



STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
P.O. BOX 2360
HONOLULU, HAWAII 96804

Date: 04/06/2026

Time: 10:29 AM

Location: CR 211 & Videoconference

Committee: EDU/WAM

Department: Education

Person Testifying: Keith T. Hayashi, Superintendent of Education

Title of Bill: HB2567, HD1, RELATING TO EDUCATION.

Purpose of Bill: Establishes the Early Childhood Education Investment Special Fund. Appropriates funds. Effective 7/1/3000. (HD1)

Department's Position:

The Department of Education (Department) offers the following comments and concerns regarding HB 2567, Proposed SD1.

Concerns Regarding Organizational Agility:

The Department has concerns regarding the limitation of authority for the Board of Education (Board) and the Superintendent to establish positions. Restricting this authority constrains the Department's ability to respond to emergent operational demands to address evolving operational needs.

- **Operational Examples:** When a Complex Area Superintendent (CAS) nears retirement, the Department often creates a temporary Deputy CAS position to ensure a seamless leadership transition. This is a standard best practice to ensure continuity of operations during executive transitions. Additionally, during the Maui wildfires, Deputy CAS positions were created to assist the two Maui CASs with crisis response and support schools and communities.
- **Existing Oversight:** The Department agrees that oversight is essential. Currently, Board Policy 500-2 mandates a formal, public process for the Board to approve the addition or abolishment of offices led by subordinate superintendents. This ensures that these decisions are not made in a vacuum and that any new leadership structure is vetted for alignment with the Department's strategic goals, while maintaining the executive agility required to manage a statewide school system.

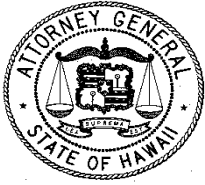
Opposition to Specific Provisions

The Department respectfully opposes the following provisions:

- **Board Evaluation of Complex Area Superintendents:** CASs are currently evaluated annually by their direct supervisors. These supervisors possess the routine, first-hand insight necessary to accurately assess performance and provide direction. Because the Board does not have a direct supervisory relationship with CASs, shifting this responsibility would create a misalignment between daily accountability and performance review. The Board's role is one of governance and policy, whereas the evaluation of CASs is a matter of operational management.
- **Legislative Access to Personnel Evaluations:** The Department is deeply concerned by the provision requiring that CAS performance evaluations be provided to legislators upon request. Performance evaluations are confidential personnel matters between an employee

and their supervisor.

Thank you for the opportunity to testify and for your continued support of the education of Hawai'i's keiki.



**TESTIMONY OF
THE DEPARTMENT OF THE ATTORNEY GENERAL
KA 'OIHANA O KA LOIO KUHINA
THIRTY-THIRD LEGISLATURE, 2026**

ON THE FOLLOWING MEASURE:

H.B. NO. 2567, H.D. 1, PROPOSED S.D.1, RELATING TO EDUCATION.

BEFORE THE:

SENATE COMMITTEES ON EDUCATION AND ON WAYS AND MEANS

DATE: Monday, April 6, 2026

TIME: 10:29 a.m.

LOCATION: State Capitol, Room 211

TESTIFIER(S): Anne E. Lopez, Attorney General, or
Ian Robertson, Deputy Attorney General

Chairs Kim and Dela Cruz and Members of the Committees:

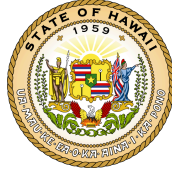
The Department of the Attorney General provides the following comments regarding this bill.

The purposes of this bill as introduced and as amended are to establish the early childhood education investment special fund and appropriate moneys into that fund to generate investment income to support early childhood education programs.

Proposed Senate Draft 1 would change the purposes of this bill to limiting the number of individuals in superintendent level positions, requiring written evaluations of complex area superintendents every two years, and appropriating funds to establish two deputy superintendent positions.

The proposed Senate Draft 1, if adopted by the Committees, may subject the bill to challenge under *League of Women Voters of Honolulu v. State*, 150 Hawai'i 182, 205, 499 P.3d 382, 405 (2021), in which the Hawai'i Supreme Court held that the constitutional requirements that a bill must pass three readings in each house "begin[s] anew after a non-germane amendment changes the object or subject of a bill so that it is no longer related to the original bill as introduced." We believe a court could conclude that Proposed Senate Draft 1, if adopted, may be found to be outside the scope of the purpose of the original bill and be considered to be a new bill that will require three readings in each house pursuant to article III, section 15, of the Hawai'i Constitution.

We respectfully ask the Committees to consider our comments.



**STATE OF HAWAII
BOARD OF EDUCATION
PAPA HO'ONA'AUAO**
P.O. BOX 2360
HONOLULU, HAWAII 96804

**Senate Committee on Education
Senate Committee on Ways and Means
Monday, April 6, 2026
10:29 a.m.
Hawaii State Capitol, Room 211**

Measure: House Bill 2567 Proposed SD1, Relating to Education

Purpose of Measure:

Establishes a cap on the total number of superintendent-level positions within the Department of Education. Defines "superintendent-level position". Requires the Board of Education to conduct a written performance evaluation of each complex area superintendent every two years. Appropriates funds to establish two Deputy Superintendent positions within the Office of the Superintendent. Effective 7/1/2050.

Aloha Chairs Kim and Dela Cruz, and Vice Chairs Kidani and Moriwaki, and Members of the Committee:

The Board of Education respectfully offers comments on the proposed SD1 for House Bill 2567.

The Board has strong concerns with assuming management responsibilities such as conducting performance evaluations, over employees other than the Superintendent of Education and State Librarian – for which the Board has developed robust evaluation processes – rather than remaining focused on its constitutionally mandated responsibility to formulate statewide education policy.

Also, because the Board does not engage in the daily operations of the Department of Education given its primary responsibility, the Board would not be positioned to fairly and properly evaluate other Department employees. The Superintendent, as chief executive officer of the Department, and the appropriate subordinate superintendents as deemed fit, are able to more suitably evaluate their direct reports.

Additional resources would be required for the Board to conduct evaluations beyond its two employees.

The Board defers to the Department regarding the other aspects of the proposed legislation.

Mahalo for this opportunity to testify on behalf of the Board.



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Osa Tui, Jr.
President

Logan Okita
Vice President

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Andrea Eshelman
Executive Director

**TESTIMONY TO THE HAWAI'I SENATE COMMITTEE ON EDUCATION &
TESTIMONY TO THE HAWAI'I SENATE COMMITTEE ON WAYS AND MEANS**

Item: HB 2567, HD1, Proposed SD1 – Relating to Education

Position: Support

Hearing: Monday, April 6, 2026, 10:29 am, Room 211

Submitter: Osa Tui, Jr., President - Hawai'i State Teachers Association

Dear Chairs Kim and Dela Cruz, Vice Chairs Kidani and Moriwaki, and members of the committees,

The Hawai'i State Teachers Association **supports** H.B. 2567, HD1, Proposed SD1, which places a cap on administrative positions within the state and complex area offices, appropriates moneys for 2 Deputy Superintendent positions within the Office of the Superintendent and ensures our educational leaders are held to consistent evaluation standards. We view these proposed amendments as a positive step forward.

Particularly at a time when public school student enrollment is decreasing, we must be mindful of top-heavy growth at the superintendent level. As the Hawai'i Department of Education's framework has expanded over the years, it is important to maintain a healthy balance between state-level superintendent roles and school-level needs. By establishing a cap of superintendent-level positions, this legislation helps direct crucial funding back into our classrooms, providing better resources and support systems directly to our students. Focusing this cap specifically on the superintendent, deputy superintendents, assistant superintendents, and complex area superintendents ensures we are addressing top-level growth appropriately.

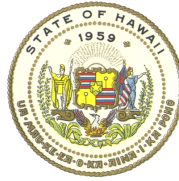
Currently, the state superintendent is evaluated by the Board of Education, and public school teachers participate in the Educator Effectiveness System. This bill creates a unified approach to professional review by requiring the Board of Education to conduct written performance evaluations for each complex area superintendent every two years. Since both the state superintendent and classroom educators engage in regular evaluations to ensure educational quality, extending similar reviews to the complex area

superintendents who guide and support teachers establishes a fair and consistent standard across the department.

Ultimately, this bill fosters a more balanced, collaborative education system that remains focused on student outcomes. We respectfully urge the committee to pass this measure. Thank you for the opportunity to submit testimony.

Mahalo.

JOSH GREEN, MD
GOVERNOR



KEITH T. HAYASHI
SUPERINTENDENT

JANETTE F. L. SNELLING
COMPLEX AREA SUPERINTENDENT

STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
OFFICE OF THE COMPLEX AREA SUPERINTENDENT
WEST HAWAII DISTRICT OFFICE
75-140 HUALALAI ROAD
KAILUA-KONA, HAWAII 96740
PHONE: (808) 327-4991

April 4, 2026

Aloha Chair Dela Cruz, Vice Chair Moriwaki, and members of the Ways and Means Committee,
Chair Mercado Kim, Vice Chair Kidani, and members of the Education Committee

My name is Janette Snelling. I serve as the Complex Area Superintendent for Honoka'a, Kealakehe,
Kohala, and Konawaena Complex Area. My testimony for the proposed SD1 for HB 2567.

I have concerns on several points regarding the proposal that the Hawai'i Board of Education
evaluate CASs every two years:

1. The Board of Education is not in a direct supervisory role of CASs. Importantly, the four focus areas proposed for the periodic evaluation by the Board of Education requires consistent interaction and oversight. This is not a realistic expectation.
2. The current structure for my annual evaluation is valuable and necessary. Touch points happen throughout the year and provide critical opportunities for me to reflect on my practice and course correct, if needed, to ensure that I am best serving the students and families in my complex area.
3. As it is not common practice for board members and legislators to have direct access to the personnel evaluations of individual educational leaders whom they do not directly supervise, would it be better served to leave the current evaluation structure in place and ask for a report on the four critical areas outlined in this proposal every two years?

I am also advocating for flexibility in the proposed statutory cap on superintendent-level positions for this reason. When I transitioned into the CAS role, I served in a temporary position as Deputy CAS for six months. Moving from a single school to supervising and supporting 19 schools required a massive shift in professional mindset and practice. That transition period was vital. Our Superintendent needs the flexibility to address needs like this to ensure efficient operations.

Respectfully submitted for your consideration,

Janette Snelling
Complex Area Superintendent, HKKK

Telephone: (808) 313-7800 • Fax: (808) 327-4994

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

**TESTIMONY TO THE SENATE COMMITTEE ON WAYS AND MEANS AND THE
COMMITTEE ON EDUCATION**

RE: HB 2567, SD1 PROPOSED - RELATING TO EDUCATION

DATE: April 6, 2026

TO: Chair Dela Cruz, Vice Chair Moriwaki, Chair Mercado Kim, Vice Chair Kidani, and
Members of the Committees

FROM: Lori Yatsushiro, Complex Area Superintendent

POSITION: Comments with concerns

The first concern with HB2567, SD1 Proposed, is the Superintendent losing the managerial rights to create necessary leadership positions. If this provision had been in place during the Maui Wildfires, which included the Lahaina, Kula, and Kihei wildfires, the two Maui Complex Area Superintendents would have been significantly hindered in their ability to temporarily hire Deputy Complex Area Superintendents to help and guide the numerous issues with supporting our communities in their time of need. Deputy CASs worked directly with schools to ensure students, teachers, and community members were supported in their transitions to continue their education in other schools. This took many dedicated hands and countless hours to ensure students and families that lost their homes and family members were supported with the love and compassion required. We worked collaboratively with our State Office team to bring students and staff back to some form of normalcy or as normal as possible. Deputy CASs took shifts to ensure constant communication with State Leadership, school leadership, and the Maui Emergency Management Agency. The role of Deputy CASs was critical during this crisis. This was a temporary position and has since sunsetted; however, if there were a cap on "superintendent" positions, this essential extra support would not have been provided. The implementation of such measures would have created barriers to responsive leadership. These administrative hurdles detract from our core mission, leading to measurable negative consequences for student learning and the delivery of essential support services.

