening |
| | to be how you're going to do it. There's not going | | naturalistically, but I think we know enough. |
| 6 | to be one simple there's one design for any | 6 | There's a lot of interest, and I would say probably |
| 7 | canabinoids study. It's going to vary depending | 7 | the biggest is as a substitution therapy. |
| 8 | upon the purpose of what you're trying to use this | 8 | Like anything else, the field is going to |
| 9 | for. | 9 | have to take some educated guesses, but I don't |
| 10 | I think that's what you're going to have to | 10 | think we need to wait years to do more work to jump |
| 11 | think through, is what's unique about the outcomes | | into experimental clinical research, looking at |
| | for these different populations, and then what | | cannabinoids as substitution treatments in |
| | would be the outcomes that you'd want to consider | 13 | opioid-use disorder. |
| 14 | in using them? Is it an acute use? Is it a | 14 | It's kind of crazy we don't have anything in |
| | chronic use to reduce symptoms of withdrawal? So | 15 | that realm, randomized designs, in a clinical |
| | it's very short term. Is it to try to be used in | 16 | |
| | combination with one of the other drugs that are | 17 | this. I don't think we need to wait. I think we |
| | used for opioid-use disorder? | 18 | need to do all of these types of research. We make |
| 19 | · · · · · · · · · · · · · · · · · · · | | some best guess about what the product would be, |
| 20 | think you've got to be careful because I think if | | but I think there are different routes of |
| | the discussion starts flipping around from these, | | administration and different strains. There's THC |
| | we're going to be constantly getting confused with | 22 | and CBD, but we might be overstating. |
| | | | |
| | Page 18 | | Page 20 |
| 1 | what we're talking about. So I think you're going | 1 | Most of the cannabis, unless it's divorced |
| 2 | to have to narrow so pick the one that you want | 2 | of all THC, it's a bit analogous to different |
| 3 | to talk about. | 3 | benzodiazepines and anxiolytic sleeping agents. |
| 4 | Let's assume it's to reduce withdrawal. In | 4 | I'm more struck by more commonalities than |
| 5 | that kind of study, what would you want to do? | 5 | differences. So we make a best guess, and we start |
| 6 | What would be the outcomes that you would want to | 6 | doing some experimental work. |
| 7 | consider? Is there a particular cannabinoid | 7 | DR. SHURTLEFF: Can I just comment? |
| 8 | agent whatever, a mechanisms, a | 8 | DR. STRAIN: Sure. David, then Els, then |
| 9 | component that you specifically think would be | 9 | Frances. |
| 10 | relevant for that? | 10 | DR. SHURTLEFF: I agree with Dr. Turk's |
| 11 | Then you go on to the next, and you'd have a | 11 | analysis. I think it's also marrying the specifics |
| 12 | whole sequence of these things. Maybe some, we are | 12 | of the cannabis with a specific condition. For |
| 13 | fine with the measures that we have, and maybe for | 13 | example, there's a lot of work done with, for |
| 14 | other purposes, we don't have good measures. That | 14 | example, Sativex, the GW compound, showing that it |
| 15 | | 1 | can be effective for treatment of chronic pain. We |
| | will come up, I'm sure, later when we talk about | 15 | |
| 16 | will come up, I'm sure, later when we talk about some of the other conditions, as well as | | know that 50 to 80 percent of patients on methadone |
| | | 16 | - |
| | some of the other conditions, as well as cannabinoids. | 16 17 | know that 50 to 80 percent of patients on methadone |
| 17 18 | some of the other conditions, as well as cannabinoids. | 16 17 18 | know that 50 to 80 percent of patients on methadone or buprenorphine have issues of chronic pain, so I |
| 17 18 19 | some of the other conditions, as well as cannabinoids. DR. JOHNSON: I wanted to get in there | 16 17 18 | know that 50 to 80 percent of patients on methadone or buprenorphine have issues of chronic pain, so I could imagine a trial where you combine, say, a Sativex product, getting very concrete, with |
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| 17 18 19 20 | some of the other conditions, as well as cannabinoids. DR. JOHNSON: I wanted to get in there because it sounds like I might be in the minority DR. STRAIN: This is Matt Johnson. | 16 17 18 19 20 21 | know that 50 to 80 percent of patients on methadone or buprenorphine have issues of chronic pain, so I could imagine a trial where you combine, say, a Sativex product, getting very concrete, with individuals on methadone or buprenorphine. |

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| 1 | Hurd just reported a paper showing changes in | 1 than talking to people who have a 30-year history |
| | craving for opioids. And I think CBD for managing, | 2 of just using all kinds of drugs, et cetera. |
| | for example, those kinds of conditions, anxiety, | 3 So before you make those decisions, I think |
| | craving, could be another kind of approach. So I | 4 it's really helpful to get that input, so that for |
| | think you're right in breaking down the components | 5 each of these, you can then incorporate that |
| | of the OUD and marrying those components with | 6 information into the design; what is the question |
| | specific elements of the cannabis plant that we | 7 you're actually asking for that population. |
| | know have shown some efficacy. | 8 DR. STRAIN: Frances, Tom, and then David. |
| 9 | | 9 DR. LEVIN: It's interesting, because I |
| | pharmaceutical grade, the GW compounds, the | 10 think that because we've had these effective |
| | FDA-approved compounds, just because I think in the | 11 treatments like buprenorphine or methadone, the |
| | long run, standardizing dose administration makes | 12 idea is that anybody can be on these drugs, and |
| | more sense than a smoke product that has so many | 13 they're going to do well. And the reality is that |
| | variations. We know there's 110 cannabinoids, 120 | 14 we're finding that if you have a lot of psychiatric |
| | terpenes, within the cannabis plant itself. | 15 comorbidity, if you have a lot of impulsivity, if |
| | | |
| 16 | 1 5 | 16 you have not the right social situation in your |
| | how it's grown, and the season, or whatever else | 17 life, these drugs don't work as well, and you wind |
| | might be involved in the agriculture around that, I | 18 up dropping out of treatment. |
| | think going with these, either whether it's | 19 So I think that this has been a thing for |
| | EMA-approved or FDA-approved compounds seems to | 20 the field, and I've been a very strong proponent |
| | make more sense to me. | 21 like with cocaine. I don't think we're going to |
| 22 | DR. STRAIN: Thank you. Els? | 22 find a single medication for cocaine users. We're |
| | | |
| | Page 22 | Page 24 |
| | - | |
| 1 | DR. HOUTSMULLER: This is a situation where | 1 going to have to have different medications based |
| 2 | DR. HOUTSMULLER: This is a situation where there is widespread use by, as we've discussed, | going to have to have different medications based on either different phenotypes, or endotypes, or |
| 3 | DR. HOUTSMULLER: This is a situation where there is widespread use by, as we've discussed, different populations for likely different | going to have to have different medications based on either different phenotypes, or endotypes, or whatever you want to say. |
| 3 | DR. HOUTSMULLER: This is a situation where there is widespread use by, as we've discussed, different populations for likely different purposes, so I think this is exactly the situation | going to have to have different medications based on either different phenotypes, or endotypes, or whatever you want to say. What prompted me to ask to say something is |
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| | Page 25 | | Page 27 |
| 1 | product, and they overdosed, and you feel protected | 1 | great specificity to them, which you don't have |
| 2 | more. | 2 | with these natural biologics. We're talking about |
| 3 | So that's why I think the thinking is more | 3 | THC as if it just hits the CD1. It doesn't. It's |
| 4 | towards an adjunct treatment rather than a | 4 | all over the place. |
| 5 | replacement therapy, like using it like we do | 5 | So it just seems a dialogue about this |
| 6 | methadone or whatever else. So that would be why I | 6 | without having the benefit of all of that |
| 7 | would say be afraid to use it alone. | 7 | knowledge the knowledge is admittedly 40 years |
| 8 | DR. JOHNSON: And I would agree with all | 8 | old now, but it's there, and patents could be |
| 9 | that, the idea like taking people who have | 9 | developed on that. |
| 10 | failed | 10 | Commercial development of this is the other |
| 11 | DR. STRAIN: I'm sorry. Matt? | 11 | thing I think about. Right now, it's all stuff |
| 12 | DR. JOHNSON: institution therapy, those | 12 | that, in fact, the only regulation around it is |
| 13 | folks. | 13 | from the Federal Trade Commission to see if you're |
| 14 | DR. STRAIN: I'm going to try to keep | 14 | lying about what it might be, but otherwise, |
| 15 | people Tom, David, then Dustin. | 15 | nothing about its production. Somehow it seems |
| 16 | DR. JOHNSON: How about I do this? Does | 16 | like the FDA needs to be able to get in here and |
| 17 | that help you? | 17 | regulate some of the junk that's out there. |
| 18 | DR. STRAIN: Yes, that's fine as well. | 18 | That's a little bit off the as I said, I |
| 19 | Tom? | 19 | think we're missing a major piece of what's in this |
| 20 | DR. KOSTEN: One of the groups that's not | 20 | dialogue. |
| 21 | been well represented at this meeting is the | 21 | DR. STRAIN: Thanks. David? |
| 22 | pharmaceutical industry; at least it doesn't seem | 22 | DR. SHURTLEFF: Yeah. Just to follow up on |
| | Page 26 | | Page 28 |
| 1 | like it. They did a tremendous amount of work with | 1 | a couple of comments, we're running this natural |

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13 relatively weak.

- 2 cannabinoids and making artificial versions.
- Now, we think of them mostly as dangerous 3
- 4 substances, that people are coming in with K2 and
- 5 all these other bizarre combinations of making
- 6 these -- there are hundreds of these compounds, and
- 7 most all are full agonists as opposed to partial
- 8 agonists like THC. And there has been found that
- 9 there are toxicities, but they were all developed
- 10 with the commercial idea that they would decrease
- 11 tolerance to opiates, so therefore give them
- 12 together with opiates as a way to markedly reduce
- 13 the amount of opiates you need and how much over
- 14 time. 15 They were not tested out in terms of using
- 16 them for what about a detox, or what about a
- 17 transition off of opiates? So contacting some of
- 18 these companies -- I mean, they've got
- 19 pharmaceutical grade substances that are much more
- 20 simple to manufacture, unfortunately, which is why
- 21 they're manufactured in Mexico all the time now, or
- 22 in China. They're highly potent, and you have a

2 experiment now; 33 states have legalized marijuana

The other comment is before we get into

studying the conditions in and of themselves, we

I think where we could go is first let's

16 the cannabinoids before we try to think about how to combine that with OUD. I realize there's a need

step back and study the individual conditions with

to do that, but it may be worth stepping back and

Then the other thing related to Tom's

10 know CBD, there have been some studies to suggest,

epidemiological data showing why patients are

5 taking the cannabis. From what I've read, the

6 predominant reason is for pain management.

8 these comorbidities related to OUD, I think

11 for example, CBD may have effects on social

12 anxiety, for example, but those studies are

19 studying these disorders independently.

21 comment, I agree that cannabis is a natural

22 product, it's messy, but I think, actually, CBD,

3 for medical use, and there's a lot of

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| | Page 29 | | Page 31 |
| 1 | that may be the benefit. It's hitting multiple | 1 | cannabinoids we know, really, very little about, |
| | targets, as many drugs of abuse do. They may | | even CBD. Just the example of that, it's in your |
| 3 | provide some medical benefit. | 3 | coffee if you want to buy it out on the street |
| 4 | The final comment, we're not studying the | 4 | probably, probably only about a milligram. Many |
| 5 | minor cannabinoids. There's so much more in the | 5 | people think of it as this very benign substance, |
| 6 | cannabis plant that we just don't know much about, | 6 | and in a lot of ways it is, but it's got a lot of |
| 7 | that I think having industry, or government, | 7 | very complicated pharmacokinetic interactions, |
| 8 | or certainly we at NCCIH are trying to do more | 8 | particularly with opioids. |
| 9 | in studying the terpenes and the minor | 9 | So the point being there's a need for a lot |
| 10 | cannabinoids, that may show some clinical benefit | 10 | of really basic dose-response, and safety, and drug |
| 11 | for a variety of disorders. We're focusing on | 11 | interaction studies with any of these new |
| 12 | pain, but I could imagine setting those more | 12 | compounds, including CBD, which is not that new. |
| 13 | broadly for other indications. | 13 | DR. STRAIN: I cut you off before, Matt. |
| 14 | DR. STRAIN: Thank you. Dustin, then Matt. | 14 | Did you have a comment that you wanted to make? |
| 15 | DR. LEE: Yes, I'm just going to add into | 15 | DR. JOHNSON: I'll say a little more about |
| 16 | what's just been discussed right now. I just | 16 | what I've said before. Again, I think we need to |
| 17 | wanted to bring in consideration of the reality of | 17 | be moving on all tracks. Scientists have this sort |
| 18 | the therapeutic cannabis marketplace and what are | 18 | of propensity that it's a self-control issue, that |
| 19 | the chances that that whole systems is going to | 19 | maybe 20 years from now, we'll have all of the |
| 20 | change. As you said, we don't have a lot of | 20 | background information to go forward; yet, every |
| 21 | pharmaceutical representatives. You can say we | 21 | year goes by without more effective treatments. |
| 22 | also don't have dispensary representatives here, | 22 | Then we're talking about a number of things like |
| | | | |
| | Page 30 | | Page 32 |
| 1 | Page 30 because that's really where medical cannabis is | 1 | Page 32 chronic pain and OUD, but for these different |
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| 2 3 | because that's really where medical cannabis is being practiced right now. | 2 3 | chronic pain and OUD, but for these different things, there's an opportunity cost. I think we |
| 2 3 4 | because that's really where medical cannabis is being practiced right now. So it's great to do this research, and I | 2 3 4 | chronic pain and OUD, but for these different things, there's an opportunity cost. I think we know enough to step in with experimental clinical |
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| F | Page 33 Page 35 |
| 1 DR. STRAIN: Thanks. | 1 over to this side. |
| 2 DR. COMER: Well, not to be snarky or | 2 DR. HOUTSMULLER: oh, here it is. |
| 3 anything, but there are all these regulatory and | 3 MALE VOICE: Yes, you do. |
| 4 practical issues in working with cannabinoids, and | 4 DR. HOUTSMULLER: Thank you so much. |
| 5 I think Ryan did a really good job yesterday of | 5 I'm Els. |
| 6 identifying most of those. But if we want to talk | 6 DR. STRAIN: It was a little eerie to see |
| 7 about, okay, what would a clinical trial look like | 7 Bob's name without Bob. |
| 8 for a cannabinoid as an adjunct to | 8 DR. HOUTSMULLER: He also got to be you |
| 9 medication-assisted treatment, I completely agree | 9 yesterday. |
| 10 with Frances that I can't even imagine taking a | 10 DR. STRAIN: What's that? |
| 11 patient with opioid-use disorder, and then just | 11 DR. HOUTSMULLER: He got to be you |
| | |
| 12 putting them on a cannabinoid as a stand-alone | 12 yesterday. 13 DR. STRAIN: Yeah. |
| 13 medication just because the risk is too high. | |
| 14 What if we just, as an exercise, think about | 14 DR. HOUTSMULLER: I did have a comment. |
| 15 what a design of a trial would look like. | 15 When I heard and I'm not really an expert on the |
| 16 Immediately it comes to mind that in medications | 16 research in this area, so I'm listening to what |
| 17 development, NIDA wants to develop a product. S | |
| 18 immediately I'm thinking, well, buprenorphine would | |
| 19 be a good platform to use as maintenance | 19 compare them, then my comment was going to be, if |
| 20 medication. But then how would you add a | 20 this is a field where it would be appropriate to |
| 21 cannabinoid onto that as a single I don't know | 21 compare, for example, different to compare |
| 22 if it's feasible to add a cannabinoid onto | 22 either adding some cannabinoid, or just a marijuana |
| F | Page 34 Page 36 |
| 1 buprenorphine strip. | 1 that people can buy from a dispensary, with not |
| 2 So then my next thought was, okay, methador | ne 2 adding that or with adding something else. |
| 3 might be easier. So if we had methadone, and the | n 3 Then I was going to put a plug in for PCORI |
| 4 added a cannabinoid into that as a single kind of | 4 and say you should really start thinking about a |
| 5 product, then we would talk about doing the | 5 real-world effectiveness study, and do a large |
| 6 drug-drug interaction studies. We would talk about | 6 study where you have some control over what people |
| 7 what doses of methadone and the cannabinoid wo | uld 7 take, and you add some standard I mean, not to |
| 8 make sense; what kind of safety questions are we | 8 just, well, go buy your marijuana, but something |
| 9 raising here, and how would we design that kind of | 9 from dispensaries, et cetera, and you compare that |
| 10 study. | 10 to a whole group that doesn't get that. But then |
| DR. STRAIN: Our goal, just to be clear, is | 11 when I heard Sandy talk more about efficacy and |
| 12 not to actually design the study today, obviously, | 12 safety, I don't know that it's ready for that. |
| 13 but to lay out the parameters of what we want to | 13 So I'm not making any comment about that. I |
| 14 do. | 14 was just thinking, oh, maybe it isn't there yet. |
| 15 Now, Bob Dworkin's name card is up, | 15 If there is widespread use and people are using |
| 16 which | 16 this, different populations are using this, in |
| 17 DR. HOUTSMULLER: I'm not Bob. | 17 addition to a maintenance treatment, then it sounds |
| 18 DR. STRAIN: That's alright. Did you have a | 18 like that would be ready for a comparative |
| 19 comment you wanted to make, Els? | 19 effectiveness study, and a real-world setting, |
| 20 DR. HOUTSMULLER: I do have a comment, a | |
| 21 don't have my | 21 parts of marijuana, but looking at something that |
| 22 DR. STRAIN: Well, okay, and then we'll go | 22 is available. |
| | 22 IS available. |

