
State of Hawai‘i – Department of Health
Office of Medical Cannabis Control and Regulation

Guidance for Hawaii Medical Providers:
Telehealth Certification for Medical Cannabis Patients

ISSUED: September 18, 2025

Overview

Hawaii medical cannabis patients are now permitted to use telehealth for initial medical cannabis certification or renewal appointments, beginning September 18th, 2025. This change is authorized under [Act 241, Session Laws of Hawaii \(SLH\) 2025](#), which removed the requirement that a medical provider conduct an initial in-person visit prior to certifying a patient for the medical use of cannabis.

Medical providers who wish to certify patients via telehealth must still comply with state law and maintain the same standards of care as traditional in-person consultations.

Guidance for Telehealth Certification

1. Provider Location

- Medical providers must be **physically located in the State of Hawaii** at the time of the telehealth certification appointment. **HRS §329-123(a).**

2. Standard of Care

- Telehealth appointments must adhere to the **same standards of practice as in-person appointments.**
- Telehealth services must include a documented patient evaluation, including history and a discussion of physical symptoms adequate to establish a diagnosis and to identify underlying conditions or contra-indications to the treatment recommended or provided.
- **Relying solely on an online questionnaire is not considered treatment and does not meet the standard of care** for medical cannabis certification. **HRS §453-1.3.**

3. Medical Records

- Providers must maintain **complete and accurate medical records** for telehealth certifications, in accordance with **HAR §11-160-13.**

4. Bona Fide Provider-Patient Relationship

- Telehealth certification must establish a **valid bona fide provider-patient relationship** as defined under **HAR §11-160-2.** This means that the physician or APRN has ongoing responsibility for the assessment, care, and treatment of a qualifying patient's debilitating medical condition with respect to the medical use of cannabis. It also includes:

- Completing a full assessment of the qualifying patient's medical history and current medical condition, including conducting a review of the qualifying patient's medical records related to the qualifying medical condition as medically appropriate;
- Providing follow up care and treatment as medically appropriate to the qualifying patient and assess the qualifying patient's condition during the course of the qualifying patient's medical use of cannabis; and
- Maintaining records of the qualifying patient's treatment and condition in accordance with medically accepted standards.
- This ensures appropriate evaluation, ongoing care, and documentation.

5. Certification Scope

- Telehealth may be used for:
 - **Initial medical cannabis certification**
 - **Renewal of existing certification**

Best Practices for Telehealth Certification

- Conduct a thorough medical history review and patient evaluation during the telehealth visit.
- Confirm patient identity using secure methods.
- Discuss risks, benefits, and alternatives of medical cannabis therapy.
- Provide clear instructions regarding dosage, administration, and follow-up care.
- Document all aspects of the visit in the patient's medical record.

References

Providers should review the following laws and regulations to ensure compliance:

- [HRS §453-1.3](#) – Practice of telemedicine
- [HAR §11-160-2](#) – Definition of a bona fide physician-patient relationship
- [HAR §11-160-13](#) – Medical records
- [Act 046, SLH 2025](#) – Violations and penalties
- [Act 241, SLH 2025](#) – Telehealth authorization for medical cannabis

Providers are required to maintain thorough and accurate documentation to support all medical cannabis certifications.

Note: This guidance is intended for informational purposes and does not replace legal or other regulatory advice. Providers are responsible for ensuring compliance with all applicable laws and professional standards.