Had this provision been in place during the 2023 Maui wildfires, the two Maui Complex Area Superintendents would have been significantly hindered in their ability to temporarily hire Deputy Complex Area Superintendents (Deputy CASs). These temporary leadership roles were critical to addressing the immense and immediate needs of students, staff, and families. Deputy CASs worked directly with schools to ensure that students, teachers, and community members were supported as they transitioned to other campuses to continue their education. This required many dedicated hands and countless hours to ensure that students and families who had lost

homes—and in some cases loved ones—received the compassion, coordination, and stability they deserved.

The Deputy CAS role was temporary and has since sunsetted. However, if there had been a statutory cap on “superintendent” positions, this essential surge capacity would not have been possible. In times of crisis, leadership flexibility is not a luxury, it is absolutely a necessity. Restricting the Superintendent’s ability to respond dynamically risks limiting the Department’s capacity to act swiftly and compassionately when our communities need us most.

Secondly, losing the ability to prioritize seamless transitions and on the job training opportunities through temporary leadership roles will ultimately weaken the stability of our schools and diminish the quality of support provided to our students and families. For example, as a Deputy CAS, I was afforded the opportunity to be updated on the comprehensive operations and issues within the complex area. This allowed me to ask questions and gather historical information to ensure a seamless transition. Having the opportunity to transition in this manner has helped to ensure my schools continued to receive the support already in progress and to ensure the complex area as a whole would move forward effectively in educating and supporting our students.

Lastly, I strongly oppose the Board of Education evaluating CASs. Currently, the Deputy Superintendent evaluates the CASs. The Deputy Superintendent possesses a deep understanding of the expectations and responsibilities of the CASs. Having served as a CAS herself, the Deputy Superintendent is better able to provide informed feedback and guidance due to her direct, previous experiences. There is constant communication, support, and feedback, including in-person visits, with the CASs to ensure our schools are receiving the support and guidance they need. It will be exceptionally difficult for the volunteer Board of Education members to effectively evaluate CASs without the necessary background knowledge and experience of CAS responsibilities and expectations. BOE members are volunteers and most have high-impact careers that would not allow them the time needed to thoroughly evaluate CASs. Expecting volunteer BOE members to divert time from their primary professions to take on additional, complex responsibilities, in addition to the important work already being done by board members, is unreasonable.

Tied to that, performance evaluations are traditionally confidential professional documents and intended to be private tools for administrative accountability and growth. This shift could lead to school leaders being judged on political optics or local "popularity" rather than their actual effectiveness in improving student achievement. This will not increase meaningful accountability; instead, it invites instability, political

interference, and a breakdown of professional standards that ultimately harms the stability of the school system and student learning.

In closing, please consider the profound issues with capping the number of leadership positions, as there are times, particularly during crises or transitions, that additional leadership positions are absolutely necessary and supportive to school staff, students, and the community. In addition, I respectfully urge the Committees to reconsider the proposal for Complex Area Superintendent (CAS) evaluations to be conducted by voluntary Board of Education members. To ensure professional rigor and institutional stability, we recommend that these evaluations remain under the purview of professional Department leadership and be maintained as confidential personnel records.

Thank you for the opportunity to provide testimony on HB2567, SD1 Proposed.

HB-2567-HD-1

Submitted on: 4/3/2026 11:25:54 PM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
Susan Pcola_Davis	Individual	Oppose	In Person

Comments:

Testimony: Susan Pcola-Davis

I think this hearing needs to be rescheduled for **ACCURACY** because of the following:

STRONGLY OPPOSE

HB2567

My testimony is to address an **ERROR** in the bill number for today's measure: HB2567

Description: Establishes the Early Childhood Education Investment Special Fund. Appropriates funds. Effective 7/1/3000. (HD1)

The hearing notice shows

Description: Establishes a cap on the total number of superintendent-level positions within the Department of Education. Defines "superintendent-level position". Requires the Board of Education to conduct a written performance evaluation of each complex area superintendent every 2 years. Appropriates moneys for 2 Deputy Superintendent positions within the Office of the Superintendent. Effective 7/1/2050. (SD2)

Irregularities with SB 3334:

This bill is SB3334. The last posting regarding that bill was on March 23. This measure has been deleted from the meeting scheduled on Tuesday 03-24-26 2:00PM in conference room 309 VIA VIDEOCONFERENCE. No other meeting was scheduled to hear this bill. It had been scheduled to be heard by the House Committee on Education then the House Committee on Finance.

Irregularities with HB 2567:

ON March 24 this was posted "Public notice requirement waived pursuant to Senate Rule 21.THE SENATE. I saw nothing in Senate Rule 21 that refers to a waiver.

Date: Monday, April 6, 2026

Time: 10:29 AM

Location: Conference Room 211 & Videoconference

Committee: WAM and EDU

Committee on Ways and Means

The Honorable Donovan M. Dela Cruz, Chair

The Honorable Sharon Y. Moriwaki, Vice Chair

Committee on Education

The Honorable Donna Mercado Kim, Chair

The Honorable Michelle N. Kidani, Vice Chair

Members of the Senate

State Capitol, Room 208

Honolulu, Hawaii 96813

Bill No. HB 2567, HD1 RELATING TO EDUCATION

Position: COMMENTS AND CONCERNS

Dear Chair Dela Cruz, Vice Chair Moriwaki, Chair Kim, Vice Chair Kidani, and Members of the Senate Committee on Ways and Means and Education:

The new proposed SD1 appears to have changed significantly from HB 2567 and is almost identical to SB3334, SD2.

I still have concerns regarding the provision that would assign evaluation of complex area superintendents to the Board of Education. Our current structure provides consistent oversight and professional guidance through the Deputy Superintendent of Academics, who meets regularly with complex area superintendents for training, collaboration, mentoring, and formal evaluation. This model ensures accountability while grounding evaluation in educational leadership expertise. While members of the Board of Education are deeply committed and serve with distinction, their volunteer role and broad responsibilities may not allow the time or specialized focus necessary for the effective evaluation of complex area superintendents. The existing system already balances accountability with meaningful professional growth.

I would again like to offer some perspective on the provision establishing a statutory cap on "superintendent-level positions." While I understand and appreciate the intent to promote efficiency and accountability, a fixed cap could unintentionally limit the State Superintendent's ability to respond to emerging needs or evolving organizational demands. Effective leadership structures must remain adaptable to changing circumstances, and statutory limits may reduce the flexibility necessary to meet future challenges.

On a personal note, I greatly benefited from serving as a deputy complex area superintendent prior to assuming the complex area superintendent role. That transitional experience provided invaluable preparation for the responsibilities I now carry. A rigid cap could limit similar

leadership development pathways for future superintendents, ultimately affecting succession planning and long-term system stability.

I respectfully urge continued dialogue and collaboration as this legislation moves forward to ensure our policies remain responsive and supportive.

Thank you for the opportunity to provide testimony. I look forward to working together to support a strong and effective educational system for our students.

Ernest Muh
Complex Area Superintendent
Leilehua–Mililani–Waialua Complex

HB-2567-HD-1

Submitted on: 4/4/2026 9:23:33 AM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
Rochelle Mahoe	Testifying for Department of Education	Comments	Written Testimony Only

Comments:

Date: April 4, 2026

Committee: WAM Committee and Education Committee

Department: Education

Person Testifying: Rochelle Mahoe, Ph.D., Farrington-Kaiser-Kalani (FKK) Complex Area Superintendent

Title of Bill: HB2567, HD1, Proposed SD1 Relating to Education

Position: Comments with Concerns

Thank you for the opportunity to provide testimony on HB2567, HD1, Proposed SD1. I would like to offer comments on several provisions that will inadvertently impact the operational effectiveness of our public school system.

The new proposed SD1 has changed drastically from its original House Bill 2567, HD1, and appears nearly identical to SB 3334, SD2. Previous testimony stated the bill introduces structural changes including statutory limits on leadership positions, a requirement for the Board of Education (BOE) to evaluate Complex Area Superintendents (CASs), and a process for the Legislature to request access to those evaluations.

While I recognize the Legislature’s intent for fiscal and administrative efficiency, a truly effective system requires that the Superintendent maintain clear executive authority. Under the Hawai‘i State Constitution, the Superintendent serves as the Chief Executive Officer; to ensure true accountability, a CEO must have the direct authority to manage and evaluate the staff responsible for daily operations.

Shifting CAS evaluations to the Board risks fracturing this essential chain of command. CASs serve as the vital link between state strategy and school-level implementation. Because the Superintendent is immersed in these daily operational realities and understands the diverse portfolio of schools each CAS oversees, the Superintendent is best positioned to provide the specialized, actionable feedback this multifaceted role requires.

Furthermore, I suggest that maintaining flexibility in leadership positions allows the Department to remain agile. The Superintendent requires the discretion to adjust leadership structures—without the constraints of rigid statutory caps—to meet the evolving needs of our schools and students.

Finally, I have reservations regarding the provision allowing for the request of individual performance evaluations. Protecting the confidentiality of personnel records is a fundamental professional standard that ensures honest, constructive dialogue between a supervisor and their staff.

I believe there are collaborative ways to achieve our shared goals for efficiency while honoring the existing executive structure. I respectfully ask the Committee to consider these operational nuances to ensure our leadership remains empowered to support our schools.

Thank you for your time and your dedicated service to public education.

HB-2567-HD-1

Submitted on: 4/4/2026 4:00:24 PM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
Hannah Loyola	Testifying for Hawaii Department of Education	Comments	Written Testimony Only

Comments:

To: Chair Donovan M. Dela Cruz, Vice Chair Sharon Y. Moriwaki, and members of the Committee on Ways and Means

To: Chair Donna Mercado Kim, Vice Chair Michelle N. Kidani, and members of the Committee on Education

Subject: Comments with Concerns regarding HB 2567

Aloha Chairs, Vice Chairs, and Members of the Committees,

As a school leader serving the Kohala community, I am writing to formally submit my comments with concerns regarding the proposed language in HB 2567.

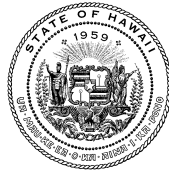
1. I wish to express significant concern regarding language that limits the Superintendent’s managerial right to establish necessary leadership positions. To effectively support our schools, the Department requires administrative flexibility. Capping or restricting these positions hinders the Superintendent’s ability to pivot resources and expertise to meet the evolving needs of our students and complex areas.