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| | Page 37 | | Page 39 |
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| 1 | DR. JOHNSON: And I wanted to say something | 1 | interested in being on methadone or bup and that |
| 2 | on | | would. I think it's a pretty good guess there's a |
| 3 | DR. STRAIN: Celia? | 3 | |
| 4 | DR. JOHNSON: oh, go ahead. | 4 | be open for that. |
| 5 | DR. WINCHELL: You've got to wait, Matt, if | 5 | I completely agree with the ethical concerns |
| 6 | I may. | 6 | about putting people on cannabinoids who are |
| 7 | DR. JOHNSON: Oh, yeah; go ahead. | 7 | candidates for mu agonist or partial agonist |
| 8 | DR. WINCHELL: I'm very interested in what | 8 | treatment, so keeping that in mind and looking at |
| 9 | Dr. Comer and Dr. Levin both said about being | 9 | people for whatever reason it hasn't worked for |
| 10 | loathe to imagine a non-mu treatment as a stand | 10 | them or they're not interested in that; that would |
| 11 | alone because that's a very important point. We | 11 | be of interest. |
| 12 | certainly have a number of non-mu treatments that | 12 | |
| 13 | have been proposed to treat addictions of various | 13 | DR. WINCHELL: And I'd love to hear Frances' |
| 14 | kinds. And OUD being the sexy topic of the day, | 14 | answer to this question. |
| | where the money is, people bring new molecular | 15 | DR. STRAIN: David, Ryan, and then Frances. |
| | entities, all kinds of different molecular | 16 | 5 |
| | pathways, different targets, and they are | 17 | from a federal research organization, I'm sort of |
| | interested in studying these in patients with | 18 | |
| | opioid-use disorder. | | and I somewhat agree that we're playing catch-up |
| 20 | Sometimes the sponsors are a little fuzzy | | here with the science and the public use, and we |
| | about what aspect of the disorder would be amenable | | need to move as quickly as possible. Of course, we |
| 22 | to treatment by their molecule. "Oh, it could | 22 | have some regulations around how we can study |
| | | _ | |
| | Page 38 | | Page 40 |
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| | Page 41 | | Page 43 |
| 1 | but for our center, we are very much moving ahead | 1 | or address the issue that they say. |
| | with doing clinical research. | 2 | Essentially, if the cannabis industry says |
| 3 | We're primarily interested in minor | | that cannabis is great for opioid withdrawal, then |
| | cannabinoids, and particularly CBD, just because | | you design the study for that. I think that that's |
| | THC has so many potential issues with abuse | | where we can have credibility not only in the |
| | liability and other potential it's not the best | | decision making, but also we're addressing a key |
| | profile in terms of abuse liability and safety. | | clinically relevant outcome. So we're saying, |
| | But that's not to say that there can't be some | | alright, they're using it for this right now |
| | minimum dose combined with some other cannabinoids; | | anyway; let's find out if that's a good idea or |
| | we can get into the weeds on that. | | not. |
| | | | |
| 11 | But I think the point is, Matt's urgency | 11 | So you're essentially calling them on what |
| | about moving forward with some clinical research, I | | their claim is, so good or bad, the outcome becomes |
| | think we are open to that, as NCCIH, to go into the | | important. |
| | clinical realm. We're doing that already. We just | 14 | The other thing that kind of gets lost in |
| | spent over \$3 million on projects looking at minor | | this a little bit is that as you're doing this, we |
| | cannabinoids. At least two of them were with human | | can get really wrapped up in the idea of product |
| | subjects. We're about to award a third project | | development, the use of Sativex versus cannabis, |
| | this year, looking at CBD and THC for the | | and things like that. The reality right now in the |
| 19 | management of neuropathic pain. | 19 | product that gets evaluated is that, for most |
| 20 | So there are opportunities at the federal | 20 | people in the U.S., they have access to cannabis. |
| 21 | level to move the clinical research forward, I | 21 | So even if you develop a nice, clean |
| 22 | guess is my point. There's also a wealth of | 22 | pharmaceutical, there's not a good business case |
| | | | |
| | Page 42 | | Page 44 |
| 1 | - | 1 | |
| | information to learn from what's actually going on | | for doing that right now because that costs a ton |
| 2 | information to learn from what's actually going on in the real world, using rigorous approaches, | 2 | for doing that right now because that costs a ton of money, who's going foot the bill, and then |
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| | Page 45 | | Page 47 |
| 1 | comorbidities. And long-term use of THC we know is | 1 | think, from my perspective as a clinician, is the |
| 2 | generally pretty bad for people with anxiety, and | 2 | |
| 3 | depression, and PTSD, and psychosis; so making sure | 3 | we all quote, 50 percent or more of patients at |
| 4 | that we're carefully thinking about which | 4 | 6 months aren't on an opiate treatment after |
| 5 | cannabinoid for which population. | 5 | they've been put on it. If you look at pharmacy |
| 6 | DR. STRAIN: Thank you. Frances, Tanya, and | 6 | data, like prescription data Morgan did a |
| 7 | then Kenzie. | 7 | study it's like 80-90 percent. In a clinical |
| 8 | DR. LEVIN: I was just going to comment on | 8 | trial, we all quote 50-60 percent, but in the real |
| 9 | the issue of preference because I think that often | 9 | world, people are dropping out left and right at |
| 10 | changes frequently with patients over time. I | 10 | much higher rates because of all of the issues |
| 11 | think the vast majority of people with opiate-use | 11 | surrounding it. |
| 12 | disorder, as we know, aren't taking any | 12 | So to me, if we could find something that |
| | medication I don't say medication-assisted | 13 | would work on the high dropout because once the |
| 14 | treatments anymore medications for opiate-use | 14 | patients stop, the risk of overdose goes way up. |
| 15 | disorder. | 15 | To me, that would be my perspective, and my |
| 16 | Part of that is not because of preference; | 16 | opinion, the first thing to look at is keeping |
| 17 | it's because of reimbursement, doctors not being | 17 | people on medications as a first step. |
| 18 | available, doctors not prescribing enough; there | 18 | Adam's study was sort of a naturalistic. He |
| 19 | are a whole bunch of reasons why. But I think that | 19 | didn't go into that study really thinking about, |
| 20 | if you could define a group that truly doesn't want | 20 | oh, these people are all going to be using |
| 21 | a standard opiate-use disorder treatment, and I | 21 | marijuana, but they all continued using marijuana, |
| 22 | think that's a big question, then I think the idea | 22 | and the people on marijuana were retained in |
| | | | |
| | Page 46 | | Page 48 |
| 1 | of having an alternative is good. | 1 | treatment. The gold standard is just keep people |
| 2 | There was an interesting paper in the | 2 | coming through the door and keeping them in |
| 3 | American Journal Psychiatry in which they, no | 3 | treatment first. So I think that we have a lot to |
| 4 | surprise, found that if you gave a person with PTSD | 4 | do even on that side, even before going to the |
| 5 | an option of either psychotherapy or medication, | 5 | preference side. |
| 6 | they were retained in treatment a lot better if | 6 | DR. STRAIN: Thank you. We are closing in. |
| 7 | they were first given what they wanted. Often | 7 | We've just got a couple more minutes before we |
| 8 | clinical trials aren't designed that way, and | 8 | shift gears. I've got left Tanya, Kenzie, and then |
| | that's a whole I just was listening to Roger | 9 | , |
| 10 | yesterday talking about a clinical trial in which | 10 | |
| 11 | people are going to get choice in the CTN. | 11 | we could glean from a pharmaceutical industry. The |
| 12 | So I think this issue of choice is often not | 12 | pharmaceutical industry worked a lot in this area, |
| 13 | looked at as clinical trialists, and I think is a | 13 | but what's interesting is their efforts were in |
| 14 | very important one. So I agree with you, but I | | anti-cannabinoids. They were trying to decrease an |
| | think if you could define a group that you know had | 15 | appetite. If you could look at whatever's |
| | all available access to medication treatments, and | 16 | |
| 17 | were given enough psychoeducation about it and | 17 | · |
| | still refused it there's a big difference | 18 | 5 |
| | between an antagonist and an agonist, so if they | 19 | |
| | say they don't want an agonist, there's an | | you the way from the other side. There were safety |
| 21 | antagonist available. | | concerns. For example, those safety concerns were |
| 22 | But if you look at the other side, which I | 22 | around, that people who were receiving |
| i i | | 1 | |

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| | 1 anti-cannabinoids, they were getting depression and | 1 you. |
| | 2 they were suicidal. | 2 DR. SHURTLEFF: You said that you didn't see |
| | So once the signal emerges, it's all kind of | 3 any difference with opioid symptoms, but I'm |
| | 4 halted, stopped, those programs. It shows you with | 4 wondering about some of the issues you just |
| | 5 the cannabinoids, where to move, in which | 5 mentioned, anxiety and pain. Were those part of |
| | 6 direction, and what is the reason, and why the | 6 your natural history studies? |
| | 7 retention is better, for example; why they would | 7 DR. PRESTON: Unfortunately, we don't take |
| | 8 work in withdrawal, and this is why, because of | 8 chronic pain patients and we don't take people with |
| | 9 this effective component that would hold them. | 9 other major psychiatric symptoms. |
| 1 | | 10 DR. SHURTLEFF: There might be some benefit |
| 1 | 1 failed programs in the pharmaceutical industry. | 11 for more observational studies in those types of |
| 1 | | 12 patients. |
| 1 | 3 neuropsychiatric side effects are very key to the | DR. PRESTON: I think there probably is a |
| | 4 health program. | 14 lot of data out there that could be mined to look |
| 1 | | 15 for those kinds of effects. |
| 1 | | 16 DR. STRAIN: Sandy? |
| 1 | 7 studies, and we've done some of those. We analyzed | 17 DR. COMER: I just wanted to follow up on |
| | B data from people who were in treatment for opioid | 18 Celia and Matt's comment about, well, what about |
| | and cocaine dependence, and what we found is the | 19 patients who don't want to be on medication- |
| | people who used marijuana did no better or no worse | 20 assisted treatment and they want to be on a |
| | 1 on the opioid outcome measures and no better or | 21 cannabinoid? I appreciate Kenzie's work because I |
| | 2 worse on the cocaine outcome measures. What they | 22 think that really is apropos to what we're talking |
| | | |
| | | |
| | Page 50 | Page 52 |
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| | Page 50 | |
| | Page 50 1 did have was they were more likely to meet criteria | 1 about. |
| | Page 50 1 did have was they were more likely to meet criteria 2 for marijuana-use disorder. | about. Setting aside marijuana, because it has very |
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| | Page 53 | | Page 55 |
| 1 | endpoint? Is it retention? Is it reduced use? | 1 | had that conversation about cannabis because now |
| | What is it? | | we're sort of in that groove, where we're saying, |
| 3 | That's where it gets a little fuzzy in my | | okay, we see some of the parameters. Obviously, |
| 4 | mind. We talked yesterday about the need or the | | sleep agents are very different. We've got |
| | desire to reduce opioid use because that's where | | pharmaceutical grade things. We can do dosing |
| | the problematic behaviors come in. Then if | | correctly. We don't have local dispensaries that |
| 7 | somebody does reduce their use, does that mean that | 7 | are selling Ambien, if you can get an Ambien card |
| 8 | it's going to put them at higher risk of overdosing | 8 | from somebody, so it's a different set of cultural |
| 9 | in that situation? So that's a risk factor that we | 9 | and social stipulations. |
| 10 | have to think about in that kind of trial design. | 10 | I'll turn this over to you, Andrew, in a |
| 11 | So it's an interesting exercise in terms of | 11 | moment. |
| 12 | what kind of study would we do, and what would be | 12 | We also know that sleep complaints are an |
| 13 | the safest for the patient? What kind of endpoints | 13 | issue that patients report who are in methadone and |
| 14 | do we need to think about? | 14 | buprenorphine treatment, and there's a long history |
| 15 | Group Discussion – Sleep Agents | 15 | of data saying that people continue to report sleep |
| 16 | DR. STRAIN: Well, thank you, to all of you | 16 | problems even after they've stabilized in other |
| 17 | for your thoughts on that; a lot to consider, a lot | 17 | ways in treatment, and we could be doing better |
| 18 | of questions, and obviously no answers yet. But | 18 | with these, probably, symptoms that they're |
| 19 | I'm very appreciative of hearing the interest in | 19 | reporting. |
| 20 | seeing this kind of work be done, either in a | 20 | |
| | naturalistic way or in a systematic way from NIH's | | Andrew, did you have anything you wanted to say |
| 22 | perspective. The FDA is struggling with this as | 22 | about this as you kind of digested yesterday's |
| | | | |
| | Page 54 | | Page 56 |
| | Page 54 | | Page 56 |
| | well. | | presentation? |
| 2 | well. We're in the midst of a grand social | 2 | presentation? DR. HUHN: Thanks, Eric. |
| 2 3 | well. We're in the midst of a grand social experiment in this country, which confounds | 2 3 | presentation? DR. HUHN: Thanks, Eric. I kind of think about this in two ways. |
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| | Page 57 | | Page 59 |
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| | 1 literature as well, but at least the marijuana | 1 | target as stand-alone symptoms, or do they have to |
| | 2 literature, we've shown repeatedly that improving | 2 | be tied to opioid-use disorder and improving |
| | 3 sleep isn't necessarily linked with improving | 3 | treatment there? Because those are two very |
| | 4 self-administration. | 4 | different kinds of approaches. |
| | 5 It's certainly a complaint we hear about a | 5 | I actually asked Nora that when she was at |
| | 6 lot, and I think it is driving why people are using | 6 | Columbia giving a lecture, and she said the latter; |
| | 7 opiates or going back to opiates. I think it's a | 7 | that it has to be tied to reductions in use. But |
| | 8 mediator, so maybe it's not necessarily in and of | 8 | then I was thinking, and I said this to her. I was |
| | 9 itself the issue, but more that if you treat | 9 | like, "Why is that?" We have a whole aisle full of |
| 1 | o it in the lab with marijuana, we haven't seen | 10 | medications in the pharmacy that treats symptoms of |
| 1 | 1 it, but maybe in a clinical setting that, yeah, if | 11 | a cold. You're not treating the underlying |
| 1 | 2 people are trying to come off of opiates and you're | 12 | disorder, but you're treating the symptoms, and |
| 1 | 3 giving them Vivitrol, for example, and they're | 13 | that's really helpful for patients. |
| 1 | 4 still having sleep problems, they may say the hell | 14 | So can we think about a sleep medication as |
| 1 | 5 with it, I'm not going to take the next shot, or | 15 | a medication for treating opioid-induced sleep |
| 1 | 6 maybe the buprenorphine isn't helping enough with | 16 | problems and craving craving is the same kind of |
| 1 | 7 that. | 17 | issue or do we have to tie it necessarily to |
| 1 | 8 So I think it may serve as an important | 18 | actually reducing opioid use? |
| 1 | 9 mediator that we should be addressing, perhaps. | 19 | DR. KLEYKAMP: I'll go first. Annie |
| 2 | o Again, I don't think it is a stand alone, as a | 20 | Kleykamp with ACTTION, University of Rochester. We |
| 2 | 1 thing, but I think it's an important factor just as | 21 | just wrote a scoping review and Andrew was at |
| 2 | 2 other ones are. Not treating psychiatric | 22 | that meeting on craving and opioid-use disorder, |
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| | Page 58 | | Page 60 |
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| | 1 comorbidity people, don't stay in treatment and | 1 | struggling with these questions, and then we |
| | comorbidity people, don't stay in treatment and don't do well. There's a whole variety of factors, | 1 2 | struggling with these questions, and then we published a commentary on the idea. I think where |
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| 1 | just feel like there are discrete buckets. There | 1 | belly ache |
| 2 | are new technology measures that are more clear. I | 2 | DR. HUHN: Which direction is so you |
| 3 | don't know if anyone agrees with that, but | 3 | could have an indication for craving? |
| 4 | listening to Ryan with cannabinoids, the | 4 | DR. WINCHELL: No. Craving is a very |
| 5 | psilocybins, everything is very interesting, but | 5 | complicated thing that we are not here to talk |
| 6 | I'm not sure we're there yet to actually write a | 6 | about today. |
| 7 | recommendation paper. That's two separate things I | 7 | (Laughter.) |
| 8 | wanted to throw out. | 8 | DR. STRAIN: They're a whole other meeting. |
| 9 | DR. STRAIN: Thank you. Celia, and then | 9 | Let me see, I've got Celia, Kenzie, Peter, |
| 10 | Kenzie. | 10 | and then Naomi. |
| 11 | DR. WINCHELL: I think I might have some | 11 | DR. PRESTON: I just wanted to second what |
| 12 | insight into what Dr. Volkow was aiming at. It's | 12 | Annie said about the new techniques for measuring |
| 13 | perfectly fine to study a drug to treat the | 13 | sleep effects. We've been adding measures of sleep |
| 14 | symptom. People are suffering, and you have a drug | 14 | to our research, and one of the interesting things |
| 15 | that can relieve that symptom; that's great. The | 15 | we found is that the night after opioid use, sleep |
| 16 | issue is whether you could support a marketing | 16 | is worse compared to other nights. That wasn't |
| 17 | claim that a drug was an effective treatment for | 17 | true for cocaine use, kind of surprisingly. |
| 18 | opioid-use disorder by demonstrating an effect on a | 18 | So I think better understanding the |
| 19 | symptom. | 19 | relationship between sleep and drug use is really |
| 20 | So if I could parse that for you a little | 20 | important. That's separate from the withdrawal. I |
| 21 | bit, obviously, people with opioid-use disorders | 21 | think that's a different category of sleep |
| 22 | have many other concomitant complaints that we | 22 | problems. But I think it would help us focus |
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| | | | |
| | could probably help them with. If you demonstrate | | better on how we should deal with a problem. |
| | that helping the people with those problems also | 2 | , |
| | translates to some effect on their opioid-use | 3 | |
| | disorder itself, then those endpoints could support | | in pain, and I'm thinking about the conversation |
| | a marketing claim for opioid-use disorder. | | that I had with Patrick Finan yesterday. As |
| 6 | You don't have to make a marketing claim for | | somewhat of an outsider with regard to opioid-use |
| | opioid-use disorder for everything in the world | | disorder, it's a little curious to me that pain |
| 8 | that you're going to treat OUD patients with. I think that's what the distinction was. | 8 | · · · · · · · · · · · · · · · · · · · |
| 9 10 | DR. COMER: Can I respond to that? | | the primary indication when it's prescribed, but I understand the idea that perhaps pain may not |
| 11 | | 10 | really apply to everyone. |
| | DR. COMER: I'm sorry; just a direct | | Nevertheless, I think there's emerging |
| 12 | response. So the question, then, is I | 12 13 | |
| | understand the labeling question, and it's a really | | substances, there is this reciprocal relationship |
| | important one at the FDA. But if you had a | | wherein pain can be a reason for use, but use can |
| 16 | | 16 | |
| 17 | reducing craving in patients with opioid-use | 17 | |
| | reasoning oraving in patiente with opiola-use | / | man opioido. Thoir mai rogard to bloop, aloro |
| | | 1 8 | seems to be something of a reciprocal relationship |
| 18 | disorder, is that not or would it have to be | 18 19 | 5 1 1 |
| 18 19 | disorder, is that not or would it have to be broader, this reduces craving in general? | 19 | there as well, where the pain can worsen the sleep, |
| 18 19 20 | disorder, is that not or would it have to be broader, this reduces craving in general? DR. WINCHELL: Craving's a special case. | 19 20 | there as well, where the pain can worsen the sleep, and the poor sleep can make the pain worse. |
| 18 19 20 21 | disorder, is that not or would it have to be broader, this reduces craving in general? | 19 20 21 | there as well, where the pain can worsen the sleep, |

