

## Fee-Exempt Hawaii Controlled Substance Registration (HiCSR) Qualification and Instructions

Registrants who are government institutions or employed by federal, state and local governments, and need a Hawaii Controlled Substance Registration (HiCSR) to carry out their duties as part of their government work qualify for a fee-exempt HiCSR. A fee-exempt registration is ONLY valid in the commission of required duties either involving controlled substances performed on behalf of the government facility, or in the commission of duties of an employee acting within the scope of their government employment.

### Read ALL instructions and Information

#### Application Instructions:

**Effective April 1, 2022**, APPLICATIONS for a fee-exempt (non-paid government) Hawaii Controlled Substance Registration (HiCSR) must include the following:

1. Completed Hawaii Controlled Substance Registration [Mail-In Application](#) (*Online initial and renewal registration is not available for fee-exempt registrants*).
2. **REQUIRED VERIFICATION LETTER:** All fee-exempt applications must include a letter from the applicant's government employer verifying that the applicant is a government employee or facility. The letter must be on official letterhead and signed by the Division Administrator/Director of the Program. The letter must contain the direct contact information of the Administrator/Program Director, including printed name, phone number and government email address. The letter must include a justification for the need and scope of services for use of controlled substances (e.g., administer, prescribe, or dispense). **Government researchers must also submit a research protocol, a security protocol and record keeping procedure.**
3. **Renewal Applications: Annual renewal is required and shall be submitted via mail-in application, with a required verification letter** (see #2 above) and a **copy of your fee-exempt issued DEA registration**. Renewals may be submitted 60 days prior to expiration date. It is the registrant's responsibility to ensure timely submittal of the required application and supporting documents to avoid incurrance of any late fees. A government, fee-exempt registrant is subject to a late fee if a fee-exempt registration is registered after expiration.

### **Who 'Qualifies' for fee-exempt HiCSR:**

1. Institutions: Any hospital or other institution which is operated by an agency of the United States (including the U.S. Army, Navy, Marine Corps, Air Force, Coast Guard, Veteran's Administration), of any State, or any political subdivision or agency thereof; and
2. Individual practitioners who are required to obtain an individual registration to carry out their duties as an official of an agency of the United States (including the U.S. Army, Navy, Marine Corps, Air Force, Coast Guard, Veteran's Administration), of any State, or any political subdivision thereof.

### **Obtain a fee-exempt corresponding Drug Enforcement Administration (DEA) Registration**

- A fee-exempt HiCSR shall have a required corresponding fee-exempt DEA issued to the same applicant and business address. Upon receiving your fee-exempt Hawaii Controlled Substance Registration, you must provide a copy of the associated fee-exempt DEA Registration to our office. Please email a copy of your fee-exempt federal DEA certificate to [hawaiicsreg@hawaii.gov](mailto:hawaiicsreg@hawaii.gov).
- If a copy of the fee-exempt federal DEA certificate is not received, this will delay or affect your ability to renew.
- Hawaii is a dual registration state. BOTH a valid HiCSR and DEA registration is required to work with controlled substances.

### **Clarification regarding the scope of activities allowed under a HiCSR Fee-Exempt Registration:**

- Non-government employment: If a fee-exempt government employee, also performs work outside of their government employment they must also obtain a SEPARATE FEE-BASED State of Hawaii Controlled Substance Registration (HiCSR), and a corresponding fee-based DEA registration for these private practice activities.  
  
e.g. Dr. Aloha is employed by the Department of Health and has a fee-exempt HiCSR and DEA specific for work with the Department of Health. Dr. Aloha decides to work on the weekend at a private clinic. Consequently, Dr. Aloha must apply for and obtain a separate fee-based HiCSR and DEA to work at his/her weekend job . In other words, Dr. Aloha must pay for a registration to perform non-government, private work on the weekend. Dr. Aloha would then have two (2) separate HiCSRs and DEA registrations; one for the fee-exempt government activity at the Department of Health and the other for the fee-based private/business activity on the weekend.

Note 1: You are also **NOT** a government employee if you work for a private company that contracts with a government facility.

Note 2: You do not qualify for fee-exemption if you work for a non-profit organization.

- You may not add a non-government work related business or prescribing addresses to your fee-exempt registration.

### **Further information about fee-exempt registration:**

- A fee-exempt HiCSR does not exempt a registrant from ANY Hawaii or Federal Controlled Substance laws or rules.
- A fee-exempt HiCSR must be **renewed ANNUALLY and within 60 days of expiration.**
- **An expired fee-exempt HiCSR is subject to a \$50 late fee.**
- **An expired HiCSR (fee exempt or fee based) is NOT VALID** and cannot be used for controlled substance activities.
- If a fee-exempt HiCSR is no longer needed, submit a signed and dated letter stating the registration is no longer needed and to be inactivated. A scanned copy of the letter can be submitted by email to [hawaiiicsreg@hawaii.gov](mailto:hawaiiicsreg@hawaii.gov).

**It is the responsibility of the registrant to submit notification if separation from government employment occurs.**

- A FEE-EXEMPT REGISTRATION IS TO CARRY OUT NECESSARY DUTIES OF GOVERNMENT EMPLOYMENT: If a registrant uses a fee-exempt HiCSR to perform work outside of the scope of their government employment, **the fee exemption will be revoked, and the registrant will be subject to administrative and/or criminal penalties relating to those violations.**
- Conversion of fee-based HiCSR to fee-exempt HiCSR: A current fee-based registration with an upcoming renewal, may be converted to a fee-exempt registration by following the instructions above and submitting the required documents. Conversion may only be performed 60 days prior to renewal.

Note: A registrant who works for a government facility can choose to pay the HiCSR fee for an initial or renewal registration, in lieu of obtaining a fee-exempt registration. The registrant is responsible for this payment and the Narcotics Enforcement Division **will not reimburse any fees paid for an initial or renewal registration.**