2. I am also concerned with the proposal for the Board of Education to conduct written performance evaluations of Complex Area Superintendents. Structurally, the CAS reports directly to the Superintendent. Introducing a direct evaluation from the Board could create a dual-reporting conflict which may dilute the Superintendent’s authority and lead to inconsistent strategic alignment across the Department. Accountability is vital, but it should follow the established chain of command to ensure clear and effective leadership.

Thank you for the opportunity to share the perspective of a school leader dedicated to the success of our Hawaii Department of Education students.

Mahalo,

Hannah Loyola



STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
HILO-WAIĀKEA COMPLEX
75 AUPUNI STREET, RM. 203
HILO, HAWAII 96720

Date: April 5, 2026

Committee: Chair Dela Cruz, Vice Chair Moriwaki, and members of the WAM Committee, Chair Mercado Kim, Vice Chair Kidani and members of the Education Committee

Department: Education

Person Testifying: Kasie Kaleohano, Hilo-Waiākea Complex Area Superintendent

Title of Bill: HB 2567, SD1 Relating to Education

Position: Comments with Concerns

Aloha Chair Dela Cruz, Vice Chair Moriwaki, Chair Mercado Kim, Vice Chair Kidani and members of the Committees,

Mahalo for the opportunity to provide testimony on HB2567, SD1. While I share the legislature's commitment to accountability and excellence in leadership, I want to express significant concerns regarding the proposed amendments in Senate Draft 1, specifically as they pertain to the evaluation process for Complex Area Superintendents and the erosion of necessary managerial rights.

I stand in opposition of the provision granting the Board of Education the authority to evaluate Complex Area Superintendents directly, as well as the requirement to grant the legislature access to these evaluations.

A system already exists that requires annual evaluations by the Deputy Superintendent of Academics. These evaluations consist of multiple check points to ensure progress towards goals in the State Strategic Plan and Complex Area specific initiatives. Direct evaluation by the Board creates a dual-reporting structure that risks conflicting directives and undermines the Superintendent's authority to manage the Department's executive team.

Personnel evaluations are highly sensitive documents. Allowing legislative access to these records sets a concerning precedent that may politicize professional performance reviews and hinder the ability to provide candid, constructive feedback necessary for growth.

I am further concerned with the limitations placed on the Superintendent's managerial rights to create leadership positions. The educational landscape is dynamic. The Superintendent must maintain the flexibility to establish and adjust leadership roles to meet emerging needs such as shifts in student mental health requirements, digital equity, or curriculum transitions, without being constrained by rigid

statutory constraints. Centralizing the authority to create positions ensures that the Department can align its human resources with its strategic plan effectively.

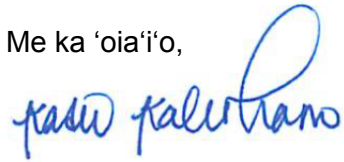
As a Complex Area Superintendent, the proposed changes in SD1 would directly impact my daily work and the stability of school operations in the following ways:

- Introducing a new layer of evaluation for my direct supervisors creates a trickle-down effect of uncertainty. When the chain of command is blurred at the executive level, it slows down the decision-making process for school-level support and resource allocation.
- The prospect of having performance evaluations subject to legislative review may act as a deterrent for high-quality candidates seeking leadership roles. Any vacancy or turnover caused by these shifts in oversight directly diminishes the support my school receives.
- If the Superintendent's ability to create leadership positions is restricted, schools in my complex area may see a delay in the implementation of specialized support roles that are critical for addressing specific district-wide challenges.

While I wholeheartedly support the spirit of transparency, HB2567, SD1, as currently drafted, creates structural redundancies and compromises the privacy of personnel management. I respectfully request that these concerns be addressed to ensure the Department can maintain a clear, effective, and professional leadership hierarchy.

Mahalo for the opportunity to testify.

Me ka 'ōia'īo,



Kasie Kaleohano
Hilo-Waiākea Complex Area Superintendent

Date: Monday, March 6, 2026

Time: 10:29 AM

Location: Conference Room
211

Committee: WAM and EDU

Committee: WAM: Honorable Chair Dela Cruz, Honorable Vice Chair Moriwaki and Honorable Members of the WAM Committee. EDU: Honorable Chair Kim, Honorable Vice Chair Kidani and Honorable Members of the EDU Committee

Department: Education

Person Testifying: Richard Fajardo

Title of Bill: HB 2567 SD1 Relating to Education

Position: Comments and Concerns

Dear Chair Dela Cruz, Vice Chair Moriwaki, Chair Kim, Vice Chair Kidani and Members of the Senate Committee on Ways and Means and Education:

My name is Richard Fajardo and I am the Complex Area Superintendent for the Pearl City-Waipahu Complex Area. I want to express my comments and concerns relating to the proposed HB2567 SD1.

The original version of HB2567 was to establish the Early Childhood Investment Special Fund. The current proposal, HB2567 SD1, removed and replaced the original content with language very similar to SB3334 SD2.

With that said, I am expressing the following concerns:

1, Supervision of Complex Area Superintendents by the Board of Education every two years

- I immensely acknowledge and appreciate the Board of Education's commitment towards public education in Hawaii. My concern is the added task this puts on a voluntary board and the capacity to thoroughly evaluate each Complex Area Superintendent. In the department's current established structure, in which the Deputy Superintendent of Academics evaluates each Complex Area Superintendent, the Deputy Superintendent of Academics, through line authority, commands accountability and a high standard towards performance. I can attest first hand the amount of time, effort and commitment Deputy Armstrong puts forth in our evaluation. In addition to two formal evaluation meetings (mid year and end of year), we meet monthly at leadership meetings and she

conducts multiple visits to Leeward District Office to monitor and discuss progress. Having the Board of Education conduct evaluations every two years without direct line authority may make it challenging for immediate feedback and directive corrective measures to ensure accountability and results.

2. Cap on the number of Superintendents level positions

- I understand and appreciate the intention of efficiency and accountability. In my perspective, a fixed cap limits the Hawaii Department of Education State Superintendent use his or her discretion to create positions to assist with transition. An example of this is within the last two years, Complex Area Superintendents on the islands of Oahu, Kauai and the Big Island retired. Temporary Complex Area Deputy Superintendent positions were created in order to allow a seamless transition and minimize impact in the field.

I am able to discuss this further if needed and collaborate with each of you in order ensure that our public school system provides the necessary learning opportunities so that our students receive the education they deserve. Thank you for your time and consideration.

Richard Fajardo
Hawaii Department of Education
Complex Area Superintendent, Pearl City-Waipahu

HB-2567-HD-1

Submitted on: 4/4/2026 8:39:43 PM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
Jon Henry Lee	Testifying for Campbell-Kapolei Complex Area	Comments	Written Testimony Only

Comments:

Aloha WAM Chair Dela Cruz, WAM Vice-Chair Moriwaki, and EDU Chair Kim, EDU Vice-Chair Kidani and Members of the Committees,

My name is Jon Henry Lee, and I am the Complex Area Superintendent (CAS) for the Campbell-Kapolei Complex Area. Thank you for the opportunity to share my comments and concerns regarding HB 2567 SD1. There have been wholesale changes to the language and intent of the original bill, and it is now almost identical to SB 3334 SD2. From the promising idea of financially supporting early education to the now proposed Senate version of capping and changing the evaluation process for some superintendent-level positions, there is not even a semblance of what was initially intended.

As the newest CAS, I am accustomed to and welcome annual evaluations. Being new to the role, I need direct feedback, both from my supervisors and those whom I support, so I can grow professionally. Performance evaluations, much like student assessments, should be an ongoing process—establishing expectations, monitoring progress, and engaging in continuous feedback loops—not a once-at-the-end event. Shifting to a biennial evaluation process overseen by a volunteer board of nine members and two representatives would be unnecessarily complicated and ineffective in achieving a meaningful performance review.

I strongly recommend that the evaluation of CASs remain an annual function performed by the Deputy Superintendent of Academics. This ensures proper alignment with Department of Education priorities and maintains the essential line of authority. Deputy Superintendent Armstrong is exceptionally capable and qualified, possessing extensive experience at both the school and executive levels. When I was an interim CAS, she immediately provided thorough onboarding and familiarized me with the evaluation tool that measures progress on key areas such as student achievement, empowerment of schools, support and accountability, talent management, and operational leadership. Her 24-7 responsiveness and the efficiency of her staff have been vital for myself and others who share the same role.

If the goal is to address concerns about bureaucracy and system responsiveness, imagine the difficulty of addressing a personnel performance issue two years later with a board whose membership actively changes based on appointments. Superintendent Hayashi must maintain the managerial flexibility to direct and staff the workforce effectively to meet the evolving needs of our communities. Guided by data, established roles, and the backing of our legislative partners,

the Superintendent is positioned to take timely action to ensure appropriate staffing and support are deployed where they are most needed.

The Campbell-Kapolei Complex Area exemplifies why flexibility is essential. We serve the state's largest enrollment, with over 16,400 students across 18 schools, representing nearly 11% of the entire DOE student body in a single complex area—already double the size of most others. Projected growth from the Hoopili development alone will necessitate three new elementary schools, an additional middle school, and a new high school. This does not account for the capacity needed for new housing developments in Ewa Beach and East Kapolei. While these shifts are magnified in our area, other communities are evolving as well. I urge your consideration to allow for open discussion and collaboration in the future so that our system can adjust proactively and accordingly.

Thank you again for your time and for the opportunity to present these comments and suggestions. I recognize the deeply held and passionate perspectives that surround issues in education. Our students deserve a high-quality education, which can only be realized through a highly effective and well-supported system. I look forward to working collaboratively with all stakeholders to help make that vision a reality.



STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA 'AUAO
'EWA ELEMENTARY SCHOOL
91-1280 RENTON ROAD
'EWA, HAWAII 96706
PHONE: (808) 307-8200
FAX: (808) 681-8206*

April 5, 2026

Chair Donna Mercado Kim, Vice Chair Michelle Kidani & Members of the Senate Education Committee and Chair Donovan Dela Cruz, Vice Chair Sharon Moriwaki & Members of the Senate Ways & Means Committee-

I am Stan Tamashiro, Principal of Ewa Elementary School since January 2003 who was previously a Complex Area Superintendent for the Campbell, Kapolei and Waianae Complex Areas from January 2002 to December 2002, a Deputy District Superintendent for Leeward District from August 2001 to December 2001 and Principal of Kaimiloa Elementary School from November 1991 to July 2001.

I am writing in opposition to HB2567 HD1 SD1, Relating to Education. My concerns are that this bill in its current form removes the Superintendent's decision making authority to hire the necessary number of superintendent level personnel within our Department's needs and budget. A superintendent should have the authority and responsibility to have as many superintendent level positions as he/she seems viable for the success of our Department.

My other concern is that the Superintendent and not the Board of Education should be conducting the evaluation of his/her subordinate superintendent as the Superintendent is much more aware of the responsibilities of our subordinate superintendent than the Board of Education. I am also opposed to the Legislature having the right to request access to subordinate superintendent's evaluations as this level of personnel evaluation should be left with our State Superintendent. This action along with limiting the number of superintendent level positions minimizes the Superintendent's managerial rights.