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| improving sleep can improve pain, and thereby | 1 | perhaps even more concerning, it looks like a |
| | | pretty convincing increase in dementia, with people |
| | | on these compounds for years. |
| | 4 | I was actually going to ask Andrew whether |
| - | 5 | |
| | 6 | looks like the orexin system releases |
| DR. STRAIN: I've got Naomi, Matt, and then | 7 | acetylcholine, and presumably these are |
| Kit. | 8 | anticholinergic effects of these various kinds of |
| DR. LOWY: To address some part of your | 9 | SSRIs, as well as traditional sleep medications, |
| question, I think that there are two ways to look | 10 | benzos and Z compounds, that might be tied to that |
| at an aspect of a disease like sleep. I think that | 11 | dementia increase. |
| FDA certainly entertains aspects of disease as far | 12 | Perhaps this is and we don't really know |
| as a drug target, but clearly the second way to do | 13 | yet because it's a new thing. This concern that |
| it is to get a broad indication, and then, either | 14 | there's a it might be a real problem that we're |
| with the initial application or subsequently, to | 15 | giving these drugs to people chronically rather |
| look at specific aspects of the disease. | 16 | than pushing sleep hygiene. Whatever we know about |
| An example of that and we have someone | 17 | the real concerns about chronically putting people |
| from Psychiatry Products here is the | 18 | on these agents, that could be even heightened for |
| vortioxetine. That's approved for major | 19 | people with substance-use disorders, like opioids. |
| depression, and that label now has some specific | 20 | DR. STRAIN: Thank you. Kit, and then |
| wording on improvement in processing speed. That's | 21 | Andrew, and then Ryan. |
| included in the label. It's not under the | 22 | DR. BONSON: It's certainly the position of |
| | | |
| Page 66 | | Page 68 |
| Page 66 indications section, but certainly that information | 1 | Page 68 the federal government, FDA, NIH, that opioid use |
| - | 1 | |
| indications section, but certainly that information | 2 | the federal government, FDA, NIH, that opioid use |
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| | Page 65 improving sleep can improve pain, and thereby improve sleep, and have an effect on the opiate use in a mechanistic sort of way. I think that in many ways dovetails on Matt's comment, too. It seems like pain should be, perhaps, more of a focus than it is. DR. STRAIN: I've got Naomi, Matt, and then Kit. DR. LOWY: To address some part of your question, I think that there are two ways to look at an aspect of a disease like sleep. I think that FDA certainly entertains aspects of disease as far as a drug target, but clearly the second way to do it is to get a broad indication, and then, either with the initial application or subsequently, to look at specific aspects of the disease. | Page 65improving sleep can improve pain, and thereby1improve sleep, and have an effect on the opiate use2in a mechanistic sort of way. I think that in many3ways dovetails on Matt's comment, too. It seems4like pain should be, perhaps, more of a focus than5it is.6DR. STRAIN: I've got Naomi, Matt, and then7Kit.8DR. LOWY: To address some part of your9question, I think that there are two ways to look10at an aspect of a disease like sleep. I think that11FDA certainly entertains aspects of disease as far12as a drug target, but clearly the second way to do13it is to get a broad indication, and then, either14with the initial application or subsequently, to15look at specific aspects of the disease.16An example of that and we have someone17from Psychiatry Products here is the18vortioxetine. That's approved for major19depression, and that label now has some specific20wording on improvement in processing speed. That's21 |

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| | 1 Anything for a medication indication change has to | 1 sleep disorder, and a medication band-aid for |
| | 2 be tied to reduced opioid use or elimination of | 2 2 weeks or for 10 weeks is not going to make that |
| | ³ illicit opioid use, but I don't think that captures | 3 go away. In talking with Michael Smith and other |
| | 4 the full experience of somebody in recovery from | 4 sleep folks, it's a challenge to get them to do |
| | 5 opioid-use disorder; that there's a lot of | 5 CBT-I while they're taking meds because the meds |
| | 6 dysfunction and issues with cognition and emotion | 6 are taking care of the sleep problem. So figuring |
| | 7 that are also important to the life experience of | 7 out that transition is one of the biggest |
| | 8 the patient, and it's mostly being ignored right | 8 challenges. |
| | 9 now in lieu of elimination, or at least reduction, | 9 In the cannabis world, the |
| | o of illicit opioid use. | 10 abstinence-induced insomnia is a really big deal, |
| 1 | | 11 and in talking with the opioid folks, it's a big |
| 1 | 2 effects of suvorexant, I have no idea about that | 12 deal there, too. So my sense is that sleep |
| | 3 because it's only been on the market for a few | 13 problems probably proceed a lot of the problematic |
| | 4 years. There's no report on that. A lot of the | 14 drug use. So that's a key thing that needs to be |
| | 5 long-term stuff that I'm aware of is in relation to | 15 addressed in all of this. Long=term medication use |
| | 6 benzodiazepines or Z drugs, which are benzo-like | 16 in the sleep treatment community is typically not |
| 1 | 7 drugs, and would agree that there are issues in | 17 endorsed because you have long-term issues and |
| | 8 prescribing those kinds of medications long term. | 18 problems with it. |
| 1 | | 19 DR. STRAIN: Brian? |
| 2 | o substance-use disorders, where you don't want them | 20 DR. KILUK: This is in response to some of |
| | 1 to be dependent on multiple things, it might make | 21 the comments about harm reduction and thinking |
| | 2 sense to use a medication intervention for sleep | 22 about clinically meaningful outcomes. Part of this |
| | | |
| | | |
| | Page 70 | Page 72 |
| | Page 70 1 for a period of time, and then also study how to | Page 72 1 is maybe asking the question in the opposite |
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| | 1 for a period of time, and then also study how to | 1 is maybe asking the question in the opposite |
| | for a period of time, and then also study how to transition people into cognitive behavioral therapy | is maybe asking the question in the opposite direction. One way is to think, well, we assume |
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| | Page 73 | | Page 75 |
|--|--|--|--|
| 1 | Coca-Cola. | 1 | DR. HUHN: It's the combination, but there |
| 2 | (Laughter.) | 2 | are studies linking chronic opioid use to central |
| 3 | DR. STRAIN: And I said, "Before we try a | 3 | sleep apnea, which brings up and there's some |
| 4 | medicine, let's try a couple of other things." But | 4 | research in methadone-maintained patients also, |
| 5 | I was a miracle worker, and he got the TV out of | 5 | clearly, because you're maintained on an agonist |
| 6 | the room, stopped eating green peppers, and | 6 | long term, that that might it's hard to say |
| 7 | drinking Coca-Cola, a 2-liter bottle, in bed. So | 7 | bring on the onset of apnea because probably nobody |
| 8 | there's something to be said for those non- | 8 | was testing for apnea before they got on methadone, |
| 9 | chronologic [inaudible - mic fades]. | 9 | but it's an issue in those patients. |
| 10 | DR. LEVIN: I think as a clinician, to | 10 | I think there's data that's just come out or |
| 11 | respond to those complaints, it's often the way you | 11 | will come out soon that methadone and buprenorphine |
| 12 | bridge a relationship with the patient. | 12 | maintained patients, their sleep hygiene is or |
| 13 | DR. STRAIN: Sure. | 13 | their sense of sleep hygiene their sleep, in |
| 14 | DR. LEVIN: So I think that that's part of | 14 | general, is not as not as good as the general |
| 15 | it as well. I think that when you have somebody | 15 | population, on average. |
| 16 | who comes in with an opiate-use disorder, if their | 16 | DR. STRAIN: It seems to me that there's |
| 17 | major complaint is asleep, and you can address that | 17 | interest in the topic because it is something that |
| 18 | but you're still trying to work in the treatment, | 18 | we do know the patients report as an issue, those |
| 19 | whether it's psychotherapy or medication | 19 | who are in opiate maintenance treatment. There are |
| 20 | treatments, then I think it could be very helpful. | 20 | some attractive features to diving into it. There |
| 21 | Again, I'm a little skeptical about going | 21 | is the conundrum that Ryan raised about if you |
| 22 | after sleep as the prime thing with an opiate-use | 22 | treat somebody with a medicine, their willingness |
| | | | |
| | Page 74 | | Page 76 |
| 1 | Page 74 | 1 | Page 76 |
| | disorder, but I think that having it be in | | to engage in CBT-I, for example, may decrease, but |
| 2 | disorder, but I think that having it be in conjunction or something as a way to bridge into | 2 | to engage in CBT-I, for example, may decrease, but that's a testable question. |
| 2 3 | disorder, but I think that having it be in conjunction or something as a way to bridge into getting people either to stay in treatment or get | 2 3 | to engage in CBT-I, for example, may decrease, but that's a testable question. What? |
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| | Page 77 | | Page 79 |
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| 1 | development and insomnia, and there are some | 1 | training for example, work by Yang, et al |
| 2 | important points that I think are worth sharing. | 2 | suggests that even 5 hours of training can reduce |
| 3 | We would want to have a trial to have both | 3 | smoking and can reduce the number of cigarette |
| 4 | objective and subjective measures. When you take a | 4 | |
| | s subjective complaint of insomnia, and total sleep | 5 | |
| | time, and things like that, it's important to have | 6 | 2 hours of meditation training can reduce the |
| | an objective measure, like the PSG would be the | | intensity of the pain sensation. |
| | gold standard, and then to complement that with a | 8 | |
| | subjective measure. And that can come in a number | | the non-pharmacologic space. I know that's not the |
| | of different ways that hasn't yet been | 10 | |
| | standardized. | | ways if you get the camel's nose under the tent, |
| 12 | | | with some modest training in these |
| | think about. I think another thing that we want to | | non-pharmacologic approaches, that may be |
| | understand, since a lot of times, when somebody | | acceptable to patients with opiate-use disorder to |
| | 5 gets started on a drug for insomnia, they usually | | |
| | | 15 | |
| | 5 end up taking it for a long time. So we'd want the 7 clinical trial to reflect safety and efficacy over | 16 | |
| | | 17 | |
| | 3 time. | | through their treatment. |
| 19 | | 19 | , , , , , |
| 20 | | 20 | |
| | about the various instruments now being used to | | training with meditative and other kinds of |
| 22 | 2 measure sleep beyond just PSG, because it is very | 22 | behavioral approaches. |
| | | | |
| | Page 78 | | Page 80 |
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| | | 1 | DR. STRAIN: Thank you. Celia? |
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| 1 | that sleep drugs would be appropriately studied in | 1 | a lot more data we could be collecting about not |
| 2 | opioid-use disorder patients who complain of sleep | 2 | just sleep, but stress and general health in our |
| 3 | disturbances. | 3 | trials. |
| 4 | DR. STRAIN: Kenzie, Andrew, and Tom. | 4 | So I wonder what other people think about |
| 5 | DR. PRESTON: Actually, what I was going to | 5 | incorporating those. |
| 6 | talk about were objective measures versus | 6 | DR. TOURE: FDA's perspective, I think we |
| 7 | subjective measures. What we're finding in our | 7 | want to understand, I think, some of the coding., |
| 8 | population is that for our participants, sleep is | 8 | so we welcome data to help us understand what are |
| 9 | worse objectively than it is what they talk about. | 9 | the coding rules that help |
| 10 | So there may be, in fact, undiagnosed sleep | 10 | us understand the sleep patterns? |
| 11 | problems, that if they lead to long-term cognitive | 11 | A lot of times, we all have some sort of |
| 12 | problems or whatever, we may want to think about | 12 | actigraphy on our phones, or watches, or whatever. |
| 13 | it. I think that would, again, second my | 13 | And we could just be lying down reading a book, but |
| 14 | suggestion that we do more research with objective | 14 | it might be thinking that we're sleeping. So we |
| 15 | measures of sleep in our patient population. | 15 | just need to make sure that the data reflects |
| 16 | DR. STRAIN: Interesting. Andrew? | 16 | sleep. |
| 17 | DR. HUHN: I agree with that. I mostly | 17 | DR. STRAIN: Again, a quick story. I'm |
| 18 | agree that at least this is the trial I have | 18 | sorry. I wear a Fitbit, as does my daughter, and |
| 19 | that's outpatient. We have criteria around you do | 19 | we've discovered that, actually does anybody |
| 20 | have to be complaining of sleep disturbance to be | 20 | else have a Fitbit here? Anybody? |
| 21 | on a sleep medication. | 21 | , |
| 22 | The scenario where I don't think that's true | 22 | actually gives you lots of steps? |
| | | | |
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| _ | Page 82 | | Page 84 |
| | is an opioid withdrawal study because, at least in | 1 | (Laughter.) |
| 2 | is an opioid withdrawal study because, at least in my experience, people going through acute opioid | 2 | (Laughter.) DR. STRAIN: My daughter now actually will |
| 2 3 | is an opioid withdrawal study because, at least in my experience, people going through acute opioid withdrawal across the board have poor sleep. | 2 3 | (Laughter.) DR. STRAIN: My daughter now actually will go down and fold the laundry if she needs to get a |
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| 1 | time. | 1 | us need to make sure we check out of the hotel. |
| 2 | So are you doing these sleep measures | 2 | Any final thoughts? Tom, is yours up there? |
| 3 | 24 hours a day? | 3 | I thought there was a residual. |
| 4 | DR. HUHN: The actigraphy we do, and we also | 4 | DR. KOSTEN: Yes, that one of the things |
| 5 | have them self-report daytime sleepiness. | 5 | that maybe we should think about is we were doing a |
| 6 | DR. KOSTEN: No, I was thinking of that | 6 | study in geriatric patients, where we gave them a |
| 7 | device that you | 7 | gift of a Fitbit like thing, and ours was the cheap |
| 8 | DR. HUHN: That's not 24 hours; that's just | 8 | kind we got from China that only cost like 15 |
| 9 | when they go to bed. I think there might be a | 9 | bucks, but it worked reasonably well. |
| 10 | battery issue with that. | 10 | But a number of them were getting opiates |
| 11 | DR. KLEYKAMP: I wanted to add a couple of | 11 | for various kinds of pain. We just got some of the |
| 12 | things about the technology development, and I'm | 12 | weirdest they don't recognize when they're |
| 13 | sure you have more here to say. When I was at | 13 | falling asleep. I know I fall asleep during these |
| 14 | BPRU, we published an Ambien study. I did this | 14 | meetings, and other people recognize it, but I |
| 15 | with Miriam Mintzer, healthy volunteers. We | 15 | don't. |
| 16 | brought them on the Ambien and maintained them for | 16 | (Laughter.) |
| 17 | a month. My focus was cognitive performance, sort | 17 | DR. STRAIN: Yes, we have been. |
| 18 | of an interest of mine. | 18 | (Laughter.) |
| 19 | So speaking to Matt, you have the concerns | 19 | |
| 20 | of long-term maintenance, but then you have the | 20 | 24 hours a day, opiates put you to sleep during the |
| 21 | benefit of and we all relate to this when we | 21 | day, I think. If you just think about sleep |
| 22 | sleep well and maybe write better the next day, and | 22 | disruptions during the night, I'm afraid you're |
| | | | |
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| 1 | speak more coherently at something like | 1 | missing a whole bunch of stuff that's going on. |
| 2 | this having, say, more executive function on | 2 | DR. STRAIN: No, that's a great point. |
| 3 | board; then for treatment or behavioral | 3 | Well, thanks. We have about a 15-minute |
| 4 | interventions, it's something to look at. If we | 4 | break. We do have some snacks. After the break, |
| 5 | were to write something up, I'd want to prompt that | 5 | what we'll do is we'll do 45 minutes on |
| 6 | in the discussion. | 6 | psychedelics and then 45 minutes on vaccines. |
| 7 | But also a personal use; I'm sort of | 7 | Lunch, actually, we're going to have sandwiches |
| 8 | obsessed with my own sleep. I have an Apple 4, and | 8 | available back where we had breakfast. But what |
| 9 | the technology I had a Fitbit for a while, so | 9 | we're going to ask is that you go down and grab |
| 10 | the app I use now and I don't know if you're | 10 | your sandwich, bring it back here, and we'll do a |
| 11 | familiar with it it's quite sensitive to my | 11 | wrap up, kind of big picture thing, around like |
| 12 | sleep, and it bases it on heart rate, and movement, | 12 | 12:15, start around 12:10 or 12:15. But in the |
| 13 | and light, and I know the newest Apple watch is | 13 | meantime, let's go ahead and take a break. Thanks. |
| 14 | even more advanced. | 14 | (Whereupon, at 10:14 a.m., a recess was |
| 15 | So I say that because I think things are | 15 | taken.) |
| 16 | going very quickly with this sleep technology, and | 16 | Group Discussion - Psychedelics |
| 17 | I'm certain you all would support that. I feel | 17 | DR. STRAIN: I got distracted with the |
| 18 | like in the next year, it could be really small | 18 | conversations. Others will be hopefully wondering |
| 19 | devices that people could use to get pretty precise | 19 | again, but I am trying to keep us somewhat on |
| 20 | findings. | 20 | track. |
| 21 | DR. STRAIN: I think we're just about up to | 21 | We are now going to talk about psychedelics. |
| 0 | the time for the break, and I know at least some of | 22 | As I mentioned before, a similar sort of |
| 22 | | | |

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| 1 | conversation. I think there are a lot of similar | 1 | articulate, when we require a REMS, the elements to |
| 2 | aspects in terms of themes that will probably come | | assure safe use, the serious risks that would |
| | up as we talk about this, but it will be certainly | 3 | happen if somebody did it wrong. |
| | useful to go through it. | 4 | |
| 5 | Matt, I wonder if you had any opening | 5 | of both sides of their mouths, like, really, |
| 6 | thoughts that you wanted to convey. Again, I don't | | psychedelics are fine, but also if you want to use |
| | mean to put people on the spot, but just because | | them therapeutically, you have to be super, super |
| | you're the expert and presented yesterday. | | careful. So we are going to need your help in |
| 9 | DR. JOHNSON: It sounds like there's a lot | | articulating these risks in a way that would |
| 10 | of interest, which is reinforcing and exciting. I | | support the type of groups that you envision. |
| | think the major issues, we just need a lot more | 11 | DR. STRAIN: Michael, and then Matt, and |
| | work in this area. There's been a strong trend of | 12 | then Kit. |
| | more folks jumping into this research with | 13 | DR. BOGENSCHUTZ: I wanted to circle back to |
| | psychedelics, so I hope that continues. | 14 | the issue that came up in when we were talking |
| 15 | There are a million questions. We need to | | about cannabinoids, that Sandy, and Frances, and |
| 16 | be completely data driven. We need to consistently | | others articulated, about the fact that it's |
| | be mindful of the risks and safety factors at play | | potentially life threatening for people not to be |
| | in the research. Yes, we need more research. | | on a mu agonist or antagonist. I think the same |
| 19 | DR. STRAIN: Good. Thanks. | | issue comes up with the psychedelics, unless they |
| 20 | (Laughter.) | | turn out to be really miraculously effective, which |
| 21 | DR. TURK: You're supposed to say more and | | we are not counting on at this point. |
| 22 | better research. | 22 | There's really three ways of dealing with |
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| 1 | DR. JOHNSON: Yeah, right. | 1 | that. One is that you administer the psychedelic |
| 2 | DR. STRAIN: More and better research. | | at a moment in treatment when the person is |
| 3 | DR. BONSON: You're supposed to say, "Please | | detoxified, and then you don't have to worry about |
| | fund us." | | the drug-drug interactions. You can do that with |
| 5 | DR. JOHNSON: Yeah, that's the real what | | psychedelics, unlike most other drugs, because it's |
| | I said was code for that. | | a an episodic treatment. You do it in a day, then |
| 7 | DR. STRAIN: There's a streamer going below | | they can be on whatever their preferred medication |
| 8 | his table saying, "Need funding. Please fund us." | | is. |
| 9 | DR. JOHNSON: Money, please. | 9 | The second is to do it concurrent with their |
| 10 | DR. STRAIN: This is open for discussion. | | treatment with Vivitrol or a partial agonist. We |
| | Yes, Celia? | | need to know a lot more about drug- drug |
| 12 | DR. WINCHELL: I wanted to circle back to | | interactions in both directions, how having the |
| | some of the discussion yesterday. A lot of people | | opioid on board might affect the experience and the |
| | seem to agree that if a psychedelic or psilocybin | | acute effect, and the persisting effect. |
| | like product were to be marketed as a | 15 | Then the third, which I think is maybe even |
| | pharmaceutical, your ideal situation would be that | | more dicey than with cannabis, is the idea of |
| | there would be some type of FDA enforced REMS that | 17 | |
| | would limit the context of use to specific | | refusing the first-line treatments, and then |
| | providers and settings. | | feeling okay about that. But I can't get there, |
| 20 | What I wanted to ask you to expand on was | | especially with these drugs, such as psilocybin, |
| | how we would articulate what the risks were for use | | where there's so much hype about expectations about |
| 1.71 | | 141 | where there a so much hype about $expectations$ about |

22 how it's going to work.

