

# Frequently Asked Questions About Certifying Healthcare Providers

## 1. What is required for me to register as a Certifying Healthcare Provider with the Cannabis Control Commission (Commission) in Massachusetts?

You will need at least *one established place of practice in Massachusetts* and hold:

- An active, full license with no prescribing restrictions that is in good standing with the Board of Registration in Medicine (“BORIM”), Board of Registration in Nursing (“BORIN”), or Board of Registration of Physician Assistants (“BORPA”), as applicable;
- A Massachusetts Controlled Substances Registration (“MCSR”) number; and
- If you are a Certified Nurse Practitioner or a Physician Assistant, you will also need an attestation from your board-certified, supervising physician stating that there are mutually agreed upon guidelines regarding the proposed Healthcare Provider’s prescriptive practices.

For more information on specific requirements, please see:

<https://masscannabiscontrol.com/certifying-healthcare-providers/requirements/>.

## 2. How can I register as a Certifying Healthcare Provider with the Commission?

Electronic PDF applications for Certifying Healthcare Providers are available through the Commission’s website “Forms and Templates” page at:

<https://masscannabiscontrol.com/public-documents/forms-templates/>. Completed applications should be sent to [Licensing@CCCMass.com](mailto:Licensing@CCCMass.com).

Once the Commission approves your application, registration occurs via the [Medical Use of Marijuana Program Online System](#) (“MMJOS” or “Online System”). All certifications for Qualifying Patients are issued and tracked through the Online System.

## 3. Are there any fees associated with the application for Certifying Healthcare Providers?



No. It is free to apply for and register as a Certifying Healthcare Provider in Massachusetts.

#### **4. What is the process once I submit my application?**

Once the Commission receives your application, staff will review it for completeness. If the Commission requires additional information, staff will send a notice to the email address on your application. When approved, you will receive an automated notice from the MMJOS with your username and you will be prompted to create log in credentials.

#### **5. How do I log into my account?**

You can access the provider portal login page at: <https://provider.massciportal.com>.

#### **6. I do not remember my password for MMJOS, how can I reset it?**

There are two ways to reset your password in MMJOS:

1. Email [Commission@CCCMass.com](mailto:Commission@CCCMass.com) for assistance with a reset.
2. Contact the Commission's Medical Use of Marijuana Program at 833-869-6820.

#### **7. Will I need to renew my registration as a Certifying Healthcare Provider in Massachusetts?**

Once registered by the Commission, a certifying Physician, Certified Nurse Practitioner, or Physician Assistant will indefinitely retain a registration to certify a Qualifying Patient's Debilitating Medical Condition.

#### **8. Can my registration be revoked?**

Yes. If one of several conditions listed below are met, you can lose your ability to certify a Qualifying Patient's Debilitating Medical Condition:

- If your license to practice has been suspended, revoked, or restricted with regards to prescribing, or you have voluntarily agreed not to practice medicine in Massachusetts;
- Your Massachusetts Controlled Substances Registration is suspended or revoked;



- You have fraudulently issued a Written Certification of Debilitating Medical Condition;
- You have certified a Qualifying Patient for a Debilitating Medical Condition without appropriate professional development credits pursuant to 935 CMR 501.010(1); or
- You surrender your registration.

**9. I am a Certified Nurse Practitioner. How do I apply for a waiver to practice individually?**

Certified Nurse Practitioners may submit a waiver to practice without the oversight of a supervising physician if they meet the conditions to do so. The waiver is available at: <https://masscannabiscontrol.com/public-documents/forms-templates/>.

**10. Can I hold an initial patient Certificate of Registration Appointment via telehealth?**

No. In general, Certifying Healthcare Providers must conduct an initial Clinical Visit with Qualifying Patients to issue an initial Certificate of Registration per 935 Code Mass. Regs. §§ 501.002 and 501.010.

However, the Commission is currently considering waivers to this requirement. Learn more in this bulletin: “Reissued Order Allowing for Telehealth Consultations for Patients”. The waiver is available at: <https://masscannabiscontrol.com/public-documents/forms-templates/>.

**11. Can I conduct general Qualifying Patient visits via telehealth?**

Yes. Telehealth visits after the initial in-person certifying visit is held are permitted, so long as the Certifying Healthcare Provider has obtained a waiver to do so.

- To obtain a telehealth waiver, Certifying Healthcare Providers must complete and submit the Commission’s general Waiver Request Form, available at: <https://masscannabiscontrol.com/public-documents/forms-templates/>.
- Once completed, the waiver form and any additional information should be combined into a single PDF document and emailed to [Licensing@cccmass.com](mailto:Licensing@cccmass.com).
- Please identify “Telehealth Waiver Request” in the subject line.



## **12. Are there any restrictions on whom I can certify as a Certifying Healthcare Provider?**

You may not certify yourself or your immediate family members as Qualifying Patients.

## **13. Who am I able to certify as a Certifying Healthcare Provider?**

You may certify Qualifying Patients with whom you have a bona fide healthcare relationship. Patient examples include the following:

- A Massachusetts resident 18 years of age or older who has been diagnosed as having a debilitating medical condition;
- A Massachusetts resident under the age of 18, when the following conditions having been met:
  - You and another Massachusetts-licensed Certifying Healthcare Provider (who is a board-certified pediatrician or board-certified pediatric subspecialist, oncologist, neurologist, or family physician,) diagnose the Qualifying Patient as having a debilitating life-limiting illness (i.e., one that does not respond to curative treatments, where reasonable estimates of prognosis suggest death may occur within two years).
  - If the debilitating medical condition is not life-limiting, both Certifying Healthcare Providers must determine that the benefits of the medical use of marijuana outweigh the risks. There must be a discussion of the potential negative impacts on neurological development with the parent or legal guardian of the Qualifying Patient, written consent of the parent or legal guardian, and documentation of the rationale in the medical record and the certification.

## **14. Am I able to serve as a Qualifying Patient's personal caregiver?**

A Certifying Healthcare Provider may not serve as a Qualifying Patient's personal caregiver if he or she has issued a written certification to that patient for the use of medical marijuana.

## **15. As a Healthcare Provider, am I restricted with respect to my involvement or relationship to a Medical Marijuana Treatment Center (MTC)?**

Yes. Certain restrictions apply to the Certifying Healthcare Providers, his/her co-workers, employees, and immediate family members. These individuals may not:



- Directly or indirectly accept, ask for, or offer anything of value to a personal caregiver, MTC, or anyone associated with an MTC in any manner;
- Offer a discount or anything of value to a qualifying patient based on the patient's agreement or decision to use a particular personal caregiver or MTC;
- Examine or counsel a patient at an MTC;
- Issue a certification at an MTC;
- Have a direct or indirect financial interest in an MTC; or
- Directly or indirectly benefit from a patient obtaining a certification. This does not prohibit the Certifying Healthcare Provider from charging an appropriate fee for a clinical visit.

**16. Am I able to contact the Commission for law interpretation and/or legal advice?**

While the Commission is happy to answer questions about the program, please consult an attorney if you have any questions regarding the laws and regulations that apply to your role and the Medical Use of Marijuana Program.

**17. I do not see my question listed here, who am I able to contact for help?**

If you have any questions regarding the Certifying Healthcare Provider application process, please contact the Commission at [Commission@CCCMass.com](mailto:Commission@CCCMass.com).