Thank you for the opportunity to submit my testimony in opposition to this bill in its current form.

Sincerely,

Stanley G. Tamashiro, Jr.
Principal

TO: Committee on Ways and Means: Chair Donovan M. Dela Cruz & Vice Chair Sharon Y. Moriwaki

Committee on Education: Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani

DATE: Monday, April 6, 2026

TIME: 10:29AM

LOCATION: Hawai'i State Capital Conference Room 211

COMMITTEE: WAM and EDU

BILL: HB 2567 HD1, Relating to Education: Superintendent-Level Positions; Cap; Complex Area Superintendents

TESTIFIER(S): Adria Medeiros, Principal Mountain View Elementary School

POSITION: COMMENTS WITH CONCERNS

Aloha Chair Donovan M. Dela Cruz & Vice Chair Sharon Y. Moriwaki, Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani.

My name is Adria Medeiros, and I serve as the principal of Mountain View Elementary School in the Ka'u-Kea'au-Pāhoa Complex Area on Hawai'i Island. I respectfully submit comments with concerns regarding HB2567 SD1.

I appreciate that this version of the bill maintains the Complex Area structure. Preserving this regional leadership model is critical, particularly for rural and Neighbor Island schools.

However, I have significant concerns regarding both the ambiguity of the bill's language and the governance and managerial implications of its provisions.

HB2567 SD1 introduces changes to leadership structure and oversight without clearly defining key components of implementation. The bill references caps on superintendent-level positions and the addition of new leadership roles, yet does not clearly establish how those positions will be balanced, allocated, or adjusted over time. This lack of specificity makes it difficult to fully understand the operational impact on schools and raises concern about unintended consequences. Policy decisions of this magnitude should not rely on undefined implementation details.

Hawai'i's public school system is not static. Leadership needs shift based on enrollment changes, geographic realities, staffing challenges, and emergent crises. As a rural principal serving a complex area the geographic size of O'ahu, I rely on responsive and regionally grounded leadership. Policies that alter leadership structures without clearly defining capacity or allocation create uncertainty at the school level and risk reducing responsiveness when it is needed most.

I am also strongly opposed to the provision requiring the Board of Education to conduct evaluations of Complex Area Superintendents and allowing those evaluations to be accessed by the Legislature. Performance evaluation is a managerial function that should remain under the authority of the Superintendent of Education. Expanding evaluation authority beyond the executive management

structure blurs the line between governance and operations and risks politicizing what should remain a professional supervisory process.

Additionally, while fiscal accountability is important, embedding constraints on leadership structure in statute may limit the Superintendent's ability to adapt to changing conditions. Leadership allocation decisions should remain flexible and responsive to student and community needs, particularly in a statewide system serving diverse and geographically dispersed populations.

When legislation introduces structural change without clearly defining how that structure will function in practice, it creates uncertainty for those of us responsible for daily school operations.

For these reasons, I respectfully urge the Committee to carefully reconsider HB2567 SD1 and the potential unintended impacts of its current form.

Mahalo for your time and for your continued commitment to Hawai'i's students and schools.

A handwritten signature in blue ink, appearing to read "A. Medeiros".

Adria Medeiros
Principal, Mountain View Elementary School



Kaua'i High School
3577 Lala Road, Lihue, HI 96766

April 5, 2026

To: Chair Woodson and Members of the House Committee on Education; Chair Senator Donna Mercado Kim and Members of the House of Ways and Means

As the Principal of Kaua'i High School, I am writing to express my strong opposition to the language inserted into the proposed SD 1 of HB 2567. While the original bill addressed early childhood investment, the current draft incorporates measures that fundamentally undermine the professional integrity and operational agility of the Hawai'i Department of Education. I speak today as an educator of 35 years who believes that for our schools to thrive, leadership must remain in the hands of educational experts rather than political entities.

The proposed SD 1 mandates that the Board of Education conduct written performance evaluations for Complex Area Superintendents (CASs) and provides legislators access to these records upon request. I oppose these measures for the following reasons:

A CAS is an operational leader who must be evaluated by a Superintendent who understands the clinical and logistical complexities of the role. Shifting evaluation authority to political bodies moves the focus away from student outcomes toward political compliance. Evaluations are professional tools for improvement, not public documents for political leverage. Allowing legislative access destroys the "psychological safety" necessary for experts to be evaluated effectively by their peers.

The proposed SD 1 seeks to establish a statutory cap on superintendent positions and requires legislative reporting on these roles. These changes severely limit the Superintendent's ability to manage the department:

I am deeply concerned with the Superintendent losing the authority to create leadership positions based on student needs. Stripping the "Lead Learner" of the ability to structure their own team moves toward a system of micromanagement. Only those closest to the children—our Superintendents, and CASs—know what leadership gaps exist on the ground, whether they

pertain to academic competencies, mental health, Career Technical Education (CTE), Academy Designs, or neighbor island logistics and challenges..

Education is a specialized, high-stakes profession that requires the steady hands of those who understand the "heartbeat" of the various levels of schools.. We must trust and empower the professionals chosen to lead. I urge this committee to oppose the proposed SD 1 for HB 2567 to protect the professional autonomy of our educational system.

Mahalo,

Marlene Visitation Leary

Marlene Visitation Leary

Principal and Alumni, Kaua'i High School

HB-2567-HD-1

Submitted on: 4/3/2026 9:05:36 AM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
Garret S Zakahi	Individual	Oppose	Written Testimony Only

Comments:

To: Committee on Ways and Means; Committee on Education

From: Garret Zakahi, Principal

Date: April 03, 2026

Subject: Testimony in OPPOSITION to HB 2567 HD1 – Relating to Department of Education Personnel

Testimony in Opposition to HB 2567 HD1

To Chairs Dela Cruz and Kim, Vice Chairs Moriwaki and Kidani, and Members of the Committees:

I am writing to express my strong opposition to HB 2567 HD1. While the intent of ensuring fiscal accountability is understandable, this measure as currently drafted presents significant risks to the operational integrity and administrative autonomy of the Hawaii Department of Education (DOE).

By shifting oversight of Complex Area Superintendents (CASs) and placing statutory caps on leadership, this bill undermines the established governance structure and the Superintendent’s ability to lead effectively.

Primary Concerns Regarding HB 2567 HD1

1. Infringement on Managerial Rights and Flexibility

The proposal to establish a statutory cap on superintendent and subordinate positions is a rigid solution to a dynamic problem.

- **Operational Agility:** The Superintendent must retain the right to adjust leadership structures based on the evolving needs of Hawaii's students and schools.
- **Arbitrary Limits:** Hard caps do not account for future crises, federal mandates, or shifts in student population that may require specialized administrative oversight.

2. Improper Board Oversight of CAS Positions

Mandating that the Board of Education (BOE) conduct performance evaluations for Complex Area Superintendents (CASs) disrupts the professional chain of command.

- **Direct Reporting:** CASs report directly to the Superintendent. Moving their evaluations to the Board creates a "dual-reporting" conflict that muddies accountability.
- **Micro-management:** The Board's role is policy and high-level governance; engaging in the biennial evaluation of middle-management positions is an overreach of their intended function.

3. Violation of Personnel Privacy and Confidentiality

Perhaps the most concerning provision is the requirement for the Superintendent to provide copies of CAS performance evaluations to legislators upon request.

- **Privacy Rights:** Performance evaluations are highly sensitive personnel records. Providing these to the Legislature bypasses standard privacy protections afforded to public employees.
- **Political Interference:** Opening personnel evaluations to legislative review invites the politicization of educational leadership, which should remain merit-based and protected from external pressure.

Conclusion

As the Department has noted in its "Comments with Concerns," this bill erodes the Superintendent's managerial authority and risks the professional privacy of our educational leaders. For the Department to function efficiently, the Superintendent must have the autonomy to manage their team without undue legislative interference in specific personnel files or rigid staffing caps.

I respectfully urge the Committees to defer HB 2567 HD1.

Thank you for the opportunity to provide testimony on this important matter.

Respectfully submitted,

Garret Zakahi

Principal - Jefferson Elementary School

HB-2567-HD-1

Submitted on: 4/4/2026 11:39:43 AM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
Tracy Lui	Individual	Oppose	Written Testimony Only

Comments:

Testimony in Opposition to HB2567

TO: Senate Committee on Ways and Means (WAM) and the Committee on Education (EDU)

RE: HB2567 – Relating to Education

Chair, Vice-Chair, and Members of the Committees:

I am writing to express my opposition to HB2567, specifically regarding the proposed statutory cap on leadership positions and the transfer of performance evaluation duties to the Board of Education.

1. Opposition to an Arbitrary Statutory Cap (Section 2)

Section 2 of the bill seeks to establish a hard cap on "superintendent-level positions." I oppose the implementation of an arbitrary numerical limit on leadership. Educational needs are dynamic; a fixed cap fails to account for future growth, crisis management requirements, or the evolving complexity of our school system.

*Recommendation: Rather than an arbitrary cap, the Legislature should direct the Department to develop a data-driven process to determine appropriate staffing levels based on student population, geographic needs, and administrative necessity.

2. Concerns Regarding Board-Led Evaluations (Section 3)

The bill proposes that the Board of Education (BOE) conduct biennial written evaluations of Complex Area Superintendents (CAS). This raises significant operational questions:

- What is the deficiency in the current system? Currently, CAS are evaluated by the Superintendent, their direct supervisor. The Superintendent is best positioned to observe daily performance and operational alignment.
- What is the benefit of Board oversight? Shifting this duty to a volunteer Board risks a lack of professional expertise in the evaluation process and creates a redundant layer of bureaucracy. The Board’s role is policy and governance, not the direct management of mid-level administrative personnel.

3. Strong Opposition to Legislative Disclosure (Section 3b)

Finally, I strongly oppose the requirement that performance evaluations be "made available to any member of the legislature upon request."

- Privacy and Professionalism: These are confidential personnel records. Disclosing them to the Legislature invites political interference into professional employment matters.
- Precedent: No other class of civil servant or state executive is subjected to having their private performance reviews distributed to 76 different legislators. This provision undermines the privacy rights of employees and will severely hamper the recruitment of qualified leaders.

Conclusion

While accountability is vital, it should be handled through established administrative channels—not through political oversight or arbitrary caps. I urge the committee to hold this bill or significantly amend it to protect the professional integrity of our education system.

Thank you for the opportunity to testify.

Respectfully,
Tracy Lui
Principal
Kahului Elementary School

Date: April 5, 2026

Time: 10:30am

Location: Conference Room 211

Committee: WAM and EDU

Department: Hawaii Department of Education - Hale'iwa Elementary School

BILL: HB 2567 HD 1

Testifier: Malaea Wetzel

Position: **COMMENTS AND CONCERNS**

Aloha Chair Dela Cruz, Vice Chair Moriwaki, Chair Mercado Kim and Vice Chair Kindani,

Thank you for the opportunity to provide testimony on H.B. 2567 HD1

I would first like to sincerely thank the Committee for revising earlier versions of this bill. The removal of provisions that would have shifted principal evaluation authority to School Community Councils and disrupted the Complex Area Superintendent (CAS) structure reflects thoughtful responsiveness to the concerns of school leaders across the state. These revisions preserved the integrity of HIDOE's tri-level leadership system.