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| 1 | It's hard to imagine not overtly or covertly | 1 | think that's all you can do. |
| | creating the impression of why don't you try this | 2 | |
| | cool new thing instead. Ethically, I think that | 3 | then David. |
| | the big problem. Post-detox, pre-Vivitrol is one | 4 | DR. BONSON: I think I'm going to respond to |
| | idea that I've been developing. Randy Brown, who | 5 | Matt, actually, first before I get to the other |
| | was here yesterday, is working on co-administration | | comment. I think what's unique about the history |
| | with buprenorphine, and Hopkins has been working on | | of psychedelics is that the community that was |
| | designs, too. | 8 | using them was very invested in making sure that |
| 9 | I think, practically speaking, we need to | 9 | |
| 10 | find a way to integrate it into treatments that we | 10 | set and setting came out of the community, the |
| 11 | already know work and save lives. | 11 | people who are using these drugs. It didn't come |
| 12 | DR. STRAIN: Thanks. Matt, Kit, and then | 12 | out of the researchers who were doing it, |
| 13 | Rob. | 13 | necessarily; it was already in place. |
| 14 | DR. JOHNSON: Regarding the risks in the | 14 | So there are also ways that the community |
| 15 | wild, so to speak, speaking out of both sides of | 15 | kind of took care of itself in large part, so that |
| 16 | the mouth, it's tough. We just have to | 16 | when there were disturbances that people were |
| 17 | consistently describe the nuances. It's difficult. | 17 | getting to, they kind of were they're like |
| 18 | I'd refer people to a recent paper that | 18 | manuals back from the '60s, where it helps you |
| 19 | Peter, and Jack Henningfield, and Roland and myself | 19 | understand how to help your friend who's having a |
| 20 | published, really, revealing everything we know | 20 | bad trip. So the reason that people may not have |
| 21 | about the abuse liability, risks, and harms of | 21 | been showing up in emergency rooms could be because |
| 22 | psilocybin, in particular. | 22 | that community, unique among any other drug-using |
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| 1 | It's true that there are some promising | 1 | community, was invested in that perspective. |
| | preliminary findings that we should follow up on. | | That's kind of an odd thing about this category of |
| | It's also true that in the realm of illicit use, | | drugs. |
| | the harms consistent of that drug class, | 4 | |
| | consistently rank towards the bottom. And it's | 5 | Celia, I wonder if you can speak more about what is |
| 6 | true that there are harms, but compulsive drug | 6 | possible in terms of REMS because we, obviously, at |
| | seeking doesn't appear to be one of them. But it's | | FDA do not regulate the practice of medicine, and |
| | also true that people appear to be psychiatrically | | yet there are things that can go into a REMS that |
| | harmed. That's probably interacting with | | sort of sounds like regulating practice under the |
| | vulnerability. It's true that there are accidents, | | name of safety. |
| 11 | sometimes fatal. | 11 | So I wonder if you can elaborate on that. |
| 12 | So all of these things can be true at the | 12 | And then, there was a question posed to me |
| 13 | same time, so I think we have to just be completely | | yesterday about there may be a really great REMS |
| 14 | data driven. I never give a talk to any audience | 14 | for the originator drug, but what happens when a |
| 15 | without spending some time, typically at the | 15 | competitor comes out after a number of years? How |
| 16 | beginning, about what we know about the real risks | 16 | much of that is maintained or could they change it? |
| 17 | and what we do to address those. | 17 | Could you speak to some of those |
| 18 | I beg every time I talk to a journalist, and | 18 | possibilities? I'm not sure about the law as well |
| 19 | it's largely successful. It's like, "Please say | 19 | as you are. |
| 20 | we're not encouraging use. Please mention that | 20 | DR. WINCHELL: I can when Eric |
| 21 | | 1 | |
| | there are risks, and that the way we're doing it | 21 | DR. STRAIN: Why don't we break out of the |
| | addresses what we know about the risks." So I | | DR. STRAIN: Why don't we break out of the sequence? Yes, I'll take that prerogative. |

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| | 1 | Celia, if you want to respond to that? And | 1 | these REMS for generic were anticompetitive? |
| | 2 | then we'll go to Ron, Peter, maybe me, and David. | 2 | |
| | | I don't know. I may step out of the role of | 3 | that people had been using these REMS to block |
| | 4 | moderator. | 4 | competition, but that's been addressed, I believe. |
| | 5 | DR. WINCHELL: REMS are not really my area | 5 | |
| | 6 | of expertise, but I have some experience with them. | 6 | DR. WINCHELL: Well, certainly in one case, |
| | 7 | I would say that the closest parallel in my | 7 | we authorized the creation of a separate but equal |
| | | | 8 | REMS for the generic products and other products |
| | 9 | describing for the ideal situation for | 9 | because the innovator wouldn't play ball. But for |
| 1 | | psychedelic-assisted treatment would be the | | the most part, I think that people have managed to |
| | | probuphine story. | | get those REMS working. |
| | 12 | Probuphine is an implantable buprenorphine | 12 | DR. STRAIN: Thank you. Let's go back to |
| 1 | 13 | that has to be put in place through a surgical | 13 | Rob, Peter, and David. |
| | | procedure. Our surgery colleagues, with a lot of | 14 | |
| | | experience in the implantable contraceptive field, | 15 | were just made, one of the challenges that we |
| | | identified a number of extremely concerning adverse | | certainly see and Usona's primary program being |
| | | events that had been associated with these types of | | for the treatment of major depressive disorder with |
| | | drugs: migration out of the arm into the lung; | 18 | psilocybin. But one of the biggest challenges we |
| | | embolism; nerve damage; all kinds of bad stuff that | 19 | see is there are over 17 million people with |
| | | had been happening with these types of products, | | depression. Then if we talk about use disorders, |
| | | despite the fact that these drugs are administered | | and all of the studies of the Hopkins folks and |
| | | by people who are trained as surgeons. | | others, and Michael have done, the potential |
| | | | | |
| | | Page 98 | | Page 100 |
| | 1 | So under the probuphine REMS, we created a | 1 | patient population that could have access to |
| | 2 | requirement that the drug could only be inserted by | | |
| | 3 | requirement that the drug could only be inserted by | 2 | |
| | - | people who had been trained to do that insertion | 2 3 | psilocybin, for instance, upon approval, is |
| | | | 3 | psilocybin, for instance, upon approval, is |
| | | people who had been trained to do that insertion | 3 4 | psilocybin, for instance, upon approval, is astronomical. Even if you just look at the folks |
| | 4 5 | people who had been trained to do that insertion and removal. | 3 4 | psilocybin, for instance, upon approval, is astronomical. Even if you just look at the folks who are taking antidepressants who might be |
| | 4 5 6 | people who had been trained to do that insertion and removal. You kind of have to lock down the pathway to | 3 4 5 6 | psilocybin, for instance, upon approval, is astronomical. Even if you just look at the folks who are taking antidepressants who might be eligible, it's more like 30 million people. |
| | 4 5 6 7 | people who had been trained to do that insertion and removal. You kind of have to lock down the pathway to make sure that the drug only gets into the hands of | 3 4 5 6 | psilocybin, for instance, upon approval, is astronomical. Even if you just look at the folks who are taking antidepressants who might be eligible, it's more like 30 million people. So we very much embrace and endorse the idea that this needs to be rolled out in tightly a |
| | 4 5 6 7 8 | people who had been trained to do that insertion and removal. You kind of have to lock down the pathway to make sure that the drug only gets into the hands of the people who are appropriate to use it. You can | 3 4 5 6 7 8 | psilocybin, for instance, upon approval, is astronomical. Even if you just look at the folks who are taking antidepressants who might be eligible, it's more like 30 million people. So we very much embrace and endorse the idea that this needs to be rolled out in tightly a |
| 1 | 4 5 7 8 9 | people who had been trained to do that insertion and removal. You kind of have to lock down the pathway to make sure that the drug only gets into the hands of the people who are appropriate to use it. You can certify facilities. Only specific facilities are | 3 4 5 6 7 8 | psilocybin, for instance, upon approval, is astronomical. Even if you just look at the folks who are taking antidepressants who might be eligible, it's more like 30 million people. So we very much embrace and endorse the idea that this needs to be rolled out in tightly a controlled, secure way. A very well-informed, controlled REMS is going to be a critical component |
| | 4 5 7 8 9 | people who had been trained to do that insertion and removal. You kind of have to lock down the pathway to make sure that the drug only gets into the hands of the people who are appropriate to use it. You can certify facilities. Only specific facilities are allowed to administer the drug. Only specific | 3 4 5 7 8 9 | psilocybin, for instance, upon approval, is astronomical. Even if you just look at the folks who are taking antidepressants who might be eligible, it's more like 30 million people. So we very much embrace and endorse the idea that this needs to be rolled out in tightly a controlled, secure way. A very well-informed, controlled REMS is going to be a critical component |
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|----------------|---|----------------|---|
| 1 | The comment I think Kit and I were talking | 1 | careful in implying causation. But of course, like |
| 2 | yesterday about, or just exploring, I was asking | 2 | anything, there are certainly risks. |
| 3 | these general questions. Where is that done, | 3 | So what we are offered in this really unique |
| | because the work we do under our IND and | 4 | position of almost, always having to be very clear |
| 5 | Hopkins those are our INDs and all of us are | 5 | that we're not advocating for use and not only |
| 6 | in agreement, there's a clear need for significant | 6 | our interviews with media but in our publications |
| 7 | provider involvement, including doctoral level, | 7 | in some cases. I'm not sure that many other people |
| 8 | psychotherapists, effectively, who are in the room | 8 | are in that sort of position, where they have to be |
| 9 | during a dosing session, who are involved prior to | 9 | very clear about that. |
| 10 | administration of a psychedelic, and then have | 10 | We know that for many thousands of years, |
| 11 | follow-up visits. | 11 | humans have used these substances, it appears, in a |
| 12 | The healthcare system doesn't seem | | therapeutic manner, and that continues to take |
| 13 | particularly great at handling delivering therapy. | | place in some indigenous older traditions. In the |
| | If we're going to have an impact on these large | | case of Avahuasca and peyote in the Native American |
| | populations, how do we do it if it requires | | church, and now we know that there are some |
| | 50 person-hours per treatment? These are some of | 16 | decriminalization initiatives in Denver and |
| | the biggest questions I think we faced if, | 17 | Oakland; perhaps you've heard of these. |
| | ultimately, psychedelics are successful at | 18 | Though many of us who work in the world of |
| | obtaining approval. It needs everyone's greatest | 19 | addiction aren't fond of the idea of |
| | minds thinking on this. It's not going to happen | 20 | criminalization of drugs, in general, we do have |
| | in isolation. | 21 | some concerns about these initiatives and what |
| 22 | DR. STRAIN: I will conveniently not answer | 22 | might happen as a result. |
| | | | |
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| 1 | all those questions, but go on. And it will be | 1 | That said, I do think there are |
| 2 | Peter, and David, then Michael, I think, and then | 2 | opportunities to evaluate what's happening in the |
| 3 | Matt. | 3 | real world and to get a better sense of risks from |
| 4 | DR. HENDRICKS: I just wanted to provide a | 4 | that perspective as well. It seems, no matter what |
| 5 | little backdrop, too, because the psychedelics are | 5 | happens on the drug development side, that people |
| 6 | really quite unique. Some medical historians and | 6 | are going to continue to use these substances for |
| 7 | others have argued that they might be the very | 7 | therapeutic intent, and that's something we have to |
| 8 | first psychoactive substances that humans ever | 8 | keep in mind. |
| 9 | used, and there's, I think, some convincing | 9 | DR. STRAIN: Thank you. David, Michael, |
| 10 | archeological, anthropological evidence indicating | 10 | Matt, Tanya, and Roger. |
| 11 | that humans have used these substances, or I should | 11 | DR. SHURTLEFF: Just a couple of points. |
| 12 | say these psilocybin [indiscernible] mushrooms, | 12 | Here we go again, Right? We're following the |
| 13 | many thousands of years ago in a very highly | 13 | cannabinoid, the cannabis story here, where Oakland |
| 14 | ritualized context. So there seem to be some | 14 | and Denver have decriminalized these hallucinogens. |
| 15 | awareness, from what we can gather, that they | 15 | That is both a risk and an opportunity to get some |
| 16 | needed to be handled with extreme caution and care. | 16 | observational data about what's happening in the |
| 17 | In the same way that we know folks are out | 17 | real world. |
| | | | I will say, speaking for NCCIH, this is an |
| 18 | there in the natural environment using cannabis, it | 18 | r win day, opeaking for recent, and le ar |
| | appears as if folks are out there in the natural | | area we're interested in pursuing for various |
| 19 20 | appears as if folks are out there in the natural environment using psychedelics. Some of the | 19 20 | area we're interested in pursuing for various conditions. We're primarily interested in chronic |
| 19 20 | appears as if folks are out there in the natural | 19 20 21 | area we're interested in pursuing for various conditions. We're primarily interested in chronic pain, intractable chronic pain, but of course |
| 19 20 21 | appears as if folks are out there in the natural environment using psychedelics. Some of the | 19 20 21 | area we're interested in pursuing for various conditions. We're primarily interested in chronic |

| 1 | Page 109 | | Page 111 |
|--|---|---|--|
| 1 | areas of medicine and in clinical psychology where | 1 | across the field, suggests that there is something |
| 2 | you don't need to be you could be a graduate | 2 | about the subjective experience that is |
| 3 | student in psychology and reporting to a licensed | 3 | causing perhaps that's the |
| 4 | therapist, but not everyone who's doing therapy | 4 | suggestion long-term effects, and people learn |
| 5 | needs to have there needs to be someone with | 5 | something. This is more in the realm of learning, |
| 6 | those credentials overseeing the process. I think | 6 | what you would normally get from a psychotherapy, |
| 7 | of nurse practitioners and physicians' assistants | 7 | so the experience is probably important for those |
| 8 | and that there is someone with the fuller | 8 | long-term outcomes. |
| 9 | credentialing above them. | 9 | But it may be that in the first several |
| 10 | I kind of think about it this way. Not | 10 | days, it's called an afterglow, this more kind of |
| 11 | everyone in the operating room needs to be a | 11 | direct biological effect, where you have this |
| 12 | surgeon; but relatively minor detail. There are a | 12 | increased neuroplasticity, or whatever mechanism, |
| 13 | lot of these. That's just one example of many | | and you could get that perhaps without the |
| | parameters that we need to work out. | | psychedelic effect. And maybe you have models |
| 15 | Ketamine lessons, that came up. I think, | 15 | where you get one, the other, and perhaps you get |
| 16 | gosh, one of the big things is really watching the | | the best from both. |
| 17 | off-label use of ketamine. Relatively speaking, | 17 | Anyway, a million directions, and you need |
| | the REMS with esketamine is real keeping on the | 18 | data for all of it. |
| 19 | track, and it's a world of difference compared to | 19 | DR. STRAIN: Thank you. Tanya? |
| 20 | what's happening off label than esketamine. | 20 | DR. RAMEY: I just wanted to make a |
| 21 | That said, it would also be very interesting | 21 | suggestion. As we are entering this route of |
| 22 | to see ketamine treated and there are just some | 22 | research, it's really important to pay attention to |
| | | | |
| | Page 110 | | Page 112 |
| 1 | straight up experiments to wrap around this as a | 1 | deep phenotyping. There are batteries, deep |
| 2 | medication, facilitated psychotherapy like a | | |
| | | 2 | phenotyping batteries, that they developed at |
| 3 | psychedelic. Who knows whether we could get those | | NIAAA, and also NIDA is developing expanded deep |
| | psychedelic. Who knows whether we could get those antidepressant effects to last longer. | 3 | |
| | | 3 4 | NIAAA, and also NIDA is developing expanded deep |
| 4 5 | antidepressant effects to last longer. | 3 4 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of |
| 4 5 6 7 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these non-psychedelic psychedelics, there are a number of | 3 4 5 6 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. |
| 4 5 6 7 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these | 3 4 5 6 7 8 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. So there will be interception, and there will be measures of social cognition. For psychedelics, it's really very important because |
| 4 5 6 7 8 9 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these non-psychedelic psychedelics, there are a number of scaffolds that can be built, and we're learning so much about structure activity relationships and | 3 4 5 6 7 8 9 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. So there will be interception, and there will be measures of social cognition. For psychedelics, it's really very important because that's where the action occurs. That will be |
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| 4 5 7 8 9 10 11 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these non-psychedelic psychedelics, there are a number of scaffolds that can be built, and we're learning so much about structure activity relationships and biased agonism. David Olson at UC Davis has some really interesting data on multiple mechanisms for neuroplasticity in the cortex that he's seeing with | 3 4 5 6 7 8 9 10 11 12 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. So there will be interception, and there will be measures of social cognition. For psychedelics, it's really very important because that's where the action occurs. That will be really important to see what's happening with the interception, how it changes, and how social cognitions change, and not only like executive; we |
| 4 5 7 8 9 10 11 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these non-psychedelic psychedelics, there are a number of scaffolds that can be built, and we're learning so much about structure activity relationships and biased agonism. David Olson at UC Davis has some really interesting data on multiple mechanisms for neuroplasticity in the cortex that he's seeing with non-psychedelic analogs. | 3 4 5 6 7 8 9 10 11 12 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. So there will be interception, and there will be measures of social cognition. For psychedelics, it's really very important because that's where the action occurs. That will be really important to see what's happening with the interception, how it changes, and how social cognitions change, and not only like executive; we need to have a full spectrum. |
| 4 5 7 8 9 10 11 12 13 14 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these non-psychedelic psychedelics, there are a number of scaffolds that can be built, and we're learning so much about structure activity relationships and biased agonism. David Olson at UC Davis has some really interesting data on multiple mechanisms for neuroplasticity in the cortex that he's seeing with non-psychedelic analogs. So this might be in the same category of do | 3 4 5 6 7 8 9 10 11 12 13 14 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. So there will be interception, and there will be measures of social cognition. For psychedelics, it's really very important because that's where the action occurs. That will be really important to see what's happening with the interception, how it changes, and how social cognitions change, and not only like executive; we need to have a full spectrum. So this battery is like a short term. |
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| 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these non-psychedelic psychedelics, there are a number of scaffolds that can be built, and we're learning so much about structure activity relationships and biased agonism. David Olson at UC Davis has some really interesting data on multiple mechanisms for neuroplasticity in the cortex that he's seeing with non-psychedelic analogs. So this might be in the same category of do you get with 18-MC or noribogaine the normalization of dopamine in the mesolimbic? So it could be there's this [inaudible - mic fades] or kind of directly biological mechanisms that are at play with the psychedelics. We should be pursuing all of these threads. My best guess is that the long-term effects | 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. So there will be interception, and there will be measures of social cognition. For psychedelics, it's really very important because that's where the action occurs. That will be really important to see what's happening with the interception, how it changes, and how social cognitions change, and not only like executive; we need to have a full spectrum. So this battery is like a short term. They're composed to be tolerable. In terms of feasibility, they take less than 2 hours, and they're all on iPads. So you might want to consider that because you need to have that full picture of who is entering and what the changes are. The other thing is a follow-up to what Celia |
| 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | antidepressant effects to last longer. Just to reinforce what Michael said about the really interesting prospect of these non-psychedelic psychedelics, there are a number of scaffolds that can be built, and we're learning so much about structure activity relationships and biased agonism. David Olson at UC Davis has some really interesting data on multiple mechanisms for neuroplasticity in the cortex that he's seeing with non-psychedelic analogs. So this might be in the same category of do you get with 18-MC or noribogaine the normalization of dopamine in the mesolimbic? So it could be there's this [inaudible - mic fades] or kind of directly biological mechanisms that are at play with the psychedelics. We should be pursuing all of these threads. | 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | NIAAA, and also NIDA is developing expanded deep phenotyping battery, which includes all levels of cognition, not only executive. So there will be interception, and there will be measures of social cognition. For psychedelics, it's really very important because that's where the action occurs. That will be really important to see what's happening with the interception, how it changes, and how social cognitions change, and not only like executive; we need to have a full spectrum. So this battery is like a short term. They're composed to be tolerable. In terms of feasibility, they take less than 2 hours, and they're all on iPads. So you might want to consider that because you need to have that full picture of who is entering and what the changes are. |

