

**SB-3334-SD-1**

Submitted on: 2/23/2026 4:38:08 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Ned Uemae	Testifying for Department of Education	Oppose	Written Testimony Only

Comments:

Dear Chair, Vice Chair, and Members of the Senate,

My name is Ned Uemae, and I serve as the Principal of Nu'uaniu Elementary School. I am writing to express my strong opposition to Senate Bill 3334.

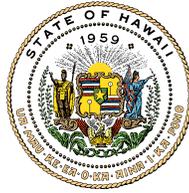
Our Complex Area Superintendent has been instrumental in advancing our complex area and supporting the continued growth of our schools. She understands the unique structures, strengths, and needs of each individual school and provides timely guidance and meaningful support to school administrators. Her leadership has been critical in helping principals navigate challenges, implement initiatives effectively, and remain focused on student achievement.

In addition, she plays an active and essential role in the school improvement process, ensuring alignment, accountability, and equitable support for all students. Eliminating this position would disrupt the progress we have made and weaken the system of support that enables schools to function effectively.

I am also concerned that removing this level of leadership while shifting full governance to School Community Councils (SCCs) would compromise the role of principals and create inconsistency in decision-making across schools. The Complex Area Superintendent provides a necessary balance of oversight, expertise, and coordination that ensures stability and student-centered leadership.

For these reasons, I strongly oppose Senate Bill 3334.

Thank you for your time and consideration.



**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
**KA 'OIHANA HO'ONA'AUAO**  
Pōmaika'i Elementary  
4650 S. Kamehameha Ave.  
Kahului, HI 96732

Dear Committee on Ways & Means,

I am writing this letter on behalf of myself in opposition to SB 3334. Although I do believe in the importance of a School Community Council, I do not feel that the council should be empowered to have significant authority over a Principal's selection and/or evaluation. Not all council members are focused on doing what's best for students as a whole and some could be doing what's best only for THEIR student and their beliefs and values. The role of overseeing what's best for students needs to remain in the authority of the Principal and his/her staff. The current role and authority for the council to provide insight into the decision-making process should remain as it is written.

Each school has its own school community council by-laws, so how will the State manage consistency across all of the schools with this new authority? What checks and balances are in place to ensure that the council is fair, equitable, and just? What happens when conflict exists between members of the council and whose responsibility will it be to create harmony and co-existence when opinions strongly differ? How will this dynamic change the role of a Principal, since the council would be responsible for a good majority of their evaluation? Are we sure that we want this level of influence and leverage given to parents and community members who may have no teaching or school experience? Principals will lose more autonomy and authority with this new Bill. The job is challenging as it is. This new layer, would in turn, create more bureaucracy within the school community for us to navigate.

The elimination of the Complex Area Superintendent (CAS) would be absolutely detrimental to the DOE. The major issues of the DOE are not related to the CAS position at all. The CAS is a lifeline for us when we need support. The day-to-day duties of a Principal are complex and never-ending. Not having a direct line to my supervisor (CAS) and depending on a District Administrator, who would then be tasked with overseeing even more schools than a CAS, will not work effectively. I agree that our DOE is very large and at times can be seen as "top-heavy." However, eliminating the CAS position will not create more efficiency for less money.

Lastly, I respect the work that you all are doing. I know that we can relate with each other to the constant judgement placed on us as public figures and that there seems

to be more complaints than compliments on any given day. It saddens me to watch news clips and recordings of our public officials categorizing and calling us disrespectful and rude. I have not once been rude or disrespectful to a legislator. I value your civil service and have a belief that each legislator is doing their best to improve the livelihood of our communities. What I can tell is that since COVID, our communities, our parents, and our children have changed adversely. Family values, family past times, and family beliefs have severely shifted. The challenges that all schools are facing right now are enormous. We need to work together to help resolve these challenges and in order for that to take place we need to trust each other and have faith in expertise and roles. The Education Committee heard the voices of the Principals and yet the measure is still moving forward. This is not the time to make a drastic change in authority at schools. This is a time to listen intently to Principals and have trust in the process. Since Superintendent Hayashi has come on board, I have a renewed sense of faith in upper leadership and continue to bring my best to school everyday regardless of the difficulties. We are making positive changes at school and we need your help and support. We don't need more scrutiny and oversight. We need your trust.

Submitted Respectfully,

A handwritten signature in black ink that reads "Timothy Shim". The signature is written in a cursive, flowing style.

Timothy Shim  
Principal

**Date:** February 25, 2026

**Time:** 10:55 am

**Location:** Conference Room 211 and Videoconference

**Committee:** WAM

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

**BILL:** SB 3334 Relating to Education: Elimination of the Complex Area Superintendent Position

**Testifier:** Patrick Wetzel

**Position: OPPOSITION AND COMMENTS**

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

I am writing to express my opposition to SB 3334, 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 SB 3334 and ensure this vital position remains in place.

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

Sincerely,



Patrick Wetzel  
Hickam Principal

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:27:14 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Theodore Mura	Testifying for Hawaii Department of Education	Oppose	Written Testimony Only

Comments:

To the Honorable Members of the Committee:

My name is Ted Mura, and I am the proud principal of Prince Jonah Kuhio Elementary School. I am writing to express my continued and unwavering opposition to SB 3334. While the latest amendments to the bill suggest a compromise by retaining the Complex Area Superintendent (CAS) position, the proposal to slash the number of these leaders from fifteen down to seven remains a dangerous and detrimental move for Hawaii’s public education system. This drastic consolidation is not a matter of streamlining; it is a fundamental dismantling of the local leadership structure that our schools, teachers, and students rely on for stability and advocacy.

The shift toward a seven-CAS model would effectively create "super-complexes," forcing a single individual to oversee a massive and unmanageable number of schools. Hawaii’s unique geography and the distinct socioeconomic identities of our communities require a leadership touch that is present and personal. When a superintendent is spread across forty or more campuses, they lose the ability to truly know their principals, the specific challenges of their student populations, and the unique needs of the families in those areas. This bill prioritizes administrative convenience over the actual efficacy of school oversight, moving us toward a distant, cold bureaucracy rather than a responsive educational system.

Furthermore, this reduction will inevitably create an administrative bottleneck that will stall progress and crisis management across the state. Currently, the CAS serves as the primary bridge for resolving high-stakes issues—ranging from student discipline appeals to facilities emergencies—that would otherwise languish in the State Superintendent’s office. By doubling the workload of the remaining seven superintendents, SB 3334 ensures that response times will slow and critical decisions will be delayed. This isolation will leave our principals without a reachable mentor and our school community councils without a local authority to hear their concerns, ultimately leading to higher rates of educator burnout and community frustration.

I am deeply concerned that our most vulnerable and rural schools will be the first to suffer under this consolidated model. In a system where only seven voices represent the entire state's diverse complexes, the needs of smaller or geographically isolated schools will inevitably be drowned out by the demands of larger, high-density districts. We should be looking for ways to bring leadership closer to our students, not pushing it further away. Reducing our local leadership by more than half is not a solution for efficiency; it is a recipe for a systemic breakdown that

Hawaii's children cannot afford. I urge the committee to reject SB 3334 and maintain the current fifteen CAS positions to ensure every school community remains heard and supported.

Respectfully submitted,

Ted Mura

Principal, Prince Jonah Kuhio Elementary School

**Date:** Wednesday, February 25, 2026

**Time:** 10:55 am

**Location:** Room 211

**Committee:** WAM

**Bill:** SB 3334 SD1: Relating to Education

**Testifiers:** Kasie Kaleohano, Complex Area Superintendent, Hilo-Waiākea  
Stacey Bello, Complex Area Superintendent, Ka'ū-Kea'au-Pāhoa  
Janette Snelling, Complex Area Superintendent, Honoka'a- Kealakehe-  
Kohala-Konawaena

**Position:** Oppose with Comments

Dear Chair Dela Cruz, Vice Chair Moriwaki and Members of the WAM Committee

As the three Complex Area Superintendents (CAS) representing the diverse and geographically vast school communities of Hawai'i Island, we are writing to collectively express our strong opposition to Senate Bill 3334 SD1. While we share the goal of ensuring excellence in school leadership, we believe this measure fundamentally undermines the established systems that ensure our principals are supported, evaluated, and held accountable by those with direct educational expertise.

## **The Critical Role of the CAS**

The role of a Complex Area Superintendent is not merely administrative, it is deeply instructional and relational. All three of us collectively have over 90 years of experience in cultivating relationships and building community partnerships in our respective areas. We serve as the primary bridge between state-level policy and the daily realities of our classrooms. Our core mission involves:

- **Direct Principal Support:** We provide hands-on mentorship and professional development tailored to the specific needs of our school leaders and the communities they serve.
- **Contextual Oversight:** We understand the unique cultural, geographical, environmental and socio-economic landscape of our specific island communities, from the rural reaches of Ka'ū, Pāhoa, North Kohala, and Honokaa to the growing hubs of Kona and Hilo.
- **Systemic Accountability:** We are responsible for the holistic performance of our complexes, ensuring that school-level decisions align with student achievement goals.

## **The Need for Educational Expertise in Leadership Decisions**

SB 3334 SD1 proposes shifts in the hiring and evaluation processes of school principals. We firmly believe that educational leadership must be evaluated by experienced educators. Principalship is a specialized profession requiring a deep understanding of pedagogy, curriculum standards, English Learners, Special Education, and other relevant educational law. Removing or diminishing the CAS's role in these processes risks placing hiring decisions in the hands of those who may not fully grasp the complex instructional requirements of a school. Our current processes are designed to ensure that a principal is not just an operational manager, but an instructional leader.

## **Existing Robust Processes**

It is important to note that rigorous systems for principal selection and evaluation already exist. The current Department of Education (DOE) framework includes:

1. **Comprehensive Evaluations:** Regular, data-driven assessments of a principal's impact on school climate and student growth.
2. **Stakeholder Input:** Mechanisms that already allow for community and staff feedback during the hiring and evaluation process.
3. **Certification Standards:** Strict prerequisites that ensure candidates have the necessary foundational training before they ever step into an interview.

## **The Geographic Reality of Hawai'i Island**

Finally, Hawai'i Island presents unique logistical and geographical challenges. For two of us, it takes anywhere from 1.5-2.0 hours to travel one way between the two furthest schools within the complex area we serve. Having one District Superintendent to oversee the entire island will destroy the relationship, oversight and support that currently exists with our schools.

Our "Big Island" requires a localized, active leadership structure. Centralizing or altering these processes through the lens of SB 3334 SD1 threatens to ignore the "boots-on-the-ground" knowledge and presence that we maintain and the timely response to school situations we can provide. Under the current structure of three Hawai'i Island CASs, we are best positioned to understand which leaders will thrive in our specific island environments and how to support them effectively across long distances.

We urge you to trust the expertise and experience of our Hawai'i Island educational leaders and maintain the integrity of our current support and evaluation systems.

Mahalo for your consideration of our testimony.

## TESTIMONY IN OPPOSITION TO S.B. NO. 3334, S.D. 1 RELATING TO EDUCATION

**TO:** The Senate Committee on Education

**FROM:** Principal, Keaukaha Elementary School

**POSITION: OPPOSE S.B. NO. 3334, S.D. 1; REQUEST THE COMMITTEE HOLD THIS BILL**

To the Honorable Chair, Vice Chair, and Members of the Committee:

I am writing as the Principal of Keaukaha Elementary School to express my **strong opposition** to S.B. No. 3334, S.D. 1. While the legislature's stated intent is to reduce "administrative burdens" and "unclear authority structures," this measure instead creates a period of significant structural instability and moves our schools toward a more centralized governance model that distances decision-making from our local communities. **I respectfully request that the committee hold this bill.**

The transition from "Complex Areas" to an "unspecified number of districts" creates immediate uncertainty for our staff and students. At Keaukaha Elementary, our current complex structure allows for a cohesive "K-12" alignment where elementary, middle, and high schools work together under a shared administrative officer. By repealing this model, the bill risks breaking the "articulated and aligned K-12 standards-based curriculum" that we have worked hard to build for our students.

This bill fundamentally shifts the balance of power within the Department of Education:

- The bill clarifies that the Superintendent of Education—not a local leader—shall have final authority to appoint a principal. This centralization undermines the role of our local School Community Councils (SCC).
- The newly established District Superintendents for Academics and Deputy District Superintendents are given direct authority over principals to ensure "consistent direction". While the bill claims to empower principals to "personalize efforts," the reality is that we will be subject to multiple layers of new district leadership appointed directly by the state Superintendent.
- For critical safety and disciplinary matters—such as the preclusion of a child from school for moral or disciplinary reasons—authority is shifted from a known Complex Area Superintendent to a "district superintendent," yet the bill does not specify how many districts will exist or how these new leaders will be distributed.

Our staff relies on the current complex area system for direct personnel, fiscal, and facilities support. Replacing a localized Complex Area Superintendent with a District Superintendent for Academics—who is subject to an annual performance evaluation by the Board of Education rather than being accountable to the schools they serve—threatens the responsiveness of the department to our school's specific needs.

S.B. No. 3334, S.D. 1 proposes to dismantle a localized support system in favor of a rebranded district structure that centralizes power and creates unnecessary administrative churn. For the stability of Keaukaha Elementary and the students we serve, we need clear, localized support, not more state-level appointments and "unspecified" district boundaries.

Please hold S.B. No. 3334, S.D. 1.

Mahalo,



Vincent Venzon

Principal Keaukaha Elementary School

**Date:** Wednesday, February 25, 2026

**Time:** 10:55 AM

**Location:** Conference Room 211 & Videoconference

**Committee:** WAM

The Honorable Donovan M. Dela Cruz, Chair  
The Honorable Sharon Y. Moriwaki, Vice Chair  
and Members of the Senate  
State Capitol, Room 208  
Honolulu, Hawaii 96813

Bill No. SB 3334, SD1 RELATING TO EDUCATION

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

We write in strong opposition to Senate Bill 3334 (SB3334), which proposes a major reorganization of the Hawai'i Department of Education (HIDOE) by repealing the position of Complex Area Superintendent (CAS) and dissolving the current complex area administrative structure.

While we understand the stated intent of reducing administrative burdens, this proposal would consolidate two complex areas into a single, significantly larger district and fundamentally alter the level of leadership, responsiveness, and support currently provided to our schools.

At present, our schools are organized into two complex areas. One serves the 'Aiea, Moanalua, and Radford complexes, including schools connected to Joint Base Pearl Harbor-Hickam. The other serves the Leilehua, Mililani, and Waialua complexes, including schools connected to Schofield Barracks and Wheeler Army Airfield.

Under SB3334, these two complex areas would be consolidated into a single district stretching from the outskirts of Honolulu to the North Shore. The proposed district would include **42 schools and 27,301 students** across a geographically expansive and socioeconomically diverse region. This represents a significant increase in scope and responsibility for a single district superintendent.

The CAS is not merely an administrative layer; it serves as the essential link between individual schools and HIDOE's central leadership. Complex Area Superintendents translate state-level priorities into context-sensitive implementation at school sites, ensure alignment across schools, provide direct supervision and coaching to principals, advocate for school-specific needs, and coordinate responses during crises and emergent situations.

Eliminating the CAS position would remove a critical level of regional leadership and accountability. Without a dedicated leader focused on a defined group of schools, campuses risk operating with diminished coordination, reduced advocacy, and less consistent strategic direction.

Section 17 of the bill does not clearly specify how the statutory responsibilities of the CAS would be reassigned, nor how principal supervision and regional oversight would be maintained. If the intent is to revert to a district superintendent model overseeing an expanded portfolio of 42 schools, the practical implications are concerning. Consolidating oversight of more than 27,000 students under fewer leaders would likely reduce direct support to principals, create oversight gaps, and limit responsiveness to urgent school needs. Leadership capacity would inevitably be stretched.