As the principal of Hale'iwa Elementary School for the past 16 years, I have served under four Complex Area Superintendents and four Superintendents. When I began as an educational officer, the Department had only one Deputy Superintendent. Over the past decade and a half, the needs of the students we serve have grown significantly in complexity, and the Department has had to evolve to meet these expanding responsibilities. This version of the bill includes structural concerns that unnecessarily blur lines of leadership and accountability and limit the Department's ability to remain responsive to a changing educational landscape.

Specifically, I would like to express concerns with the following provisions:

First, requiring the Board of Education to evaluate Complex Area Superintendents weakens clear lines of leadership and accountability. The Board is responsible for setting policy, while the Superintendent is responsible for managing personnel and executing that policy. Complex Area Superintendents report directly to the Superintendent and serve as the critical link between schools and the Department. Assigning evaluation authority to the Board creates a misalignment between governance and management, undermines the Superintendent's ability to effectively lead and supervise system leadership, and risks creating fragmented accountability.

Additionally, allowing the legislature to request access to these evaluations raises serious concerns. Personnel evaluations are inherently sensitive and are intended to support professional growth and

effective supervision within a clear chain of command. Expanding access beyond that structure may compromise confidentiality, discourage candid evaluation practices, and further blur appropriate governance boundaries.

Second, establishing a statutory cap on superintendent-level positions restricts the Superintendent's ability to effectively manage and organize the Department. Leadership structures must remain flexible to respond to evolving student needs, operational priorities, and statewide initiatives. This flexibility is essential to ensuring that schools receive the support they need. Limiting this authority in statute removes critical managerial discretion and does not reflect the complexity of operating a statewide public education system.

Hawaii's public education system depends on clear governance roles, strong leadership coherence, and appropriate managerial authority. While I appreciate the Committee's efforts to improve earlier versions of this bill, the current draft continues to raise significant concerns in these areas.

For these reasons, I respectfully urge the Committee to carefully reconsider these provisions.

Respectfully submitted,
Malaea Wetzel
Principal, Hale'iwa Elementary School

Date: April 6, 2026

Time: 10:29am

Location: 211

Committees: WAM and EDU

TO: Chair Dela Cruz, Vice Chair Moriwaki, Chair Kim, Vice Chair Kidani, and Members of the Committees on Ways and Means and Education

FROM: Barbara Oura Tavares

MEASURE: HB2567, HD1 – RELATING TO EDUCATION

POSITION: COMMENTS WITH CONCERNS

Thank you for the opportunity to submit testimony regarding HB2567, HD1. I am writing to respectfully express my strong concerns regarding the proposed administrative caps and evaluation procedures for the Department of Education (DOE) leadership.

Points of Concern:

- **Capping Superintendent-Level Positions:** I have strong reservations about capping the total number of superintendent-level positions. The decision regarding the necessity of these roles should remain under the purview of the Superintendent. With adequate justification and data—both performance-based and financial—the Department must retain the flexibility to adjust its leadership structure to meet evolving educational needs.
- **Redundant Evaluations and "Double Jeopardy":** The proposals requiring annual reporting to the legislature, mandating the Board of Education to conduct written performance evaluations of each Complex Area Superintendent every two years, and requiring the Superintendent to provide copies of these evaluations to legislators upon request are highly problematic.
 - These provisions essentially place Complex Area Superintendents in "double jeopardy." Best practices in human resources dictate that an employee should have one primary supervisor—here, the Superintendent.
 - To be formally evaluated by the Superintendent while simultaneously being scrutinized by the

Board of Education and individual legislators creates a profound sense of ambiguity. This overlap invites actions and directives that could easily be deemed arbitrary and capricious.

I respectfully ask that the Committee remove these reporting and evaluation mandates from the bill and consider alternative, more standard ways to determine the effectiveness, accountability, and productivity of the Department of Education's leadership without compromising the established chain of command.

Thank you for your time, your public service, and your thoughtful consideration of these points.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Barbara Oura Tavares', written in a cursive style.

Barbara Oura Tavares

Principal - Lihikai Elementary School

Barbara.Oura_Tavares@k12.hi.us

**Senate on Education
Monday, April 6, 2026**

10:29 a.m.

Hawai'i State Capitol, Room 211

Measure: HB 2567 HD1 Relating to Education

Testifier: Ian Haskins, Principal, Nāhi'ena'ena Elementary School

Position: Comments with Concerns

Aloha Senator Donna Mercado Kim, Vice Chair Senator Michelle N. Kidani, and Chair Donovan Dela Cruz and Vice Chair Sharon Y. Moriwaki,

My name is Ian Haskins. I am the Principal of Princess Nāhi'ena'ena Elementary School. During the critical recovery period following the Lahaina wildfires, I served as the Temporarily Assigned Principal of King Kamehameha III Elementary School—a campus completely lost in the tragedy.

I am writing to share how the leadership and support of my Complex Area Superintendent (CAS) and a Deputy Complex Area Superintendent was not merely helpful, but a structural necessity for our school's survival.

Leading a school community through an unprecedented national crisis requires a level of administrative leadership and organizational management that exceeds the traditional scope of school-level leadership. The destruction of our campus necessitated the rapid development of a temporary site at Pulelehua, involving logistics that were staggering in scale.

- **Strategic Transitions:** We managed three distinct physical transitions—from temporary learning hubs in local churches to a temporary stay at Princess Nāhi'ena'ena, and finally to our current site at Pulelehua. As a leader, my focus had to be on the morale of my teachers and the safety of our students. This was only possible because the CAS and Deputy CAS managed the high-level infrastructure and operational standards required for each move.
- **Interagency Coordination:** We were inundated with inquiries from federal and state agencies, county officials, and environmental safety teams. The Complex Area leadership served as a critical strategic filter. They managed these high-level communications and "big picture" coordination, allowing me to remain grounded and visible for my immediate school community.

During an emergency of this magnitude, the burden placed on a single campus is immense. There were moments when the volume of external demands from donors,

partners, and officials threatened to pull me away from the emotional and instructional needs of my families.

This crisis demonstrated the absolute necessity of distributed leadership. The flexibility afforded to the Superintendent to adapt the Department's structure and create essential support positions in real-time was critical; without that immediate support being made available in Lahaina, the situation for our students and staff would have looked very different. This flexibility was a game-changer. While CAS Winkle managed the relentless schedule of emergency meetings and state-level coordination, the Deputy CAS provided the direct, high-level support I needed to rebuild a sense of normalcy for my staff. This partnership was a safeguard—it ensured that while the "big picture" was being managed at the Complex level, the "human picture" was being cared for at the school level.

My experience in Lahaina taught me that in a crisis, a principal must be physically and emotionally present for their students and teachers. This is only achievable when there is a robust, two-tiered Complex Area leadership team equipped to handle the interagency hurdles. The partnership between the CAS and Deputy CAS is a vital structural asset that allows principals to stay focused on their core mission: the well-being and education of our students.

Thank you for the opportunity to share my experience and for your continued dedication to Hawai'i's students. I urge you to defer SB 3334.

Department: Education

Person Testifying: Derek Santos, Principal, Kalihi Uka Elementary School

Title of Bill: HB 2567 SD1 – Relating to Education

Hearing Date: April 6, 2026

Position: COMMENTS WITH CONCERNS

Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Senate Ways and Means Committee:

My name is Derek Santos, and I am the Principal of Kalihi Uka Elementary School. I am writing to express **strong concerns regarding the provisions in HB 2567 SD1**. The practical application of this bill creates a rigid, top-down environment which undermines the Department's ability to lead effectively.

1. Opposing Board of Education (BOE) Evaluation of CASs

The requirement for the BOE to conduct written performance evaluations of each CAS every two years is a fundamental overreach.

- **Chain of Command:** As a Principal, I report to my CAS. My CAS reports to the Superintendent. This internal chain of command ensures that evaluations are based on professional educational standards and day-to-day operational realities.
- **Political Interference:** Shifting this responsibility to the BOE—and requiring that these evaluations be handed over to legislators upon request—politicizes the role of the CAS. Our educational leaders should be evaluated by professional educators, not by a governing board or a legislative body. This creates an environment of "compliance via fear" rather than "growth via leadership."

2. Loss of Managerial Flexibility (Personnel Caps)

The proposal to cap superintendent-level positions at 27 individuals ignores the evolving needs of Hawaii's 250+ schools.

- **Arbitrary Limits:** Education is not static. Whether dealing with a pandemic, a natural disaster, or a shift in federal mandates, the Superintendent must have the managerial right to create leadership positions that address the specific needs of our students. In the past few weeks, numerous Hawai'i schools have been affected by the storms and flooding. With the help and guidance of superintendent and the other superintendent level positions in district and state office, schools are continuing to shift, adapt and evolve to meet the needs of the students, families and communities. **Education and the**

needs of students, the schools and communities are constantly evolving, Superintendent Hayashi needs to have the ability to lead with flexibility to ensure the department is also evolving.

- **Impact on Schools:** When leadership is capped by statute rather than by need, the administrative burden doesn't disappear; it simply trickles down. Without adequate state/district support, the "boots on the ground"—the Principals—will be forced to absorb even more administrative tasks, taking our focus away from the classroom.

3. Privacy and Professionalism

The provision requiring the Superintendent to provide copies of CAS evaluations to legislators upon request is highly concerning. Professional evaluations are intended to be a confidential tool for growth and accountability. Making them available for legislative review sets a dangerous precedent for all Department employees and may discourage qualified leaders from seeking these critical roles.

Conclusion

I urge the Committee to **reconsider these provisions** and allow the Superintendent the authority to manage personnel and evaluations internally.

Thank you for the opportunity to testify.

HB-2567-HD-1

Submitted on: 4/5/2026 9:12:11 AM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
Gary Kanamori	Individual	Comments	Written Testimony Only

Comments:

Committee on Ways and Means / Committee on Education

Monday, April 6, 2026 - 10:29 a.m.

Measure: HB2567, Relating to Education

Testifier: Gary Kanamori, Principal, Pukalani Elementary School

Position: Comments with concerns

Aloha Chairs Donovan M. Dela Cruz and Donna Mercado Kim and Vice Chairs Sharon Y. Moriwaki and Michelle N. Kidani,

I am Gary Kanamori and I currently serve as the Principal of Pukalani Elementary School, but during the 2023 wildfires, I was the Principal of Princess Nāhi‘ena‘ena Elementary School in Lahaina. I am writing to share my first-hand experience regarding the vital role of Complex Area leadership during an unprecedented crisis. My experience during and after the 2023 wildfires highlighted that it was critical to have a Deputy Complex Area Superintendent as additional executive-level support to respond to the unprecedented operational and instructional challenges we faced as a school community.

In the wake of the wildfires, the operational and instructional challenges we faced were staggering. As a principal, my primary focus was the immediate safety and emotional stability of my students, staff, and families. However, the sheer volume of logistics required to keep a school functioning in a disaster zone is more than any single campus leader can navigate alone. My experience highlighted that relying on a single Complex Area Superintendent (CAS) is not enough during a catastrophe. Having a Deputy CAS provided the essential executive-level support needed to manage the "macro" so I could focus on the "micro."