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| TR | EATING OUD (B-MOST-O) | | November 22, 2019 |
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| | Page 113 | | Page 115 |
| 1 | these types of drugs, there could be risks that | 1 | placebo effect. I think the ultimate answer comes |
| 2 | would appear down the road, and not only a bad trip | 2 | through a triangulation. And there are things that |
| 3 | but also other risks. | 3 | can be done nothing's perfect to address this |
| 4 | DR. STRAIN: Thank you. Roger, Rob, and | 4 | blinding question. |
| 5 | Kit. | 5 | DR. STRAIN: Thank you. Rob, and then Kit. |
| 6 | DR. WEISS: My question is a different type | 6 | MR. BARROW: I think Kit probably has |
| 7 | of question, which has to do with the mechanics of | 7 | comments, too. |
| 8 | doing the research, which is the idea of a placebo | 8 | DR. BONSON: Go ahead. I've got a number of |
| 9 | control. It's my understanding that you try to | 9 | things to talk about now. |
| 10 | talk people into believing that if nothing's going | 10 | MR. BARROW: Not to turn it all back to the |
| 11 | on, that that's a possibility. They could be | 11 | delivery side of things, I think FDA has been very |
| 12 | bored. | 12 | clear in thinking about methodological aspects of |
| 13 | What I don't understand is [inaudible - mic | 13 | it. Even where there are challenges such as |
| 14 | fades] with the active drug, it's like you can't | 14 | blinding, there may not be one perfect answer, and |
| 15 | possibly believe that you might have gotten a | 15 | it may be different by indication that you're |
| 16 | placebo, and I would think that for most people, it | 16 | studying based on the effects of a comparator. |
| 17 | would be really hard to believe it'd be very | 17 | I think one of the things for this group in |
| 18 | tough to blind it, is what I'm saying. I just | 18 | particular, I think the model of esketamine got |
| 19 | wonder what your experience is with that. | 19 | brought up, and that's particularly interesting. |
| 20 | DR. JOHNSON: Should I answer that? | 20 | The REMS for esketamine mandates that you're under |
| 21 | DR. STRAIN: Yes, Matt. Go ahead and answer | 21 | observation for 2 hours, which there's a clear risk |
| 22 | that, and then we'll go back to Rob. | 22 | identified, so there's a clear need for a REMS. |
| | Page 114 | | Page 116 |
| 1 | DR. JOHNSON: We have done a number of | 1 | I think what the field would probably |
| 2 | things and things are happening currently. In the | 2 | benefit from is a testing of the bounds of this set |
| 3 | first study Roland published, he used a really high | 3 | and setting and heavy therapists we call them |
| 4 | dose of methylphenidate in people with no | 4 | facilitator involvement to understand whether it |
| 5 | psychedelic history and collected data. Even the | 5 | is a risk or not. And I'm by no means advocating |
| 6 | lead therapist in those sessions, who had conducted | 6 | one way or the other, but just that it's a question |
| 7 | hundreds of psychedelic therapy sessions back in | 7 | that needs to be empirically tested; not |
| 8 | the '60s, was fooled; I think it was something like | 8 | necessarily for us to try to do away with some |
| 9 | a quarter of the time in terms of not guessing | 9 | component of that, because in an ideal world, I |
| 10 | correctly. | 10 | think all of us would say anyone with depression, |
| 11 | So there are things you can do. Currently, | 11 | it'd be great to have heavy therapy as an adjunct |
| 12 | both Michael and Peter are running studies with | 12 | in any of these conditions. |
| | diabanku duamina a kink daga ay anting alagaha | | l leven thisking about so lebility and |

- 13 diphenhydramine, a high dose as an active placebo.
- 14 There's the use of lower doses of the drug. I
- 15 thought in the smoking cessation work, the next16 step, in terms of really convincing me in terms of
- 17 whether it's going forward, after the open-label
- 18 was comparative efficacy, so keep randomization and
- 19 don't worry about the blinding yet; that's for the20 next step.
- 21 We have evidence in healthy normals that 22 there's a real pharmacology; it's not just all
- DR. STRAIN: Thanks. Kit? DR. BONSON: I have a bunch of things here.

world may be more scalable. It may not be the gold

However, thinking about scalability and

interesting to see groups like Hopkins test the

16 bounds of this and see can psilocybin administered

safely and effectively with a rolled-back kind of

model of facilitation or guiding that in the real

14 thinking about potential use, it would be

standard, but it may be still safe.

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| | Page 117 | | Page 119 |
| 1 | In the question of placebo versus blinding, I would | 1 | In 1962, there were amendments to the Food, |
| 2 | argue that most psychoactive drugs that we | 2 | Drug, and Cosmetic Act that instituted the IND |
| 3 | administer, you can tell whether they're on them or | 3 | system that we have, and one of the main things |
| 4 | not. There are always going to be the adverse | 4 | that you had to do was to get the chemistry, and |
| 5 | events that people don't like: SSRIs, sexual | 5 | nobody could get the chemistry right to get the LSD |
| 6 | dysfunction, TCAs, being unable to urinate | 6 | because Sandoz had it all. |
| 7 | properly. There are all kinds of things that are | 7 | So that just eliminated a lot of it. Then |
| | possible and can go on. | 8 | |
| 9 | · | 9 | |
| | regulator because what I want to know is does this | 10 | |
| | actually show efficacy? There are all kinds of | 11 | |
| | strategies. You can do low dose versus high dose, | 12 | |
| | but if both of them are the same or neither of them | 13 | |
| | work, then you've done a study, and you have no | 14 | |
| | idea against placebo what's going on. So I would | 15 | |
| | still, personally, advocate for placebo, but there | 16 | |
| | are lots of different strategies that FDA will | 17 | |
| | allow and consider. | 18 | |
| 19 | About obscure psychedelics that people are | 19 | |
| | interested in doing, great, but the thing is, | 20 | |
| | there's a whole lot of work that needs to happen | | research outcomes that people wanted. |
| | before they can ever get into a person. There's a | 22 | |
| | | | |
| | | | |
| | Page 118 | | Page 120 |
| 1 | Page 118 lot of toxicology that has to be done. There are | 1 | Page 120 was revealed that the government had been given LSD |
| | | | |
| 2 | lot of toxicology that has to be done. There are | 2 | was revealed that the government had been given LSD |
| 2 | lot of toxicology that has to be done. There are only a limited number of psychedelics with an | 2 3 | was revealed that the government had been given LSD illicitly to a lot of people without their |
| 2 3 4 | lot of toxicology that has to be done. There are only a limited number of psychedelics with an extensive clinical history back 50 odd years ago, | 2 3 4 | was revealed that the government had been given LSD illicitly to a lot of people without their knowledge. So NIMH just said that's it; we're out |
| 2 3 4 5 | lot of toxicology that has to be done. There are only a limited number of psychedelics with an extensive clinical history back 50 odd years ago, where we felt like it was safe enough that it could | 2 3 4 5 | was revealed that the government had been given LSD illicitly to a lot of people without their knowledge. So NIMH just said that's it; we're out of this. But there were people that were |
| 2 3 4 5 6 | lot of toxicology that has to be done. There are only a limited number of psychedelics with an extensive clinical history back 50 odd years ago, where we felt like it was safe enough that it could go into a person in an IND, but that doesn't | 2 3 4 5 | was revealed that the government had been given LSD illicitly to a lot of people without their knowledge. So NIMH just said that's it; we're out of this. But there were people that were continuing on to do this research through 1987, and |
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| | 1 about opiate-use disorder, which is what we're | 1 | with ketamine. All of the clinics that were giving |
| | 2 supposed to be talking about. | 2 | intravenous ketamine before are continuing to give |
| | 3 Where does this fit in, in terms of like, is | 3 | intravenous ketamine, and none of them are |
| | 4 it something that's done post-detox? Is it done | 4 | psychiatrists. They're all docs that just inject |
| | 5 during treatment with an agonist? Should we be | 5 | you, and you walk out the clinic, and that's it. |
| | 6 doing this because we've got effective therapies | 6 | So first off, the REMS doesn't apply to |
| | 7 out there? I've got thoughts as well I could add | 7 | them, but I don't understand how the REMS is going |
| | 8 to that about it. But I think that's also | 8 | to be enforced with the private practice people in |
| | 9 something to get us back focused on the opioid use. | 9 | the community that don't have CARF and don't have |
| 1 | 0 Any thoughts about either of those, specific | 10 | JCAHO. They're just doing it, and maybe FDA can |
| 1 | 1 thoughts to Celia on the REMS, or the FDA not to | 11 | answer that question; how do you do that? So those |
| 1 | 2 personalize it or how it fits into opiate use. | 12 | are my two comments. |
| 1 | 3 Tom, and then Sandy. | 13 | DR. STRAIN: Sandy? |
| 1 | 4 DR. KOSTEN: I think how it fits into opiate | 14 | DR. COMER: I agree with what Tom is saying, |
| 1 | 5 use is probably the most critical question because | 15 | and I think something that Mike said really |
| 1 | 6 I don't really see how you can possibly, in good | 16 | captured my attention because I think that's a |
| 1 | 7 faith, take somebody who's an opiate user and not | 17 | really nice compromise in terms of giving |
| 1 | 8 put them on something that's going to prevent | 18 | psilocybin to somebody who's a stable patient on |
| 1 | 9 overdoses, whenever. They've got to be on | 19 | Vivitrol. We know that there's a certain relapse |
| 2 | o buprenorphine, methadone, or naltrexone, or maybe a | 20 | rate after several months of treatment, so in that |
| 2 | 1 vaccine, but they've got to be on something. | 21 | situation, you could give the medication, I don't |
| 2 | 2 Now, on the other hand, that many of these | 22 | know, after 2 or 3 months of treatment with |
| | | | |
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| | 1 patients have craving that continues on all of our | 1 | Vivitrol, and then hope that the patient stays on |
| | 2 existing treatments is an interesting question. | 2 | Vivitrol. |
| | 3 Craving is not an outcome that anybody wants to | 3 | But then for the ones who relapse, it's not |
| | 4 face up to, clearly, but if you look at what | 4 | your fault. There's nothing that we're doing to |
| | 5 happens with these treatments, it seems like once | 5 | increase the risk of overdose; it's the patient's |
| | 6 you're stabilized, for even a couple of weeks on | 6 | decision to stop, and, hopefully, the treatment |
| | 7 some kind of treatment, whether it's any one of | 7 | with psilocybin would reduce the risk of relapse; |
| | 8 those four, thinking about doing this with patients | 8 | and if they do relapse, that the use will be lower |
| | 9 who still feel uncomfortable, and craving, and may | 9 | or whatever. That's a situation, I think just |
| 1 | o in fact relapse one way or another by discontinuum, | 10 | clinically, where it seems like it would meet the |
| 1 | 1 that would be a reasonable population. | 11 | ethical concerns. |
| 1 | 2 But as a first-line treatment, I don't see | 12 | DR. STRAIN: Matt? |
| 1 | 3 it, and as my rather provocative suggestion of | 13 | DR. JOHNSON: And fortunately, everyone |
| 1 | 4 giving it during detox, as far as that goes, it's | 14 | who's thinking about this that I know of, and the |
| 1 | 5 hard to not agree with the medication director of | | discussion surrounding it, and the stuff that we've |
| 1 | 6 NIDA to say, "What a perfect way to produce a bad | | been thinking about for years, they all fall in |
| 1 | 7 trip," meaning it probably wouldn't work for that. | 17 | this category; so an agonist treatment or |
| | 8 That sort of where we fit in. | | antagonist treatment being part of the mix, and |
| - 1 | | | |

- 18 That sort of where we fit in.
- As far as the REMS goes, though, I'm just 19
- 20 concerned on the REMS, how enforceable is the REMS
- 21 program? I don't know of any teeth that it has in
- 22 it, and I certainly know what's going on in Houston 22 including the philanthropists that have funded this

21

19 being very mindful about the loss of tolerance and

20 pushing people away from effective treatments.

I'll tell you, it's not easy. The folks,

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| 1 | and many of the people supportive of this work, | 1 | I think that's really what we want to do as |
| 2 | it's like they don't get it. You've got to fight | 2 | healthcare providers, is we want people to be more |
| 3 | against this, "Well, people are still addicted," | 3 | fulfilled in their lives. I'm not getting choked |
| | and it's like you haven't really addressed when | | up on the point; it's a peanut. |
| | someone has a psychedelic, they're going to be | 5 | |
| | liberated. It's like, no; people die. They lose | 6 | |
| | their tolerance. | 7 | DR. STRAIN: I see this as an opportunity to |
| 8 | Fortunately, right now, it seems like | 8 | perhaps do that, which is what intrigues me. I |
| 9 | everyone is approaching this very mindfully. With | | don't think, Matt, I've told you this. I ran into, |
| | respect to REMS, the IV use of ketamine is not | | a few weeks ago at a social function, a |
| | falling under the Spravato REMS, so I think that's | | cardiologist who was a care provider for a patient |
| | part of the answer there because that's been | | who had been through one of the psychedelic studies |
| | approved for treatment for decades, and they're | | at Hopkins. |
| | using it off label. It was approved as an | 14 | - |
| | anesthetic. | 15 | I did, "I've got this patient who went through |
| 16 | So as far as I know, some of these things, | | this," he said, "and this guy was a" and he |
| 17 | GHB has had a really good track record in terms of | 17 | called him a jerk, but he used something that |
| | diversion and abuse; the sodium oxybate, Xyrem | | started with the letter A, and it was a lot more |
| 19 | formulation. | | stronger than that. And I was like, "Oh." |
| 20 | I have a question for folks here. I know | | [Inaudible - mic fades]. He says, "I used to dread |
| 21 | the restrictions on methadone, in particular, | 21 | seeing him, and now he's just a great guy." |
| 22 | preexists the whole concept of REMS. Is that | 22 | It's an N of 1, it's anecdotal, but there's |
| | | | |
| | Page 126 | | Page 128 |
| 1 | directly legislatively mandated? And if so, maybe | 1 | something meaningful that changed in his life by |
| 2 | part of that is what we're dealing with, what could | 2 | going through this, and that's really intriguing. |
| 3 | be part of the future here; so multiple mechanisms, | 3 | I think that's what we strive for when we take care |
| 4 | including REMS and beyond, that could help to keep | 4 | of people, regardless of whether it's with a |
| 5 | this safely contained. | 5 | psychedelic, or if it's with an antidepressant, or |
| 6 | DR. STRAIN: So we're going to need to wrap | 6 | whatever. We want something more than simply |
| 7 | up because we've run over a little bit because we | 7 | relieving a target symptom. |
| 8 | started a little late a little bit. | 8 | Anyway, on that note, let's switch gears |
| 9 | Celia, there was something directed towards | 9 | again, and we're on the home stretch, but we're |
| 10 | an FDA question or a couple there. I don't know if | 10 | going to talk about vaccines. As we've been doing, |
| 11 | you had a thought or not, and if not, I'll wrap | 11 | Sandy or Marco, either of you, if you want to tag |
| 12 | DR. WINCHELL: Nothing definitive. | 12 | team, if you have any opening thoughts about the |
| 13 | DR. STRAIN: Okay. Let me take the | 13 | topic before we dive into it. |
| 14 | prerogative, as the moderator, to just say I've | 14 | DR. COMER: I do, and then maybe Marco can |
| 15 | been struck by how, with respect to opiate-use | 15 | add some of his comments. I think the vaccine |
| 16 | disorder, we've been moving more and more toward a | 16 | approach is different in a lot of ways from the |
| 17 | model where we give people a medication to | 17 | other approaches that we've been talking about the |
| 18 | hopefully decrease their opiate use and decrease | 18 | last couple of days. One of the big ones is that |
| 19 | their risk of using illicit opioids, but we're | 19 | the vaccines are not expected to have any abuse |
| 20 | really not focusing much on trying to get them | 20 | liability or risk of diversion, so that's a huge |
| | | | |
| | better as people to have meaningful change in their | 21 | one. |
| | better as people to have meaningful change in their lives. | 21 22 | |

