



MEMORANDUM

TO: Members of CBPL Boards and Commissions

DATE: January 11, 2019

FROM: Sara Chambers
Acting Division Director

RE: Use of CBD oil in licensed
practice

Since the passage of Senate Bill 6 in Alaska, several boards have asked questions regarding the use of cannabidiol (CBD) oil as part of a licensee's professional practice. Neither SB6 nor the recently signed Farm Bill of 2018 addresses the use of CBD oil on patients. This is a rapidly evolving area, and boards should encourage licensees to use caution.

The Alaska Department of Natural Resources, Division of Agriculture has stated it will issue regulations that will create an industrial hemp pilot program in Alaska that is intended in part to verify that all product marketed as CBD oil in Alaska does not exceed the permissible THC threshold of .3 percent. Until then, professional licensing boards should consider how the use of untested CBD oil may impact consumers.

This division and the Alaska Department of Law recommend that boards and licensees review the following sources:

- Advisory from the Department of Law's Consumer Protection Unit: http://law.alaska.gov/press/consumer_alerts/2018/1118-CBDoil.html
- Division of Agriculture's frequently asked questions on industrial hemp: <http://plants.alaska.gov/industrialhempFAQs.htm>.

Both sources raise concerns that a product marketed as CBD oil from industrial hemp may actually be CBD oil from marijuana. For this reason, we recommend caution and patience.