At a time when schools are addressing academic recovery, student mental health, military mobility, and workforce readiness, reducing regional leadership capacity sends the wrong message about our commitment to student-centered support.

Although SB3334 is framed as a measure to reduce bureaucracy, the bill calls for additional deputy positions to support the district superintendent. Rather than eliminating administrative layers, the proposal appears to shift and potentially expand them under a different structure. Removing CAS positions while adding deputies may increase complexity rather than streamline operations.

The proposed district would encompass military-connected communities at Joint Base Pearl Harbor-Hickam, Schofield Barracks, and Wheeler Army Airfield, as well as rural North Shore communities and urban areas near Honolulu. These communities have distinct demographics, logistical realities, and educational needs. Effective leadership across such a broad and diverse region requires proximity, deep contextual understanding, and sustained relationship-building — all of which are more difficult under an overly consolidated structure.

The Complex Area Superintendent model was designed to strengthen coherence, responsiveness, and accountability within Hawai'i's statewide school system. Eliminating this role risks weakening regional leadership, overextending district administration, and diminishing the level of support available to schools, educators, students, and families.

For these reasons, we respectfully urge the Committee to defer SB3334.

Thank you for the opportunity to provide testimony.

John Erickson  
Complex Area Superintendent  
Aiea–Moanalua–Radford Complex

Ernest Muh  
Complex Area Superintendent  
Leilehua–Mililani–Waialua Complex



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

**Senate Committee on Ways and Means  
Wednesday, February 25, 2026  
10:55 a.m.  
Hawaii State Capitol, Room 211**

**Measure: Senate Bill 3334 SD1, Relating to Education**

**Purpose of Measure:**

Reestablishes the organizational structure of the Department of Education by repealing complex areas and establishing an unspecified number of districts across the State. Repeals the position of Complex Area Superintendent and establishes the positions of District Superintendent for Academics and Deputy District Superintendents who are required to undergo annual performance evaluations. Clarifies that School Community Councils shall submit principal evaluations to the Superintendent of Education, who shall have final authority to appoint a principal. Requires the Department of Education to adopt rules. Makes conforming amendments..

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

The Board of Education respectfully opposes Senate Bill 3334 SD1:

- The role and responsibilities of the complex area superintendents exist to provide streamlined support and resources that would otherwise have to be duplicated across districts or at each school.
- Complex area superintendents provide decision-making, coordination, and accountability structures that schools and the Department have come to depend on to function effectively.
- The broad support of our schools for the complex area superintendent positions, as well as the significant gains made by Hawaii in the area of student achievement – the principal mission of the Department of Education – are indicative of the efficiency and effectiveness of this structure.

The Board defers to the Department on the more specific impacts of eliminating the position of complex area superintendent.

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

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 HIGH and PAHALA ELEMENTARY SCHOOL  
96-3150 Pikake Street / PO Box 100  
Pahala, Hawaii 96777  
Phone: (808) 313-4100 Fax: (808) 928-2092

To: **WAYS AND MEANS COMMITTEE** Senator Donovan M. Dela Cruz, Chair Senator Sharon Y. Moriwaki,  
Vice Chair

**DATE:** Wednesday, February 25, 2026

**TIME:** 10:55AM

**LOCATION:** Conference Room 211 & Videoconference, State Capitol, 415 South Beretania Street

**Committee:** WAM (Ways and Means)

**BILL:** SB 3334 SD1, Relating to Education Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Sharon Beck, Principal Ka'ū High and Pahala Elementary School

**POSITION: OPPOSITION AND COMMENTS**

Aloha Senator Donovan M. Dela Cruz, Chair Senator Sharon Y. Moriwaki, Vice Chair

My name is Sharon Beck, and I serve as the Principal of Ka'ū High and Pahala Elementary School in the Ka'ū-Kea'au-Pāhoa Complex Area on Hawai'i Island. I respectfully submit this testimony in strong opposition to SB3334 SD1.

I can't even imagine doing my job without the support from the Complex Area Superintendent and Complex Area Resource Team. Day-to-day operations in rural schools are already complex. We manage staffing shortages, transportation challenges, compliance requirements, special education coordination, and community needs with fewer resources and longer response chains than our urban counterparts. The Complex Area structure provides a stabilizing layer that keeps those systems functioning. Removing that layer without clearly articulating how equivalent capacity will be preserved creates unnecessary risk for schools like mine.

Structural reform of this magnitude should provide clarity before dismantling an existing framework that is actively supporting school operations. As written, SB3334 SD1 removes a defined leadership structure without clearly establishing how rural and Neighbor Island schools will maintain the same level of access, responsiveness, and advocacy.

For these reasons, I respectfully urge you to reconsider advancing SB3334 SD1 in its current form.

Mahalo for your time and for your commitment to the students and communities we serve.

Handwritten signature of Sharon Beck in blue ink.

Sharon Beck  
Principal, Ka'ū High and Pahala Elementary School

AN EQUAL OPPORTUNITY EMPLOYER

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:44:16 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Garret S Zakahi	Testifying for Department of Education	Oppose	Written Testimony Only

Comments:

**Senator Donovan Dela Cruz, Chair**

**Senator Sharon Moriwaki, Vice Chair**

**Committee: Ways and Means**

**RE: SB 3334 – RELATING TO EDUCATION – STRONGLY OPPOSE**

**Hearing date: February 25, 2026, at 10:55 AM**

**Aloha Chair Dela Cruz, Vice Chair Moriwaki, and members of the committee,**

Mahalo for the opportunity to provide this testimony and for your continued commitment to Hawai‘i’s students and public schools.

My name is **Garret Zakahi**, and I have served as the Principal of President Thomas Jefferson Elementary School for the past 12 school years. I am writing to respectfully submit my testimony in **STRONG OPPOSITION** to **SB 3334**.

While I appreciate the Legislature’s focus on educational reform, the updates proposed in SB 3334 would destabilize school leadership and dismantle essential support structures. My opposition focuses on two critical areas:

**I. The Vital Role of Complex Area Superintendents (CAS)**

In Hawai‘i’s unique single-district system, the CAS is not an "administrative burden"; they are the primary lifeline between individual schools and the Department of Education.

- **Essential Oversight:** The CAS provides the fiscal and administrative compliance support necessary to meet State and Federal mandates.

- **Crisis Management:** Principals cannot manage extreme student crises or legal challenges in isolation. The CAS provides the experience-based guidance required in these high-stakes moments.
- **Consequences of Elimination:** Removing this layer will result in a leadership vacuum, leaving principals without direct supervision and shifting unmanageable administrative tasks onto school leaders who should be focused on instruction.

## II. Risks of Restructuring Principal Evaluations

SB 3334 proposes giving School Community Councils (SCC) a 50% weight in the evaluation and selection of principals. This shift is deeply concerning for the following reasons:

- **Compromised Integrity:** Moving personnel functions to the SCC level compromises the confidentiality and professional standards of the hiring and evaluation process.
- **Politicization of Leadership:** This risks turning leadership decisions into popularity contests or political maneuvers rather than assessments based on instructional expertise and student growth.
- **Redundancy:** The existing **Comprehensive Evaluation System for School Administrators (CESSA)** already provides a robust framework for holding principals accountable.

## Conclusion

The combined effect of eliminating the CAS position and radicalizing the evaluation process will weaken our leadership pipeline and destabilize our schools—particularly those in high-need communities.

I respectfully urge the Committee to **DEFER** SB 3334 and instead engage in a collaborative dialogue with school leaders and educators to strengthen our existing structures.

Mahalo for your time and for your continued commitment to Hawai‘i’s students and public schools.

Sincerely,

**Garret Zakahi** Principal, President Thomas Jefferson Elementary School



STATE OF HAWAII  
DEPARTMENT OF EDUCATION

HILO-WAIĀKEA COMPLEX  
75 AUPUNI STREET, RM. 203  
HILO, HAWAII 96720

**Department:** Education  
**Person Testifying:** Jasmine Okada, Trintje Hironaga, Polly Quigley  
**Title of Bill:** SB3334 SD1 RELATING TO EDUCATION  
**Position:** **OPPOSE**

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

As Educational Officers with decades of experience in the Department of Education, we are writing to express our **strong opposition** to SB3334 SD1.

Our role as Educational Officers is to provide the "boots on the ground" support that schools need to function effectively. We work daily at the intersection of state policy and school-level reality. From our perspective, the changes proposed in this bill would significantly destabilize the support systems we have built for our students and teachers.

#### **The Necessity of the Complex Area Model**

The proposal to revert Complex Area Superintendents (CAS) to a District Superintendent model is a step backward. Under Act 51, the shift to Complex Areas was designed specifically to create "tighter-knit work units." As EOs, our ability to move the needle on student achievement relies entirely on our proximity to the schools. In a smaller Complex Area, we know the specific data trends of each school, the unique culture of their staff, and the specific challenges of their geographic community.

If we move back to a massive District model, the support we provide will be spread so thin it will effectively become "diluted," as noted by my colleagues. Instead of being a partner in a school's improvement, my role would shift to a distant administrator managing a massive caseload. We cannot address modern complexities like AI integration, the mental health crisis, and chronic absenteeism from a 30,000-foot district view; these require the high-touch, responsive support only a Complex Area structure allows.

#### **Impact on Professional Support and Coaching**

The CAS serves as the instructional leader who aligns our work. By supervising a manageable number of schools, the CAS ensures that the professional development and resources we provide as EOs are unified and purposeful. Doubling or tripling the number of schools under a single superintendent would create an insurmountable bottleneck. Urgent school needs—ranging from facility safety to curriculum crises—would languish in a bureaucratic queue, leaving schools and EOs without the timely guidance necessary to protect and educate students.

#### **Concerns Regarding SCC Evaluation of Principals**

Furthermore, we strongly agree with the concerns regarding School Community Councils (SCC) participating in principal evaluations. As EOs, we often facilitate collaboration between schools and their stakeholders. Effective leadership requires a principal to make difficult, objective decisions that may not always be popular with all staff or community members.

Introducing subordinates and those they supervise into the formal evaluation process creates an inherent conflict of interest. It risks turning a professional growth tool into a platform for personal grievances or "quid pro quo" dynamics. This undermines the integrity of school leadership and, ultimately, the stability of the school environment. Evaluation should remain a professional process conducted by qualified supervisors who have the full context of a principal's performance.

The current Complex Area system allows us to be responsive, personal, and accountable. SB3334 SD1 threatens to dismantle that efficiency in favor of an outdated, centralized bureaucracy.

Mahalo for your consideration of this testimony and for your support of our schools.

Sincerely,



Jasmine Okada, Educational Officer Hilo-Waiakea Complex, District Educational Specialist



Trintje Hironaga, Educational Officer Hilo-Waiakea Complex, School Renewal Specialist



Polly Quigley, PhD, Educational Officer Hilo-Waiakea Complex, District Educational Specialist



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

**Date:** 02/25/2026

**Time:** 10:55 AM

**Location:** CR 211 & Videoconference

**Committee:** WAM

**Department:** Education

**Person Testifying:** Keith T. Hayashi, Superintendent of Education

**Title of Bill:** SB3334, SD1, RELATING TO EDUCATION.

**Purpose of Bill:** Reestablishes the organizational structure of the Department of Education by repealing complex areas and establishing an unspecified number of districts across the State. Repeals the position of Complex Area Superintendent and establishes the positions of District Superintendent for Academics and Deputy District Superintendents who are required to undergo annual performance evaluations. Clarifies that School Community Councils shall submit principal evaluations to the Superintendent of Education, who shall have final authority to appoint a principal. Requires the Department of Education to adopt rules. Makes conforming amendments. (SD1)

**Department's Position:**

The Department of Education (Department) opposes SB 3334 SD 1.

This proposal is not merely about reorganizing titles or adjusting lines on an organizational chart. At its core, it would dismantle the existing complex area leadership structure that directly supports student success across Hawai'i. Hawai'i's students rely on timely, informed, and locally responsive decision-making to ensure their schools are effectively led, appropriately staffed, and adequately resourced. The current structure includes 15 complex areas statewide, each designed to provide focused leadership and oversight tailored to the unique needs of its schools and communities.

A complex area is a regional grouping of high schools and its feeder elementary and middle schools. The Complex Area Superintendent (CAS) structure was intentionally designed to keep accountability, capacity building, and operational support close to classrooms. Eliminating this framework would distance governance from schools, erode localized leadership, and undermine the responsive support systems that students and educators depend on every day.

If returned to the prior structure, the median span of control would potentially double the scope of responsibility for a single leader. Such an expansive span of control would

dilute meaningful support and oversight for schools, even with the addition of multiple deputies per area. As governance becomes more removed from campuses, responsiveness, accountability, and sustained engagement inevitably decline.

When leadership is distanced from the day-to-day realities of individual schools, students feel the impact first—and most profoundly.

## **Key Points of Opposition**

### **1. Risk to Regional Fiscal and Personnel Accountability**

The CAS structure balances oversight, support, and responsiveness in a way that a district superintendent model cannot replicate without compromising effectiveness.

- **Performance Oversight:** The CAS is responsible for administering the Comprehensive Evaluation System for School Administrators (CESSA) for complex area educational officers including principals. Replacing CAS positions with District Superintendents would substantially increase workload demands and dilute the capacity for both rigorous oversight and meaningful support for improvement. Effective evaluation depends on sustained, localized engagement, ongoing school visits, coaching conversations, and timely feedback, not a broadened supervisory structure that limits the time necessary for meaningful monitoring and follow-through.
- **Fiscal Stewardship:** Through Human Resource Regional Officers and District Educational Specialists, each CAS aligns staffing and budgets to the unique needs of school to directly impact student success. Removing this regional layer risks disconnecting financial decisions from school realities, weakening resource targeting and student impact.

### **2. Compromising Leadership Effectiveness and Continuity**

The voice of the School Community Council (SCC) is important and valued. However, assigning SCCs 50% weight in principal selection and evaluation risks politicizing decisions and shifting them away from the professional expertise required to assess and sustain effective school leadership.

- **Selection Structure** - SCCs currently play a meaningful role in principal selection through representation on the selection committee. While community input is essential, allocating 50% decision-making weight is not appropriate. Effective principal leadership requires expertise in instruction, budgeting, labor compliance, and strategic planning, technical areas that extend beyond the typical scope of SCC experience.
- **Evaluation Structure** - Under current policy, SCCs contribute feedback to a principal's annual evaluation, particularly regarding leadership, communication, and school climate. This input is an important component of the process. However, the CAS is specifically trained and positioned to provide professional oversight using a comprehensive evaluation framework grounded in educational leadership standards and systemwide improvement goals.

### **3. Operational Instability and Labor Issue Resolution**

Eliminating the CAS position would undermine system effectiveness by creating administrative bottlenecks and limiting both timely problem-solving and targeted school support.

- **Operational Instability:** CASs understand the unique operational realities of their

schools and communities. Their regional proximity, closer than a district-based model, enables quicker response times, targeted interventions, and more efficient coordination of support. Shifting to a district structure risks slower responses, duplicated efforts, and misaligned services.

- **Labor Issue Resolution:** CASs bring deep knowledge of school-level contexts, allowing for prompt and effective resolution of parent concerns, community matters, and legal or labor issues. Expanding the span of control under a District Superintendent model would push complex personnel and legal matters higher up the system, increasing administrative burden and delaying resolution.

#### 4. Reduced Oversight and Responsiveness in a Statewide District

Hawai'i operates as a single, statewide public school district through the Hawai'i State Department of Education, serving simultaneously as both a State Educational Agency (SEA) and a Local Educational Agency (LEA). This unique structure requires strong complex area infrastructure to effectively meet the diverse needs of schools, educators, and communities across urban, rural, and neighbor island contexts.

