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August 25, 2020

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The Honorable Bev Clarno  
Secretary of State  
Members of the Explanatory Statement Committee

Dear Secretary of State Clarno,

On behalf of the American Psychiatric Association, a national medical specialty society representing more than 38,800 psychiatric physicians, as well as their patients and families, we write with concern about Measure 109. If passed, Measure 109 would allow for the manufacturing, delivery, and administration of psilocybin for the treatment of mental health conditions. It is unwise to authorize treatment that is not yet approved by the Food and Drug Administration (FDA) and oppose the proposal outlined in Measure 109.

As medical experts in psychiatric care, we are concerned about determining medical treatment by ballot initiative. Such treatment should be evidence-based and determined solely by professional standards of care. Science does not yet indicate that psilocybin is a safe medical treatment for mental health conditions. While the FDA has granted psilocybin breakthrough therapy status,<sup>1</sup> this does not establish the safety and efficacy of this treatment, it merely establishes the process by which to further study the treatment. Furthermore, Measure 109 is troubling as it would allow the use of psilocybin for “treating mental health conditions, including but not limited to addiction, depression, anxiety disorders, and end-of-life psychological distress.” However, the FDA’s current designation for studying psilocybin is focused only on major depressive disorder.

All of the above concerns are compounded by Measure 109’s proposal to authorize non-medical providers to administer psilocybin. Treating patients with mental health and substance use disorders is complex, due to the fact that more than half of these patients also have an underlying physical illness. Given our limited understanding of psilocybin’s effects on patients and how it may interact with other medications, it is dangerous to allow practitioners – especially those with no medical training – to dispense a controlled substance.

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<sup>1</sup> Brooks, Megan. [“FDA Grants Psilocybin Second Breakthrough Therapy Designation for Resistant Depression.”](#) November 25, 2019, Medscape.

Before instituting any changes in practice and policy, we urge you to prioritize the safety of Oregonians and wait for conclusive scientific evidence as to the effects of psilocybin on a patient's whole health. APA strongly opposes the inclusion of Measure 109 on the upcoming ballot; doing so would put Oregonians at great risk. If Measure 109 remains on the ballot, we urge you to explicitly address the science and extreme risks associated with the use of psilocybin in the voter's guide explanatory statement. Additionally, the statement should indicate that if this initiative passes, this controlled substance may be administered to high-risk patients without the involvement of a medically-trained professional.

Sincerely,

A handwritten signature in blue ink that reads "Saul Levin" followed by "M.D., M.P.A." in smaller text.

Saul Levin, M.D., M.P.A., FRCP-E, FRCPsych  
CEO and Medical Director  
American Psychiatric Association