

Rowan University

Office of Research Compliance

Guidance and Directive on the Use of Cannabis in Research

I. PURPOSE

The Purpose of this directive is to provide appropriate guidance on the permissible use of Marijuana and industrial hemp in research at Rowan University.

II. APPLICABILITY

This directive applies to all faculty, employees and students, post-doctoral fellows, visiting scientists or visiting scholars who may request the possession, use, distribution, manufacturing and/or cultivation of marijuana or industrial hemp. The research use of marijuana must only be conducted with a valid license obtained from the Drug Enforcement Administration (DEA) and the Food and Drug Administration (FDA) for use in research animals and humans.

III. DEFINITIONS

1. *Cannabis*: An annual deciduous plant (*Cannabis sativa*) belonging to the family of Cannabaceae also known as the hemp family used for recreational and medicinal purposes. This includes marijuana and hemp.
2. *Cannabidiol*: Also known as CBD, is a naturally occurring (non-synthetic) chemical compound that exists in the plants in the Cannabis family. Cannabidiol is a cannabinoid and non-psychoactive.
3. *Cannabinoid*: This is a term used for chemicals of the family of cannabidiols. There are 80 natural products that are called cannabinoids.
4. *Cannabis research*: involves the growth, production, procurement, administration or use of marijuana and/or industrial hemp for research purposes.
5. *CBD*: A natural cannabidiol derived from hemp. It is non-psychoactive. It is commercially available in multiple forms such as capsules, creams, sprays, edible products, etc.
6. *CBD Oil*: is oil extracted from industrial hemp. Hemp oil is almost free of THC (defined below) and it has no psychoactive properties.
7. *CSA*: The Controlled Substances Act (CSA) Title II of the Comprehensive Drug Abuse Prevention and Control Act of 1970 is the federal U.S. drug policy under which the manufacture, importation, possession, use and distribution of certain narcotics, stimulants, depressants, hallucinogens, anabolic steroids and other chemicals are regulated.

8. *DEA*: works to enforce the controlled substances laws and regulations of the United States, including as they pertain to the manufacture, distribution, and dispensing of legally produced controlled substances. Inquiries regarding DEA activities may be sent to the Drug Enforcement Administration,
9. *FDA*: The Food and Drug Administration is responsible for protecting the public health by ensuring the safety, efficacy, and security of human and veterinary drugs, biological products, and medical devices; and by ensuring the safety of our nation's food supply, cosmetics, and products that emit radiation.
10. *Hemp*: It is a strain of *Cannabis sativa* grown specifically for industrial use of derived products such as hemp oil, hemp cream, tea, bars, etc. Hemp is lower in concentration of tetrahydrocannabinol (THC) (contains less than 0.3 percent of the THC) and less psychoactive.
11. *Hemp oil*: is oil extracted from industrial hemp. Hemp oil is almost free of THC and it has no psychoactive properties.
12. *IACUC*: Institutional animal care and use committee responsible for review and approval of animals used in research, education and testing.
13. *IRB*: Institutional Review Board is the committee that protects the rights and welfare of human research subjects by reviewing and approving the study prior to initiation.
14. *Marijuana*: includes all parts of *Cannabis sativa*. The resins produced from the plant are used recreationally and for medicinal purposes. The main psychoactive (mind-altering) chemical in marijuana, responsible for most of the intoxicating effects, is delta-9-tetrahydrocannabinol (THC). The chemical is found in resin produced by the leaves and bud primarily of the female cannabis plant. The plant also contains more than 500 other chemicals, including more than 100 compounds that are chemically related to THC, called cannabinoids. Marijuana is currently a Schedule 1 drug according to the DEA and is illegal under federal law.
15. *Medical marijuana*: is marijuana used to treat diseases or relieve painful symptoms. Physician-prescribed marijuana is legal in the State of New Jersey. It requires users to be participants in the Medicinal Marijuana Program and follow all procedures for lawful participation in that program. Please note that because marijuana remains illegal under law, even valid participants in the program may not possess marijuana on Rowan University property.
16. *NIDA*: National Institute on Drug Abuse's function is to advance science on the causes and consequences of drug use and addiction, and to apply that knowledge to improve individual and public health.
17. *THC*: is one of at least 113 cannabinoids identified in cannabis. THC is the principal psychoactive constituent of cannabis. With chemical name (-)-trans- Δ^9 -tetrahydrocannabinol, the term THC also refers to cannabinoid isomers.

