

# Minnesota Medical Cannabis Program Petition to Add an Approved Delivery Method

## Making your petition

- Any person may petition the Minnesota Department of Health ("the department" or "MDH") to add an approved delivery method to those listed in subdivision 14 of Minnesota Statutes section 152.22.

**Petitions are accepted only between June 1 and July 31, each year.  
Petitions received outside of these dates will not be reviewed.**

**Petitions must be sent by certified U.S. mail to:**

Minnesota Department of Health  
Office of Medical Cannabis  
P.O. Box 64882  
St. Paul, MN 55164-0882

- You must mail the original copy of the petition with an original signature.
- Complete each section of this petition and attach all supporting documents. Clearly indicate which section of the petition an attachment is for.
- Each petition is limited to one proposed approved delivery method.
- If a petition does not meet the standards for submission, it will be dismissed without being considered.

## Petition review process

- If the petition is accepted for consideration, MDH will post notice of review of the petition on its medical cannabis website and allow public comment and input on the petition for at least 30 days. MDH staff will also provide information about the proposed delivery method and a review of the current literature regarding its effectiveness.
- The Commissioner will approve or deny the petition by December 1 of the year the petition is accepted for consideration.
- You may withdraw the petition at any time before it is posted on the website for public comment by submitting a written statement to the Department stating that you wish to withdraw it.

Section A: Petitioner's Information			
Name (First, Middle, Last): [REDACTED]			
Home Address (including Apartment or Suite #): [REDACTED]			
City: [REDACTED]		State: MN	Zip Code: [REDACTED]
Telephone Number: [REDACTED]		E-mail Address: [REDACTED]	

Section B: Delivery Method You Are Requesting Be Added
Please specify and provide a brief description of the proposed delivery method. Be as precise as possible in describing the delivery method you are requesting be added. <i>Attach additional pages as needed.</i>
<p>PLEASE SEE ATTACHED DOCUMENTATION FOR SECTIONS B, C, D, AND E - DUE TO MY MEDICAL DISEASE I HAVE PAIN IN MY HANDS WHICH MAKES IT EASIER FOR ME TO TYPE RATHER THAN WRITE. THANK YOU FOR UNDERSTANDING.</p>

**Section C: Anticipated Benefits from the Proposed Delivery Method**

Describe the anticipated benefits from the proposed delivery method and why it is better than currently approved delivery methods. Identify patient populations that do not benefit from current delivery methods

*Attach additional pages if needed.*

PLEASE SEE ATTACHED SHEET.

**Section D: How Current Delivery Methods Are Inadequate**

Provide information regarding the extent to which the currently approved delivery methods are unable to meet the needs of patients enrolled in the medical cannabis program. *Attach additional pages if needed.*

PLEASE SEE ATTACHED SHEET

Please accept this typed letter in place of the handwritten form- pain in my hands makes it difficult to write.

### **Section B: Delivery Method You Are Requesting Be Added**

1) Medical Marijuana Edibles. There are many options for medical marijuana edibles. I will list a few to give you an idea: granola bars, nuts, jerky, sauce, dip, candy, brownies, chocolate bars, cookies, drinks, butter.

Infused edibles can be split into three basic categories: those geared towards gastrointestinal uptake (digested through stomach), those geared towards oral uptake (through saliva), and a few that fit into a hybrid category that will target both.

\* I would also like to note that in some states, companies offer a medicated meals-on-wheels service for patients that cannot physically leave the house.

### **Section C: Anticipated Benefits from the Proposed Delivery Method**

1) The medical benefits of edible medical marijuana last longer than other options available (some last up to eight hours).

2) The effects are more evenly distributed throughout the body when eaten.

3) It works better for long lasting pain relief, muscle spasms, and other similar conditions.

4) It will help patients who have difficulties maintaining weight/calorie intake due to illness, nausea, or other problems related to their condition.

5) It offers another option for those who cannot use or tolerate current delivery methods.

6) With more options available there is potential for a decrease in price for medical marijuana as I'm sure you are aware that Minnesota prices are extremely high compared to other states, which is turning people away from the program. With lower prices, more patients would be able to afford it versus illegally obtaining it (ex. My 86 year old grandmother gets hers illegally as she cannot afford the prices in Minnesota at this time). There is something wrong if you can buy it cheaper on the streets than from one of the labs producing it here (and that isn't the case in other states).

7) Medical marijuana in edible form is safer than the prescription narcotics that the majority of us are taking for our medical conditions.

### **Section D: How Current Delivery Methods Are Inadequate**

1) Medical marijuana edibles effects last longer than the current delivery methods. If you were given the option to take medication once or twice a day instead of three or more times a day, what would you pick?

2) Each person responds different to medications. The same is true with medical marijuana. While one delivery method may work for one patient, it may not for another.

If you were treating a patient for high cholesterol would you give them a blood pressure medication to treat the high cholesterol? No, because medicine is not a one pill fits all.

3) Each medical condition treatment varies with the method and user. One condition may work well with oils, while another condition may work better with edibles. The need for different delivery methods should be available as it is for modern medicine such as; PO, topical, IV, IM, SQ, sublingual, suppositories, etc.

4) We as patients deserve to have every option available to try. Not all of us have medication or respond to medication that is available or FDA approved. Take my disease for example, Behcet's Disease. There is no FDA approved treatment for Behcet's Disease so we rely on medications that are aimed to treat Lupus, RA, or other autoimmune diseases in attempt to manage symptoms of our disease as there is no cure. So where does it leave those of us who have no official medication or have failed the medications available? Grasping at any option we can try. (In my case, I have allergies to twenty-nine medications as of this writing, with sensitivities to three others. I have talked with others who have similar stories.)

5) Speaking as a nurse who was in the medical field for many years prior to becoming ill with Behcet's Disease, I feel we as medical providers/staff should be willing to do what we can to help the patients. If that means exploring other delivery options for patients in Minnesota, we should be doing it. We should be paving the way for medical marijuana research, not following behind other states. After all, you never know when you, a family member, or friend, will be on the patient end of it.

### **Section E: Scientific Evidence of Support for the Delivery Method**

Instead of attaching evidence, I would encourage you to join online support groups or go to a local support group for the current and upcoming conditions that are qualified or being considered for medical marijuana at this time. Hearing stories from personal experience is better than relying on studies that are extremely limited. To show how limited the research studies are for medical marijuana, I have attached an article for you to review.

Thank you for your time and consideration with this matter.

**Section E (optional): Scientific Evidence of Support for the Delivery Method**

It will strengthen your petition to include evidence generally accepted by the medical community and other experts that addresses the effectiveness of the proposed medical cannabis delivery method and discusses its potential risks and benefits. This includes but is not limited to full text, peer-reviewed published journals or other completed medical studies. Please attach complete copies of any article or reference, not abstracts.

**I have attached relevant articles.** (check box if you have attached scientific articles or studies)

PLEASE SEE SECTION ON ATTACHED SHEET.

**Section F (optional): Letters in Support**

Attach letters of support from persons knowledgeable about the use of the delivery method with medical cannabis.

**I have attached letters of support.** (check box if you have attached letters of support)

**Section I: Acknowledgement and Signature**

*Please Note: Any individually identifiable health information relating to any past, present, or future health condition or health care contained in this petition is classified as a health record under Minnesota Statutes §144.291, and is not subject to public disclosure.*

**I certify that the information provided in this petition is true and accurate to the best of my knowledge.**

  
SIGNATURE

07/31/2016  
DATE (mm/dd/yyyy)

To obtain this information in a different format, call:  
(651) 201-5598 in the Metro area and (844) 879-3381 in the Non-metro.