- **Span of Control Analysis:** Research shows that effective oversight in complex systems like education requires a manageable span of control. Under the current structure, CASs can regularly visit schools, conduct thorough principal evaluations, and respond quickly to personnel, operational, or safety issues. Moving to a District Superintendent model would more than double this span of control, reducing the Department's ability to monitor performance, address crises promptly, and provide targeted support, especially in high-need, rural, and neighbor island schools. This change would likely slow interventions, weaken oversight, and reduce support for principals and teachers, ultimately limiting improvements in student outcomes and widening existing disparities.
- **Time Trade Offs Under a District Model:** Shifting to a district model would fundamentally change how leaders spend their time. Managing day-to-day operations across more schools would leave less time for strategic planning, coaching principals, analyzing student data, or supporting instructional improvement. A centralized structure also overlooks the unique recruitment, retention, and resource challenges of rural and neighbor island complexes, further limiting the Department's ability to provide targeted, effective support.

Under the current complex area structure, principals receive more targeted support, fiscal decisions are closely aligned with student needs, and operational issues are resolved more quickly.

Strong student outcomes depend on a robust management system capable of auditing, evaluating, and supporting the workforce at the regional level. Hawai'i has seen significant academic gains under this framework. On the National Assessment of Educational Progress (NAEP), the state has risen from the bottom 10 to the top 15 nationwide in fourth-grade reading over the past two decades, and from the bottom 10 to the national average in eighth-grade math. On the Smarter Balanced Assessment, Hawai'i now has the highest proficiency in language arts and the third highest in mathematics among participating states, nearing a return to pre-pandemic levels in both subjects. These results reflect sustained effort by teachers, principals, and school teams supported by a regional leadership structure that ensures accountability, instructional alignment, and targeted support.

A 2024 analysis by the Council of the Great City Schools also found Hawai'i's administrative structure to be modest compared with other large districts:

- Teachers make up a higher percentage of total staff
- Student-to-teacher ratios are favorable
- Ratios of students per central office and school site administrative/support staff are favorable

For these reasons, the Department of Education respectfully requests that the legislature defer this measure.

**Date:** Wednesday, February 25, 2026

**Time:** 10:55 AM

**Location:** Conference Room 211 &  
Videoconference

**Committee:** WAM

The Honorable Donovan M. Dela Cruz, Chair  
The Honorable Sharon Y. Moriwaki, Vice Chair  
and Members of the Senate  
State Capitol, Room 208  
Honolulu, Hawaii 96813

Bill No. SB 3334, SD1 RELATING TO EDUCATION

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

As the current Complex Area Superintendents (CASs) serving the communities of Kaua'i, Maui, Lāna'i, and Moloka'i we respectfully submit this joint testimony in **opposition** to SB3334. We write as educational leaders concerned about the operational instability this measure would introduce to Hawaii's public schools.

Our opposition is grounded in our commitment to supporting school principals. SB3334 proposes shifting 50% of the weight in principal selection and evaluation to School Community Councils. While community voice is a cornerstone of our system, principal leadership is a highly specialized profession requiring a complex balance of expertise, fiscal management, labor compliance, human relations and strategic planning.

Unlike a school-based committee composed of educators who know what they need in a school leader, SCC members may lack the specialized training and system-wide perspective necessary to evaluate these technical competencies. Diluting the evaluation structure in this way risks:

- **Inconsistency:** Creating vastly different standards of success from one school to the next.
- **Politicization:** Deters principals from making bold, data-driven decisions that may be unpopular but are necessary for student achievement.
- **Loss of Calibration:** The CAS currently provides calibrated, professional oversight grounded in established educational leadership standards.

In regions like Kaua'i, Maui, Lāna'i, and Moloka'i, the CAS office is the local bridge between the State office and the school campus. A centralized model fails to account for the unique recruitment, retention, and resource challenges inherent to our Neighbor Island and rural complexes.

Removing this layer would have immediate negative impacts:

- **Slower Response Times:** CASs provide regional proximity, allowing for rapid response to parent concerns, legal issues, and operational emergencies.
- **Labor Issues:** CASs possess the deep "on-the-ground" knowledge required to resolve complex labor and legal issues efficiently. Moving these responsibilities to a centralized state office will inevitably increase delays and administrative burdens.

For these reasons, we respectfully request that this committee reconsider this measure. Thank you for your time and for your dedication to Hawaii's students.

Mahalo,

Complex Area Superintendents:

Leila Maeda-Kobayashi, Kapa'a-Kaua'i-Waimea Complex Area

Rebecca Winkie, Hāna-Lahainaluna-Lāna'i-Molokai

Lori Yatsushiro, Baldwin-Kekaulike-Kūlanihāko'i-Maui

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:54:03 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Cheryl Chock	Testifying for Hawaii Department of Education	Oppose	Written Testimony Only

Comments:

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

**I submit this testimony in strong opposition to SB 3334 SD1. I work within a complex area supporting schools as a School Renewal Specialist. From my professional experience, I have seen firsthand the critical role this position plays in supporting schools and ensuring accountability.**

**Complex Area Superintendents provide essential leadership, guidance, and oversight across multiple schools. They supervise principals, coordinate special education services, monitor compliance with state and federal requirements, and support academic and fiscal planning. Their role ensures consistency, responsiveness, and timely problem-solving at the regional level. Eliminating this statutory structure could create confusion and reduce transparency about who is responsible for key decisions.**

**I am particularly concerned that the bill replaces clearly defined statutory roles with references to an “appropriate authority, as designated by the department by rule.” As someone who works within this structure, clarity in leadership matters. Schools rely on defined lines of authority to resolve issues quickly and effectively. Shifting these responsibilities into administrative rulemaking reduces legislative oversight and may create uncertainty for educators and staff.**

**I am also concerned about the impact on principal evaluation, school plan approval, discipline appeals, and federal compliance monitoring. Changes of this magnitude require a clear transition plan and fiscal analysis to avoid disruption to schools and students.**

**Complex Area Superintendents serve as a vital bridge between state leadership and school communities. Removing this role without a transparent, data-driven justification risks weakening support systems that schools depend on daily.**

**For these reasons, I respectfully urge the Committee to defer this measure or substantially amend it.**

**Thank you for the opportunity to testify.**

**Respectfully,**

**Cheryl Chock**

**School Renewal Specialist**

**Kaimuki-McKinley-Roosevelt Complex Area**

**TO:** House/Senate Committee on Education

**FROM:** Dr. Barry Harris, Proud Principal – Mokulele Elementary School

**DATE:** February 24, 2026

**RE: SB 3334 – RELATING TO EDUCATION – STRONGLY OPPOSE**

Chair, Vice Chair, and Members of the Committee:

Thank you for the opportunity to testify on **SB 3334**. While the stated goal of this bill is to "eliminate unnecessary administrative burdens," its implementation threatens to dismantle the leadership structures that provide essential stability to our schools. I stand firm in my strong opposition to this measure.

My opposition is rooted in my direct experience with the current educational structure. Specifically, I believe this bill overlooks the indispensable role of the **Complex Area Superintendents (CAS)**.

- **Integral Support & Management:** In my experience, the CAS has been an integral part of the support needed to effectively run, manage, and successfully move our schools in a positive direction. They act as the bridge between high-level policy and classroom reality.
- **Mentorship and Guidance:** The depth of experience a CAS brings cannot be overstated. Their ability to guide, mentor, and support principals and staff is what allows our respective Complexes and Complex Areas to function as a cohesive unit.
- **Qualifications Matter:** The demands of this position are immense. Leading a Complex Area requires specific credentials and a high level of expertise. This role cannot be taken for granted, nor can it be assigned haphazardly to anyone without the rigorous experience needed to execute the demands of the position effectively.

SB 3334 suggests that authority structures are "unclear." However, "revisiting" these foundational elements risks creating a leadership vacuum or, worse, centralizing power in a way that ignores the unique needs of our specific geographic complexes.

Feature	Impact of Strong CAS Leadership	Risk of SB 3334
<b>Complex Unity</b>	Brings schools together for shared resources.	Isolated schools with no regional guidance.
<b>Mentorship</b>	Seasoned leaders coaching new principals.	Lack of professional development and support.
<b>Decision-Making</b>	Informed by local area needs and data.	Top-down mandates from a central office.

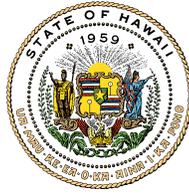
For these reasons, it is my humble opinion that we cannot afford to gamble with the leadership structures that support our students and educators. The CAS position is a cornerstone of our current system; weakening or "revisiting" the authority of those with the proven experience to lead our complexes could be viewed as a step backward for Hawaii's children and the State Department of Education overall.

"The success of our schools depends on leadership that is both qualified and accessible. SB 3334 threatens to undermine the very mentors and guides who ensure our schools move in a positive direction."

For these reasons, I respectfully stand firm in my opposition to **SB 3334**.

V/r,

Dr. Barry Harris, Proud Principal  
Mokulele Elementary School



STATE OF HAWAII  
DEPARTMENT OF EDUCATION – Pearl City Complex  
February 24, 2026

**Department:** Department of Education Pearl City Complex

**BILL:** SB 3334, Relating to Education Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Garrett Arakawa, Neil Blomberg, Joseph Halfmann, Keith Hui, Kim Koga, Michael Sugano, James Suster, Lance Tanouye, Lisa Tominaga, Gavin Tsue

**POSITION: OPPOSITION AND COMMENTS**

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

We are writing to express our opposition to SB 3334. While we understand the intent to reduce "administrative burdens," this bill fails to recognize the essential leadership that Complex Area Superintendents (CAS) provide—particularly for rural and underserved communities. We have serious concerns about the SCC evaluation revisions as well.

Our opposition is based on three critical concerns:

**1. Erosion of the Tri-Level Leadership Framework**

Beyond simple administration, the CAS acts as a crucial lifeline between grassroots school needs and state initiatives. If this role is cut, the direct line of communication to the DOE's leadership disappears. This leaves schools as 'isolated units' without a shared direction or a representative to champion their specific needs at the top level.

**2. Concern over the erosion of Local Autonomy**

The consolidation of power under a district-level hierarchy replaces meaningful support from a Complex Area Superintendent (CAS) with a district superintendent who will be required to support 40 to 50 schools. This creates a structure that treats schools and their necessary supports like numbers on a list, causing the understanding of community needs to be lost.

School culture, community dynamics, and academic requirements are unique to our local areas. The current complex area structure allows a CAS to remain connected to the communities they serve and the schools they oversee. The Pearl City Complex, like others, has its own unique strengths and areas for growth; our CAS is familiar with and closely connected to these efforts.

While it is not the only factor, the rise of our schools from near the bottom of national educational rankings in the early 2000s to our improved standing today coincides with the

responsive, flexible CAS framework established nearly twenty years ago by former Superintendent Hamamoto. Eroding local autonomy by returning to an outdated support structure is quite literally a step backward. We oppose this effort.

### **3. Improper Expansion of School Community Council (SCC) Authority**

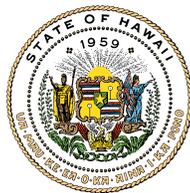
We oppose the proposal to assign a 50% weight to SCC evaluations in the principal selection process for several critical reasons. First, this change effectively grants SCCs hiring authority that violates current labor agreements and union contracts. Second, it undermines the objective, merit-based assessment managed by the CAS. We are concerned that removing CAS oversight invites personal biases, allowing the selection process to be derailed by a few vocal individuals rather than centered on a candidate's professional qualifications.

Consequently, we ask the Committee to hold SB 3334 and preserve the area leadership necessary for providing our students and staff with tailored support. Thank you for considering this testimony.

Respectfully,

*Garrett Arakawa, Neil Blomberg, Joseph Halfmann, Keith Hui, Kim Koga, Michael Sugano,  
James Suster, Lance Tanouye, Lisa Tominaga, Gavin Tsue*

Pearl City Complex Principals



**STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
KA 'OIHANA HO'ONA'AUAO  
THE MOANALUA COMPLEX**

2/11/26

Dear Madame Chair Kim,

We, the Principals of the Moanalua Complex, collectively submit this testimony to express our strong opposition to SB3334. Representing a diverse group of high-performing, military-impacted schools - including four elementary schools, one middle school, and one high school - serving thousands of students and families in our community, we believe this bill would significantly compromise our ability to lead our schools effectively.

SB3334 seeks to abolish the Complex Area Superintendent (CAS) position to address "unclear authority structures" and "administrative burdens". From our perspective as school leaders on the ground, this proposal fails to account for the staggering scale of the Hawaii Department of Education. While the average school district in the United States serves roughly 5,000 students, a single Hawaii complex area typically oversees at least 1,900 employees, 10,000 students, and 19,000 parents.

Our collective concerns regarding the repeal of the CAS position include:

- **Unreasonable Scope of Responsibility:** This bill would redirect large-scale issues above the authority of Principals from 296 schools—representing over 165,000 students and 42,000 employees—directly to the State Superintendent. It is physically and administratively impossible for a single office to manage the nuanced, high-intensity problems of nearly 300 schools effectively.
- **Loss of Local Leadership:** The CAS serves as a vital intermediary, overseeing essential functions such as personnel, fiscal support, curriculum development, and special education programs within our specific complex areas. Removing this layer of leadership would leave us without the localized support necessary to navigate complex state and federal compliance. Removing this role would weaken effective support and responsiveness. The Complex Area Superintendent role provides timely, context-specific support that helps schools respond effectively to challenges. It remains unclear how the significant responsibilities currently managed at the complex level would be reassigned, and whether schools would receive the same level of responsiveness and clarity. We must thoughtfully consider whether removing regional leadership truly strengthens our system or unintentionally diminishes the support structures principals depend on to lead their schools effectively.

- Over Centralized/Decentralized Principal Selection: SB3334 proposes giving the State Superintendent final authority over all principal appointments. We believe that removing the CAS from this process—who has the most balanced knowledge of our schools' specific needs—will lead to a "one-size-fits-all" approach that ignores the unique culture of the Moanalua Complex. On the other side of this, the school community council authority structure is even more unclear than the authority of the CAS, which would lead to a contrary effect that the bill seeks.
- Strained Military Community Support: As the Moanalua Complex serves a significant military population, we are particularly concerned by the bill's proposal to replace CAS representation on the State Council on Educational Opportunity for Military Children. The CAS provides a consistent, high-level administrative voice that is essential for facilitating the Interstate Compact on Educational Opportunity for Military Children.

Our Complex Area Superintendents are already stretched thin, managing responsibilities that far exceed national averages. Removing them will not decrease administrative burden; it will create larger administrative issues, mostly in the form of a bottleneck at the state level that will ultimately harm our students and community. The CAS is the "bridge" within the Hawai'i Department of Education's tri-level structure. Abolishing this role does not diminish the administrative needs of our schools. It creates an unsustainable and dangerous consolidation of responsibility at the top.

The unique nature of our State Educational Agency and Local Educational Agency being one and the same, we are the ninth largest school district and the only statewide district in the nation. The sheer size of our district requires us to have the role of Complex Area Superintendent. Removing the CAS will not streamline the department; instead, it will trigger a systemic failure by redirecting high-intensity problems from nearly 300 schools, representing 165,000 students, directly to the State Superintendent. The only "physically and administratively impossible" for a single office to manage effectively.

As the unified leadership of the Moanalua Complex, we stand **STRONGLY OPPOSED** to SB3334 as it will contribute to the ultimate collapse of our educational system.