IV. REFERENCES

1. U.S. Food and Drug Administration, “Marijuana research with human subjects”, <https://www.fda.gov/news-events/public-health-focus/marijuana-research-human-subjects>.
2. Hemp Farming Act of 2018, <https://www.fb.org/market-intel/2018-farm-bill-provides-a-path-forward-for-industrial-hemp>.
3. University Guidelines on Marijuana Use and Hemp Research. Colorado State University, <https://source.colostate.edu/marijuana-guidelines/>.
4. Industrial Hemp production in New Jersey, <https://njaes.rutgers.edu/fs1302/>.
5. DEA Announcement Regarding Hemp and Marijuana, <https://hempgazette.com/news/hemp-marijuana-dea-hg0989/>.
6. Oregon State University Guidance on Cannabis Research, Teaching, and Outreach Activities, <https://research.oregonstate.edu/cannabis-research>.
7. New Jersey hemp license application, <https://www.nj.gov/agriculture/applic/>.
8. Drug Enforcement Administration registration - New applications, https://www.deadiversion.usdoj.gov/online_forms_apps.html.
9. Alcohol and Other Drug Policy, Rowan University Policy No: SL:2016:02, <https://confluence.rowan.edu/display/POLICY/Alcohol+and+Other+Drugs+Policy>

V. POLICY GUIDANCE

1. Rowan University is committed to the pursuit of a quality education and research by providing an environment which promotes respect, safety, and optimal health and well-being to all members of the campus community. This includes students, faculty, staff, administration, alumni, and Rowan University visitors and guests.
2. Researchers interested in conducting research with marijuana or hemp must contact the Office of Research Compliance for further guidance prior to commencing such research.
3. Marijuana is a controlled substance under the DEA’s controlled substance category Schedule I; therefore, marijuana is subject to federal regulations.
4. Rowan is a federally funded institution (title IV funding and participant in federal grants). We are governed by federal law; as such, Rowan is not permitted to be involved in the use, cultivation, production or sale of marijuana or cannabis on our campus. Federally approved dispensary (OMIS) is permitted for cannabis research.
5. Sponsored research is permissible when the extramural sponsor meets the following conditions:
 - a. Extramural sponsor funding does not come from the cultivation, production and manufacturing, or sale of cannabis or marijuana
 - b. Not a member of the marijuana or cannabis industry

Acceptable extramural sponsors of research that meet the conditions above include:

- a. Federal or state agencies
- b. Non-profit organizations
- c. Industry
- d. Private individuals

Because federal laws still prohibit the cultivation, production and manufacturing, sale, and use of marijuana, careful consideration of the external sponsor and sponsor's funding sources must be conducted. There are significant legal and reputational risks associated with conducting unapproved cannabis research; so any research related to cannabis regardless if funded or not by an extramural sponsor must be reviewed and approved by Rowan University's proper offices.

For opportunities related to sponsored research, contact the Rowan University Office of Sponsored Programs. Rowan University Corporate & Foundations Office should be contacted related to gifts.

6. Faculty can engage in outside activities with the cannabis industry. Faculty must make it clear and known to the external entity that engagement on an advisory board, as a consultant, or other work is not done as a faculty member of Rowan University; and faculty may make no such claim that they represent Rowan University to the external entity or its stakeholders, shareholders, employees, patients, or customers. Rowan resources and facilities are not permitted to be used for any outside, private activities related to any faculty private engagement with the cannabis industry.
7. Rowan University forbids marijuana research when investigators possess, use, distribute, conduct experiments in humans or animals without a license obtained from the state, DEA, FDA and NIDA in accordance with federal law and under the strict guidance of the Office of Research Compliance.
 - a. Rowan complies with the Drug Free Schools and Communities Act and Drug Free Workplace Act. Therefore, research studies that use marijuana with proper licensure from the DEA must not recruit Rowan University students or employees as subjects.
8. Research involving the use of marijuana in animals or humans must be reviewed and approved by the IACUC and IRB, respectively.
9. Human observational studies such as, surveys, interviews and questionnaires that does not involve the actual use of marijuana do not require a license; however, such studies require prior IRB review and approval in accordance with Rowan University IRB Guidelines (<https://research.rowan.edu/officeofresearch/compliance/irb/index.html>)
10. Research involving hemp is permitted in certain limited circumstances. However, researchers must first obtain a license from the state to grow, harvest, possess, process, distribute and/or buy industrial hemp for research purposes. Use of industrial hemp and its byproducts are permissible for basic and applied research. Any third-party, external entity that supplies hemp for research purposes must have the proper permissions and licenses from the state.

11. Clinical trials with industrial hemp cannot be conducted without the Investigational New Drug Approval (IND). Such materials for clinical trials must be obtained from DEA approved sources.
12. Research in animals with industrial hemp is permissible after IACUC review and approval. IACUC's requirements for non-pharmaceutical grade use of drugs in animals must be met unless the commercial cannabis product is of the pharmaceutical grade quality.