



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
OFFICE OF THE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS

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Testimony of the Department of Commerce and Consumer Affairs

Before the
House Committee on Consumer Protection & Commerce
Thursday, February 26, 2026
2:00 p.m.
Conference Room 329 & Via Videoconference

On the following measure:
H.B. 1946, H.D. 1, RELATING TO REGISTRATION OF TIME SHARES

Chair Matayoshi and Members of the Committee:

My name is Lori Beth Van Cantfort, and I am the Time Share Administrator of the Department of Commerce and Consumer Affairs, Professional and Vocational Licensing Division (Department). The Department appreciates the intent of and offers comments on this bill.

The purpose of this bill is to provide that (1) renewal applications be deemed approved upon delivery, and (2) amendment applications be deemed approved by law on the 45th day after submittal unless the Director issues a deficiency letter within that period.

Section 2 of the bill, page 5, lines 12-13, seeks to require that applications for renewal be deemed approved upon delivery. The Department is open to streamlining the renewal process but believes that a 30-day period to address any deficiencies should be allowed. Also, the statute should clearly state that applications for renewal will not be deemed approved 30 days after receipt unless all documents required to be

submitted under HRS section 514E-10(f) and Hawaii Administrative Rules, section 16-106-4.2 are submitted. The Department has been working with the proponent of the bill, the American Resort Development Association (ARDA), and they have agreed to a 30-day review period.

If applications for renewal are deemed approved within 30 days of submittal, amendments to program documents should not be submitted with applications for renewal. Amendments to disclosure statements should not be submitted because additional time is required to review and comment on amendments if they are material and substantial. Therefore, HRS section 514E-10(f)(1), found on page 5, lines 16-18, should be deleted. ARDA has agreed to the removal of this paragraph.

Section 2, page 7, lines 14-19, seeks to require that applications for amendments, other than amendments to add or remove time share inventory, shall be deemed approved on the 45th day after submittal if a deficiency letter is not issued within that time. Other types of amendments, besides adding or removing inventory, also require more time to review if they include material and substantial changes that affect consumers' rights and obligations. These documents include the time share declaration, time share trust document and disclosure statement. The Department requests that amendments that are material and substantial not be deemed approved unless the Department does not send a deficiency letter within 60 days of submittal. ARDA has agreed to increase the number of days to review amendments to 60 days.

Thank you for the opportunity to testify on this bill.



February 23, 2026

Representative Scott Matayoshi, Chair
Representative Tina Grandinetti, Vice Chair
House Committee on Consumer Protection and Commerce
Hawaii State Legislature

Support for HB1946 HD1

Dear Chair Matayoshi, Vice Chair Grandinetti and Members of the House Committee on Consumer Protection and Commerce,

On behalf of the Kohala Coast Resort Association (KCRA) thank you for providing us with the opportunity to provide our **SUPPORT of HB1946 HD1 Relating to Registration of Time Shares.**

Hawaii's time share industry is a significant and stable component of our visitor economy, accounting for approximately 15 percent of the state's visitor plant inventory and supporting thousands of local jobs. Many of these properties are affiliated with international brands and are relied upon by repeat visitors who invest long-term in Hawaii's communities.

KCRA supports HB1946 HD1, which will help streamline the time share registration process. This measure will allow time share registration renewals to be automatically approved upon submission, and deems minor registration amendments approved after 45 days, unless the Director of Commerce and Consumer Affairs issues a deficiency notice. This change will reduce delays while still maintaining consumer protections. We believe this bill will improve transparency for consumers, reduce administrative burdens on DCCA, provide regulatory certainty for legitimate businesses and support a vital sector of Hawaii's tourism economy.

HB1946 HD1 addresses concerns with the current registration and amendment approval process. Under existing law, routine renewal filings and minor amendments to time share plans can remain pending for years due to administrative backlogs. Applicants have experienced difficulty obtaining approvals or determining whether their renewal filings have even been reviewed. This has created uncertainty for developers, plan managers, and exchange agents, and has also prevented consumers from receiving the most current and accurate disclosure information.

This measure will provide two key improvements. First, HB1946 HD1 will allow registration renewals to be deemed approved upon delivery. These renewals involve no material changes, still require full payment of renewal fees, and comply with all statutory requirements. This change simply eliminates unnecessary administrative delay. Second, the bill establishes a 45-day review period for minor amendments that do not add or remove inventory. If DCCA does not issue a deficiency letter within that timeframe, the amendment is deemed approved by operation of law. This preserves DCCA's authority to review and reject deficient filings while providing certainty and predictability for applicants.