Sincerely,  
The Principals of the Moanalua Complex



Robin Martin- Principal, Moanalua High School



[Komarey Moss \(Feb 11, 2026 19:44:24 HST\)](#)

Komarey Moss- Principal, Moanalua Middle School



[Lynda Galera \(Feb 11, 2026 17:04:30 HST\)](#)

Lynda Galera- Principal, Moanalua Elementary School



[Tyler Brown \(Feb 11, 2026 13:12:16 HST\)](#)

Tyler Brown- Principal, Red Hill Elementary School



[Rory Vierra \(Feb 11, 2026 16:25:01 HST\)](#)

Rory Vierra- Principal, Shafter Elementary School



[Randall Galeon \(Feb 11, 2026 12:42:30 HST\)](#)

Randall Galeon- Principal, Salt Lake Elementary School

# Moanalua Complex Principals-Testimony against SB3334 2\_13\_2026 (1)

Final Audit Report

2026-02-11

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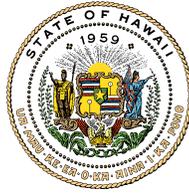
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**STATE OF HAWAII**  
**ILIMA INTERMEDIATE SCHOOL**  
**KA 'OIHANA HO'ONA'AUAO**  
91-884 FORT WEAVER ROAD  
EWA BEACH, HAWAII 96706

February 23, 2026

To: Senator Donovan Dela Cruz, Chair; Senator Sharon Moriwaki, Vice-Chair; Senator Lynn DeCoite; Senator Brandon J.C. Elefante; Senator Troy N. Hashimoto; Senator Lorraine R. Inouye; Senator Dru Mamo Kanuha; Senator Michelle N. Kidani; Senator Donna Mercado Kim; Senator Chris Lee; Senator Herbert M. "Tim" Richards III; Senator Glenn Wakai; Senator Kurt Fevella:

I am writing as a constituent and as the Principal of Ilima Intermediate School in the Campbell–Kapolei Complex to respectfully urge you to oppose Senate Bill 3334 (SB3334), even with the proposed SD1 amendments that restructure the system into a State Superintendent–District Superintendent–School Administration model.

While I understand and appreciate the intent of the amendments to streamline administration and empower principals, the proposed structure would not achieve these outcomes in practice. Instead, SB3334 SD1 risks dismantling organizational systems that are currently effective, contractually grounded, and still maturing. Most concerning, the bill moves the Legislature toward restructuring public education without meaningful collaboration with the Hawaii State Department of Education (HIDOE) Superintendent and Deputy Superintendents, whose roles are essential to ensuring coherence, continuity, and stability across the system.

At present, the upper leadership structure of the HIDOE consists of one Superintendent, three Deputy Superintendents, and eight Assistant Superintendents, working in coordination with 15 Complex Area Superintendents who oversee 258 public schools statewide. This structure was intentionally designed and implemented in response to long-standing concerns raised from the field regarding span of control, responsiveness, and support for school leaders. Many of these leadership roles are still refining systems and processes, and it is premature to dismantle a structure that is actively evolving to address those concerns to achieve the results you have been seeking.

Rather than legislating a wholesale restructuring, the focus should be on internal refinement and continuous improvement of the existing framework. For example, I commend the Superintendent for recognizing that it was not feasible for one Assistant Superintendent to effectively oversee

facilities, safety and security, the school meal program, and transportation simultaneously. Separating these areas was a thoughtful and necessary adjustment that reflects responsible leadership and responsiveness to operational realities. This type of internal realignment, rather than statutory restructuring, is precisely how large systems should improve.

If additional executive-level support is deemed necessary in the future, I would strongly recommend an approach similar to that used within the University of Hawai‘i system: any expansion of upper leadership should occur through a transparent budget request to the Governor and Legislature for new, specifically funded positions supported by general funds, rather than repurposing or reallocating existing resources. The current structure could be capped, refined, and allowed to mature so that all operational and instructional areas can be addressed appropriately and effectively.

These concerns are echoed in testimony submitted by the Hawaii Government Employees Association (HGEA), which strongly opposes SB3334 due to its potential to destabilize leadership structures and interfere with established labor agreements. Educational governance reform must be pursued in partnership with, not in opposition to, the professionals responsible for implementing and sustaining these systems statewide.

The Campbell–Kapolei Complex is one of the largest and fastest-growing public school complexes in Hawai‘i, serving more than 18 schools, with additional schools planned, and approximately 16,444 students, representing nearly 11% of statewide enrollment. Rapid residential development across Kapolei, Ewa Beach, and surrounding communities has resulted in sustained enrollment pressures, overcrowding, and the need for constant coordination related to staffing, facilities, safety, and student services. Within the broader Leeward District, which includes 44 schools serving more than 35,000 students, these challenges are magnified. Addressing these realities requires leadership that is localized, accessible, and deeply knowledgeable of both schools and the communities they serve.

SB3334 SD1 proposes eliminating the Complex Area Superintendent (CAS) structure and replacing it with a district model in which principals report directly to a District Superintendent and District Deputy Superintendent. From an operational standpoint, this significantly expands the span of control at the district level while removing complex-level leaders who currently provide direct, differentiated support to principals. Notably, the CAS model was created precisely to address the excessive span of control that existed under earlier centralized structures. Eliminating it risks returning the system to a model that history has already shown to be ineffective.

The CAS role already functions as a streamlined and effective system. Complex Area Superintendents serve as the primary supervisors, instructional coaches, and advocates for principals. They reduce bureaucracy by resolving issues at the complex level, coordinating resources across schools, and ensuring principals are not required to navigate state-level systems

independently. This structure allows principals to focus on instructional leadership, student outcomes, and school culture, the very empowerment SB3334 claims to promote.

The Senate Education Committee report states that Complex Area Superintendents possess broad oversight and administrative authority but often lack the personal insight into school-level issues necessary to identify effective solutions. This characterization is not accurate in our complex. During my tenure, our CAS leaders, Heidi Armstrong, Sean Tajima, and our current CAS, Jon Henry Lee, have demonstrated a deep and consistent understanding of our schools, our students, and our community. Our CAS leaders maintain direct and ongoing communication with state Senators and Representatives, attend Neighborhood Board meetings alongside principals, regularly visit school campuses, and actively engage with families and staff to understand school-level realities. We meet monthly as a Complex Principals' group with our CAS, and we have intentionally invited our legislative partners to participate in these conversations. This is not a distant or disconnected leadership model; it is responsive, informed, and collaborative.

Additionally, SB3334 raises serious concerns related to collective bargaining and contractual obligations. The bill would interfere with established agreements governing principal selection, supervision, and evaluation, including the Comprehensive Evaluation System for School Administrators (CESSA). These processes were negotiated in good faith between employee unions and the HIDOE, and legislative action that overrides them undermines labor stability, due process, and trust in the system.

The bill also proposes expanded involvement of School Community Councils in principal evaluation and recommendation processes. While community voice is essential and already valued, there are well-established feedback mechanisms in place through SCCs without altering governance or evaluation structures. Expanding these roles further, while centralizing final authority with the Superintendent, risks politicizing leadership decisions and destabilizing principal tenure, particularly in large, rapidly growing complexes where leadership continuity is critical to school improvement.

Importantly, the decentralized system established under Act 51 is still maturing and showing meaningful progress. Recent improvements, such as the conversion of vice principals to 12-month employees, demonstrate that the current framework is evolving in ways that strengthen school leadership. Disrupting this system now, without full collaboration with the Superintendent, Deputy Superintendents, Assistant Superintendents, the Hawaii Board of Education, and Complex Area Superintendents would reverse decades of progress and create unnecessary instability for schools and administrators.

From an organizational and professional standpoint, eliminating the CAS role does not simplify the system. Instead, it concentrates authority, increases distance between decision-makers and schools, and creates new bottlenecks at the district and state levels. Large, complex systems

require intermediate leadership structures to maintain coherence, consistency, and responsiveness, particularly in communities experiencing rapid growth.

For the Campbell–Kapolei Complex, the CAS position is not an unnecessary layer of administration. It is a critical function that supports new school openings, addresses overcrowding, responds swiftly to community concerns, and ensures alignment across dozens of campuses. Eliminating this role, even under a revised district structure, would weaken principal support and destabilize schools at a time when stability is most needed.

The Senate Education Committee report acknowledges that the current system is a “work in progress.” I strongly agree, and that is precisely why SB3334 SD1 should not move forward. A system that is evolving must be allowed to continue improving through thoughtful review, collaboration, and refinement, not through abrupt structural dismantling. This mirrors the same Continuous School Improvement Process that schools across the state are required to follow: we plan, we do, we check, and we act. Change should be guided by a clear plan, grounded in evidence, and developed collaboratively.

I respectfully urge you not to support SB3334 or its proposed SD1 amendments. Rather than restructuring the system through legislation that works around existing leadership, I encourage the Ways and Means Committee along with the Senate Education Committee to collaborate directly with the HDOE Superintendent, Deputy Superintendents, Assistant Superintendents, Complex Area Superintendents, and principals to strengthen what is already in place. A shared, statewide plan that emphasizes collaboration, transparency, and clear lines of responsibility will better support school leaders, uphold labor agreements, and ensure decisions remain responsive to local school communities.

Thank you for your time, your service, and your continued commitment to Hawai‘i’s public schools.

Respectfully,

A handwritten signature in black ink, appearing to read 'Shayne Greenland', with a long horizontal flourish extending to the right.

Shayne Greenland  
Principal  
Ilima Intermediate School

# Testimony in Opposition to SB 3334

**DATE:** February 23, 2026

**TO:** Members of the Committee

**FROM:** Christopher D. Bonilla, Principal, Holomua Elementary School

**RE: STRONGER OPPOSITION TO SB 3334 – Preservation of Systemic Cohesion and Professional Oversight**

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## Introduction & Standing

Aloha Chair, Vice Chair, and Members of the Committee. My name is Christopher D. Bonilla, and I serve as the Principal of Holomua Elementary School. I submit this testimony in **firm opposition** to SB 3334. This legislation threatens to dismantle the essential infrastructure of the Hawaii State Department of Education (HIDOE) by undermining the critical role of the Complex Area Superintendent (CAS) and compromising the professional integrity of school leadership.

## The Role of the CAS: A Matter of Equity and Systemic Integrity

School leadership cannot function in isolation. The CAS serves as the vital connective tissue between individual school sites and state-level policy. For Holomua Elementary—the state’s sole remaining **multi-track school**—the CAS is not merely a supervisor, but a critical advocate.

- **Complexity Management:** Our unique operational structure requires high-level coordination with state leadership and private entities to manage campus expansion and scheduling intricacies.
- **Mitigation of Siloed Operations:** Removing or weakening CAS oversight forces schools to compete for resources, creating a fragmented system where equity is sacrificed for localized influence.
- **The Risk of Systemic Failure:** Without the CAS, the burden of systemic advocacy falls solely on individual administrators, leading to leadership burnout and a breakdown of the communication channels necessary for student achievement.

## Opposition to the Expansion of SCC Authority

I specifically oppose the provisions in SB 3334 that seek to expand the authority of the **School Community Council (SCC)** regarding principal evaluations and personnel decisions.

While community input is valued, school leadership is a specialized profession requiring rigorous training, data-driven decision-making, and adherence to complex labor-management agreements.

The Professional Standard	The SB 3334 Risk
<p><b>Technical Expertise:</b> The CAS possesses the "wheelhouse" knowledge to evaluate principals based on HIDOE standards and contractual obligations.</p>	<p><b>Subjective Oversight:</b> Shifting authority to the SCC invites "du jour" initiatives driven by personal opinion or anecdotal evidence rather than educational research.</p>
<p><b>Ethical Consistency:</b> Principals are morally bound to prioritize student outcomes and professional standards above all else.</p>	<p><b>Conflict of Interest:</b> Expanded SCC authority introduces voices that may harbor motives inconsistent with educational best practices.</p>

**Conclusion: A Challenge to the Committee**

I urge this committee to consider the long-term impact of this legislation on the future of Hawaii's schools. We must not sacrifice **systemic cohesion** for **localized overreach**.

To preserve the stability of our leadership, the professional standards of our educators, and the equity of our learning environments for our students, I respectfully urge the committee to **hold this bill**. Mahalo.



**STATE OF HAWAII**  
DEPARTMENT OF EDUCATION  
Kāneʻohe Elementary School  
45-495 Kamehameha Highway  
Kaneohe, HI 96744  
Phone 808-305-0000 • Fax 808-235-9185

**Date:** 02/25/2026  
**Time:** 10:55 AM  
**Location:** 211  
**Committee:** WAM

**Department:** Education  
**Person Testifying:** Derek Minakami  
**Title of Bill:** SB3334 SD1 RELATING TO EDUCATION

**Position:** OPPOSE

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

As a school principal with 33 years of experience as an educator in the DOE, I strongly oppose this bill for the following reasons:

This bill appears to simply revert the title of the Complex-Area Superintendent back to District Superintendent. But since it does not specify how many districts there will be should the bill pass, it can be assumed that it will be based on the existing seven districts, which was the former model of dividing schools. If that is the case, it must be acknowledged that even twenty years ago when Act 51 separated the districts into the Complex-Areas, there was a needs for tighter knit work units, closer supervision and supports, and increased responsiveness between school and district offices. Today, this is even more so the case. Our jobs as school leaders is much more complex and demanding with the need to implement viable curriculum, address AI, reduce post-pandemic chronic absenteeism, support well-being and mental health, etc..

Supporting schools immersed in this increased level of complexity, Complex-Area Superintendents play a critical role by knowing their schools well, setting a clear, unified vision that aligns instructional initiatives; acting as a liaison with state entities often advocating on behalf of schools such as ensuring unsafe facility concerns are addressed; coaching, mentoring and evaluating principals to encourage continuous improvement on behalf of students; networking with and recruiting neighborhood partners to collaborate with schools

and offer opportunities to students that build a greater sense of kuleana to their community; and interfacing with parents and care-givers to address concerns while fostering positive relationships. Doubling or tripling the number of schools they need to supervise by converting complex-areas back to districts would make that job insurmountable given current conditions.

As principals, we rely on our Complex-Area Superintendent to act swiftly and provide personalized counsel informed by a thorough knowledge of our schools. At present, should the position be eliminated and these essential responsibilities reassigned to a district superintendent then responses and impact will surely be diluted. Instead of being managed by someone overseeing 9 to 28 schools within a limited geographic area of 550 to 1000 square miles, the superintendent and two deputy superintendents would need to play a similar role for 258 schools covering 10,000 square miles in addition to all their regular duties.

Lastly, the bill calls for School Community Councils to play a role in evaluating the principal and I feel this is inappropriate. The School Community Council includes members from Bargaining Unit 5 and the classified staff, both of whom are evaluated by the principal. Hence there is serious risk of bias, quid pro quo, and/or claims of retaliation when you have parties subject to being evaluated serving as evaluators. Whether influenced by a fear of retaliation or motivated by a personal grievance, subordinates have a difficult time impartially evaluating their supervisors. In the end, this subverts the goal of using the evaluation results for professional development and diminishes trust in the authenticity of the evaluations.

Mahalo for your consideration of this testimony.

**SB-3334-SD-1**

Submitted on: 2/23/2026 1:43:28 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Alexandra Obra	Individual	Oppose	Written Testimony Only

Comments:

**Department: HDOE - Waiāhole Elementary School**

**BILL: SB 3334, Relating to Education Elimination of Complex Area Superintendent Positions**

**TESTIFIER(S): Alexandra Obra, Principal**

**POSITION: OPPOSITION AND COMMENTS**

**Aloha Chair Dela Cruz and Members of the Committee:**

**I am writing to express my opposition to SB 3334. While I understand the intent to reduce "administrative burdens," this bill fails to recognize the essential regional leadership that Complex Area Superintendents (CAS) provide—particularly for rural and underserved communities.**

**Our opposition is based on four critical concerns:**

**1. Erosion of the Tri-Level Leadership Framework**

**The CAS is not merely an administrative layer; they are the vital conduit connecting individual school needs with state-level initiatives. Eliminating this position severs the communication link between the "schoolhouse" and the Department of Education's central leadership. Without a CAS, our schools risk becoming "islands of operation," lacking a cohesive regional strategy or a direct line of advocacy at the state level.**

**2. Request for Additional Clarity on the Replacement for CAS**

**Section 17 of the bill is vague as to how CAS duties would be reassigned. If the thought was to return to district superintendents, that would greatly increase the number of schools under the supervision of a smaller number of individuals, which will lead to systemic neglect and burnout.**

**3. Improper Expansion of School Community Council (SCC) Authority**

**The bill proposes giving SCC evaluations a 50% weight in principal selection. We oppose this shift for the following reasons:**

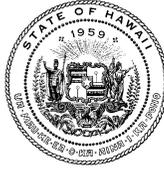
- **Union Contract Conflicts:** This creates a "de facto" hiring power for SCCs that contradicts existing labor agreements.
- **Integrity of Evaluation:** This shift bypasses the professional, merit-based evaluation currently facilitated by the CAS. We are concerned that, without regional oversight, the selection process could be easily disrupted by a small number of disgruntled individuals rather than focused on professional competence.

