



DH, MMRegulations

From: Jennifer Minkovich <jenniferho@pcom.edu>
Sent: Tuesday, March 9, 2021 8:58 AM
To: DH, MMRegulations
Subject: [External] Proposed Rule-making- Medical Marijuana Proposed Regulations
Attachments: JM - Proposed Regulations Comment.doc

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Dear Director Collins,

Please find attached my letter containing my comment on the proposed regulations.

Thank you kindly for your time and consideration.

[Jennifer Minkovich, DO](#)

Medical Cannabis Certification Physician
Board-Certified Family Medicine Physician
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Dr. Jennifer Minkovich
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John J Collins
Director- DOH Office of Medical Marijuana
Room 628, Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120

Re: Proposed Rule-Making -PA MMJ Program Proposed Regulations

March 8, 2021

Dear Director Collins,

I am writing to comment on a proposed regulation concerning the PA Medical Marijuana Program:

Section 1141a.21 (Under *Definitions*) Regarding patient certification consultations-
The definition of “continuing care” is proposed to be revised to mirror the definition in the act by adding “including an in-person consultation with the patient” to the end.

My comment: The above proposed regulation is affirming/clarifying the definition of *Continuing care* to signify, "Treating a patient, in the course of which the practitioner has completed a full assessment of the patient’s medical history and current medical condition *including an in-person consultation with the patient.*" On face, this appears to be just a semantic clarification. My concern is, however, that this affirmation is signaling that the DOH will not be indefinitely extending (i.e. not adopting) the temporary provision to allow for virtual consult via telehealth. The reversing of course to return to the in-person-only consultation model in a post-Covid world, is, I think, counterproductive.

Since being able to implement certification via telehealth, I have been able to reach and assist people all over Pennsylvania. I have been able to certify and recertify folks in rural areas that would have otherwise had no or limited access to an approved physician. The provision allowing telehealth has not only expanded the reach of the program to rural areas, but has also provided a logistically-manageable mechanism of certification for folks with physical disability who find it hard to leave the home. In addition, the feedback that I have gotten from many

patients is that having telehealth available has expanded the option of approved (certifying) physicians, so that patients are not limited to seeing a doctor in their geographic area, which has in-turn discouraged the unfortunate price-gauging and the other unsavory policies used by unscrupulous physicians at the onset of the program. And frankly speaking, telehealth is convenient for everyone, and logistically makes sense – a fact that we have all discovered during this pandemic.

I would be so grateful if you or a member of your staff could reach out to me to discuss this matter further. I would be happy to share more of my experience and the patient feedback I have received regarding the telehealth experience, and I would like to know more about what lies ahead for telehealth in the PA MMJ Program.

Thank you kindly,
Jennifer Minkovich, DO
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