HB1946 HD1 is crafted to improve efficiency without weakening consumer protections. The measure does not apply to initial registrations nor to amendments involving inventory changes. Further, HB1946 HD1 does not reduce disclosure requirements nor limit enforcement authority. Instead, it allows DCCA to focus its limited time and resources on substantive and higher-risk filings, while ensuring consumers receive timely and accurate information.

For these reasons, we respectfully urge your committee to pass HB1946 HD1. Thank you for your consideration of this request. We look forward to working with the legislature on this vitally important issue.

Sincerely,

A handwritten signature in black ink that reads "Stephanie P. Donoho". The signature is written in a cursive, flowing style.

Stephanie Donoho, Administrative Director, Kohala Coast Resort Association

PO Box 6991, Kamuela, HI 96743 * (808) 747-5762 * kohalacoastresortassn@gmail.com * www.kohalacoastresorts.com

February 25, 2026

Representative Scot Matayoshi, Chair
Representative Tina Grandinetti, Vice Chair
Members of the House Consumer Protection and Commerce Committee
Hawaii State Legislature
Honolulu, Hawaii

Re: HB 1946 HD1-Registration of Time Shares

Dear Chair Matayoshi, Vice Chair Grandinetti and Members of the Committee:

Thank you for the opportunity to submit testimony **in strong support of HB 1946 HD1** which seeks to streamline the time share registration process by establishing automatic approvals of registration renewals upon payment of the renewal fee and deeming minor amendments approved unless a deficiency letter is issued by the Department of Commerce and Consumer Affairs (DCCA) within a fixed period. We appreciate the Legislature's ongoing commitment to improving the administrative processes governing Hawaii's timeshare industry, ultimately benefiting consumers, regulators, and developers alike.

As an active participant in Hawaii's regulatory framework, we have routinely experienced extended delays in obtaining approvals for disclosure statement revisions, registration renewals, and related amendment filings. In many instances, approvals can take months or even years to be issued creating persistent challenges across multiple filing periods.

These delays, while understandable given resource constraints and workload, have significant downstream effects:

- They hinder developers' ability to provide purchasers with the most accurate and up-to-date disclosure statements at the time of sale.
- They delay implementation of revisions to Purchase and Sale Agreements, even when such revisions strengthen consumer protections and enhance clarity.
- They create operational bottlenecks across legal, compliance, and sales teams, particularly when filings remain in prolonged "pending" status.

For these reasons, we strongly support the improvements proposed in HB 1946 HD1. The changes represent a true win-win-win for all parties involved:

A Win for Consumers - Consumers benefit when they receive timely, accurate, and up-to-date information. More predictable approval timelines ensure that disclosure statements and related materials reflect the latest revisions, enhancing transparency and empowering buyers to make fully informed decisions.

A Win for DCCA - Clearer process expectations and timelines will support the DCCA's workflow efficiency, help reduce administrative backlogs, and minimize repeated follow-up inquiries. These efficiencies would also enable the DCCA to devote more time and resources to reviewing complex

or high-impact filings, including new development projects that have the potential to generate additional tourism revenue and broader economic benefits for the State of Hawaii.

A Win for Developers - Streamlined approval processes allow developers to more effectively implement regulatory updates, operational improvements, and consumer-focused revisions while maintaining strict compliance.

The proposed changes in HB 1946 HD1 would strengthen Hawaii's regulatory structure in a manner that is positive, balanced, and beneficial to all parties. For consumers, it enhances clarity and confidence; for DCCA, it improves efficiency; and for developers, it helps ensure timely compliance and operational alignment.

For these reasons, we respectfully urge the Committee to pass HB 1946 HD1.
Thank you for your time and consideration.

Sincerely,



Daralis Vega de Fernandez
Director, Legal-Registration
Travel + Leisure Co.
Daralis.VegadeFernandez@travelandleisure.com
Cell: 407-433-4697

February 25, 2026

TO: Representative Scot Z. Matayoshi, Chair
Representative Tina Nakada Grandinetti, Vice Chair
Members of the Committee on Consumer Protection & Commerce

FR: Hilton Grand Vacations

RE: **HB 1946, HD1, - RELATING TO REGISTRATION OF TIME SHARES**
Hearing Date: February 26, 2026, at 2:00 p.m.