#### **4. Risk of "Honolulu-Centric" Governance**

**Removing regional leadership altogether threatens to centralize power entirely in Honolulu. For rural complexes like Nanakuli-Waianae and for our colleagues on the Neighbor Islands, a centralized structure ignores our unique geographic, cultural, and socio-economic challenges. This bill risks creating a hyper-centralized system that lacks accountability to the specific communities it is meant to serve.**

**For these reasons, we urge the Committee to hold SB 3334 and maintain the regional leadership structure that ensures our schools, teachers, and students receive the specialized support they require. Mahalo for the opportunity to testify.**

**Respectfully,**



**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
**KA `OIHANA HO`ONA`AUAO**  
**KAPŌLEI HIGH SCHOOL**  
91-5007 KAPŌLEI PARKWAY  
KAPŌLEI, HAWAII 96707  
Phone: (808) 305-8000  
Fax: (808) 692-8255

Date: February 23, 2026

To: Honorable Chair Dela Cruz and Members of the Legislative Committee

Subject: TESTIMONY IN OPPOSITION TO SB3334 SD1 RELATING TO EDUCATION

Dear Chair and Committee Members,

I am writing to express my strong opposition to SB3334, SD1, which proposes a significant restructuring of the Department of Education (DOE) by repealing the current complex area system and the role of the Complex Area Superintendent (CAS). While I understand the desire to improve administrative efficiency, I believe this bill as currently drafted will have detrimental effects on our schools, principals, and the unique communities they serve.

Under the current structure, Complex Area Superintendents serve as a critical bridge between the state department and individual schools. The proposal to replace this system with an unspecified number of "districts" overseen by "District Superintendents for Academics" and "Deputy District Superintendents" risks losing the localized support that is vital for school success.

The CAS is uniquely positioned to understand the specific socioeconomic, cultural, and geographic needs of their specific community. They provide school principals with valuable resources and guidance tailored to those needs—a level of support that may be diluted in a larger, more centralized district model. Removing this layer of leadership disrupts established relationships and the specialized oversight that currently ensures administrative and instructional support services—including personnel, fiscal, and facilities support—are delivered effectively to our students.

I am deeply concerned about the provision in SB3334, SD1 that requires School Community Councils (SCC) to submit principal evaluations to the Superintendent of Education. While community engagement is a cornerstone of our education system, granting the SCC such weight and consideration in a formal performance evaluation carries significant unintended consequences:

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Civil Rights Compliance Branch, Hawai'i State Department of Education, 1390 Miller Street, Room 416, Honolulu, HI 96813, (808) 784-6325 or relay CRCB@k12.hi.us

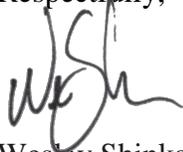
- **Subjectivity and Lack of Training:** SCC members, while well-intentioned, may lack the professional expertise in educational leadership and pedagogical standards required to conduct a fair and objective professional evaluation of a school principal.
- **Political Pressure:** Shifting evaluation power to a community council can inadvertently subject a principal's job security to local politics or the specific agendas of a few vocal individuals, rather than their overall effectiveness in improving student outcomes.
- **Conflict of Interest:** Principals must often make difficult decisions for the long-term benefit of the school that may be unpopular in the short term. Fearing a negative evaluation from the SCC could discourage principals from taking the necessary, bold steps required for systemic improvement.

While the bill notes that the Superintendent of Education retains final authority over appointments, the requirement that these evaluations be submitted and considered introduces a level of instability that could deter high-quality leaders from seeking or remaining in principal positions.

The current complex area structure was designed to provide localized, specialized support to schools. Repealing this structure in favor of a new district system risks creating the very "unclear authority structures" the bill claims to want to eliminate. I urge the committee to maintain the current role of the Complex Area Superintendent and to reconsider the weight given to School Community Councils in the formal evaluation of our school leaders.

For these reasons, I respectfully ask that you oppose SB3334, SD1. Thank you for your time, your service, and your continued commitment to Hawai'i's public schools.

Respectfully,

A handwritten signature in black ink, appearing to read 'W. Shinkawa', written over a faint, illegible printed name.

Wesley Shinkawa, Principal

Kapolei High School

**SB-3334-SD-1**

Submitted on: 2/23/2026 2:08:08 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Leslie Ziu	Individual	Oppose	Written Testimony Only

Comments:

Aloha,

I write in strong opposition to SB3334. My name is Leslie Ziu and I am proud and humbled to serve as Principal of Mākaha Elementary School. I am a newer principal in our Hawai'i Department of Education (HIDOE) system having just completed one year of service in this position as of November 2025. The Nānākuli-Wai'anae Complex Area Superintendent (CAS) has been instrumental in helping me transition to this work and guide the school.

CAS Disa Hauge has served over 40 years in the Nānākuli-Wai'anae Complex. She is extremely knowledgeable of our community as a resident within it and former teacher, vice principal, and principal here before stepping into the role. She also was a student herself at Mākaha Elementary School! Her firsthand knowledge of the unique challenges Nānākuli-Wai'anae faces, paired with her highly technical knowledge allows me to be more culturally responsive and effective as a newcomer. She ensures I am not missing important compliance deadlines for the state and also is available at any time if staff or student is facing an emergency. Tragically, a beloved and veteran educator unexpectedly died on a Friday in October 2025. That Saturday, CAS Hauge spent hours with me on the phone helping me craft a communication and support plan for staff, students, and families alike. That Monday, CAS Hauge was there on campus with me to help deliver the news and mobilize grief resources. I would sincerely be a less effective leader without her and know my fellow principals feel the same way. Our work is rewarding, but also challenging as we navigate budget, personnel management, parent concerns, and student needs. As someone who wishes to serve in HIDOE for decades more, please do not support this bill to take away the CAS position. The CAS leaders provides the most essential support for our administrators and complex areas, which ultimately allow us to best serve students.

Mahalo for your time and consideration.

Respectfully,

Leslie Ziu

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## Testimony in Opposition to SB3334

**To:** The Hawaii State Legislature

**Date:** February 23, 2026

**Re:** Opposition to SB3334, Relating to the Department of Education's Leadership Structure

We, the Educational Officers of the Aiea-Moanalua-Radford Complex Area, respectfully submit this testimony to express our strong opposition to **SB3334**. This bill, which proposes to abolish the Complex Area Superintendent (CAS) position, fundamentally changes the leadership structure of the Department of Education (DOE) in a way that will significantly compromise support for our schools, undermine the DOE's operational autonomy, and ultimately harm our students.

Our opposition is based on the following critical points:

### 1. Loss of Localized Leadership and Direct School Support

The original intent of establishing the Complex Area Superintendent structure was to decentralize support, bringing dedicated administrative and operational assistance closer to the schools by having a superintendent manage a smaller, more focused group of schools.

- **Removal of a Vital Intermediary:** The CAS serves as a vital intermediary, overseeing essential local functions like fiscal support and curriculum development. Removing this layer eliminates a key voice that facilitates critical school-home relationships and two-way communication, which is necessary to build trust and strengthen community engagement.
- **Unreasonable Scope of Responsibility:** This bill redirects large-scale, complex issues—which currently fall within the authority of the CAS—directly to the State Superintendent. Given the staggering scale of the Hawaii Department of Education (258 schools), this consolidation will create an unmanageable bottleneck, making effective management of nuanced student needs (including high-needs, English Learners, and Special Education students) administratively impossible.

### 2. Undermining the Autonomy of the Department of Education

The Department of Education is constitutionally governed by the Board of Education (BOE), not the Legislature. This bill directly interferes with the established governance structure of the DOE, undermining its autonomy and creating a more politicized environment for educational decisions.

- **Over-Centralized Principal Selection:** Though the State Superintendent has final authority over all principal appointments, it is the CAS who possesses the most balanced

knowledge of unique school cultures. Giving the school community councils the power to evaluate and recommend principals to the State Superintendent will inevitably lead to a "one-size-fits-all" approach that ignores the specific core values and needs of individual communities.

- **Risk to Administrator Quality and Retention:** Allowing a layman board with little or no educational background to evaluate principals is a grave concern. This process will become even more political, fail to attract quality administrators, and threaten the retention of experienced, effective school leaders.

We recognize the desire for streamlined accountability, but eliminating the Complex Area Superintendent position will only create a bottleneck at the state level. It will not solve existing issues of "unclear authority structures" but will instead erode the local support, leadership, and operational autonomy critical for the success of our students and school communities.

**For these reasons, we strongly urge you to vote AGAINST SB3334.**

**Sincerely,**

The Educational Officers of the Aiea-Moanalua-Radford Complex Area

Date: Wednesday, February 25, 2026

Time: 10:55 am

Location: Conference Room 211 & Videoconference, State Capitol, 415 South Beretania Street

Committee: WAM

Department: Ka'ū-Kea'au-Pāhoa Complex Area

BILL: SB 3334, Relating to Education: Elimination of Complex Area Superintendent Positions

TESTIFIER: Wilma Roddy

POSITION: STRONG OPPOSITION

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

I'm Wilma Roddy, and I am writing to express my strong opposition to SB 3334, which seeks to repeal the Complex Area Superintendent (CAS) position.

This measure would dismantle the most effective bridge between our rural communities and the state government. Removing this layer of leadership would create a massive structural void, destabilize school support systems, and centralize power in a way that detaches leadership from the unique needs of our diverse communities. In our district, Ka'ū-Kea'au-Pāhoa (KKP) Complex Area, our CAS is the frontline of support.

I currently serve as a Complex Academic Officer (CAO) in KKP, prior to that I served as Principal for 9 years and Vice Principal for 5 years. I had the privilege of working alongside two amazing Complex Area Superintendents whose leadership provides a level of support, mentorship, stability and localized expertise that ensures our rural schools are never overlooked by a centralized state office that is miles away from our daily realities.

- **Crisis Response:** During the eruptions of Kilauea in 2014 and 2018, our CAS was able to seamlessly coordinate school closures and relocations, ensuring that the education of displaced students continued without interruption while prioritizing the physical safety of our staff and families. Maintaining a local CAS ensures our principals have immediate access to leadership that possesses an intimate understanding of our geography and infrastructure, allowing for swift, informed decision-making that keeps our schools running safely.
- **Addressing the Teacher Shortage:** Our CAS has shown exceptional initiative in addressing our unique staffing challenges by spearheading the 'Homegrown Job Fair' for

KKP. This is a visionary initiative that empowers our own residents to become educators. This strategy not only addresses staffing needs but ensures our teachers are deeply invested in the long-term success of the community they call home.

- **Empowering Student Voice:** Another standout achievement is the establishment of the KKP CAS Student Advisory Council. This platform does more than just open a line of communication; it cultivates the next generation of local leaders by ensuring that students from Kea‘au to Ka‘ū have a seat at the table. By engaging directly with leadership on critical issues like transportation and campus safety, our students see firsthand that their lived experiences can drive meaningful policy changes in their own backyard.

### **Structural Concerns with SB 3334**

- **Impossible Span of Control:** Repealing 15 CAS positions would require the State Superintendent to directly oversee over 250 principals. This is a management impossibility that will lead to massive delays in school-level approvals, hiring, and disciplinary actions.
- **Politicization of Principal Selection:** Keeping principal appointments and evaluations at the complex level ensures that our leaders are selected and supported through a specialized, pedagogical lens. The CAS acts as a champion for school excellence, ensuring that every principal is equipped with the specific skills and professional support necessary to meet the unique academic goals of our Ka‘ū-Kea‘au-Pāhoa families.

The CAS position is the vital link that keeps our schools connected and cared for. Their leadership is rooted in a genuine commitment to our students and staff, making sure that our rural challenges are met with real, local solutions. Removing this role would leave our schools without their strongest advocate. I ask you to value the people behind the numbers and maintain this essential position for the sake of our community.

I respectfully urge the Committee to hold SB 3334.

Mahalo for the opportunity to testify,

Wilma Roddy

Complex Academic Officer

**Date:** Wednesday February 25, 2026

**Time:** 10:55am

**Location:** Conference Room 211 &  
Videoconference

**Committee:** WAM (Ways and Means)

**Department:** Ka'ū Kea'au Pāhoa Complex Area

**BILL: SB 3334, Relating to Education** Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Elaine Higa, District Educational Specialist (Literacy)

**POSITION: OPPOSITION AND COMMENTS**

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

I am writing to express my strong opposition to SB 3334. As a Complex Area Educational Specialist focusing on literacy within the Ka'ū-Kea'au-Pāhoa Complex Area, I see firsthand how the regional leadership of a Complex Area Superintendent (CAS) is vital to implementing the specialized instructional supports our students need to succeed.

My opposition is based on four critical concerns regarding the impact this bill would have on literacy and student achievement:

**1. Disruption of Cohesive Literacy Initiatives:** The CAS serves as the essential conduit between state-level literacy mandates and the specific needs of our "schoolhouse". Without a CAS to provide regional strategy, our schools risk becoming "islands of operation," leading to fragmented literacy programs that lack the cohesive oversight necessary to ensure every student reaches grade-level proficiency.

**2. Loss of Localized Instructional Advocacy:** Section 17 of this bill remains vague regarding the reassignment of CAS duties. Transitioning to a centralized or district-wide model would significantly increase the number of schools under a single supervisor, inevitably leading to systemic neglect. For a specialist in literacy, the loss of a CAS means losing a direct advocate who understands our unique geographic and socio-economic challenges and ensures that literacy resources are prioritized for our rural and underserved communities

**3. Impact on Professional Evaluation and Instructional Integrity:** The proposal to give School Community Councils (SCC) a 50% weight in principal selection threatens the integrity of merit-based evaluation. Literacy improvement requires school leaders with deep instructional competence. The current evaluation process, facilitated by the CAS, ensures that principals are selected based on their professional ability to lead complex academic transformations—including literacy—rather than being influenced by local politics or small groups of individuals.

**4. Threat of Hyper-Centralized Governance:** Removing regional leadership threatens to centralize power in Honolulu, ignoring the specific cultural and literacy needs of our Neighbor Island students. Effective literacy instruction is not "one-size-fits-all". Without a CAS to bridge the gap, our schools lose the specialized, regional support required to address the unique literacy challenges faced by the students in our specific complex area.

For these reasons, I urge the Committee to hold SB 3334. At its heart, literacy is about more than just reading and writing; it is about giving every child in our community the voice and the tools they need to build a bright future. This work requires a deeply personal, localized connection that only regional leadership can provide. By maintaining the current structure, you are ensuring that our literacy efforts remain rooted in the specific needs of our students, protecting the progress we have made and the dreams we are helping our children achieve. Mahalo for the opportunity to testify.

Respectfully,

Elaine Higa

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

February 23, 2026

To Chair Dela Cruz and members of the Ways and Means Committee:

As the Principal of Kaua'i High School, I am writing to express my **strong opposition** to the proposed restructuring of our educational leadership and the overhaul of the principal selection process in **SB 3334 SD1**. While I support the spirit of community engagement, the specific mechanisms in this proposal threaten to destabilize school leadership and ignore the logistical realities of our neighbor island communities.