Imagine when my campus had to shift and share half of the entire campus with the King Kamehameha III staff and students. To navigate those physical and emotional shifts where I had to ask my team to pack their classrooms up in a matter of days and share the xerox machine with strangers was not an easy road. It took incredible coordination, mediation, and time away from the real need, our students. With the Deputy CAS in place, a second-in-command was at my

school to help coordinate bus transportation for many who lost their homes and untangle the complexity of two sets of school campuses trying to function on one campus.

The presence of a Deputy CAS allowed for a division of labor that supported our school community from the weight of administrative demands:

- **Logistical Coordination:** While I focused on my school community in front of me, the CAS team managed broader interagency operations, including temporary site allocations and rigorous environmental safety testing.
- **External Communications:** In a crisis, the demand for information from the media and the broader community is relentless. Having CAS-level leadership handle these communications ensured our messaging was unified and accurate, allowing my attention to be focused on my staff and students.
- **Strategic Partnerships:** The CAS team served as the bridge to other governmental agencies and nonprofits, streamlining the influx of aid and support so it reached our staff and students effectively.

The 2023 wildfires proved that responsiveness, accessibility, and authority at the Complex Area level are necessities. I urge you to defer HB2567.

Thank you for the opportunity to share this perspective.

Department: Hawaii Department of Education, Maui District

BILL: HB 2567, Relating to Education

TESTIFIER: Richard Carosso, Principal, Lahainaluna High School

POSITION: OPPOSITION AND COMMENTS

Testimony to the Committee on Ways and Means: Chair Donovan M. Dela Cruz & Vice Chair Sharon Y. Moriwaki and Committee on Education: Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani

Aloha Chairs and Vice Chairs,

As the Principal of Lahainaluna High School, I want to thank Legislators for the significant improvements made to SB 3334 in the second draft. By removing the provisions to abolish the Complex Area Superintendent (CAS) position and the fixed SCC weight in principal selection, you have chosen to protect the stability of our schools and the professional integrity of our leadership. This decision directly supports the localized, responsive leadership our schools depend on daily.

However, while we are grateful for the adjustments made to the Senate Bill, based on our ongoing recovery efforts on the West Side, I must express serious concerns regarding the current House Bill version and specific provisions that remain in play.

The proposed statutory limit on leadership roles is particularly worrying for those of us on the ground. In the immediate aftermath of the August 8 fires, it was the emergency established Deputy CAS position that served as a most critical asset. This role was not "administrative bloat"; it was a tactical necessity.

Our Deputy CAS was instrumental in navigating the immense bureaucracy of government agencies, coordinating fire mitigation plans, and securing resources from FEMA and other emergency entities that school-level leaders simply do not have the bandwidth to manage while also running a campus. If a statutory cap had existed then, we might have been denied the very position that allowed our schools to stay afloat. We must allow the Superintendent the authority to create these specialized roles based on actual crisis and operational demand, not arbitrary caps.

Regarding the shift toward the Board of Education evaluating CASs, I urge the Committee to reconsider. A CAS is an instructional leader who must be managed within the Department's established chain of command. When a centralized board oversees regional field leaders, it creates a "governance gap." For leadership to be effective, evaluations must be conducted by those who are intimately familiar with the instructional goals and local realities the CAS is tasked with implementing.

Finally, the requirement to share confidential CAS performance evaluations with legislative bodies is a dangerous precedent. Personnel evaluations are professional development tools

intended for internal accountability. Moving these documents into the political arena risks turning professional reviews into political leverage. This will undoubtedly make it harder to recruit and retain the high-level talent we need to lead our complex areas.

Our priority is, and must remain, the education and safety of our kids. To do that, we need a Department structure that is flexible, professional, and shielded from political shifts. I respectfully ask that the Committee continue to work with school-level leaders to ensure this bill supports, rather than restricts, our ability to lead.

Mahalo for your time and for your commitment to the students of Lahainaluna and all of Hawaii.

Respectfully,

Richard Carosso
Principal
Lahainaluna High School



LATE

STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
WINDWARD O'AHU DISTRICT
46-169 KAMEHAMEHA HIGHWAY
KANE'OHE, HAWAII 96744

**TESTIMONY TO THE SENATE COMMITTEES ON WAYS AND MEANS AND EDUCATION
RE: SB 3334, PROPOSED SD2 - RELATING TO EDUCATION**

DATE: April 5, 2026

TO: WAM Chair Donovan Dela Cruz, WAM Vice Chair Sharon Moriwaki, EDU Chair Mercado Kim, EDU Vice Chair Kidani, and Members of the Senate Committees on Ways and Means and Education

FROM: Sam Izumi, Castle-Kahuku Complex Area Superintendent and Lanelle Hibbs, Kailua-Kalaheo Complex Area Superintendent

POSITION: Comments with Concerns

Dear Chair Dela Cruz, Vice Chair Moriwaki, Chair Mercado Kim, Vice Chair Kidani, and Members of the Senate Committees on Ways and Means and Education:

We would like to thank and express our appreciation to the members of the Senate Committees on Ways and Means and Education for taking the time to review all of the testimony submitted regarding HB 2567 HD1.

As HB 2567 HD1 has changed significantly and appears to mirror SB3334 SD2, we would like to respectfully provide comments for the committee's consideration. Specifically, we have concerns regarding the requirement of the Board of Education to periodically conduct written performance evaluations of complex area superintendents as the Hawai'i State Department of Education (HIDOE) already has an established process in place.

Currently, complex area superintendents are evaluated annually by HIDOE's Deputy Superintendent of Academics, who serves as our direct supervisor. This evaluation structure should remain in place as evaluations are most meaningful and effective when conducted by an employee's direct supervisor within HIDOE that possesses the expertise and experience in school leadership. The Deputy Superintendent of Academics is someone who we regularly review our progress with and works closely with us on our implementation of the HIDOE Strategic Plan Implementation Plan, the Superintendent's priorities, and our Complex Area initiatives, focus areas, and improvement efforts as identified by our annual Comprehensive Needs Assessment processes. Maintaining this reporting and evaluation relationship and process ensures alignment, accountability, and continuity in advancing HIDOE's goals.

Furthermore, while we deeply appreciate the dedication and service of the Board of Education (Board) members and their commitment to Hawai'i's public education system, we have concerns regarding the feasibility of assigning them the responsibility for evaluating each Complex Area Superintendent given their voluntary status as Board members.

While we recognize the importance of sound fiscal management and administrative efficiency, establishing a statutory cap with a fixed numerical limit on the amount of superintendent-level positions may inadvertently constrain our Superintendent's ability to adapt to unforeseen changes and/or address emerging organizational needs. HIDOE's leadership structure must remain flexible and responsive to evolving circumstances. Imposing a statutory cap would limit HIDOE's ability to adjust its organizational framework as necessary to address future challenges and ensure both continued and sustained progress toward its strategic goals. We recommend that the cap not be implemented to allow for the Superintendent to exercise the managerial rights necessary to align leadership structures with the Department's evolving operational and instructional needs.

We respectfully submit these comments for consideration as HB 2567 HD1 continues through the legislative process. It is our hope that HIDOE will have the opportunity to work together and jointly collaborate on solutions to any issues around fiscal management and administrative efficiency.

Mahalo for your time and consideration,

Sam Izumi
Complex Area Superintendent
Castle-Kahuku Complex Area

Lanelle Hibbs
Complex Area Superintendent
Kailua-Kalaheo Complex Area

Date: Monday, April 6, 2026

Time: 10:29 AM

Place: Conference Room 211

State Capitol, 415 South Beretania Street

Committee: WAM, EDN

Department: Ka'ū-Kea'au-Pāhoa Complex Area, Hawai'i State Department of Education

BILL: HB 2567, HD1, Relating to Education

TESTIFIER(S): Joy Hohnstine

POSITION: COMMENTS WITH CONCERNS

Aloha Chair Donovan M. Dela Cruz & Vice Chair Sharon Y. Moriwaki and Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani,

My name is Joy Hohnstine. I serve as a District Educational Specialist with the Hawai'i State Department of Education. I am submitting this testimony in my individual capacity and not as a representative of the Department.

Thank you to all committee members who have received and considered testimony for iterations of this bill in the past. I appreciate your time and dedication.

I am submitting testimony today with comments and concerns related to HB 2567, HD1.

My concerns are centered around the risk of creating inequity of access, representation, and decision making for rural communities such as the one I have served for the last twenty years as an employee of the Ka'ū-Kea'au-Pāhoa Complex Area.

- **Limiting the number of Superintendent positions in statute**
 - Although I understand the importance of fiscal responsibility in our decision making as it relates to hiring practices within our very large organization, I also have concerns that a set limit in the number of superintendent positions across the state may inadvertently result in inequity for hiring practices for smaller, more rural complex areas and would open the door for future decision making to eliminate more rural complex area positions in favor of larger, more urban areas with higher population density to ensure we stay within the limit of 27 positions statewide.
- **Requiring performance evaluations of Complex Area Superintendents by the BOE**
 - I believe that performance evaluations help us improve and ensure alignment to our mission, vision, and intention to serve students. However, Complex Area Superintendents already participate in a highly regulated review process as part of

our internal department practices. This review process would appear to meet the same need the proposed BOE review is hoping to achieve.

For these reasons, I have concerns about HB 2567, HD1. Mahalo for the opportunity to testify.

Respectfully,

A handwritten signature in black ink, appearing to read "Joy C. Anderson". The signature is written in a cursive style with a large, looped initial "J" and a distinct "A" at the end.

HB-2567-HD-1

Submitted on: 4/2/2026 3:44:55 PM

Testimony for EDU on 4/6/2026 10:29:00 AM

Submitted By	Organization	Testifier Position	Testify
cheryl burghardt	Individual	Support	Written Testimony Only

Comments:

I support this bill.

Date: April 6, 2026

Time: 10:29 a.m.

Location: Hawaii State Capitol, Conference Room 211

Committee: WAM & EDU

Measure: HB2567 SD1, Relating to Education

Testifier: A. 'Iwalani Harris

Position: Comments with Strong Concerns

Dear Chair and Members of the Committee: Chair Donovan M. Dela Cruz and Vice Chair Sharon Y. Moriwaki, and Members of the Committees on Ways and Means (WAM) and Education (EDU): Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani

I am writing to express significant concerns about **HB2567 SD1**, specifically its potential to disadvantage rural and high-needs school complexes, such as the **Ka'ū-Kea'au-Pāhoa (KKP) Complex Area**. While I support the goal of fiscal management, the proposed "superintendent-level cap" and the rigid evaluation framework pose the following risks to our community:

1. **Ignoring Geographic Reality:** The bill introduces a "superintendent-level cap," which poses a risk of restricting the number of essential leadership positions across the DOE, regardless of the unique demands or student enrollment needs of complex areas. **KKP** is one of the largest and most rural complex areas in the state. A rigid cap on leadership positions is analogous to putting a cap on the number of classes without considering enrollment or the needs of students. Decisions for more direct support to our schools in distant locales like Nā'ālehu or Pāhoa in KKP are similar to those required for Lāna'i and Moloka'i. This centralized, top-down decision-making has negative ripple effects on vulnerable, rural communities.
2. **Proven Crisis and Recovery Leadership:** During the unprecedented challenges of the pandemic, I witnessed our Complex Area Superintendents (CASs) provide the steady, localized leadership necessary to support our students, families, teachers, and administrators. They were on the ground with us, ensuring that our rural schools were not forgotten and that every child had what they needed to continue learning. Furthermore, accounts from my visit to Lahaina schools following the fires confirm the vital guidance and commitment provided by CAS leadership to school administrators in their communities as well.