Aloha Chair Matayoshi, Vice Chair Grandinetti and members of the House Committee,

Hilton Grand Vacations operates 13 resorts across four of Hawai'i's islands and has been an active contributor to Hawai'i's economy and local communities for more than two decades. As a leading global vacation ownership company operating in the State since 2001, Hilton Grand Vacations provides thousands of jobs, supports local vendors and small businesses, and welcomes members and guests who invest in Hawai'i through long-term vacation ownership. Hilton Grand Vacations hereby submits testimony in **STRONG SUPPORT of HB 1946, HD1 Relating to Registration of Time Shares.**

Hilton Grand Vacations strongly supports HB 1946, HD1, which seeks to streamline the time share registration process. This measure allows time share registration renewals to be automatically approved upon submission and deems minor registration amendments approved after 45 days unless the Director of Commerce and Consumer Affairs issues a deficiency notice, reducing delays while maintaining consumer protections. By reducing unnecessary regulatory delays, this bill will:

- Improve transparency for consumers,
- Reduce administrative burdens on DCCA,
- Provide regulatory certainty for legitimate businesses, and
- Support a vital sector of Hawaii's tourism economy.

HB 1946, HD1 addresses a long-standing concern with the current registration and amendment approval process. Under existing law, routine renewal filings and minor amendments to timeshare plans can remain pending for years due

to administrative backlogs, and obtaining approvals or determining whether a renewal and amendment filings have been reviewed can be challenging.

This measure provides two reasonable and narrowly tailored improvements. First, HB 1946, HD1 allows registration renewals to be deemed approved upon delivery. These renewals typically involve no material changes and still require full payment of renewal fees and compliance with all statutory requirements. This change simply eliminates unnecessary administrative delays for filings that are largely ministerial in nature.

Second, the bill establishes a 45-day review period for minor amendments that do not involve adding or removing inventory to an existing registered timeshare plan. If DCCA does not issue a deficiency letter within that timeframe, the amendment is deemed approved by operation of law. Importantly, this preserves DCCA's authority to review and reject deficient filings while providing certainty and predictability for applicants.

HB 1946, HD1 is carefully crafted to improve efficiency without weakening consumer protections. The measure does not apply to initial registrations or amendments involving inventory changes. Further, HB 1946, HD1 does not reduce disclosure requirements or limit enforcement authority. Instead, it allows DCCA to focus its limited resources on substantive and higher-risk filings while ensuring consumers receive timely and accurate information.

For these reasons, we respectfully urge your committee to pass HB 1946, HD1. Thank you for your consideration of this request. We look forward to working with the legislative on this vitally important issue.

Thank you for your consideration.

Hannah Vazanna
Executive Vice President
Hilton Grand Vacations

February 25, 2026

TO: Representative Scot Z. Matayoshi, Chair
Representative Tina Nakada Grandinetti, Vice Chair
Members of the Committee on Consumer Protection & Commerce

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For these reasons, we respectfully urge your committee to pass HB 1946, HD1. Thank you for your consideration of this request. We look forward to working with the legislative on this vitally important issue.

Thank you for your consideration.

Hannah Vazanna
Executive Vice President
Hilton Grand Vacations



February 25, 2026

TO: Representative Scot Matayoshi, Chair
Representative Tina Grandinetti, Vice Chair
Members of the House Consumer Protection and Commerce Committee

FR: AMERICAN RESORT DEVELOPMENT ASSOCIATION – HAWAII (ARDA-Hawaii)

RE: **HB 1946, HD1, - RELATING TO REGISTRATION OF TIME SHARES.**
Hearing date: February 26, 2026, at 10:00 a.m.

Aloha Chair Matayoshi, Vice Chair Grandinetti and members of the Committee,

ARDA-Hawaii is the local chapter of the trade association for the time share industry. There are currently 98 resorts and more than 15,000 time share units throughout Hawaii. ARDA-Hawaii hereby submits testimony in **STRONG SUPPORT of HB 1946 HD1, Relating to Registration of Time Shares.**

Hawaii's time share industry is a significant and stable component of our visitor economy, accounting for approximately 15 percent of the State's visitor lodging inventory and supporting thousands of local jobs. Many of these properties are affiliated with internationally recognized hospitality brands and are relied upon by repeat visitors who invest long-term in Hawaii's communities.