The proposal to consolidate support from 15 complex areas down to seven districts is a move toward a "one-size-fits-all" model that will disenfranchise neighbor island schools. On Kaua'i, our Complex Area Superintendent is not just an administrator; they are our primary lifeline to state leadership.

For a neighboring island school, the biggest barriers to our success are time and distance. When resources, communication, and decision-making are centralized in Honolulu, we rely on a local CAS who understands the specific nuances of our community to advocate for us. Reducing the number of CAS positions will effectively silence the neighbor islands, leaving us to navigate a bureaucracy that is geographically and culturally detached from our daily reality.

We hold deep concerns that redistricting will lead to an inequitable division of funding and resources. In larger, more populated districts, the "fight" for resources and renovations will inherently favor schools with higher enrollment numbers and more political visibility.

We already see a stark contrast in facilities and opportunities. For example, while schools like Waipahu High School have seen significant expansions of their Academies and community opportunities, rural schools on the neighbor islands continue to struggle for basic renovations and infrastructure parity. Consolidating leadership will only worsen this gap, making it increasingly difficult for rural schools to compete for the funding necessary to provide an equitable education for our students.

While the proposal seeks to grant the SCC a 50% weight in the selection and evaluation of principals, it fails to account for the actual state of these councils. Many schools, including ours, consistently struggle to recruit and retain community and parent members for our SCC boards. It is mathematically and ethically unsound to grant a 50% voting weight to a body that often does not have a full roster of members. Selecting a school leader requires deep expertise in pedagogy, labor relations, finance, and safety law. A 50% weight risks turning a professional hiring process into a "popularity contest" influenced by a small, vocal minority rather than the needs of the entire student body.

It is important to note that the current principal selection and evaluation system already incorporates stakeholder input. Our interview panels for principal selection currently include teachers, staff, parents, and community members—the same stakeholders represented on the SCC, with the exception of students.

Furthermore, principal evaluations already include input from the SCC. The system for choosing and holding leaders accountable is already in the hands of these stakeholders. Moving the weight to 50% is an overcorrection that creates instability. Principals must often make difficult, unpopular decisions to uphold state policy or ensure student safety; they should not fear for their professional standing due to the shifting winds of local council dynamics.

Effective school leadership requires a balance of community input and professional oversight. This proposal swings the pendulum too far, creating a structure that is geographically detached yet professionally compromised. For the stability of our schools and the protection of professional standards, I urge you to **hold this bill** and continue the current leadership practices that allow neighbor island schools to maintain a dedicated, local voice.

Respectfully submitted,

**Marlene Leary** Principal

A handwritten signature in blue ink, appearing to read 'M. Leary', with a large, stylized flourish at the end.

**SB-3334-SD-1**

Submitted on: 2/23/2026 2:48:39 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Todd Fujimori	Individual	Oppose	Written Testimony Only

Comments:

**Position: Opposed**

Hi. My name is Todd Fujimori.

As the Principal of Honouliuli Middle School and an administrator with 20 years of experience in the Campbell-Kapolei Complex, I am writing to express my strong opposition to Bill SB3334 SD1. My position is based on two decades of frontline experience working under the direct supervision and support of Complex Area Superintendents (CAS) Heidi Armstrong, Sean Tajima, and Jonhenry Lee.

The proposal to eliminate or diminish the CAS role threatens the safety, responsiveness, and efficacy of Hawaii’s schools for the following reasons:

**I. Critical Accessibility During Crisis**

The CAS serves as a vital first responder for school administrators. In high-stakes environments, "delayed support" is "denied support." Throughout my tenure, I have navigated several high-intensity crises, including:

- Safety Threats: Potential school shootings and student actions posing immediate risks.
- Infrastructure Failures: Major water main breaks requiring emergency campus management.
- Security Concerns: Interactions with irate, threatening individuals.

In these life-safety situations, my CAS has remained accessible and responsive. To date, my longest response time for emergency consultation has been under two minutes. Removing this layer of leadership would inevitably increase response times, placing an undue and dangerous burden on school-level administrators.

**II. Institutional Knowledge and Calibrated Support**

The efficacy of the CAS role is built on a foundation of proximity and relationship. The regular presence of the CAS on our campus—exceeding the baseline of monthly face-to-face meetings—ensures they possess an intimate understanding of our specific campus culture and needs.

The guidance I receive is never "generic." Because my CAS knows our campus, their consultation is precisely calibrated to the unique challenges of the Kapolei Complex. This tailored support is essential for meaningful school improvement and student success.

The CAS position is a critical lifeline for school safety and operational stability. I feel strongly that it is an unrealistic and "tough ask" to expect schools to maintain this level of excellence without this specific infrastructure.

I respectfully urge the committee to oppose Bill SB3334 SD1.

Thank you for the opportunity to provide testimony.

Sincerely,

Todd Fujimori (Principal, Honouliuli Middle School)

**SB-3334-SD-1**

Submitted on: 2/23/2026 3:02:57 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Corey Nakamura	Testifying for Wilcox Elementary	Oppose	Written Testimony Only

Comments:

Aloha Chair Dela Cruz, Vice-Chair and Members of the Committee,

My name is Corey Nakamura. I have served as the principal of Wilcox Elementary for 12 years and have been an educator on Kauai for my entire career. I am writing in strong opposition of SB3334 SD1.

The CAS is not a bureaucratic layer; they are the critical bridge between state-level policy and school level implementation. Eliminating the CAS position removes a mentor, coach and supervisors for principals. Without this, schools become silos, leading to inconsistencies in student services, professional development and district resource support.

In my 31 years in education, I have seen the best results come from collaboration, not the dismantling of professional support structures. True progress comes from building and strengthening, not removal.

Mahalo for the opportunity to testify.

Corey Nakamura, Principal, Wilcox Elementary

**SB-3334-SD-1**

Submitted on: 2/23/2026 3:18:06 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Travis Toriano	Individual	Oppose	Written Testimony Only

Comments:

Chair, Vice Chair, and Members of the Committee:

My name is Travis Toriano, and I serve as the Principal of Hilo Intermediate School. I am writing to express my **strong opposition to SB3334**, which seeks to revert the Department of Education from the current Complex Area structure back to a broader District-based system.

In my experience leading Hilo Intermediate, the current Complex Area model is not just an administrative preference, it is a functional necessity for the following reasons:

**1. Localized Guidance and Support**

Our Complex Area Superintendent (CAS) provides the specific, nuanced guidance needed to effectively support our students. Having a leader with direct experience in this position facilitates critical decision-making. A CAS understands the unique socio-economic and geographic challenges of our specific community in a way that a large District office simply cannot.

**2. Collaborative Leadership and Shared Vision**

The role of a school principal can be an isolating one. The Complex Area structure creates a vital network where the CAS facilitates the sharing of ideas and best practices among all principals in the complex. This ensures that our schools, from elementary through high school, are aligned in their direction and instructional strategies.

**3. Avoiding the "Island" Effect**

Reverting to a District model would create a system that is too geographically and administratively vast to provide meaningful, timely feedback to individual schools. Without the localized attention of a Complex Area, schools risk becoming "islands." The CAS acts as a crucial bridge, translating state-level initiatives into localized action while ensuring we stay aligned with our neighboring schools.

**4. Responsive Oversight**

The current structure allows for a more responsive and agile leadership model. When critical issues regarding student safety or academic success arise, having an experienced voice close at hand is imperative. The Complex Area model ensures that oversight is rooted in relationship-based leadership and professional synergy.

The Complex Area structure allows for a level of transparency and communication that is vital to the health of our school system. I respectfully urge the committee to **defer SB3334** to ensure our schools continue to receive the focused support they need to thrive.

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

**SB-3334-SD-1**

Submitted on: 2/23/2026 3:20:31 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Neil Battad	Testifying for Mauka Lani Elementary School	Oppose	Written Testimony Only

Comments:

**Chair, Vice Chair, and Members of the Committee:**

**Thank you for the opportunity to testify in strong opposition to SB 3334.**

**As a principal in the Campbell–Kapolei Complex Area, I can state clearly and without hesitation that the Complex Area Superintendent (CAS) is indispensable to the success of our schools. In a region defined by rapid growth, shifting demographics, and significant infrastructure demands, the CAS is not an administrative layer to be removed — the CAS is the strategic leader who ensures coherence, accountability, and responsiveness across our entire complex.**

**The CAS provides the essential bridge between individual schools and the Department of Education’s central leadership. State initiatives, mandates, and reforms do not implement themselves. They require thoughtful interpretation, contextualization, and alignment. Our CAS ensures that statewide priorities are translated into actionable, culturally responsive strategies tailored to the unique needs of our Campbell-Kapolei schools. Without this leadership, schools would operate in silos, and continuity for students transitioning from elementary to intermediate to high school would be compromised.**

**SB 3334 does not provide clarity on how the substantial responsibilities of the CAS would be absorbed. If these duties are consolidated into a broader district structure, the span of control would expand beyond what is reasonable or effective. The Campbell–Kapolei Complex includes numerous diverse schools serving one of the most dynamic and fast-growing populations in the state. Effective oversight requires proximity, presence, and sustained engagement. Removing the CAS risks diluting support, overextending centralized leadership, and weakening the operational stability principals depend upon. If this bill goes through, a CAS in the Leeward District who oversees between 10-18 schools would be now replaced by a Leeward District Superintendent who would oversee all 46 schools.**

**The proposal to assign a 50% weight to School Community Council evaluations in principal selection further raises serious concerns. While community input is valuable, principal hiring must remain grounded in professional standards, objective performance measures, and system-wide alignment. The CAS plays a critical role in safeguarding the integrity of this process, ensuring leadership decisions are based on demonstrated**

**competence and long-term strategic fit. Removing or minimizing this oversight introduces instability and potential conflict with established contractual frameworks.**

**Most importantly, the CAS serves as the unified voice advocating for the Campbell–Kapolei Complex at the state level. Our region faces unique challenges — enrollment growth, housing development, transportation demands, and evolving socio-economic needs. The CAS coordinates staffing, facilities planning, professional development, and resource allocation across schools to ensure we move forward as a cohesive system rather than as isolated campuses competing for attention.**

**The complex area structure was designed to decentralize authority and bring leadership closer to communities. SB 3334 moves in the opposite direction. A centralized approach cannot replace the informed, field-based leadership that understands the daily realities of ‘Ewa and Kapolei schools.**

**For these reasons, I strongly urge the Committee to hold SB 3334. The continued presence of a dedicated Complex Area Superintendent is essential to maintaining stability, equity, and strategic direction for our students and families.**

**SB-3334-SD-1**

Submitted on: 2/23/2026 3:26:50 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

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

Comments:

To: Senate Committee on Ways and Means

RE: SB3334 SD1 – Relating to Education

Position: Strongly Oppose

I respectfully submit strong opposition to SB3334 SD1.

Regarding the Elimination of the Complex Area Superintendent Position:

The HIDOE operates as a single, statewide school district under the authority of the Board of Education. The Complex Area structure was intentionally designed to ensure:

- Vertical articulation across K–12 feeder patterns
- Alignment of academic standards and instructional priorities,
- Compliance with state and federal mandates
- Consistent implementation of Board policy

Eliminating the CAS structure disrupts established lines of authority and system coherence. CASs currently serve as the accountable instructional leaders bridging schools and state leadership. Removing this role without a clearly articulated governance framework risks creating fragmentation, duplication of oversight, and inconsistent implementation of policy.

The bill does not clearly define the scope of authority, reporting relationships, or accountability metrics for the proposed District Superintendents. Without statutory clarity, this creates ambiguity in chain-of-command and system responsibility, particularly in matters of federal compliance, IDEA implementation, Title funding oversight, and civil rights accountability.

Structural reorganization of a statewide district cannot be undertaken without comprehensive transition planning, defined authority structures, and alignment with existing administrative rules. SB 3334 SD 1 does not provide that clarity.

I am particularly concerned that the proposal eliminates Complex Area Superintendent (CAS) positions while authorizing District Superintendents and Deputy District Superintendents, without clearly establishing statutory limits on the number of Deputy positions.

Complex Area Superintendents and Deputy Superintendents are currently compensated at similar levels, and both are subordinate to the Superintendent's salary cap. If SB 3334 SD 1 eliminates CAS positions and authorizes Deputy District Superintendents without clear limits, it could create positions with comparable or higher compensation than the existing CAS roles, despite the loss of a layer of leadership that provides direct support to principals and schools.

Without clear statutory caps or fiscal analysis, it is unclear whether the proposed District/Deputy structure would be cost-effective compared to the current CAS model that is already in place and operating under established salary ranges. If Deputy District Superintendents are authorized without limitation, the potential exists for administrative expansion rather than cost containment.

Additionally, if Deputy positions are compensated at a rate higher than current Complex Area Superintendents—as is typical in hierarchical compensation structures—this raises serious cost-effectiveness questions:

- What is the projected total salary expenditure under the proposed model?
- How does that compare to the current CAS structure?
- What is the long-term fiscal impact, including retirement and benefit obligations?
- Has a break-even analysis been conducted?

From a principal's perspective, it is unclear how this restructuring produces greater efficiency or improved student outcomes. Without statutory guardrails and a transparent fiscal comparison, the proposal risks increasing administrative overhead rather than streamlining governance. The bill introduces structural change with potentially higher recurring personnel costs and no demonstrated fiscal benefit to schools.

At a time when school-level positions (including teachers, educational assistants, and student support personnel) remain critical needs, expanding upper-level administrative roles without proven cost-effectiveness warrants serious scrutiny. In the absence of a detailed fiscal plan, this bill exposes the Department to unnecessary financial risk.

Regarding the school community council's evaluation shall account for fifty per cent of the overall evaluation in the selection of a principal:

The most concerning aspect of SB 3334 SD 1 is the requirement that School Community Council (SCC) evaluations account for fifty percent of the overall evaluation in the selection of a principal.

As a principal, I strongly support meaningful community engagement. SCCs play an important advisory role in school planning, academic review, and community voice. However, mandating a fixed fifty percent weighting in an employment decision fundamentally changes the nature of principal selection.

Principal hiring is not simply a community preference decision. It is a professional employment action that must comply with:

- Merit-based hiring standards
- Equal employment opportunity law
- Collective bargaining agreements
- Board of Education policy and administrative rule
- Federal and state compliance obligations

A principal is legally responsible for:

- IDEA and special education compliance
- Title I, II, III, and IV program oversight
- Civil rights protections
- Student discipline and due process
- Fiscal management of public funds
- Personnel supervision and evaluation

These responsibilities carry significant legal and fiscal liability. Requiring that an SCC evaluation constitute fifty percent of the overall evaluation elevates an advisory body into a determinative decision-making role without:

- Required training in employment law
- Accountability for compliance outcomes
- Defined conflict-of-interest safeguards
- Legal protection from employment disputes

This statutory mandate removes necessary flexibility from the hiring process and exposes the Department to increased risk of grievance, litigation, and employment challenges. Most concerning, it creates the possibility that professional qualifications, compliance expertise, and leadership experience could be outweighed by factors that are not tied to statutory accountability.

Community voice should inform the process, but it should not statutorily control half of a complex employment decision that carries significant legal, fiscal, and systemwide consequences. SCC members are advisory bodies under statute. Elevating their evaluation to a mandatory fifty percent threshold shifts them from advisory partners to determinative decision-makers without corresponding statutory authority, training requirements, or legal accountability protections. This creates exposure for the Department and potentially for SCC members themselves.

From a governance and fiscal oversight perspective, this provision introduces unnecessary risk without demonstrated benefit to student achievement or system performance. For these reasons, the SCC mandate is the most troubling component of this bill.