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| | Page 129 | | Page 131 |
| 1 | be used for treating opioid withdrawal. We're | 1 | Marco, do you have anything else to add? |
| 2 | really focusing on the treatment of opioid-use | 2 | DR. PRAVETONI: Yes, just a couple of |
| 3 | disorder. There is a concern about overdose risk | 3 | things. One, also I would like to spend on the |
| 4 | in people who are on the vaccine as a stand-alone | 4 | overdose scenario and prevention of overdose. |
| | medication, so that's similar to some of the other | 5 | |
| 6 | approaches. But the vaccine approach is very much | 6 | voice. No, it's on your voice; it's not on your |
| 7 | one where we could envision it as an adjunct | 7 | mic. |
| 8 | medication to buprenorphine, methadone, or | 8 | (Laughter.) |
| 9 | naltrexone. | 9 | DR. PRAVETONI: Yeah. In terms of |
| 10 | I wanted to focus a little bit on some of | 10 | prevention of overdose, a vaccine obviously won't |
| 11 | the unique risks and issues associated with the | 11 | prevent a relapse. But upon relapse, especially if |
| 12 | vaccine. One is, something that we don't really | 12 | you are relapsing with preferably lower doses of |
| 13 | know how it will play out clinically and it has | 13 | opioids, the vaccine would prevent actually getting |
| 14 | to do with how to transition a patient onto the | 14 | the [indiscernible] off or the potential for |
| 15 | vaccine there's not clear data to suggest that | 15 | toxicity. So that could have a role. |
| 16 | putting somebody on the vaccine will result in | 16 | As a monotherapy, one thing that we see, |
| 17 | precipitated withdrawal. We're not expecting that | 17 | especially with the case of fentanyl, carfentanil, |
| 18 | to happen because the antibody response will | 18 | and all the analogs that are very potent, they're |
| 19 | increase gradually, so we don't think that will | 19 | also very easy to block by antibodies because the |
| 20 | happen. | 20 | antibodies do need light to counteract only a very |
| 21 | At least in the early development of it with | 21 | small dose, or plasma concentration, or whatever, |
| 22 | the single vaccine, if we block the effects of one | 22 | of fentanyl. |
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| | Page 130 | | Page 132 |
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| | opioid, it's easy for a patient to switch to | 1 | For instance, even other substance-use |
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22 that I have.

Min-U-Script®

22 who's vaccinated may be less sensitive to the toxic

| | | Page 133 | | Page 135 |
|---|--|--|--|---|
| | 1 | effects of carfentanil or fentanyl. | 1 | bound. |
| | 2 | So there are other applications, and the | 2 | So when you look at bound and unbound |
| | 3 | Department of Defense is really interested in this | 3 | fraction, you reduce the unbound, so the frequency |
| | 4 | kind of approach for those reasons as well. | 4 | to collect [indiscernible] fraction. In fact, |
| | 5 | DR. STRAIN: Okay. Let's open it. Celia, | 5 | specifically, in the context of respiratory |
| | 6 | then Rob, and then Tom. | 6 | depression, not so much in these type of meetings, |
| | 7 | DR. WINCHELL: Earlier this week, NIDA held | 7 | but when I go to DoD, et cetera, they are very |
| | 8 | a very, very interesting and informative symposium | | concerned about renal catherization and how the |
| | | about the risks of opioids taken together with | 9 | unbound may recirculate across the barrier. |
| | | stimulants. And some of the information that was | 10 | So the antibodies being outside could act as |
| | | presented, if I understood it correctly, it seemed | 11 | a sponge, if you will, that will actually soak up |
| | | that many of the effects of opioids occur outside | | that unbound. Once the opioids are bound, it takes |
| | | the brain, and they're not necessarily mu mediated, | | quite a while, like before they're unbound, and |
| | | and that there are direct effects on the lung and | | then clear; so you're increasing the circulatory |
| | | on gas exchange in the lung that are separate from | | half-life of opioids, but you're kind of like |
| | | the central depression, the drive to breathe. | | tapering that. But also, once they're bound, |
| | 17 | So that was a surprise to me, and it made me | | they're no longer active. |
| | | think about the vaccine approach and how the | 18 | DR. STRAIN: Thank you. Rob, and then Tom. |
| | | vaccine approach focuses on keeping the drug in the | 19 | MR. BARROW: Just a general question about |
| | | periphery and out of the brain. To what extent do | | the risks and benefits of going down a vaccine |
| | | we understand what the drug does when it stays in | | route, which I realize is the topic, versus |
| | | the periphery? Because we are driving the | | approaching the same kind of issue with a |
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| | 1 | | 1 | Page 136 monoclonal antibody. Why go the vaccine route as |
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| | Page 137 | Page 139 |
| 1 | One of the advantages of the vaccine is that | 1 MALE VOICE: But also the analogs, rights? |
| 2 | the protective effect would last longer, so the | 2 DR. KOSTEN: Oh, yeah. It works on |
| 3 | preclinical response would last longer, and it | 3 carfentanil. In fact, it works better on |
| 4 | would be much cheaper to give, and that would be | 4 carfentanil. The higher the potency, the lower the |
| 5 | preventive, so it would beat there; and even | 5 amount that goes in you. So the antibodies all |
| 6 | minimizing events, a relapse event or an accidental | 6 cross-react to all of these fentanyls, and that's |
| 7 | exposure. So there are pros and cons with both | 7 all they react to, fentanyl derivatives. And there |
| 8 | approaches. | 8 are literally, not just dozens, but many, many more |
| 9 | DR. STRAIN: Tom? | 9 derivatives that are active, and you will in fact |
| 10 | DR. KOSTEN: Thank you. I think Marco's now | 10 bind to them. |
| 11 | said a bunch of the things of why a vaccine and why | 11 I want to emphasize that. We are already |
| 12 | not monoclonals. Monoclonals certainly will work | 12 getting some money from the Department of Defense |
| 13 | for everyone that you give them to, but how long | 13 to do it. I know that Gary Matyas has been getting |
| 14 | they're going to last is quite short, relatively | 14 money from the Army for a while to do this. |
| 15 | speaking, to the risk period you're talking about. | 15 DR. COMER: Marco is, too. |
| 16 | I want to emphasize, there's only one | 16 DR. KOSTEN: And Marco is, too. The time to |
| 17 | vaccine that I feel like we absolutely have to have | 17 pull these resources together is now. But for the |
| | as soon as possible, and that's fentanyl because | 18 defense issue, I assume many of you know that what |
| | fentanyl is not blocked by naltrexone. It's not | 19 happened with Chechnya, it was the Russians, but |
| | blocked by buprenorphine, and it's not blocked by | 20 they aerosolized fentanyl into a theater |
| | methadone. Those people are still dying with that | 21 DR. COMER: Carfentanil. |
| 22 | combination. | 22 DR. KOSTEN: Thank you. I guess some of you |
| | | |
| | Page 138 | Page 140 |
| 1 | Page 138 So the fentanyl vaccine is extremely likely | Page 140 1 heard of this before. |
| | - | |
| 2 | So the fentanyl vaccine is extremely likely | 1 heard of this before. |
| 2 3 | So the fentanyl vaccine is extremely likely to work. Why? Tiny amounts of fentanyl go a very | heard of this before. (Laughter.) |
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| 1 | things. Are we going to be able to do the | 1 | the drinking water. The ACLU people all wanted it |
| | laboratory studies, where we vaccinate people and | | highly restricted, and you couldn't possibly give |
| | we actually give them fentanyl? That's going to be | | it to prisoners and all these other groups. |
| | important to do. | 4 | DR. COMER: It's mandatory in prisons, for |
| 5 | So I think there are very practical issues | 5 | example. |
| 6 | on this that are quite not pie in the sky kind of | 6 | DR. KOSTEN: Half of them are in there for |
| 7 | tomorrow, but like right now. And DEA has to be | 7 | substance abuse, so why shouldn't you vaccinate |
| | brought on board because as make these things, the | 8 | them or something before they go out the door? Why |
| | DEA made this crazy regulation so that our | | shouldn't you inject naltrexone into them? |
| 10 | intermediate products and our final products that | 10 | Then the other issue that came up was a |
| 11 | are components of these vaccines are now Schedule I | 11 | quite controversial issue, which was can we |
| 12 | drugs. That's the way their nutsy rule works. | 12 | identify high-risk people for overdoses for dye and |
| 13 | We're working very hard with NIAAA and other | 13 | for becoming dependent? The consensus was, at the |
| 14 | places. No factory will make a Schedule I drug, | 14 | end of the day, that there were a lot of unexpected |
| 15 | unless they're in China or they're in Mexico. I'm | 15 | consequences, and it was clearest with the nicotine |
| 16 | getting some of this work done in Europe because | 16 | vaccine; that is you vaccinate a whole bunch of |
| 17 | it's just impossible to do it in the U.S | 17 | adolescents. Why do adolescents smoke? Do they |
| 18 | DR. STRAIN: Kit, you wanted to comment? | 18 | smoke to really get high from nicotine? No, they |
| 19 | Thanks, Tom. | 19 | sort of smoke to be antagonistic to their parents |
| 20 | DR. BONSON: My question has to do with | 20 | and everything else. |
| 21 | ethics questions because if there is a vaccine for | 21 | So what are they going to do? They're going |
| 22 | this, are we going to put it into at-risk | 22 | to override this vaccine. If that takes 10 |
| | Page 142 | | Page 144 |
| 1 | communities? I'm just kind of musing this through. | 1 | cigarettes in their mouth all at the same time, |
| | It could be like the Gardasil, where all teenage | | they'll smoke the 10 cigarettes at the same time. |
| | people now are encouraged to get it, regardless of | | What will you then do? You'll expose them to 10 |
| | whether you're sexually active, because you're | | times the amount of carcinogens that they would've |
| | supposed to really get it before you are sexually | | been exposed to before. Is that great idea? No. |
| 6 | active; so that's good. | 6 | Even the parents groups would agree, no, that's |
| 7 | So my concern is that it would only go into | | kind of stupid. |
| 8 | populations that are poor or of color, and they | 8 | So I think that we're going to have to think |
| 9 | would say they're at risk, and then that's not | 9 | about this. I think from the standpoint of |
| | | | - |
| | necessarily the right community. But can we | 10 | fentanyl, in particular, since we have nothing |
| 11 | neutralize this and say everyone's at risk? Then | | fentanyl, in particular, since we have nothing else, I'm quite concerned that there are probably |
| | | 11 | |
| 12 | neutralize this and say everyone's at risk? Then | 11 12 | else, I'm quite concerned that there are probably |
| 12 | neutralize this and say everyone's at risk? Then it sort of changes to dialogue a little bit about | 11 12 13 | else, I'm quite concerned that there are probably more risk groups than we think. It's not just |
| 12 13 | neutralize this and say everyone's at risk? Then it sort of changes to dialogue a little bit about how we think about drug abuse. | 11 12 13 14 | else, I'm quite concerned that there are probably more risk groups than we think. It's not just opiate addicts, they're cutting methamphetamine, |
| 12 13 14 | neutralize this and say everyone's at risk? Then it sort of changes to dialogue a little bit about how we think about drug abuse. You see where I'm going with that? | 11 12 13 14 | else, I'm quite concerned that there are probably more risk groups than we think. It's not just opiate addicts, they're cutting methamphetamine, and cocaine, and everything else with fentanyl, so |
| 12 13 14 15 | neutralize this and say everyone's at risk? Then it sort of changes to dialogue a little bit about how we think about drug abuse. You see where I'm going with that? DR. COMER: Yeah | 11 12 13 14 15 16 | else, I'm quite concerned that there are probably more risk groups than we think. It's not just opiate addicts, they're cutting methamphetamine, and cocaine, and everything else with fentanyl, so it may be just every drug abuser, period. |
| 12 13 14 15 16 | neutralize this and say everyone's at risk? Then it sort of changes to dialogue a little bit about how we think about drug abuse. You see where I'm going with that? DR. COMER: Yeah DR. KOSTEN: Sorry. | 11 12 13 14 15 16 17 | else, I'm quite concerned that there are probably more risk groups than we think. It's not just opiate addicts, they're cutting methamphetamine, and cocaine, and everything else with fentanyl, so it may be just every drug abuser, period. Then the other thing will be, what about the |
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| 1 | which is this mandatory aspect I think I'm getting | 1 | whatever they're taking it from, as opposed to |
| | at with the ethics. I didn't say that word, but | 2 | another area. |
| 3 | it's not just what populations do we bring it to; | 3 | I think that's another high risk that's |
| | it's whether or not it's mandated, and I think that | 4 | there that because you don't really know what |
| 5 | that's where the ACLU came in, problematically, | 5 | you're getting when you're taking these things. |
| 6 | about prisoners. | 6 | They're obviously not doing a pharmaceutical grade |
| 7 | DR. STRAIN: David, and then Frances. | 7 | mixture of making sure everything is equal. |
| 8 | DR. SHURTLEFF: Thank you. I'm intrigued by | 8 | DR. SHURTLEFF: Again, I don't know if |
| 9 | the fentanyl. I think if you carved out a niche, I | 9 | there's a way to address that, but I think that's |
| 10 | think that's relevant here that maybe deserves more | 10 | the variability in the street use or street |
| 11 | discussion or thinking. But I'm just curious, and | 11 | availability that could potentially make or break |
| 12 | I agree with you, the lacing of if it's heroin or | 12 | this approach. Just conceptually, I think it's an |
| 13 | stimulants, I think that's potentially another | 13 | excellent way to target a very specific application |
| 14 | public health use for this type of approach. | 14 | as needed, but I'm just wondering if we're going to |
| 15 | But I'm wondering and I don't know; maybe | 15 | be in that situation where |
| 16 | the NIDA people know. But what is the level of | 16 | DR. STRAIN: Tom, did you want to say |
| 17 | fentanyl in these products? Is it at a point where | 17 | something to that as well? Then we'll do Frances, |
| 18 | even though a little bit goes a long way, as you | 18 | and then Andrew. |
| 19 | said, are these large amounts where you could run | 19 | DR. KOSTEN: The people who are coming into |
| 20 | into the same problem with a challenge that you | 20 | the emergency rooms now in Houston, that are |
| | have with nicotine and other opioids, where even | | saying, "I'm a methamphetamine abuser, and so are |
| 22 | though a small amount will kill you, but there's 10 | 22 | all my friends." And one of them friends brings |
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| 1 | times or 20 times that amount, lethal dose, within | 1 | them in and says, "I don't know why he stopped |
| | the product that these folks are taking that have | | breathing." For the longest time, we couldn't |
| | you overwhelmed again, and you're back to the same | | convince the ER staff, "Look at his pupils." When |
| | problem. | | the pupils are pinpoint, that ain't |
| 5 | So I'm just wondering from a practical | | methamphetamine; give 'em something. And then what |
| | perspective, if it's, in fact, the case that | | they would do is load them up with naloxone, |
| | there's very little in the products that are being | 7 | |
| 8 | | 8 | |
| 9 | DR. STRAIN: Bob, do you want to answer | 9 | extremely difficult situation. |
| 10 | that, and then we'll go to Frances. | 10 | Now, the only thing I can say is that the |
| 11 | DR. KOSTEN: Yes, just to | 11 | rodents are extremely resistant. It's almost a |
| 12 | DR. STRAIN: No. Bob was chomping at the | 12 | thousand-fold difference in a rodent dose to make |
| 13 | bit to say something. | 13 | them stop breathing compared to humans, and these |
| 14 | MR. WALSH: I was going to say I can't | 14 | are rodents that we're doing the fentanyl vaccine |
| 15 | really say quantitatively what's being seen in | 15 | and giving the fentanyl on top of. And Janda's got |
| 16 | things; I just don't know that off the top of my | 16 | the same results. We are using somewhat different |
| 17 | head. But one of the things I have heard, too, as | 17 | technologies, but the concept is the same. You |
| 18 | part of the problem with this, is that things | 18 | just seem to make high affinity antibodies to this |
| 19 | aren't necessarily mixed real well either. | 19 | vaccine. |
| 1. | | | |
| 20 | So as people are taking samples and shooting | 20 | I don't know how yours have been, but |
| 21 | up, they may get one that has a much heavier dose | 21 | measuring the affinity, we're just [inaudible - mic |
| 21 | | 21 | - |

