

July 19, 2024

The Honorable Merrick B. Garland Attorney General United States Department of Justice 950 Pennsylvania Avenue NW Washington, DC 20530

Re: Schedules of Controlled Substances: Rescheduling of Marijuana Docket No. DEA–1362; A.G. Order No. 5931–2024

Dear Attorney General Garland:

Thank you for the opportunity to voice our support of your agency's proposal to reclassify marijuana from Schedule I of the Controlled Substance Act to Schedule III. NAMI is the nation's largest grassroots mental health organization representing people with mental health conditions and their families. Our Alliance of over 650 organizations, located across the country, is united by our dedication to building better lives for all people impacted by mental illness.

According to the Substance Abuse and Mental Health Services Administration's (SAMHSA) 2022 National Survey on Drug Use and Health, 47.1% of adults with any mental illness and 38.8% of adults with serious mental illness used marijuana in the past year. This is compared to the 18.2% of adults with no mental illness who reported using marijuana in the same period. Many people with mental illness report using marijuana as a way of self-medicating to positively impact their mental health-related symptoms. Despite these rates of marijuana use, there is a lack of robust research regarding the benefits and risk of marijuana use for people with mental illness. For example, some studies have found that marijuana use may trigger the appearance of schizophrenia symptoms or psychosis in young adults and that regular use may accelerate the appearance of symptoms of mood or anxiety disorders. Meanwhile, other preliminary studies have shown that cannabidiol (CBD, a compound found in cannabis) may reduce some mental health symptoms.

NAMI believes that public policy should be driven by credible, evidence-based research and supports public policies and laws that facilitate research into the risks and benefits that marijuana and other cannabis products have on people with mental health conditions. As more states move to legalize and regulate the use of marijuana, there is a significant need to better understand the risks and benefits of this substance, particularly for people with mental health conditions. With the current Schedule I designation, U.S. researchers face significant regulatory hurdles to studying marijuana, limiting the development of robust scientific research on this substance. Given the changing policy landscape, it is no longer sufficient that we allow this substance to be made available to the public without fully understanding it. By rescheduling marijuana from a Schedule I to a Schedule III, researchers across the United States will be better able to engage in research to

more fully understand the potential benefits and/or risks for people with mental health conditions or at a higher risk of mental health conditions.

We thank you and the Administration for your leadership on this issue. If you have any questions regarding our position, please contact Shannon Scully, NAMI's Director of Justice Policy and Initiatives, at scully@nami.org.

Sincerely,

Hannah Wesolowski

Chief Advocacy Officer

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National Alliance on Mental Illness (NAMI)