ARDA-Hawaii strongly supports HB 1946 which seeks to streamline the time share registration process. This measure allows time share registration renewals to be automatically approved upon submission and deems minor registration amendments approved after 45 days unless the Director of Commerce and Consumer Affairs issues a deficiency notice. This change reduces delays while maintaining consumer protections. By reducing unnecessary regulatory delays, this bill will:

- Improve transparency for consumers,
- Reduce administrative burdens on DCCA,
- Provide regulatory certainty for legitimate businesses, and
- Support a vital sector of Hawaii's tourism economy.

HB 1946 addresses a long-standing concern with the current registration and amendment approval process. Under existing law, routine renewal filings and minor amendments to time

share plans can remain *pending for years* due to administrative backlogs. Applicants have experienced difficulty obtaining approvals or determining whether their renewal filings have been reviewed. This has created uncertainty for developers, plan managers, and exchange agents, and has also prevented consumers from receiving the most current and accurate disclosure information.

This measure provides two reasonable and narrowly tailored improvements. First, HB 1946 allows registration renewals to be deemed approved upon delivery. These renewals involve no material changes and still require full payment of renewal fees and compliance with all statutory requirements. This change simply eliminates unnecessary administrative delays for filings that are ministerial in nature.

Second, the bill establishes a 45-day review period for minor amendments that do not involve adding or removing inventory. If DCCA does not issue a deficiency letter within that timeframe, the amendment is deemed approved by operation of law. Importantly, this preserves DCCA's authority to review and reject deficient filings while providing certainty and predictability for applicants.

HB 1946 is carefully crafted to improve efficiency without weakening consumer protections. The measure does not apply to initial registrations or amendments involving inventory changes. Further, HB 1946 does not reduce disclosure requirements or limit enforcement authority. Instead, it allows DCCA to focus its limited resources on substantive and higher-risk filings while ensuring consumers receive timely and accurate information.

DCCA Proposed Amendments

Based on the Department of Commerce and Consumer Affairs (DCCA)'s testimony in prior committees, we understand there are 3 proposed amendments. We have summarized them below and stated our general position:

1. Proposed: renewals be amended in bill from "approved on submission" to **45** days to review.

ARDA is agreeable to a compromise to change to 30 days. This seems like a reasonable amount of time to determine if the renewal is complete or take action by issuing a deficiency notice.

2. Proposed: amendments be changed in the bill from **45** days to **60** days.

ARDA can agree to this change; and

3. Proposed: revisions to existing law that is NOT proposed for change in bill under by deleting HRS section 514E-10(f)(1), found on page 5, lines 16-18,

(f) An application for renewal of a developer registration shall be on a form prescribed by the director and shall include:

~~(1) A current disclosure statement that meets the requirements of section 514E-9 and section 16-1063, Hawaii Administrative Rules, if not already on file;~~

ARDA can agree to this change

For these reasons, we respectfully urge your committee to pass HB 1946. Thank you for your consideration of this request. We look forward to working with the legislature on this important issue.

Thank you for your consideration.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal line that ends in a small arrowhead.

Mitchell A. Imanaka
ARDA Hawaii



STACEY C. G. HEE
ATTORNEY AT LAW

February 25, 2026

Representative Scot Matayoshi, Chair
Representative Tina Grandinetti, Vice Chair
Members of the House Consumer Protection and Commerce Committee

RE: HB 1946, HD1 – Relating to Registration of Time Shares
Hearing on February 26, 2026, at 2:00 PM

Dear Chair, Vice Chair and Members of the Committee,

My name is Stacey Hee. I am testifying as legislative counsel for ARDA Hawaii.

ARDA Hawaii strongly supports this bill.

HB 1946 seeks to amend Section 514E-10 of the Hawaii Revised Statutes with respect to the time frame for the review of renewals and amendments of registrations.

1. Renewals. Section 514E-10(e) requires the biennial renewal of developer, plan manager, exchange agent and acquisition agent registrations. HB 1946 makes no changes to the documents or fees currently required in order to renew a registration pursuant to HRS 514E-10. HB 1946 simply creates a process by which a registration will be renewed so long as the required documents and fees are submitted. Any additional changes to the registration would require an amendment to the registration which would be a separate filing. This change aims to alleviate the burden on the Director to review documents whose review are primarily ministerial in nature.