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| 1 | . work, and I don't think that's going to be a huge | 1 | testing positive only for fentanyl. |
| 2 | problem. The only problem I worry about it's | 2 | DR. LEVIN: Only for fentanyl? |
| 3 | one that's a little different, which is if this | 3 | DR. HUHN: Yeah. |
| 4 | a makes it safe on the street, does this mean that | 4 | FEMALE VOICE: Do they think they're |
| 5 | they're now going to do it all the time? | 5 | shooting heroin? |
| e | Fentanyl's very cheap to make, and there are lots | 6 | DR. HUHN: Yeah. |
| 7 | of different ways of making it. | 7 | MALE VOICE: That's the problem. |
| 8 | MALE VOICE: It will escalate. | 8 | (Crosstalk.) |
| 9 | DR. KOSTEN: Yeah. We get into a | 9 | DR. HUHN: There have been a few things |
| 10 | competition. | 10 | published recently about how this really rapidly |
| 11 | DR. STRAIN: Frances? | 11 | shifting landscape is happening in other places, |
| 12 | DR. LEVIN: I think Tom said what I was | 12 | too, where fentanyl is becoming the only available |
| 13 | going to say, in between all the times you've | 13 | drug or the drug of choice around the country. |
| 14 | a talked | 14 | DR. LEVIN: And the other thing we're not |
| 15 | 6 (Laughter.) | 15 | talking about today, and Tom mentioned it, because |
| 16 | DR. KOSTEN: Oh, come on! | 16 | 80-90 percent of our clinic is positive, heroin |
| 17 | (Laughter.) | 17 | users are positive for fentanyl. But they're |
| 18 | DR. LEVIN: But the point that the target | 18 | saying they're using heroin, but whatever. |
| 19 | group is worried about mandated treatment, and the | 19 | We're having a much harder time with |
| 20 | ACLU, and all that stuff, that starting, at least, | 20 | induction to even view. We can't do home |
| 21 | with any illicit substance user, if you're cocaine, | 21 | inductions the same way, getting people on to |
| 22 | e or heroin, or whatever, that is a group. They'll | 22 | Vivitrol. Everything is a lot harder. I think |
| | Page 150 | | Page 152 |
| 1 | have more of the cocaine hospital admissions | 1 | that's not the discussion today, but all the |
| 2 | will have overdoses due to overdoses are related | 2 | algorithms I'm responsible for training |
| 3 | to fentanyl, so I think that is a group to some | 3 | throughout the country on buprenorphine |
| 4 | degree. | 4 | administration and all that sort of stuff through |
| 5 | I think what the military does I don't | 5 | SAMHSA's PCSS program, and all these induction |
| e | know military law and whether every recruit that's | 6 | things we're writing aren't really holding true |
| 7 | going in the field has to agree to have an | | |
| | genig in the nera has to agree to have an | 7 | when there's fentanyl on board. So that's a whole |
| 8 | injection of fentanyl before they go over to | 7 8 | |
| | | 8 | - |
| 9 | injection of fentanyl before they go over to | 8 | other discussion, but we're back to the drawing |
| 9 10 | injection of fentanyl before they go over to Russia, and they would wind up going. I think | 8 9 10 | other discussion, but we're back to the drawing board with these opiate medications. |
| 9 10 11 | injection of fentanyl before they go over to Russia, and they would wind up going. I think that's another question. But yes, DoD is extremely | 8 9 10 11 | other discussion, but we're back to the drawing board with these opiate medications. DR. HUHN: Also, just thinking this all the |
| 9 10 11 12 | injection of fentanyl before they go over to Russia, and they would wind up going. I think that's another question. But yes, DoD is extremely interested in all ways of dealing with this | 8 9 10 11 | other discussion, but we're back to the drawing board with these opiate medications. DR. HUHN: Also, just thinking this all the way through, especially for application in the military, but really for anybody who was vaccinated |
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| 9 10 11 12 13 14 15 16 | injection of fentanyl before they go over to Russia, and they would wind up going. I think that's another question. But yes, DoD is extremely interested in all ways of dealing with this potential terrorism threat, whether it's mechanical devices and other kinds of stuff they're also interested in. DR. STRAIN: Andrew? DR. HUHN: I just wanted to mention, regarding the prevalence of fentanyl, that at least | 8 9 10 11 12 13 14 15 16 | other discussion, but we're back to the drawing board with these opiate medications. DR. HUHN: Also, just thinking this all the way through, especially for application in the military, but really for anybody who was vaccinated against fentanyl, if they were to be in like an emergency situation where they needed emergency medical care, fentanyl is usually a go-to drug for that to be used to control pain. So then are we really going to end up |
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| 1 | around. | 1 | instead the vaccinated animals, they will drop. |
| 2 | Roger? Oh, I'm sorry. Sandy wanted to | 2 | Fentanyl is relatively like a short |
| | comment, then Roger. | | half-life as far as like rewarding, but then it |
| _ | DR. COMER: I just wanted to comment on | | sticks around for much longer than heroin, and |
| 4 | something that someone said about, well, once we've | | morphine, or oxycodone. If you change the kind of |
| | vaccinated everybody, it's just going to drive the | | first peak that is rewarding, that seems to be very |
| | dose up. I think that the pharmacology of fentanyl | | effective, and with fentanyl more so, and it |
| | is unique in that the dose that produces the | | probably has to do with fentanyl itself and how |
| | | | |
| | euphoric effect and the dose that produces severe | | it's interfacing with the distribution, and metabolism, and all that. |
| | respiratory depression is very narrow. So the | | |
| | safety margin is more narrow for fentanyl then for | 11 | DR. STRAIN: Thank you. Roger, I think, and then Matt. |
| | heroin, for example. | | |
| 13 | I think if somebody gets vaccinated, they | 13 | DR. WEISS: Just a quick point. Boston is |
| | may end up using higher doses, but I don't think | | the same as Baltimore, that a number of patients |
| | that the street doses of fentanyl will change much | | said you can't get heroin in Boston; it's all |
| | because in a non-vaccinated person, if the dealer | | fentanyl. |
| | drags it up, then he's going to kill all of his | 17 | DR. STRAIN: We like to think Boston is |
| _ | customers | | emulating us in Baltimore, yeah. |
| 19 | MALE VOICE: Which they don't want to do. | 19 | (Laughter.) |
| 20 | DR. COMER: which they, obviously, don't | 20 | DR. WEISS: That's actually what they say, that we've heard that it all came from Baltimore. |
| 21 | want to do. DR. PRAVETONI: In fact, the effect of the | 21 22 | (Laughter.). |
| 22 | | 22 | (Laughter.). |
| | | | |
| | Page 154 | | Page 156 |
| 1 | - | 1 | |
| | vaccine in shifting the dose response for both | | DR. STRAIN: Yeah. |
| 2 | vaccine in shifting the dose response for both reward and respiratory depression goes hand in | 2 | DR. STRAIN: Yeah. DR. WEISS: The other thing, though, is if |
| 2 3 | vaccine in shifting the dose response for both reward and respiratory depression goes hand in hand, so it's equally effective; or respiratory | 2 3 | DR. STRAIN: Yeah. DR. WEISS: The other thing, though, is if you had a vaccine I'd just respond to something |
| 2 3 | vaccine in shifting the dose response for both reward and respiratory depression goes hand in hand, so it's equally effective; or respiratory depression and bradycardia, as well as reward. | 2 3 4 | DR. STRAIN: Yeah. DR. WEISS: The other thing, though, is if you had a vaccine I'd just respond to something that Tom said, that if people thought it was safe, |
| 2 3 4 5 | vaccine in shifting the dose response for both reward and respiratory depression goes hand in hand, so it's equally effective; or respiratory depression and bradycardia, as well as reward. As Sandy was saying, we've been doing this | 2 3 4 5 | DR. STRAIN: Yeah. DR. WEISS: The other thing, though, is if you had a vaccine I'd just respond to something that Tom said, that if people thought it was safe, they'd keep using it, though it would be safe but |
| 2 3 4 5 6 | vaccine in shifting the dose response for both reward and respiratory depression goes hand in hand, so it's equally effective; or respiratory depression and bradycardia, as well as reward. As Sandy was saying, we've been doing this for quite a while. When I started, oxycodone was | 2 3 4 5 6 | DR. STRAIN: Yeah. DR. WEISS: The other thing, though, is if you had a vaccine I'd just respond to something that Tom said, that if people thought it was safe, they'd keep using it, though it would be safe but ineffective. So maybe they wouldn't keep using it |
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| | Page 157 | Page 159 |
| 1 | going to also just be ineffective in the broad | 1 I think it will spread with a natural |
| 2 | scale, in the sense of it's just going to be one | 2 process that has something to do with herd |
| 3 | more aspect of this game of Whac-A-Mole. They're | 3 immunity, even though you're far from getting a |
| 4 | going to be other scaffolds. Even if it | 4 hundred percent of the people. And this is going |
| | generalizes the carfentanil, remifentanil, and the | 5 to be important because these vaccines, they will |
| | rest, it's going to be a continued Whac-A-Mole game | 6 last with the cocaine vaccine, it will last |
| | with other basic structures. But at the individual | 7 about 3 months, and then you have to revaccinate. |
| | level, for those that at least get the gumption up | 8 They're saying the opiate ones will last longer. |
| | to quit, some time, it seems like there's a lot of | 9 They might go out to 6 months, but they're not |
| | promise. | 10 going to go out I mean, it's impossible, with |
| 11 | DR. STRAIN: Tom? | 11 current ways that we do vaccines, to make this work |
| 12 | DR. KOSTEN: Just one thing that did come up | 12 more than about 6 months, and then you'd have to |
| | during those 20-years-ago meetings that was kind of | 13 give then we make them up with other kinds of |
| | interesting, and it was from a mayor of a | 14 depot formulations. |
| | relatively large urban area who had a public health | |
| | | |
| | background. His position was quite interesting, | 16 something you can sort of say like measles, |
| | which was the concept of herd immunity, which has | 17 mumps, rubella, you get it as a kid, and then |
| | to do with cattle and veterinary things, where if | 18 you're immune for the rest of your life. You've |
| | you vaccinate a proportion of a population with an | 19 got to keep chasing it. |
| | infectious disease, you only have to get about a | 20 DR. STRAIN: Well, we're winding down |
| | third of them, and the spread then stops. | 21 towards the end of this session. Other thoughts on |
| 22 | That's what his concept was for the | 22 vaccines? |
| | | |
| | Page 158 | Page 160 |
| 1 | | |
| | vaccines, that even if you've got a third of the | 1 DR. KOSTEN: And money. |
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1 really interesting, but I can't believe they didn't

2 talk about X as a non-mu approach that's on the

3 horizon." So that's one thing, and that's a major

The second thing is future ACTTION items

4 aspect, I think.

5

| 5 | The second thing is future from the fit | 5 | This is really an opportunity in people need to |
|----|---|------|---|
| 6 | related to substance abuse, and you can either | 6 | get up and go grab a brownie or something, please |
| 7 | bring that up to the group when we're having lunch | 7 | feel free to do so. This is really a chance now |
| 8 | or certainly reach out to me as well. For those of | 8 | for us to if you've had any lingering thoughts |
| 9 | you who haven't been intimately involved with | 9 | that have come up; ideas, questions; and as I |
| 10 | ACTTION, we've done meetings on stimulants, on | 10 | mentioned before, other drugs that we didn't |
| 11 | cannabis, on craving, on medical devices; and | 11 | consider; or classes of drugs that might be |
| 12 | obviously now on non-mu agents. | 12 | relevant to this; other ACTTION topics; nature of a |
| 13 | This is sort of the typical process that we | 13 | paper that might come out of this if we move |
| 14 | go through in terms of a day and a half, some talks | 14 | forward, Tom, go ahead. |
| 15 | that highlight it, but also ample time to have | 15 | DR. KOSTEN: Once I unfill my mouth. I |
| 16 | discussion like this. So if you find something | 16 | realize we probably did stimulants already, but |
| 17 | that you're thinking, "Gee, going forward, it would | 17 | that is the up and coming epidemic with |
| 18 | be really interesting," we're certainly willing to | 18 | methamphetamine. It seems like having maybe kind |
| 19 | entertain it, I think. Bob's nodding yes and | 19 | of an epidemiology presentation of how that's kind |
| 20 | Dennis is smiling. Then we'll talk also about next | 20 | of spread all over the place, and how it's getting |
| 21 | steps that's related to this meeting. | 21 | mixed in as I think [indiscernible] or someone |
| 22 | So on that note, the big hand's on the 12, | 22 | was saying about a meeting they had at NIDA later |
| | D | | D 404 |
| | Page 162 | | Page 164 |
| 1 | so let's break, and we'll start back up in about 10 | 1 | on about stimulants and opiates being kind of the |
| 2 | minutes. | 2 | drug for sure at this point cocaine and opiates |
| 3 | (Whereupon, at 12:00 p.m., a lunch recess | 3 | were bad enough, but methamphetamine and opiates |
| 4 | was taken.) | 4 | are actually quite a bit messier because the |
| 5 | | | methamphetamine lasts so much longer, and you can |
| 6 | | 6 | take it in every route of administration |
| 7 | | 7 | imaginable, and you still get high. |
| 8 | | 8 | DR. WINCHELL: I'll mentioned that FDA is |
| 9 | | 9 | working on a the Duke Margolis folks are putting |
| 10 | | 10 | together a workshop for us on stimulant-use |
| 11 | | 11 | disorder. Then there will be a patient-focused |
| 12 | | 12 | drug development meeting on stimulant-use disorder |
| 13 | | 13 | as well. |
| 14 | | 14 | DR. KOSTEN: Good. That's coming back to |
| 15 | | 15 | the forefront, and we have nothing for stimulants. |
| 16 | | 16 | DR. STRAIN: Actually, that Duke Margolis |
| 17 | | 17 | meeting I think is like in two weeks or something. |
| 18 | | 18 | It's early December. |
| 19 | | 19 | MALE VOICE: December 16th, I think. |
| 20 | | 20 | DR. STRAIN: 16th is it? |
| 21 | | 21 | DR. KOSTEN: Oh, okay. I made a mistake; |
| 22 | | 22 | they invited me to that already. |
| L | | | |
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2

3

4

AFTERNOON SESSION

DR. STRAIN: Let's go ahead and get started.

(12:23 p.m.)

General Discussion

5 This is really an opportunity -- if people need to

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| | Page 165 | | Page 167 |
| 1 | DR. WINCHELL: I honestly don't know. I've | 1 | get. It's not controlled or anything. Certainly, |
| 2 | been boostfully uninvolved. | | when we were running an opiate detox study a couple |
| 3 | (Laughter.) | 3 | of years ago, some patients were doing remarkably |
| 4 | DR. WINCHELL: I'm just going to show up. | | well on the study. And we said, "Geez, this is |
| 5 | DR. STRAIN: You can go online and register | | great." And they said, "Well, you know, I've been |
| 6 | to attend it if you want to go to it. | | taking this thing. I can't remember. Is it |
| 7 | We probably do need to and I'm looking | | krocktiom [ph]?" |
| 8 | over at Brian now. Brian spearheaded the paper we | 8 | |
| | did on stimulant-use outcome measures. Didn't you? | 9 | thing, and it really does work very well for opiate |
| | Yeah. Brian's now eating. | | withdrawal. I'm not sure whether you're still |
| 11 | DR. WINCHELL: You have a recent one about | | opiate dependent at the end of it, but we did give |
| 12 | risk levels, right? | | them naltrexone at the end. They didn't say thank |
| 13 | DR. KILUK: Yeah. | | you or anything, but they weren't particularly |
| 14 | DR. STRAIN: What journal was that in? | | sick. |
| 15 | DR. KILUK: Studies of alcohol and drugs. | 15 | DR. WEISS: We've had people, A, who have |
| 16 | DR. STRAIN: But we need to revisit | 16 | used it as a treatment and people who have come in |
| 17 | stimulants at some point, probably, and I'm looking | | addicted to kratom or that was their drug of |
| | at Bob. We've got a lot that we've got to do. | | choice. It's one of those things that's very |
| 19 | Other thoughts? Are there any drugs that we | | controversial because some people see it as the |
| 20 | missed, that you sort of say, "Gee. We really | | cure and other people see it as the problem. |
| | should have thought about X," besides obviously | 21 | |
| | stimulants. | 22 | |
| | | | |
| | Page 166 | | Page 168 |
| 1 | DR. WINCHELL: Well, we've seen a variety of | 1 | DR. KOSTEN: The eyes of the beholder. |
| 2 | drugs that are purported to have like a | 2 | DR. WEISS: Yeah. |
| 3 | pan-addiction effect. People will come in, and | 3 | DR. SHURTLEFF: Just from a basic science |
| 4 | they say we think this drug does everything, and | 4 | perspective, we're launching a program looking at |
| 5 | then they'll pick one thing to start with based on | 5 | her drug interactions, and kratom is the lead |
| 6 | where the money is, or where they think they can | 6 | compound. It's looking at how it affects |
| 7 | get fast-track designation, or where they think the | 7 | transporters |
| 8 | low-hanging fruit is. They're all over the place, | 8 | DR. STRAIN: Can you get closer to the mic? |
| 9 | just all kind of everything, unrelated to anything | 9 | DR. SHURTLEFF: Just to say that we're |
| 10 | we've seen, of course. | 10 | looking at kratom in an herb drug interaction |
| 11 | DR. COMER: What about like kratom, and | 11 | profile to see how it affects transporters, liver |
| 12 | mitragynine, and 7-hydroxymitragynine? Those are | 12 | enzymes, and other things; so just some basic |
| 13 | kind of interesting and controversial. | 13 | information that may be useful moving forward. |
| 14 | DR. WEISS: That's a big one. | 14 | DR. KOSTEN: So you have that information or |
| 15 | DR. STRAIN: Yeah. | 15 | you're |
| 16 | DR. WEISS: We're seeing a good bit of it, | 16 | 0 0 1 |
| | of kratom. The population we're seeing it in, in | | actually have believe it or not, it took a long |
| | particular, is we have a specialty program for law | | time to find the appropriate compound online, and |
| | enforcement and firefighters, and we're seeing it | 19 | there was a reliable source that our group in North |
| | in that population because it doesn't show up in | 20 | |
| 21 | urine tests. | | was able to find. They purchased large quantities. |
| 22 | DR. KOSTEN: Not only that; it's easy to | 22 | Now, the next step is to develop a profile and |
| | | | |

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ACTTION - BEYOND THE MU OPIOID SYSTEM FOR TREATING C

17 by thinking you would have bad interactions with

19 animals are reducing their alcohol use when they

20 get it. So we're not sure how much George Koob

21 will get enthusiastic about giving kratom to

18 alcohol, and it ends up what's happening is the

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| 1 | program to do this in human subjects. | 1 | all day, from morning till night. So they're |
| 2 | So we're making progress at the very | 2 | titrating their dose and using this as sort of a |
| 3 | beginning. We have the standardized kratom now. | 3 | beverage all day, and maintain their stamina, so I |
| 4 | They looked across the board, and this was the most | 4 | guess it probably reduces pain to some extent. |
| 5 | consistent product they could find. | 5 | DR. JOHNSON: People talk about the |
| 6 | FEMALE VOICE: And you're going to put an | 6 | stimulant effects, but it's not unlike the railroad |
| 7 | IND in for this? | 7 | workers using opium, perhaps. |
| 8 | DR. SHURTLEFF: I think they already do have | 8 | DR. STRAIN: Andrew, did you have something |
| 9 | FDA approval, yes, to do this. So we've already | 9 | you wanted to say? |
| 10 | cleared the FDA component, so we're now moving to | 10 | DR. HUHN: Just to mention, a lot of those |
| 11 | the interaction studies. | 11 | benefits sound a lot like the work on tramadol, |
| 12 | DR. KOSTEN: They've been doing those in | 12 | where changing the route of administration causes |
| 13 | animals. My wife, Terry, has been doing those, | 13 | bad effects and taking too much causes bad effects. |
| 14 | essentially, kratom studies with the ingredient, | 14 | And that's already FDA approved, at least for pain, |
| 15 | which we found the place that you can get it from. | 15 | so that might be something with similar advantages, |
| 16 | It's not that cheap, but we can get it. We started | 16 | but much closer. |
| 1 | | 1 | |

- 17 MALE VOICE: Yes, a weak mu agonist.
 - 18 DR. STRAIN: Bob?

DR. DWORKIN: I was just curious whether any 19 20 human abuse liability studies have been done. Has 21 the abuse liability been looked at systematically?