SB3334 SD1 introduces structural upheaval without evidence that it will improve student achievement or operational efficiency. Major governance restructuring and mandated changes to principal selection processes should not proceed without comprehensive fiscal analysis, legal

review, and systemwide planning. This bill raises significant concerns regarding accountability, compliance, fiscal responsibility, and legal exposure.

For these reasons, I respectfully urge the Committee to vote **NO** on SB3334 SD1.

Thank you for the opportunity to provide testimony.

Respectfully,  
Tracy Lui  
Principal  
Kahului Elementary School

## Testimony in Opposition to SB 3334

Senators Donovan Dela Cruz and Sharon Moriwaki,

My name is Debby Ng, and I serve as a Complex Academic Officer within a Complex Area supporting nine public schools in a high-need community. I respectfully submit this testimony in strong opposition to SB 3334.

Before addressing the substance of the bill, I want to express deep concern about the public input process surrounding SB 3334. Only 12 individual testimonies were submitted in support, while over 128 testimonies representing 280 direct signatures were submitted in opposition; additionally, both the DOE and HGEA strongly opposed the bill. It is troubling that such a clear majority of voices opposing this measure have not been adequately acknowledged. The record demonstrates that public sentiment is overwhelmingly against this bill, not in favor of it.

Additionally, even the Board of Education's own comments reflected serious concerns about the proposal. It is therefore difficult to understand why a measure with such limited public support — and significant professional and community concern — continues to move forward.

From my experience in the field, I can affirm that the proposed elimination of the Complex Area Superintendent (CAS) position would destabilize the essential support structure that schools rely upon daily. The CAS role is not redundant bureaucracy; it is a critical link that ensures instructional leadership, operational coordination, and accountability across schools.

In our Complex Area, we provide:

- Direct coaching cycles for principals
- Structured mentoring and induction support for numerous beginning teachers
- Ongoing professional development for counselors and academic coaches
- Data analysis, improvement planning, and coordinated assistance for high-turnover schools

These supports are strategically aligned by the CAS to ensure equitable delivery of resources and consistent implementation of state priorities. Removing this leadership layer would shift enormous administrative burdens onto individual principals, who are already managing instructional, compliance, and community demands.

In high-need communities like ours, coherence matters. Stability matters. Leadership continuity matters.

The CAS provides exactly that — consistent guidance that bridges the gap between state-level vision and on-the-ground realities. Eliminating this position risks fragmentation, inequity, and diminished support for the schools and students who can least afford it.

For these reasons, I respectfully urge the Committee to HOLD SB 3334 and to fully examine the long-term impacts this proposal would have on our most vulnerable communities and the students we serve.

Thank you very much for the opportunity to testify.

Sincerely,

Deborah Ng

Nānākuli/Wai'anae Complex Area

808-551-4225

*deborah.ng@k12.hi.us*

**To:** The Honorable Donovan Dela Cruz, Chair; The Honorable Sharon Moriwaki, Vice Chair; And Members of the Ways & Means Committee

**From:** Reid Kuba, Ph.D.  
Jarrett Middle School Principal

**Date:** February 10, 2026

**Measure:** SB3334 SD 1 - RELATING TO EDUCATION (Repeal of Complex Area Superintendents)

**Position:** OPPOSE

## Negative Impact on Jarrett Middle School

William P. Jarrett Middle School serves a diverse community with specific socioeconomic and academic needs. For schools like ours, this repeal removes the essential regional oversight that ensures our student needs are met within the larger Kaimukī-McKinley-Roosevelt (KMR) Complex Area.

The CAS provides several irreplaceable benefits to our school:

- **Vertical Alignment in the KMR Complex:** The CAS ensures that the transition for students from feeder elementary schools like Palolo, Ali'iolani, and Hukulani, into Jarrett Middle and eventually into Kaimukī High School is academically seamless. Without a CAS to coordinate curriculum and behavioral supports across these schools, Jarrett Middle becomes an island rather than part of a cohesive K-12 pipeline.
- **Direct Advocacy for Resources:** Jarrett relies on a CAS who understands our specific and unique needs. A statewide Assistant Superintendent or Superintendent in a central office cannot provide the same level of nuanced advocacy for Jarrett's socio-economic challenges, personnel, and student behavioral and academic needs.
- **Crisis Management & Local Oversight:** In a single-district system, the CAS is the "boots on the ground" for Jarrett Middle. Whether managing campus facilities issues or complex personnel matters, the CAS provides a level of responsiveness that a centralized state office cannot.
- **Appointed Authority:** Authority cannot simply be shifted up to the state level or down to the school level. The CAS' authority supports a Principal's authority to make decisions at the school level which is best for our students. District level authority helps to prevent conflicts of interest that may arise during personnel and parental issues at the school level.

## **Conclusion**

Repealing the CAS position threatens to destabilize the regional support systems that schools like Jarrett Middle School rely on for stability and growth. It is my deep concern that support for schools will disappear or become, at the least, distant. This ultimately has a negative impact on school level personnel and student learning.

**I respectfully urge the Committee to table SB3334.**

My name is Wendy Kau and I proudly serve as the Principal of William C. Lunalilo Elementary School. I am submitting my written testimony in opposition of SB3334 which seeks to replace the current Complex Area Superintendent (CAS) structure with district superintendents and deputies and removes several references to complex areas across statutes.

While the bill frames these changes as streamlining administration, eliminating the CAS role and concentrating authority in fewer district superintendent offices—especially in Honolulu where school density is high—will reduce direct supports, slow responsiveness to school needs, and undercut instructional impact for students. The following points explain how these changes risk creating unclear authority, diminishing communication and resources, and harming student learning and responsiveness to student needs.

### **1. Removing the Complex Area Superintendent role creates unclear direction at the district level**

- The CAS position currently serves as a clearly defined intermediary between state offices and individual schools. Eliminating that role and shifting authority into broader district superintendent offices increases the distance between schools and decision-makers.
- Without CAS-level leadership, principals and school leaders will have fewer timely points of contact for operational, personnel, and curriculum decisions. That will create uncertainty about who is responsible for rapid decisions affecting instruction, discipline, special education, and school-based supports.
- The bill's language centralizes appointment and approval authority with the superintendent of education and places broader powers in fewer district offices. Concentrating authority without preserving the CAS-level coordination risks gaps in day-to-day guidance, producing inconsistent or delayed directives to schools.

### **2. Concentrating requests for support into larger district offices overloads capacity—Honolulu is a critical example**

- Honolulu District already contains a very high concentration of schools and student needs. Moving CAS responsibilities into a single district superintendent office magnifies workloads and places a higher concentration of assistance requests in one location.
- When assistance requests—from principals, teachers, families, or community partners—are funneled into a smaller set of district offices, processing times increase. Delays in resolving staffing issues, facility problems, student services, and special education accommodations directly affect classroom instruction.
- Overburdened district offices will be less able to provide the tailored, timely support schools require, making it harder for principals to personalize efforts for their communities as the bill nominally allows.

### **3. Reduced supports, communication, and resources will negatively impact instructional effectiveness**

- Instructional improvement depends on continuous, localized coaching, curriculum alignment work, and professional development coordinated between schools and intermediate leadership. The CAS system currently supports these functions with a focus on clusters of schools that share feeder patterns and community contexts.
- Under SB3334, district superintendents may appoint staff, but the bill does not guarantee the same distributed, embedded capacity that CAS structures provide. That creates a risk that instructional supports—curriculum guidance, data-driven coaching, intervention coordination—will be thinner and less consistent across schools.
- Less consistent support means teachers and school leaders will have fewer opportunities for job-embedded professional learning, slower help implementing formative assessment systems, and weaker coordination of interventions for struggling students—reducing overall instructional impact.

### **4. Student learning and responsiveness to student needs will suffer**

- Timely responses to student needs—academic interventions, mental health referrals, special education services, and behavior supports—depend on clearly defined, local leadership channels. If those channels are concentrated and overtaxed, students experience delays in receiving services.
- The bill's restructuring risks increasing the time between school-identified need and district-level action (for example, evaluations, placements, or resource allocations). Delayed responses widen achievement gaps and reduce the chance that students receive supports while they can be most effective.
- Further, the removal of complex-area-focused roles undermines the capacity to track and address patterns across feeder schools (e.g., early-warning indicators in middle grades that predict high-school outcomes), reducing the system's ability to act preventively rather than reactively.

### **5. Communication with stakeholders will become less effective and less frequent**

- Current CAS structures help maintain regular, face-to-face communication with principals, school community councils, families, and local partners. That local presence supports trust, rapid information sharing, and collaborative problem-solving.
- Consolidating those responsibilities raises the likelihood that principals and community members will not have consistent access to leaders who understand local context. The bill's proposed annual evaluations and centralized reporting do not substitute for everyday, relationship-based communication that supports responsiveness.
- Reduced communication frequency and clarity can erode stakeholder confidence and make it harder to implement improvement strategies that require community buy-in—ultimately affecting students.

## **6. Fiscal and operational risks threaten school-level resources**

- Shifting administrative responsibilities without explicit provisions to preserve or expand district-level staffing and resources risks an effective reduction in supports. The bill allows district superintendents to appoint staff “as necessary,” but does not guarantee budgets or staffing ratios comparable to current Complex Area structures.
- If budgets are not adjusted to account for workload consolidation—especially in populous districts—schools may face longer delays for personnel actions, slower facility maintenance, and reduced access to specialized services (e.g., special education coordinators, instructional coaches).
- These operational lags divert principal time from instructional leadership to administrative problem-solving, reducing the school’s capacity to focus on pedagogy and student outcomes.

## **7. Accountability and evaluation mechanisms may not protect instructional quality**

- SB3334 introduces annual performance evaluations for district superintendents (including student outcomes, fiscal management, leadership effectiveness, and stakeholder engagement). While important, these evaluation elements alone do not ensure the day-to-day, distributed leadership currently supplied by the CAS position.
- Evaluations are retrospective and may not prevent short-term breakdowns in service or communication that undermine student learning. Without localized leadership monitoring daily implementation, problems can persist long enough to harm students before they appear in performance metrics.

SB3334 is presented as administrative streamlining, but in practice it risks removing critical, localized layers of leadership and support that sustain school responsiveness and instructional impact. Eliminating the Complex Area Superintendent role and concentrating authority into larger district superintendent offices—without guaranteed, commensurate increases in staffing, resources, or mandated local presence—will reduce supports, slow responsiveness, and hamper schools’ ability to deliver effective instruction. These changes pose real risks to student learning outcomes and to equitable responsiveness to student needs, particularly in high-density districts such as Honolulu. Respectfully, I highly oppose SB3334.

**SB-3334-SD-1**

Submitted on: 2/23/2026 4:19:09 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Disa Hauge	Individual	Oppose	Written Testimony Only

Comments:

**Aloha Chair Dela Cruz and Vice Chair Moriwaki:**

**My name is Disa Hauge, and I serve as the Complex Area Superintendent (CAS) in Nānākuli-Wai‘anae (NW). As you know, NW has the largest population of Hawaiians in the world and is considered a historically underserved community. I respectfully submit testimony in OPPOSITION to SB 3334.**

**The proposed elimination of the Complex Area Superintendent (CAS) position would devastate a proven system of support specifically designed for high-need communities like ours. Unlike district-based models serving large numbers of schools across diverse contexts, our Complex Area structure allows intensive, culturally responsive, and relationship-driven support tailored to the unique challenges facing our nine schools on the Wai‘anae Coast.**

**Our community requires a different level of support than a one-size-fits-all district model can provide. We face compound challenges: elevated staff turnover, a substantial proportion of new teachers requiring sustained mentoring, deep poverty affecting student access to school and medical/mental health services, and the critical need for culturally sustaining practices that honor our predominantly Native Hawaiian student population. A CAS overseeing a large number of schools across varied communities cannot provide the depth of engagement and support our schools require. I know: I have 42 years in Nanakuli-Waianae schools under both District Supts and CASs. Only CASs ever were able to truly support our schools in helpful ways.**

**Schools have autonomy under Act 51 to allocate resources in the best interests of their students and the CAS's authority allows support and oversight; it does not allow usurpation of principals' budgetary decisions. School level fiscal autonomy already exists and it does not, by itself, guarantee effective school systems. Complex Area Systems of Support to schools provides principals and teachers with opportunities for technical assistance and, more importantly, with opportunities to be coached, to engage in professional learning with one's peers, and to thrive together as connected schools serving students from K through 12th grade. Coherence matters in a complex--kids deserve it.**

**Our complex area has a single focus: being a system of support to its schools. Towards that end, we have data dashboards that track schools' progress on everything from attendance**

**to academic progress to compliance with special education. All teachers are observed three times a year by the complex and that data, along with principals' biweekly teacher observations and common complex-wide student assessment data, is analyzed with principals & their school instructional coaches in order to plan how best to teach our kids. Every principal has an Educational Officer assigned to support them and I meet with all principals monthly in a coaching cycle. We have an EO who supports the community school model and an EO who supports Ola Moku (Thriving Community) in which all teachers are supported with resources to teach our students the 'ike and mo'olelo of our community within the HA framework.**

**This intensive support works. Under our current CA structure, four of the six schools identified as Comprehensive Support & Improvement under federal guidelines have successfully exited that status—a testament to the hard work of our educators and the coordinated, sustained system of support the Complex Area structure enables.**

**Consolidating oversight to a district level serving large schools would severely dilute this focused support, eliminate the cultural and contextual expertise our CASs provide, and burden individual principals—many already managing extreme complexity—with responsibilities they cannot and should not have to shoulder alone.**

**In high-need, high-Hawaiian communities, coherence matters. Cultural responsiveness matters. Intensive, relationship-based support matters. Our CAS structure provides continuity of vision, coordinated accountability, and responsive leadership grounded in deep knowledge of our community's strengths and needs. Eliminating this structure risks dismantling a system that is demonstrably improving outcomes for our most underserved students.**

**I respectfully urge the Committee to HOLD SB 3334 and carefully examine the potentially devastating impact on communities like Nānākuli-Wai'anae, where students deserve—and are succeeding because of—a complex-level system built for their specific needs.**

**Thank you for the opportunity to provide testimony.**

**SB-3334-SD-1**

Submitted on: 2/23/2026 4:51:11 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Maili Costa	Individual	Support	Written Testimony Only

Comments:

I support SB3334. It ensures transparency and accountability within our school system. This bill will address governance, accountability, and oversight issues that many DOE employees have raised. When leadership structures lack transparency or when there is a perception that relationships influence outcomes, trust erodes. And once trust erodes, morale follows. These oversight efforts will ensure taxpayer dollars are used effectively and that school environments are supportive and professional. It will also strengthen the system so educators can focus on teaching.

**SB-3334-SD-1**

Submitted on: 2/23/2026 5:37:45 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Hannah Loyola	Testifying for Hawaii Department of Education	Oppose	Written Testimony Only

Comments:

The proposal to eliminate the Complex Area Superintendent (CAS) position and alter the principal evaluation process would have a disproportionately negative impact on rural and neighbor island schools.

As a school leader in Kohala, I rely heavily on the leadership of our West Hawaii CAS. Our CAS is responsible for a massive area—from Paauilo in the north to Hookena in the south. Despite these distances, she remains a constant presence in our schools, providing:

- **Direct Accountability and Support:** Regular on-site monitoring and support that a centralized district office cannot replicate.
- **Rigorous Standards:** Ensuring all West Hawaii schools implement high levels of learning for our students through the PLC at Work process.
- **Professional Stability:** Providing the leadership and resources that keep our remote schools connected to the state's vision.

I am also concerned about giving School Community Councils (SCC) authority over principal evaluations. The current system provides a fair, 50/50 balance between student learning metrics and school improvement efforts. Shifting this to a volunteer council risks inconsistent standards and may make it difficult for our rural schools to attract and keep highly qualified administrators.