2. Amendment. With respect to amendments to registrations, HB 1946 simply aims to create a time frame within which an amendment will be reviewed or a delinquency letter issued. ARDA realizes that filings which involve a new registration or the addition and/or removal of inventory require a closer review that may take more time. Therefore, these filings have been specifically exempted and do not fall within the scope of this amendment.

ARDA has reviewed the past testimony submitted by the Department of Commerce and Consumer Affairs, understands their concerns and is willing to work with DCCA on revisions to the language of this bill as stated in the testimony submitted for this hearing by ARDA Hawaii.

Representative Scot Matayoshi, Chair
Representative Tina Grandinetti, Vice Chair
Members of the House Consumer Protection and Commerce Committee
February 25, 2026
Page 2

For these reasons, I respectfully urge your committee to pass HB 1946. Thank you for your time and consideration.

Very truly yours,

McCorriston Miller Mukai MacKinnon LLP

A handwritten signature in black ink, appearing to read "Stacey C. G. Hee". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Stacey C. G. Hee

SCH:kn



February 25, 2026

Representative Scot Matayoshi, Chair
Representative Tina Grandinetti, Vice Chair
Members of the House Committee Commerce and Consumer Protection

RE: HB 1946 – Relating to Registration of Time Shares
Hearing date: February 26, 2026 at 2:00 PM

Aloha Chair Matayoshi, Vice Chair Grandinetti, and Members of the Committee,

Thank you for allowing me to submit testimony on behalf of Marriott Vacations Worldwide Corporation (“MVWC”) in **STRONG SUPPORT** of HB 1946 – Relating to Registration of Time Shares. MVWC is a global leader in the timeshare industry with five resort properties in Hawaii. Timeshare resorts are an important and stabilizing part of the tourism industry, and resort development and operations provide thousands of jobs, including high paying sales and marketing jobs in the islands year after year.

HB 1946 would allow renewals of existing timeshare registrations to be considered approved upon timely filing with the DCCA. The bill would also provide that certain minor amendments to approved time share plan registrations be considered approved forty-five days after submission to the DCCA, unless the Director of DCCA finds deficiencies and sends a deficiency letter.

This bill is needed because resort developers, plan managers, and exchange agents are required to submit renewal filings on a biennial basis, yet applicants frequently experience significant delays, often waiting years for the required renewals to be approved. The delay in approving routine renewals and amendments results in consumers receiving Hawaii disclosure statements which do not contain the most current information. HB 1946 is narrowly tailored to address only routine and minor filings that do not involve inventory changes or initial registrations. HB 1946 will allow for greater administrative efficiency without diminishing consumer protections – all disclosure requirements, filing fees, and DCCA oversight authority remain intact.

HB 1946 is carefully crafted to improve efficiency without weakening consumer protections. The measure does not apply to initial registrations or amendments involving inventory changes. Further, HB 1946 does not reduce disclosure requirements or limit enforcement authority. Instead, it allows DCCA to focus its limited resources on substantive and higher-risk filings while ensuring consumers receive timely and accurate information.

LATE

Based on the Department of Commerce and Consumer Affairs (DCCA)'s testimony in prior committees, we understand there are 3 proposed amendments. We have summarized them below and stated our general position:

1. Proposed: renewals be amended in bill from "approved on submission" to **45** days to review.
 - a. *MVWC is agreeable to a compromise to change to **30** days.*
2. Proposed: amendments be changed in the bill from **45** days to **60** days.
 - a. *MVWC can agree to this change; and*
3. MVWC is agreeable to revisions to existing law that is NOT proposed for change in bill under by deleting HRS section 514E-10(f)(1), found on page 5, lines 16-18.

By allowing DCCA to process these limited categories of submissions on an expedited track, the department can better allocate time and resources toward reviewing material amendment filings and initial registrations that warrant closer scrutiny. The practical effect should be a more efficient regulatory system where DCCA focuses on substantive reviews, developers have a more transparent timeline, and consumers receive more timely approved disclosures. For these reasons, we urge the committee to pass this bill.

Mahalo for your consideration,

Robin Suarez
Senior Vice President & Associate General Counsel
Marriott Vacations Worldwide Corporation