



April 10, 2024

The Honorable Scott Wiener  
California State Senate District 11  
1021 O Street, Suite 8620  
Sacramento, CA 95814

**Re: SB 1012 (Wiener) The Regulated Psychedelic-assisted Therapy Act and the Regulated Psychedelic Substances Control Act - Concerns**

Dear Senator Wiener,

CSAP understands and appreciates you always striving to help people, and deeply values the partnership with you on so many vitally important behavioral health issues in California. However, on their behalf, I write to express concerns with SB 1012, which would establish the Board of Regulated Psychedelic Facilitators in the Department of Consumer Affairs to license and regulate psychedelic-assisted therapy facilitators.

CSAP's concerns with SB 1012 are related to the care of a vulnerable patient population with behavioral health illnesses and who best is able to provide the specialized care to help these patients. While new and innovative treatments to treat depression, anxiety, and other psychiatric disorders are needed, the evidence to support the therapeutic use of psychedelics is not yet robust enough to justify widespread access, especially for unsupervised use or use in the presence of non-medical individuals.

CSAP believes the Legislature should exercise extreme caution in this area until there is more scientifically validated information on psychedelics with respect to the risks, benefits, and alternatives, not just at the individual level, but also at the level of public health and behavioral health.

***Recently published data shows that with increased access to psychedelics in the state of California between 2016 and 2022, observed hallucinogen-associated ED visits increased by 54 percent, and associated hospitalizations increased by 55 percent.*** Other research shows, "during a 10-year (2013-2022) study period, 4,055 psilocybin-involved exposures were reported among adolescents and young adults, 2,667 (65.8%) being single substance exposures; with most single substance cases received medical attention (adolescents: 75.3% [n = 1,176], young adults: 72.1% [n = 797])." Also of note, "cases started increasing in 2019, with 2022 seeing cases more than triple among adolescents and more than double among young adults, compared to 2018."<sup>1</sup>

CSAP also has concerns about the claim that psychedelics are rarely addictive when administered by a doctor to a patient with a mental illness. As with any mind-altering drug, psychedelics have the potential to be addictive. They are often falsely touted as non-addictive because of their rapid tolerance and limited physical withdrawal. But it is not tolerance or withdrawal that defines addiction. The hallmark of

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<sup>1</sup> Rita Farah, Ph.D. et al. [Psilocybin Exposures Reported to US Poison Centers: National Trends Over a Decade. Journal of Adolescent Health.](#)

addiction is mental preoccupation with the drug and repeated use despite harms. Further, some psychedelics, like MDMA, have a clear withdrawal or comedown. In addition, there is no system requirement in place for these substances to be required to be reported on the CURES database so other health care providers are aware that patients are on these substances that can affect their health and have medication interactions.

CSAP's bottom line on SB 1012 or any other psychedelics-related legislation is patient safety and that no harm occurs to individuals who may seek them out. With patient safety in mind, CSAP suggests the following:

- Some form of communication through the CURES system such that licensed medical professionals in California have constant and accurate access to the administration of any non-federally approved substances; and,
- To the greatest extent possible, for individuals receiving non-federally approved substances, direct communication with medical professionals be required whenever possible.

Medical professionals who can and should be consulted in such matters are already licensed and overseen by various boards in California government.

Ideally, controlled substances administered in California would only be those approved by the FDA and only prescribed by those who have a license to practice medicine and a DEA specific license for controlled substances.

Thank you for your consideration of CSAP's concerns on SB 1012.

Sincerely,



Paul Yoder  
Legislative Advocate

CC: Chair and Members, Senate Business Professions and Economic Development