



Christina Carrillo and Carl Einhaus  
1600 Broadway, Suite 2200  
Denver, CO 80202

February 19, 2025

Dear Ms. Carrillo and Mr. Einhaus,

The proposed Institute of Cannabis Research Certificate of Foundational Studies in Cannabis submitted by the Institute of Cannabis Research (ICR) and Colorado State University Pueblo has been reviewed by the ICR Governing Board per the Board's adopted process as required by House Bill 19-1311. This was a multistep process that includes a review by a Board Subcommittee, which is shared with the entire Governing Board for further comment. Finally, the Full Board approved the input and feedback that appears in this letter by vote at its February-2025 meeting. This feedback has also been shared with the proposing institution.

The Board recognizes that review of a proposed certificate that bares the ICR name and developed as a collaboration between Institute staff, who are also tenured faculty at CSU Pueblo with expertise in this area of instruction, and the university may have the appearance of a potential conflict of interest. The ICR sought counsel on behalf of its Board from Colorado's Attorney General's office. Given there is no financial benefit associated with the proposed Certificate for Board Members, the ICR was advised that a conflict of interest does not exist. The development of the proposed certificate was independent from the Board and the feedback provided represents a critical assessment of the proposed program by the Board.

Feedback:

The Board finds the proposed certificate to represent a comprehensive introduction to cannabis studies, particularly in the sciences. Future consideration may be given to adding course options in the areas of Business and Social Sciences to the certificate.

The Board recognizes that the proposed certificate is designed to be offered in an online environment, which will allow the program to reach a wide audience of interested students, however, the Board contemplated how options for hands-on experiences and instruction might be offered in innovative ways in the future.

The Board highlighted the importance of contaminants in cannabis regulation and industry and acknowledges that the topic is part of the proposed ICR 103 (Introduction to the Analytical

Chemistry of Cannabis) course. Contaminants are a concern from a public health perspective as well as from an economic and market perspective. Given that contaminants can originate from agricultural sources as well as in the processing of cannabis, instructors may consider expanding the discussion already proposed for ICR 103 related to contaminants. Further, it might be appropriate to include contamination as a topic in the proposed ICR 104 (Introduction to Agriculture and Cultivation of Cannabis).

The Board encourages that ample coverage of topics related to the health effects of cannabis (e.g. benefits, negative impacts, concerns associated with potential contaminants) in the curriculum.

To the extent possible within the online curriculum, the Board suggests incorporating mechanisms to for students within the program to engage with professionals in the cannabis space. This might include a virtual symposium, seminars, or guest content/instructors.

While the proposal for the certificate was comprehensive, the Board felt that the proposal might benefit from a few additional details. These include:

- A description and timeline for the rollout of the certificate and courses
- Cost per credit for enrolling in the credit and non-credit option
- What is the minimum number of students per course for the courses and certificate to be successful
- Expand target enrollment to include individuals and organizations that for which the course may serve as professional development

Please let me know if I can provide any additional details about the feedback from the Board. Thank you for considering the input from the ICR's Governing Board.

Sincerely,

A handwritten signature in blue ink that reads "Jon D. Reuter". The signature is written in a cursive, flowing style.

Jon Reuter, MPVM, DVM, DAFLAM  
Chair, ICR Governing Board  
Research Professor Psychology and Neuroscience  
Associate Vice Chancellor of Research Integrity and Compliance  
University of Colorado Boulder