



October 31, 2024

Dr. Suzanne Mulvehill
info@femaleorgasmresearch.org
VIA EMAIL ONLY

Dear Dr. Mulvehill:

Thank you for your recent petition under COMAR 14.17.04.07 to the Maryland Cannabis Administration (MCA) to include Female Orgasmic Difficulty/Disorder (FOD) as a new qualifying condition for medical cannabis. MCA may approve new qualifying conditions if: (1) the medical condition is debilitating, (2) the pain, suffering, and disability of the medical condition can reasonably be expected to be relieved by medical cannabis; and (3) other medical treatments have proven ineffective in providing relief. (See COMAR 14.17.04.07.)

We appreciate the time spent preparing and submitting this petition and the accompanying research provided to MCA. MCA has determined that the submission for FOD is facially insubstantial at this time, as the petition and supporting documentation did not provide research to prove that **the pain, suffering, and disability of the medical condition can reasonably be expected to be relieved by medical cannabis**. Therefore, FOD will not be added to the list of qualifying conditions in Maryland. (See COMAR 14.17.04.07E(1).)

Upon reviewing the literature submitted, we found:

1. Participants in the submitted studies self-reported symptoms of FOD or sexual dysfunction, and no single study presented a population of participants who had a documented clinical diagnosis of ICD-10 diagnosis code F52.31 for female orgasmic disorder.
2. Only two out of 14 submitted studies (*Mulvehill and Tishler* and *Kasman et al.*) specifically examined the efficacy of cannabis for FOD as the primary outcome of interest, and neither were designed as randomized clinical trials (the gold standard for evaluating treatment efficacy).
3. Only three out of the 14 studies focused on only female participants.
4. Six of the 14 studies presented data that was a minimum of 40 years old.

Additionally, no recommendation was submitted or found from the American College of Obstetricians and Gynecologists (ACOG) to utilize cannabis to effectively treat FOD.

Though MCA is not adding FOD as a qualifying condition at this time, we acknowledge the two



cannabis-specific studies submitted, including the recent article you and Dr. Tishler published in *Sexual Medicine* earlier this year as well as the 2020 article in *Sexual Medicine* by Dr. Kasman, et al., may show a promise of effective treatment in this area with additional supporting research. If there are licensed providers in Maryland who believe they have a patient who may benefit from medical cannabis for FOD or another condition, MCA allows certifying providers to certify patients for medical cannabis in Maryland for another “*chronic medical condition which is severe and for which other treatments have been ineffective*” in addition to the list of current approved qualifying conditions.

Thank you again for your submission to MCA.

Sincerely,
Maryland Cannabis Administration