3. **Unfair Evaluation Metrics:** Section 3 mandates evaluations based heavily on "student academic outcomes". In KKP, our schools serve high populations of English Learners and economically disadvantaged students. Evaluating a CAS every two years based predominantly on these metrics fails to account for the severe lack of resources, high teacher turnover, and the substantial challenges inherent in serving high populations of English Learners and economically disadvantaged students. This framework risks unfairly penalizing executive leaders for systemic issues they are actively working to overcome.

4. **The Burden of Rural Service:** The requirement to report specific travel expenses for CAS positions may inadvertently target rural leaders. In KKP, visiting our schools requires significantly more travel than in urban complexes. I am concerned this transparency measure could be used to justify cutting essential "on-the-ground" leadership time in our remote campuses and our connection as a tri-level system.

In conclusion, the proposed bill encourages centralized, "top-down decision-making" that could negatively affect leadership in vulnerable, rural communities across the state. Given the indispensable nature of the Complex Area Superintendent role in managing the unique challenges and vast geographic expanse of our rural complexes, and recognizing the disproportionate negative impact the proposed evaluation metrics and travel restrictions would have on essential leadership, I respectfully urge this Committee to **reject HB2567 SD1**. This measure will compromise the effectiveness and stability of leadership in high-needs, rural communities.

Mahalo for the opportunity to testify.

Respectfully,

'Iwalani Harris,
District Educational Specialist and educator of 34 years

Date: April 6, 2026

Time: 10:29 a.m.

Location: Hawaii State Capitol, Conference Room 211

Committee: WAM & EDU

Measure: HB2567 SD1, Relating to Education

Testifier: Elaine Higa, District Educational Specialist (Literacy)

Position: Comments with Strong Concerns

Dear Chair and Members of the Committee: Chair Donovan M. Dela Cruz and Vice Chair Sharon Y. Moriwaki, and Members of the Committees on Ways and Means (WAM) and Education (EDU): Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani

I am writing to express significant concerns regarding **HB2567 SD1**, specifically its potential to undermine literacy initiatives and student achievement in rural and high-needs school complexes like the Ka'ū-Kea'au-Pāhoa (KKP) Complex Area. While fiscal management is a worthy goal, the proposed "superintendent-level cap" and rigid evaluation framework pose the following risks to our literacy progress:

1. **Impeding Literacy Coaching and Support:** The "superintendent-level cap" threatens the very leadership structure required to implement evidence-based literacy instruction. In KKP, one of the state's most rural areas, providing equitable access to literacy specialists and instructional coaching is a logistical challenge. A rigid cap on leadership positions restricts our ability to deploy specialized support directly to schools in distant locales like Nā'ālehu or Pāhoa. Literacy improvement requires frequent, on-site modeling and feedback; top-down, centralized decision-making often overlooks the travel and time requirements necessary to support teachers in remote classrooms.
2. **Disrupting Curricular Fidelity:** During times of crisis or transition, our Complex Area Superintendents (CASs) have been essential in maintaining the stability of our district-wide literacy frameworks. Whether navigating pandemic recovery or recent environmental disasters, CAS leadership ensures that literacy remains a priority and that instructional resources reach our most vulnerable learners. This localized leadership is vital for ensuring that complex-wide literacy initiatives are not just mandated, but effectively executed and sustained.
3. **Unrealistic Evaluation of Literacy Growth:** Section 3 mandates evaluations based heavily on "student academic outcomes" every two years. In KKP, where we serve high populations of English Learners (EL) and economically disadvantaged students, literacy gains often follow a trajectory that requires sustained, multi-year intervention. Evaluating executive leadership predominantly on short-term metrics fails to account for the systemic challenges of teacher turnover and the time required to close significant

reading gaps in high-needs populations. This framework risks penalizing leaders for the very socioeconomic factors they are working to address through specialized literacy programming.

4. **Disincentivizing Rural Instructional Oversight:** The requirement to report specific travel expenses targets the very activity essential for literacy specialists: being in schools. In a rural district, travel is not an administrative "extra"; it is the only way to ensure that a student in a remote campus receives the same quality of literacy instruction as a student in an urban center. Restricting or scrutinizing this movement compromises our "tri-level" connection and our ability to provide hands-on instructional leadership where it is needed most.

In conclusion, HB2567 SD1 encourages a "one-size-fits-all" approach that is detrimental to the specialized needs of literacy instruction in rural Hawaii. To ensure every child in our complex reaches reading proficiency, we need flexible, localized leadership—not a centralized cap that distances support from the students who need it most. I respectfully urge this Committee to **reject HB2567 SD1**.

Mahalo for the opportunity to testify.

Respectfully,

Elaine Higa

District Educational Specialist (Literacy) Ka'ū-Kea'au-Pāhoa Complex Area

Date: April 6, 2026

Time: 10:29 a.m.

Location: Hawaii State Capitol, Conference Room 211

Committee: WAM & EDU

Measure: HB2567 SD1, Relating to Education

Testifier: Darren Higa

Position: Comments with Strong Concerns

Dear Chair and Members of the Committee: Chair Donovan M. Dela Cruz and Vice Chair Sharon Y. Moriwaki, and Members of the Committees on Ways and Means (WAM) and Education (EDU): Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani

I am writing today as a dedicated parent of two students in the Hilo-Waiakea Complex Area to express my strong opposition to **HB2567 SD1**. While I understand the desire for fiscal responsibility, I am deeply concerned that the proposed "superintendent-level cap" and rigid evaluation framework will directly hurt the quality of education my children receive.

As a parent, I see firsthand the challenges our schools face, and I believe this bill poses significant risks to our students' progress:

- **Threatens Direct Support for Teachers and Students:** The "superintendent-level cap" targets the leadership positions that provide vital support to our schools. My children's teachers rely on complex-area specialists and coaches to stay current on the best teaching methods. Reducing this local leadership means fewer experts in our Hilo and Waiakea classrooms, leaving our teachers with less support and our students with fewer resources.
- **Destabilizes Our Local Schools:** Our Complex Area Superintendents (CASs) are the ones who understand our specific community needs. Whether dealing with local emergencies or implementing new literacy programs, having leadership close to home ensures stability. This bill risks replacing that localized knowledge with a "one-size-fits-all" approach from Honolulu that doesn't account for the unique strengths and needs of our Hilo-Waiakea schools.
- **Unfairly Judges Student Progress:** This bill mandates evaluations based heavily on short-term academic outcomes. Every child learns at a different pace, and our schools serve a diverse population with various needs. Judging our school leaders primarily on two-year test scores is a narrow view that ignores the long-term growth and systemic work required to help every student succeed—especially those who may be struggling or have unique learning requirements.
- **Discourages Presence in Our Schools:** I want our educational leaders to be present in my children's schools, not stuck behind a desk in a central office. By scrutinizing travel and limiting the movement of specialists, this bill makes it harder for the people in charge

to actually see what is happening in our classrooms. We need leaders who are visible and accessible to parents and teachers alike.

In conclusion, HB2567 SD1 prioritizes administrative caps over the actual needs of our students. To ensure my children and their peers in the Hilo-Waiakea area reach their full potential, we need the flexibility of local leadership—not more centralized restrictions.

I respectfully urge this Committee to **reject HB2567 SD1**. Mahalo for your time and for the opportunity to share a parent's perspective.

Mahalo for the opportunity to share a parent's perspective on this critical matter.

Sincerely,

Darren Higa

Parent, Hilo-Waiakea Complex Area

Aloha Chair Dela Cruz, Chair Kim, Vice Chair Moriwaki, Vice Chair Kidani, and Members of the Committee:

Thank you for the opportunity to provide testimony on HB 2567 HD1.

I appreciate that the complex area structure was maintained, which plays an important role in supporting schools and ensuring that leadership remains connected to the unique needs of our communities. As a first-grade teacher in a Title I school serving a high population of English Learners, I rely on strong, responsive leadership at the complex area level to support instruction, resources, and student success.

However, I respectfully oppose HB 2567 HD1 due to several significant concerns:

First, the requirement that the Board of Education conduct performance evaluations of Complex Area Superintendents raises concerns about the appropriate roles and responsibilities within the Department. Effective evaluation systems should remain aligned with the Superintendent's managerial authority to ensure coherence, consistency, and accountability. Shifting this responsibility risks creating confusion, duplication, and misalignment in leadership oversight.

Second, allowing legislators to request access to individual performance evaluations introduces serious concerns regarding confidentiality, professional integrity, and the potential politicization of educational leadership. Evaluations are intended to support growth and improvement, not to be subject to external pressures that may undermine trust within the system.

Third, placing a statutory cap on superintendent and subordinate superintendent positions limits the Department's ability to respond flexibly to evolving student and school needs. In a diverse and dynamic system like Hawai'i's, leadership structures must remain adaptable. Restricting this authority could hinder the Department's ability to allocate resources effectively and provide necessary support to schools, particularly those serving vulnerable populations.

Finally, while transparency and accountability are essential, the annual reporting requirements, combined with the provisions above, may create additional administrative burdens without directly improving student outcomes.

In my classroom, my focus is on meeting the wide-ranging academic and social-emotional needs of young learners. I depend on a system of leadership that is stable, responsive, and focused on supporting schools—not one constrained by structural limitations or subject to external interference.

For these reasons, I respectfully urge the Committee to oppose HB 2567 HD1.

Thank you for your consideration.

Mahalo,
Keith K. Sakanashi
First Grade Teacher

TESTIMONY TO THE HOUSE EDUCATION COMMITTEE

RE: HB 2567, HD1 - RELATING TO EDUCATION

DATE: April 5, 2026

TO: Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee

TO: Chair Mercado Kim, Vice Chair Kidani, and Members of the Committee

FROM: Debra Heyler, Vice Principal

POSITION: COMMENTS WITH CONCERNS

Aloha Chair Dela Cruz, Vice Chair Moriwaki, Chair Mercado Kim, Vice Chair Kidani, and Members of the Committees:

First of all, I would like to thank the Senate Ways And Means Committee for maintaining the current complex area structure. Complex Area Superintendents (CAS) provide indispensable localized oversight and expert mentorship that a centralized district simply cannot replicate.

However, I must share the following concerns regarding HB 2567, HD1.

Capping the number of superintendent-level positions: CASes are essential to ensuring timeliness in critical responses, uniformity and consistency, and expert mentorship. Each school is on a trajectory of academic improvement with the guidance and support of our CAS. Being limited by a statutory cap that will impact the current systems and structure may have a consequential impact on student achievement and staff morale.

CAS evaluations by the BOE: I have concerns regarding the Board of Education conducting CAS evaluations. To maintain a clear chain of command, our regional leaders should be evaluated by the Superintendent and deputy leadership, who possess a deeper, day-to-day understanding of our statewide initiatives. Keeping this oversight within the Department ensures that those who truly understand the work are the ones guiding it.