22 MALE VOICE: No.

22 alcoholics, but you never know. Page 170 Page 172 1 DR. STRAIN: Matt? 1 DR. STRAIN: There's somebody actually at DR. JOHNSON: I certainly agree that kratom 2 2 Columbia, a chemist who makes 6-mitragynine. DR. COMER: Andrew Kruegel. 3 is very promising. My bet is it's essentially an 3 4 agonist treatment, and people report it like a very DR. STRAIN: What's his name? 4 5 new opioid profile with subjective effects. One of 5 DR. COMER: Andrew Kruegel. 6 the big picture things is there might be something 6 DR. STRAIN: Yeah. Is it laborious to make 7 very special about mitragynine pharmacologically, it or something? I forget. 7 8 and I'm open to that. DR. COMER: We have to extract it from the 8 9 One part of the package that is important 9 plant. 10 now is that no one has figured out how to get a 10 DR. KOSTEN: Yes, it's laborious. I can 11 high potency extract that's injectable and 11 tell you, we tried to do it, and we decided it was 12 sniffable. So you have a mu agonist that has to be 12 cheaper to just buy it. 13 taken orally and in a form that if you take more 13 DR. STRAIN: But I think that's probably the 14 than 4 grams or so, it's very aversive. So those 14 critical thing, is to do the abuse liability 15 kind of non-pharmacological factors alone might be studies with 6-mitragynine, which somebody in our 15 16 limiting, not preventing, its abuse potential, 16 group wanted to do that. 17 which might be why folks are reporting that it's 17 Did Al put a grant in to do that? Didn't 18 essentially a do-it-yourself agonist treatment. 18 he? DR. SHURTLEFF: It's used in East Asia. 19 19 DR. JOHNSON: I don't think the grant has 20 Chris McCurdy can give you a really good accounting 20 gone in. 21 of this. But my understanding is it's used in 21 DR. STRAIN: I thought he put an R21 in. 22 DR. JOHNSON: A big old giant bag of kratom

| 11 | | | |
|----|---|----|---|
| | Page 173 | | Page 175 |
| 1 | that was bought, just in case it was scheduled. | 1 | So I think a future ACTTION built totally |
| 2 | DR. STRAIN: Well, that's a good thought, | 2 | around outcome domains and really trying to figure |
| 3 | although I'm not sure I would bill kratom as a | 3 | out across drug classes and within drug classes. I |
| 4 | non-mu opioid approach. I think it's probably just | 4 | know that's a hard topic, but I think it's one |
| 5 | a | 5 | that's really necessary and could improve clinical |
| 6 | DR. BONSON: Definitely a mu opioid. | 6 | trials for substance-use disorders across the |
| 7 | DR. STRAIN: mu opioid that's primarily | 7 | board. |
| 8 | available in brewed tea, is my understanding. I | 8 | It could have something to do with general |
| 9 | think that's how typically it's taken. | 9 | technological developments to prevent the loose |
| 10 | DR. BONSON: Well, you can buy | 10 | cannon sort of behavioral treatment aspect that we |
| 11 | DR. STRAIN: What's that? | 11 | sometimes see, and just like the basic foundations, |
| 12 | DR. BONSON: You can buy the botanical. | 12 | then we can more easily transfer data or |
| 13 | DR. STRAIN: Yes, you buy the botanical, but | 13 | translate data across clinical trials to look at |
| 14 | I think a lot of people brew it, don't they? | 14 | these secondary outcome domains. |
| 15 | DR. BONSON: The difficulty in doing | 15 | DR. STRAIN: I was having a little |
| 16 | abuse-potential studies with mitragynine is that we | 16 | difficulty hearing you in the beginning. I did |
| 17 | don't really know what the plasma levels are in | 17 | hear the part where you said you really liked |
| 18 | humans. You can say, oh, they take this leaf, and | 18 | ACTTION meetings, though. |
| 19 | they do this, and they take this much, but there's | 19 | (Laughter.) |
| 20 | that Tarrawalla thing about how much mitragynine or | 20 | DR. STRAIN: Were you saying a meeting that |
| 21 | 7-hydroxymitragynine are in that particular leaf. | 21 | focuses on outcome measures for opiate-use disorder |
| 22 | Then we don't know what the levels of those | 22 | specifically? |
| | | | |
| | Page 174 | | Page 176 |
| 1 | 2 compounds are in the people who abuse them. So | 1 | DR. LEE: Across drug class. |
| 2 | we don't know that for humans, so we don't know how | 2 | 5 |
| 3 | to run a human abuse-potential study. And we don't | 3 | DR. LEE: We were talking about this in |
| 4 | know what it is in humans, so we can't extrapolate | 4 | cannabis as well, and we're running into, it seems |
| 5 | down for plasma levels in animal studies, where we | 5 | to me with very few exceptions, that abstinence is |
| 6 | do the typical self-administration, drug | 6 | our default outcome of record, but is it the best? |
| 7 | discrimination, and whatever it is. So it's very | 7 | I think it's an interesting discussion that we |
| | hard at this stage to know what conclusions to be | | dance around at these meetings, and then we kind of |
| 9 | drawing other than it's an unregulated mu opioid | | filter back in, okay, let's see which drug works |
| 10 | agonist. | 10 | now; where if we really focused on improving and |
| 11 | (Laughter.) | 11 | pooling together unique and novel outcomes, we |
| 12 | DR. STRAIN: That's all. | 12 | might have a general consensus on how do you |
| 13 | Other thoughts? Yeah, Dustin? | 13 | approach trial design in a larger respect. |
| 14 | DR. LEE: I have a general thought. This is | 14 | DR. STRAIN: It's kind of related. Annie |
| 15 | my second ACTTION meeting, and what I find most | 15 | and I meet regularly and kind of brainstorm ideas |
| 16 | intriguing about ACTTION is that you break down | 16 | and things. We meet in person. Bob, Dennis, and I |
| 17 | everything to the most individual level. Yesterday | 17 | talk on the phone as well, and Annie. But an idea |
| 18 | morning, we heard a little bit about this, but | 18 | we had batted around was actually quality of life |
| 19 | anyone that was at the canvas meeting like a year | | as it related to substance-use disorder. It kind |
| 1 | and a half ago, I think the general consensus | 20 | of goes back to something I was saying before lunch |
| 20 | and a nam ago, i amma aro gonorar concenced | 20 | |

21 coming out of that is we have no clue what we're

22 looking for with regards to outcome measures.

22 only thing.

21 about abstinence is good, but abstinence isn't the

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| | Page 177 | | Page 179 |
| 1 | DR. LEE: You leave it to the folks who are | 1 | that have been used because we know that they've |
| 2 | writing the systematic reviews, and we're going to | 2 | been variable. They've been specific to that |
| 3 | tell you the problems because we write the | 3 | particular study, that particular population. |
| 4 | systematic reviews, and then we figure out, and | 4 | Studies are anywhere from 6 weeks to 6 years long. |
| 5 | there's really no consensus about any of this | 5 | Obviously, they're all over the place. |
| 6 | stuff. In that respect, you can break down almost | 6 | What would be better, I think, is to try to |
| 7 | every single drug class and just determine that | 7 | articulate what we think they should be going |
| 8 | there's a mess of outcome measures. | 8 | forward. We all know what the endpoints have been. |
| 9 | I know Brian has done a ton of work in this, | 9 | We reviewed all the protocols, so we know what the |
| 10 | and I think we need more emphasis on that type of | 10 | endpoints are. We know how many there are. And we |
| 11 | pooling together across studies, and I think we | 11 | also know that many protocols say that the endpoint |
| 12 | could probably make pretty good use of time if we | 12 | is urine toxicology. |
| 13 | do that. | 13 | Now, urine toxicology is not an endpoint, |
| 14 | DR. STRAIN: Well, doing a systematic review | 14 | and EKG is not an endpoint. You have to say what |
| 15 | of outcome measures across substance-use | 15 | you're going to do with it, and there are literally |
| 16 | disorders | 16 | an infinite number of things you can calculate with |
| 17 | DR. LEE: No, I wasn't talking about that. | 17 | the urine toxicology data that you have collected. |
| 18 | DR. STRAIN: Do you want to hit Dustin now? | 18 | 5 1 5 |
| 19 | DR. LEE: I'm not touching those for a | 19 | published literature, they don't even tell you what |
| 20 | while. But you could take just one substance. And | 20 | the endpoint is. I don't think that's going to be |
| 21 | I think for the cannabis meeting, and 65 different | | particularly fruitful. I don't mean to rain on |
| 22 | cannabinoids comes across 58 trials. I don't think | 22 | anyone's parade. |
| | | | |
| | Page 178 | | Page 180 |
| | Page 178 | | Page 180 |
| | it's that much different if you look at opiate-use | 1 | DR. DWORKIN: Celia, so what would be |
| 2 | it's that much different if you look at opiate-use disorders. Even if it's abstinence, it's defined | 2 | DR. DWORKIN: Celia, so what would be helpful? |
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| | Page 181 | | Page 183 |
| 1 | problem. And if they don't have a problem, then | 1 | less frequent urine testing, we're going to miss a |
| | they're adequately treated. We've articulated | | lot. There's probably a lot of positives we're not |
| | these things. | | seeing, especially because their scheduled. The |
| 4 | Now, the problem is that there is a tension | | patients know when they have to be negative. So |
| | between wanting studies to be brief and efficient, | | for us to say we expect all the urine tests to be |
| | and wanting outcomes to be global, because it takes | | negative isn't the same thing as saying we expect a |
| | a long time to move the needle on a global outcome. | | patient to be a hundred percent abstinent. I mean, |
| | l've said this before. Obesity studies are | | we only tested them 1 out of 30 days. |
| | - | | |
| | 15 months long, I think, because that's how long it | 9 | |
| | takes to lose 7 percent of your body weight. They | | still be using pretty frequently, but if they got |
| | can't do a 12-week obesity study because nobody | | their act together enough to submit a negative |
| | loses enough weight in that time to move the | | sample at every one of these widely spaced visits, |
| | needle. | | that's pretty good. I mean, that's an indicator |
| 14 | We often have this tension. People will | | that they got their lives together. |
| | simultaneously say they want less challenging to | 15 | , |
| | achieve endpoint and a shorter study. We end up | | every urine sample you collect to be negative, |
| | perhaps demonstrating very little clinical movement | | that's not the same thing as saying the FDA |
| | in that patient. I think we just need to have a | | requires complete abstinence when we've gotten it |
| 19 | little more help articulating what could the | 19 | down to one sample a month. So I would just |
| 20 | endpoints be. | 20 | implore, stop saying that. |
| 21 | I'd also like to say that we've moved quite | 21 | FEMALE VOICE: It's in the guidance, though. |
| 22 | a long way from the original design of these | 22 | DR. WINCHELL: Yes, it's in the guidance. |
| | | | |
| | Page 182 | | Page 184 |
| - | Page 182 | | Page 184 |
| | opioid-use disorder studies that were done in | 1 | (Crosstalk.) |
| 2 | opioid-use disorder studies that were done in patients who were getting face-to-face treatment | 2 | (Crosstalk.) FEMALE VOICE: I read it at CPED [ph]. |
| 2 3 | opioid-use disorder studies that were done in patients who were getting face-to-face treatment and on-site dispensing of medication on a daily | 2 3 | (Crosstalk.) FEMALE VOICE: I read it at CPED [ph]. DR. WINCHELL: It's in the guidance. Read |
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|---|---|---|--|--|
| 1 | | Page 185 | | Page 187 |
| | 1 | negative effect, there's a domain. | 1 | Is that catching to what you feel like would be |
| | 2 | DR. STRAIN: I see. Okay. | 2 | helpful? |
| | 3 | DR. RAMEY: For example, reward in the task, | 3 | DR. WINCHELL: Well, I think our goal for |
| | 4 | which could be kind of sensitive to change, that | 4 | this particular meeting was to explore whether the |
| | 5 | could be like you had that baseline, and in the | 5 | types of endpoints that we've articulated in our |
| | 6 | end, you had the task and the change. So that's | 6 | existing guidances would be in some way appropriate |
| | 7 | your endpoint, so this has changed. You won't | 7 | or inappropriate if we were not talking about |
| | 8 | sleep; again, I'm talking about inter-reception, | 8 | agonists. So I think one of the issues is |
| | 9 | even like executive functions by domain. | 9 | always and I know I've said this before that |
| | 10 | DR. STRAIN: Thanks. David? | 10 | the risk-benefit calculation, when you're treating |
| | 11 | DR. SHURTLEFF: This may sound self-serving, | 11 | somebody with an opioid, is, well, they're going to |
| | 12 | but I'll say it anyway. What I'm going to talk | 12 | be taking an opioid anyway, so it's this opioid or |
| | 13 | about is part of the HEAL initiative. I think the | 13 | their illicit drug of choice. So all of these |
| | 14 | combination of behavioral interventions with | 14 | opioid adverse effects, they're unavoidable; it's |
| | 15 | medication so we have this program through the | 15 | pick your poison. |
| | 16 | HEAL initiative called BRIM, Behavioral Research | 16 | Well, if you're going to choose a medication |
| | 17 | for Improving MAT Adherence. | 17 | that has a completely different mechanism of |
| | 18 | But to get back at some of the comments you | 18 | action, you might expect something different. You |
| | 19 | made, Eric, about improving overall qualities and | 19 | might say this introduces a whole new set of risks, |
| | 20 | other things that may be more important, medication | 20 | and therefore our expectation for efficacy should |
| | 21 | alone is not likely to do it. I think it's a | 21 | be higher, or this introduces no risks, and our |
| | 22 | challenge, too, about how to combine which we | 22 | expectation for efficacy should be lower. |
| | | | | |
| | | Page 186 | | Page 188 |
| | 1 | discussed a little bit of it today behavioral | 1 | In talking about going beyond mu receptors |
| | | | | |
| | 2 | interventions, particularly in this population, and | | in a way people have been thinking about these |
| | | interventions, particularly in this population, and what the right time and what the right duration. | | in a way people have been thinking about these |
| | | | 2 3 | in a way people have been thinking about these |
| | 3 4 | what the right time and what the right duration. | 2 3 4 | in a way people have been thinking about these medications for my lifetime, that was kind of the |
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| | 3 4 5 6 | what the right time and what the right duration. There are a lot of things to unpack there, but I think if we're going to have a comprehensive | 2 3 4 5 | in a way people have been thinking about these medications for my lifetime, that was kind of the place where we were interested in hearing some expert opinion; what should we do differently? DR. STRAIN: Bob, you and I had a very brief |
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| | Page 189 | Page 191 |
| 1 | agents, and these four are the example, what are | 1 that's where they really get different from each |
| 2 | the clinical trial challenges in terms of patients | 2 other. |
| 3 | enrolled outcome measures and research designs? It | 3 DR. DWORKIN: I agree about that, starting |
| 4 | wouldn't be a systematic review, and it would be | 4 with the clinical trial challenges, and then we |
| 5 | longer than an editorial. So it's kind of an | 5 could think about a paper in some ways this is |
| 6 | extended commentary on what's on the horizon, and | 6 actually more interesting. The drug development |
| 7 | what are the challenges, and what should people be | 7 commercialization challenge is where we talk about |
| 8 | thinking about. | 8 things like REMS. We've had ACTTION meetings where |
| 9 | Does that sound like a reasonable paper for | 9 there are actually two articles that come out of |
| 10 | all of us to prepare and think about a substance | 10 the meeting. But the lower hanging fruit is |
| 11 | abuse journal, or a pharmacology journal, or a | 11 certainly clinical trials, and outcome measures, |
| | clinical trials journal? | 12 and related issues. |
| 13 | DR. JOHNSON: It's probably going to be | DR. WEISS: And I think with the clinical |
| 14 | little integration. This might be fine, but I | 14 trials, you could talk about shared versus unique |
| 15 | think there's probably going to be little | 15 challenges, based on what you're dealing with. |
| 16 | integration across these four things. The really | DR. STRAIN: And there may also be a feature |
| 17 | interesting stuff is what makes them not just | 17 of opportunities as well. I'm thinking with the |
| 18 | different from mu agonists, but different from each | 18 sleep aids, the technology that's emerging is an |
| 19 | other, but that might be fine. It ends up being a | 19 opportunity that is specific to sleep aids, but it |
| 20 | laundry list, but it might have a lot of value. | 20 would be nice to acknowledge that there are also |
| 21 | DR. DWORKIN: The way I was thinking about | 21 these aspects; that we're not stuck with urine |
| 22 | it is we'd pick and choose four examples of | 22 testing as the only non-self report. |
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| | Page 190 | Page 192 |
| 1 | Page 190 challenges. The challenges in moving psychedelic | Page 192 1 Other thoughts? |
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| 2 | challenges. The challenges in moving psychedelic | 1 Other thoughts? |
| 2 3 | challenges. The challenges in moving psychedelic agents forward are clearly different, and you'd use | Other thoughts? (No response.) |
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| 3 number 2, legally can. I know there are some 3 DR. TURK: - 120. From this meeting, we'll 4 regulatory agency issues for some of you. That may 5 on that we at least two, so Bob, next week when he goes, 5 be something, ou have to get approved for. Then 5 or next momething, we'll 7 something. 6 ACTTION now has 102 manuscripts that have been 7 something. 6 ACTTION now has 102 manuscripts that have been 9 ubins of or in the process. 8 So I just want you to understand, you don't 9 have to feel like everybody's going to run out the 10 door, and then you're going to ineviably think of 11 purpose, either chose on to or are not allowed 12 this sout. And you will see 12 to key will ask you permission to acknowledge you 13 this is he final discoussion. 13 were at the meeting, so there will be 13 this is he final discoussion. 14 acknowledgement you were where. Then we will 14 DR.DWORKIN: To give an example of what 15 back to us. Annie will take those comments. 19 To this group, where were yee gone back and forth for 19 address them, and typically tend to highlight what 19 To to his group, where were yee gone back and forth for 19 address them, aneutypicaly tend to highlight what | | | 2 | DR. DWORKIN: 120. | |
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| 7 something. 7 published or in the process. 8 For those that can be authors. For those 5 So I just want you to understand, you don't 10 putpose, either choose not to or are not allowed 1 something. 9 have to feel like everybody's going to run out the 10 that attended the meeting, but for whatever 11 something. 11 something. 9 have to feel like everybody's going to run out the 12 there will also to un out the every and to address them, and typically tend to highlight what 12 back to us. Annie will ake those comments. 12 back to us. Annie will take those comments. 17 to this group, where we've gone back and forth for 18 back to us. Annie will take those comments. 17 to this group, where we've gone back and forth for 19 address them, and typically tend to highlight what 19 renowned Scottish statistician - 20 of whom are busy, if we send each one of these 21 DR. DWORKIN: - about our section on what 21 or statisticitan - 20 Laughter.) 21 back to us, this is never going to see the light of 3 day, so we encourage you to try to look at it 2 tadix takes you six months | | | | | |
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