CAS Evaluations to the Legislature: Finally, the requirement that the Superintendent must provide copies of CAS performance evaluations to legislators upon request is also concerning. Personnel evaluations should remain confidential professional documents used for growth and accountability within the Department. Making these evaluations available to political bodies risks politicizing leadership roles and may deter high-quality candidates from seeking or remaining in CAS positions.

I urge you not to consider extra oversight measures. The Department should maintain the independence to evaluate and manage its own leadership team.

I respectfully encourage the Committees to continue working alongside the Superintendent and our school-level leaders to further refine this measure. Mahalo for your time and for your dedicated service to Hawaii's public schools.

Respectfully,
Debra Heyler
Vice Principal

Date: April 6, 2026

Time: 10:29 a.m.

Location: Hawaii State Capitol, Conference Room 211

Committee: WAM & EDU

Measure: HB2567 SD1, Relating to Education

Testifier: Wilma Roddy

Position: Comments with Strong Concerns

Dear Chair and Members of the Committee: Chair Donovan M. Dela Cruz and Vice Chair Sharon Y. Moriwaki, and Members of the Committees on Ways and Means (WAM) and Education (EDU): Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani

I am writing to express significant concerns about **HB2567 SD1**, specifically its potential to disadvantage rural and high-needs school complexes, such as the **Ka'ū-Kea'au-Pāhoa (KKP) Complex Area**. While I support the goal of fiscal management, the proposed "superintendent-level cap" and the rigid evaluation framework pose the following risks to our community:

1. **Boots on the ground.** A "cap" on leadership positions might sound efficient, but it ignores how big and spread out our area is. When you're out in Nā'ālehu or Pāhoa, you're not looking at data—you're looking at faces. These schools are remote, and they need leaders who aren't just managing from afar, but are actually there on the ground with us. Deciding on a leadership cap without looking at the map is like trying to run a school based on a theory rather than what's actually happening in the classrooms.
2. **We need leaders who show up when things get hard.** During the pandemic, our Complex Area Superintendents (CASs) were the ones making sure our rural kids didn't fall through the cracks. They weren't just "executives"—they were on the ground with us. We saw the same thing in Lahaina; when the world turned upside down, it was that local, steady leadership that kept the schools together.
3. **The "scoreboard" isn't fair.** This bill wants to judge a leader's success almost entirely on test scores. In KKP, we have so many students with English as a second language or dealing with the reality of being economically disadvantaged. We also have to navigate high teacher turnover. Judging a leader every two years based on scores, without looking at the uphill battle they're fighting, is just plain unfair. It punishes people for doing the hard work in the places that need them most.

4. **Travel isn't a "luxury" for us.** This bill wants extra reporting on travel expenses, which feels like a penalty for being rural. In KKP, we *have* to drive to see our kids and our teachers. I'm afraid this will be used as an excuse to cut back on "on-the-ground" time, which is exactly what keeps our remote campuses connected to the rest of the state.

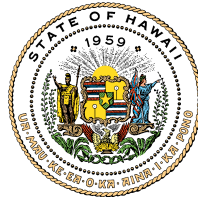
At the end of the day, this feels like "top-down" decision-making that leaves rural families behind. Our students in these high-needs areas deserve stable, present leadership. Please, **reject HB2567 SD1**. Don't make it even harder for our rural schools to get the support they need.

Mahalo for the opportunity to testify.

Respectfully,

Wilma Roddy
Complex Academic Officer and Educator for over 23 years

JOSH GREEN, M.D.
GOVERNOR



KEITH T. HAYASHI
SUPERINTENDENT

STACEY BELLO
COMPLEX AREA SUPERINTENDENT

STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
KA'Ū/KEA'AU/PĀHOA COMPLEX AREA
16-588 KEA'AU-PĀHOA ROAD
KEA'AU, HAWAII 96749

OFFICE OF THE COMPLEX AREA SUPERINTENDENT

April 5, 2026



DATE: Monday, April 6, 2026

TIME: 10:29 am

LOCATION: Room 211

BILL: HB 2567 HD1

TESTIFIER: Stacey Bello, Complex Area Superintendent
Ka'ū-Kea'au-Pāhoa Complex Area

POSITION: Comments with Continued Significant Concerns

TO: Committee on Ways and Means: Chair Donovan M. Dela Cruz & Vice Chair Sharon Y. Moriwaki
Committee on Education: Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani

My name is Stacey Bello and I currently serve as the Complex Area Superintendent (CAS) of the Ka'ū-Kea'au-Pāhoa complex area on Hawai'i Island. I am resubmitting my testimony that originally addressed SB 3334 SD 1, which has now surprisingly been morphed into HB 2567 HD1. Regardless of the bill number, my reasons for concern have not changed.

Today, I am writing again to express significant concerns with now HB 2567 HD1 (formerly SB 3334 SD2), which continues to mandate that the Board of Education (Board) conduct biennial written performance evaluations of CAS positions and make CAS evaluations available to all legislators. This measure also significantly limits the ability of our State Superintendent to run his department.

While I fully support the spirit of transparency intended by this bill, the proposed evaluation structure creates a fundamental conflict in the established line of authority and poses several operational risks.

1. Blurring the Lines of Authority

Under the current organizational structure, the Superintendent of Education is the chief executive officer responsible for the internal management of the Department. CASs report directly to the Deputy Superintendent and all superintendent positions fall under the larger umbrella of Superintendent Hayashi.

AN EQUAL OPPORTUNITY EMPLOYER

By shifting the evaluation of our CAS positions to the Board, the bill bypasses the Superintendent's executive authority. If the Board, which is a policy setting body, becomes the direct evaluator of complex area superintendents, it creates a dual report scenario that leads to administrative confusion and undermines the Superintendent's ability to manage and lead his top leadership team. Transitioning these evaluations to the Board risks a breakdown in the already established chain of command. Such a shift could undermine the administrative clarity required to effectively lead and support our complex area schools.

2. Disconnect Between Supervision and Evaluation

Effective performance evaluations should be conducted by an individual with the most direct, day-to-day oversight of the employee's work. The Deputy Superintendent is intimately involved in the operational directives and strategic goals of all 15 complex areas. Each CAS is held to a high performance standard as we are expected to carry out our assigned responsibilities that focus on student achievement, school empowerment, systems of accountability, support and evaluation of school leaders, growing our school level talent and overall operational leadership in our specific and unique complex area environments. The complexity of this role requires a reporting structure, led by a supervisor with direct experience as a complex area superintendent, to ensure instructional and operational alignment. This shared expertise ensures that guidance and annual evaluations are informed by a deep, first hand understanding of the position's unique challenges.

In contrast, the Board is a volunteer body with significant existing responsibilities who operates at a 30,000 foot policy level. Adding the requirement to conduct detailed, biennial written evaluations for 15 complex area leadership positions is an immense administrative undertaking that may distract from their primary mission of statewide policy development for the Department. Because Board members provide oversight from a strategic distance, they may not see the day-to-day interactions and the specific data needed to fully evaluate the leadership and management skills of a complex area superintendent, especially those on the neighbor islands in very rural communities like mine.

3. Confidentiality of Employee Evaluations

Personnel evaluations are designed as confidential tools to foster internal accountability and professional growth. HB 2567 HD1 (formerly SB 3334 SD2) specifically targets the 15 Complex Area Superintendents and mandates that our evaluations be made available for review by all legislators. To maintain the integrity of the evaluation process, I advocate for the continued protection of these records. Personnel evaluations are most effective when they remain confidential between the employee and those within their direct line of authority, ensuring a focused and professional accountability structure. Extending special access to these documents for legislative review would deviate from the confidentiality protections traditionally afforded to all public employees.

Based on these concerns, I respectfully urge you to vote no on HB 2567 HD1 (formerly SB 3334 SD2).

Thank you for the opportunity to provide written testimony on this important matter.

LATE

Date: April 6, 2026

Time: 10:29 am

Location: Conference Room 211 and Videoconference

Committee: WAM

Department: Hawaii Department of Education - Hickam Elementary School

BILL: HB 2567 Relating to Education: Elimination of the Complex Area Superintendent Position

Testifier: Patrick Wetzel

Position: Comments with Concerns

Aloha Chair Donovan M. Dela Cruz & Vice Chair Sharon and Chair Donna Mercado Kim & Vice Chair Michelle N. Kidani, and Members of the Committee:

I am writing to express my opposition to HB 2567, which proposes the repeal of the Complex Area Superintendent (CAS) position. As an Educational Officer who has worked under two different Complex Area Superintendents and served as the Hickam Principal for the past five years, I can attest that the role of CAS is not merely administrative; it is fundamental to the stability and growth of our schools and their leaders.

The repeal of this position would have a profound negative impact on our educational system for the following reasons:

1. Leadership Development and Vision

Complex Area Superintendents are vital architects of a unified vision for our schools. Beyond managing operations, they provide intentional professional development in Safety & Security, Instructional Leadership, and Multi-Tiered Systems of Support. Their thought leadership is essential in helping us build robust systems and cultivate high-performing leadership teams

Furthermore, the CAS strategically manages the recruitment and orientation of new principals, ensuring candidates possess the right cultural and professional fit for our unique communities—such as the military culture at Hickam. In addition, they prioritize long-term capacity building by actively recruiting future educational officers and providing teacher leaders with the opportunities necessary to dive into educational leadership.

2. Stability in High-Fluctuation Environments

At Hickam Elementary, a school with a 100% military-impacted student body, our enrollment numbers fluctuate constantly. This creates significant budgetary and operational stress. Having a CAS who understands these nuances is paramount. When our school does not meet projected enrollment counts, the CAS provides the necessary advocacy and support to ensure our operations remain funded and functional.

3. Critical Crisis Management

The CAS is the "boots on the ground" coordinator during emergencies. During the 2021 Red Hill Water Crisis, our CAS was indispensable. He deployed his district team and worked directly with us to develop essential systems for safe drinking, handwashing, and cooking. Without a localized CAS, the response to such a crisis would be fragmented and significantly slower, putting students at risk.

Complex Area Superintendents serve as the essential arbitrator for high-level conflicts. By managing complex personnel investigations and labor grievances, the CAS ensures strict adherence to state mandates while mitigating legal risks. Simultaneously, they act as a vital objective third party for parental concerns that reach an impasse.

4. Holistic Support for Educational Officers


The role of a school Principal is uniquely demanding and can be incredibly isolating. Leadership at the school level requires a partner in the field who can provide high-level counsel on sensitive issues. The Complex Area Superintendents I have served under have been that essential partner, supporting my growth as an Educational Officer and my resilience as a person. When I lost my brother during my first month as Principal at Hickam, his support was the bridge that allowed me to continue leading my school effectively.

Conclusion

Repealing the CAS position would eliminate the exact support system that allows Principals to thrive and schools to succeed during times of crisis and transition. I strongly urge the committee to hold HB 2567 and ensure this vital position remains in place.

Thank you for your time and for your commitment to our students and educators.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Wetzel". The signature is fluid and cursive, with the first name being more prominent.

Patrick Wetzel
Hickam Principal