Thank you for considering my concerns when making your decision

**SB-3334-SD-1**

Submitted on: 2/23/2026 5:42:01 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Joseph Hedstrom	Individual	Oppose	Written Testimony Only

Comments:

My name is Joseph Hedstrom, and I am a vice principal in the Hawai‘i Department of Education. I am testifying strictly as an individual and concerned educator with direct experience in school leadership. I respectfully **oppose Senate Bill 3334** and urge the Committee to hold it or vote against it.

As someone working daily in a school setting, I have seen firsthand how Complex Area Superintendents (CAS) provide essential, accessible support to principals and vice principals. They offer mentoring, help navigate compliance and curriculum challenges, assist with staffing and professional development, and serve as a responsive bridge between individual schools and the broader DOE system—tailored to our geographic and community contexts.

SB 3334 would repeal these 15 CAS positions, eliminate the complex area structure, and centralize more authority (including principal evaluations and appointments) with the state Superintendent. While the goal of reducing bureaucracy is understandable, this change would likely create the opposite effect:

1. **Increased centralization and workload strain:** With ~258 schools statewide, the Superintendent's office cannot realistically absorb direct oversight of all principals without adding new layers of staff or district-level roles (as hinted in the SD 1 amendments, like District Superintendents for Academics). This shifts support from local/regional levels—where it's most effective and community-connected—to a more distant state level, potentially delaying responses and isolating school leaders.
2. **Erosion of critical school-level supports:** CAS roles help principals and vice principals address immediate needs, from crisis management to teacher recruitment and evaluation guidance. Removing this layer risks overburdening school admins, weakening mentoring for emerging leaders (including vice principals like myself), and reducing localized accountability—contrary to the improvements from Act 51 reforms.
3. **Unclear benefits and risks to stability:** The bill lacks strong evidence of cost savings or improved outcomes, and any reallocations could be offset by new administrative needs. Our schools already face teacher shortages, facility issues, and recovery challenges—restructuring leadership now could destabilize supports at the ground level when stability is needed most.

I join many colleagues (including principals and educational officers who testified at the February 13 EDU hearing) in believing that targeted improvements to the current system would better serve our keiki than a wholesale repeal that centralizes power without proven gains.

Thank you for considering the perspectives of those working directly in Hawai'i's public schools. I respectfully request that the Committee **oppose SB 3334** or defer it for more comprehensive stakeholder input and analysis.

Sincerely, Joseph Hedstrom Vice Principal,

Hawai'i Department of Education

Waimea, HI 96796

j.hedstrom74@gmail.com

Testifying as an individual

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## TAKAMINE CONSTRUCTION, INC.

Re: SB3443

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

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

My name is Audrey Takamine and I am a small business owner in Hilo, Hawai'i. I currently have one child in the DOE system and one that just graduated. I am submitting testimony in **opposition to SB3334**. The bill may be meant to streamline operations, but removing CAS positions and shifting decisions to the top could reduce the local support and oversight schools need.

From a Hawai'i Island perspective, this proposal doesn't reflect our geographic reality. Hawai'i Island is extremely large, and expecting one Superintendent to effectively oversee principal hiring, supervision, and evaluation across our many diverse communities—from Ka'ū and Pāhoā to Hāmākua, Kohala, Kona, and Hilo—would be an overwhelming workload for one person and could reduce timely, consistent support for schools. DOE already has strong processes for principal hiring (SARSA) and evaluation (CESSA) that include community input and experienced educational oversight. **Please DEFER or vote NO on SB3334.**

Mahalo for your consideration,

A handwritten signature in black ink, appearing to read "Audrey Takamine".

Audrey Takamine

**SB-3334-SD-1**

Submitted on: 2/23/2026 6:25:04 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Michele Miller	Individual	Support	Written Testimony Only

Comments:

Chair, Vice Chair, and Members of the Committee:

I am writing in support of SB3334 SD1.

I believe Hawaii’s current administrative structure grants significant authority to school principals without sufficient structural accountability to parents and community stakeholders. While strong leadership is essential, meaningful oversight and clear feedback mechanisms are equally important in a public education system.

SB3334 SD1 creates a more balanced framework by strengthening the role of School Community Councils in principal evaluation. This shift reinforces the importance of parent and stakeholder input while maintaining final appointment authority with the Superintendent, preserving system-wide oversight.

Additionally, the Complex Area Superintendent layer has added administrative redundancy without clear, measurable improvements in accountability or student outcomes. Streamlining this position would clarify lines of authority and allow resources to be directed closer to schools and students.

A public education system should be transparent, responsive, and structurally accountable. SB3334 SD1 moves in that direction.

For these reasons, I respectfully urge passage of this measure.

Thank you for the opportunity to provide testimony,

Michele Miller

Public education supporter and parent.

Aloha Chair, Vice Chair and Members of the Senate,

My name is Tim Hosoda, Principal at Pauoa Elementary School, and I am writing to express my opposition to Senate Bill 3334 S.D.1, which proposes a restructuring of the Department of Education by repealing the established "complex area" system and replacing it with a new district-based hierarchy.

If you're just changing the name from "Complex" to "District" or adjusting geographic areas covered and adding the Deputy District Superintendents for their support with an unspecified number of these positions, I'm not sure if this will improve accountability and streamline administrative authority. This is actually adding another level of authority, which adds to the bureaucracy in the DOE.

Here is one suggestion opposed to passing this bill. Instead of making these changes that will have negative effects on the schools by adding more levels of authority, consult with the Department of Education to get a better understanding of what is currently going on. The state office is going through an organizational alignment, with the goal of identifying opportunities to streamline processes, implement industry best practices, improve existing procedures, systems, and internal controls within the offices reviewed, and strengthen internal and external communications.

Since the state office is in the process of identifying opportunities to streamline processes, which SB3334 S.D.1 is hoping to accomplish, let the DOE complete the organizational alignment. This will allow the DOE to make the necessary changes from within, which will be beneficial for the department and the schools.

If you do not work with the DOE, then this bill will have a negative impact on the organization alignment process because it will add an unspecified number of positions at the District and Deputy District levels, which may conflict with support provided by the complex/district and state office. Also, making these changes in the midst of the organizational alignment will make this process longer, more confusing, and less impactful.

I strongly urge you to allow the DOE's organization alignment process to finish before submitting any bill that would impact this organization at any level.

Thank you for allowing me to submit this testimony.

Tim Hosoda

**John Pelletier**

Ahupua'a 'o 'O'oma, Kailua-Kona, HI

February 23, 2026

jdp2766@gmail.com

**Senate Committee on Ways and Means**

Honorable Donovan M. Dela Cruz, Chair

Honorable Sharon Y. Moriwaki, Vice Chair

**RE: SB3334 - Relating to Education.**

Aloha nui kākou, aloha Chair, Vice Chair, and members of the Committee,

I'm John Pelletier, a resident of Kona on the Island of Hawai'i, and I'm testifying in **support** of SB3334.

Recent reporting by [Honolulu Civil Beat](#) revealed that the Department of Education spent approximately \$4 million on more than 8,000 travel trips, with limited documentation of their educational value. This reporting highlights a broader structural issue with the Department of Education: decision-making authority and resource control are concentrated far from the classrooms and communities most directly affected. When oversight and direction sit primarily within administrative layers, transparency and local accountability suffer.

This connects directly to what many educators describe under the current tri-level structure. There is significant downward pressure from the Complex Area level requiring schools to align with "Complex Area Projects," even when those initiatives may not reflect the specific needs of students on a particular campus. I have heard from school leaders who want to innovate with their teachers to address local challenges, but feel constrained because their ideas conflict with "Complex Direction." When authority flows downward through multiple layers, schools are often accountable upward to supervisors rather than outward to families.

SB3334 addresses this by shifting autonomy to Principals and School Community Councils (SCCs). Instead of prioritizing alignment with complex-level initiatives, schools would be empowered to align their strategies with the actual needs of their students and communities. Accountability would rest more directly with the teachers, parents, and local leaders who know those students best.

Some argue that empowering SCCs in this way would be disruptive, or that councils are not ready for that level of authority. I would argue that limited engagement is a predictable result of limited power. Agency drives engagement. When communities are given meaningful authority over their schools' direction and leadership, participation increases. When decisions are made closer to home, transparency improves and spending decisions are more easily scrutinized by those directly impacted.

Mahalo for the opportunity to testify in **support** of SB3334, and mahalo ā nui for your ongoing service to the people of Hawai'i.

Ke aloha nō,  
John Pelletier

**SB-3334-SD-1**

Submitted on: 2/23/2026 8:12:21 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lee Ajifu	Individual	Oppose	Written Testimony Only

Comments:

Eliminating the current structure of management will only create a lack of focus from the new person in charge. Every Complex has it's own supervisor (CAS) because nobody can reasonable oversee all of the schools in Hawaii by themselves.

The section about letting the community choose principals is completely ridiculous! How would the community know which person is actually qualified to be the pricipal in the school? It would come down to a popularity contest. Just because you have many friends in the community that would vote for you doesn't make you a good educational leader.

Thank you for your time,

Lee Ajifu

February 23, 2026

Testimony by: Anela Pia, Ka'imiloa Elementary School Principal

SB 3334 - RELATING TO EDUCATION

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

Thank you for the opportunity to testify in opposition to SB 3334.

I have served Hawai'i's public schools for 26 years as a teacher, vice principal, and currently as a principal. Throughout my administrative career, I have worked under five Complex Area Superintendents: Ann Mahi, Matthew Ho, Sean Tajima, Interim Cindy Otsu, and Jon Henry Lee. Each has played a meaningful role in strengthening the schools I have served and in developing me as a leader.

As a classroom teacher, I was largely unaware of the depth and scope of the Complex Area Superintendent (CAS) role, as much of its impact occurs behind the scenes. However, once I entered administration, I quickly came to understand how essential this position is within the structure of the Hawaii Department of Education under the framework established by Act 51.

As a vice principal in a school undergoing significant reform, CAS Mahi served as a strategic thought partner and steady guide to our principal. Her counsel helped us navigate complex decisions during a critical period of transition, ensuring that change efforts were thoughtful, measured, and aligned to system priorities.

In my first principalship, I worked under CAS Ho. I observed him intentionally build a comprehensive system of supports for principals, including the assignment of Point Person Education Officers (PPEO) to strengthen high-quality instructional leadership while ensuring strong implementation of policy and compliance with law. The PPEO structure emerged from his active listening to both community members and principals. While CAS Ho's solution was not the specific approach I imagined, it directly addressed the needs I was communicating and did so in a way that supported not only my school, but other schools and their communities as well. His understanding of the broader system-level picture, balancing community concerns, principal capacity, instructional priorities, and legal responsibilities, shaped a solution that no single school could have designed in isolation. Over time, this structure enhanced instructional coherence, strengthened accountability systems, and improved operational alignment and stability at my site.

These experiences illustrate how the CAS serves as an essential leadership bridge between individual schools and the broader system. This is especially critical in rapidly growing regions such as the Campbell-Kapolei Complex Area (CK), currently the fastest-growing complex area in the state. Enrollment growth, expanding communities, and increasing student needs already place significant demands on schools and leadership. Reducing support by consolidating additional areas under a larger "district" structure would not lessen those demands, it would

intensify them. Even if renamed or restructured, combining more schools under fewer supervisory leaders inevitably dilutes access, responsiveness, and timely support. The students and educators in high-growth communities would experience that impact most directly.

The CAS:

- Coaches and develops principals
- Builds leadership pipelines
- Ensures consistent implementation of policy and law
- Aligns improvement efforts across schools
- Serves as a strategic buffer so principals can remain focused on instruction and student outcomes

Eliminating or consolidating this role risks fragmentation, weakened leadership development, and increased strain on the Superintendent's office. At a time when schools are navigating academic recovery, staffing challenges, and increasing accountability demands, reducing leadership infrastructure, particularly in high-growth areas, would create instability rather than efficiency.

I also respectfully express serious concern regarding provisions within SB3334 that would weight School Community Council (SCC) evaluations at 50% in principal selection decisions and expand SCC authority in principal evaluation.

Community voice is vital to a healthy and responsive school system. SCC partnership matters deeply. However, assigning a 50% evaluative weight in high-stakes hiring decisions is disproportionate and introduces significant risk.

Principal selection must remain grounded in demonstrated instructional leadership, professional qualifications, and system-level expertise. Leadership selection should be merit-based and centered on a candidate's ability to advance student achievement, strengthen school culture, and manage complex operational systems. When evaluative authority is weighted so heavily toward a body that may change annually and whose members may not have formal preparation in leadership evaluation standards, the process becomes vulnerable to inconsistency and limited perspective. Decisions of this magnitude should not be shaped by shifting dynamics but anchored in established professional criteria.

Similarly, principal evaluation requires:

- Deep contextual understanding of instructional systems
- Knowledge of personnel management and labor frameworks
- Familiarity with legal and compliance obligations
- Awareness of the operational complexity of leading a public school

While SCC members offer valuable community insight, most do not have sustained exposure to the full scope of a principal's responsibilities nor formal training in leadership assessment. Transferring evaluative authority in this manner risks compromising fairness, rigor, and professional integrity in principal evaluation.

Principal evaluation should remain the responsibility of trained educational supervisors who possess the expertise, sustained interaction, and system-wide perspective necessary to assess leadership comprehensively. The current structure allows for meaningful feedback, professional growth, and accountability aligned to established leadership competencies. Altering that structure weakens important safeguards.

My perspective is grounded in 26 years of service across multiple roles within our system. The Complex Area Superintendent has consistently served as a critical lifeline to schools and to me as a leader. Removing that structure and substantially altering principal selection and evaluation processes would create uncertainty at a time when our focus must remain squarely on strengthening teaching and learning for students.

For these reasons, I respectfully urge the Committee to defer SB3334.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Anela Pia". The signature is written in a cursive, flowing style.

Anela Pia

Ka'imiloa Elementary School Principal

**Jill La Boy**  
PRINCIPAL



**Joyceline Lee**  
VICE PRINCIPAL

**Penisoni Tuifua**  
VICE PRINCIPAL

**STATE OF HAWAII**  
DEPARTMENT OF EDUCATION  
**KAILUA HIGH SCHOOL**  
451 ULUMANU DRIVE  
KAILUA, HAWAII 96734  
TELEPHONE: (808) 266-7900 · FAX: (808) 2667915

**Date:** 02/25/2026

**Time:** 10:55 AM

**Location:** 211

**Committee:** WAM

**Department:** Education  
**Person Testifying:** Jill LaBoy  
**Title of Bill:** SB3334 SD1 RELATING TO EDUCATION

**Position:** OPPOSE

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

My name is Jill LaBoy, and I respectfully testify in opposition to SB3334 SD1.

As an educator in the Hawai'i Department of Education for the past 29 years and a current high school principal, I have experienced firsthand how critical strong, localized leadership structures are to school success. I strongly oppose this bill because it would weaken the direct, responsive support that schools depend on every day.

Complex Area Superintendents (CASs) provide immediate, job-embedded support to principals and schools. The principalship has become increasingly complex. We are navigating intensified academic expectations, student mental health needs, staff shortages, family engagement challenges, compliance requirements, and evolving state and federal mandates. In this environment, timely and context-specific guidance is not a luxury—it is essential.

Our CASs have served as administrators within our communities. They understand the unique demographics, histories, and needs of our schools. They know our students and families. When urgent issues arise—whether related to safety, staffing, special education, community concerns, or crisis response—we have direct access to leaders who understand our context and can respond quickly and effectively.

Reverting to a district-level superintendent structure would create additional layers between schools and decision-makers. Increased bureaucracy and reduced proximity to schools would inevitably delay support and diminish the relational trust that is foundational to effective school leadership.

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

Principal turnover is already a nationwide concern, and Hawai'i is not immune. Leadership instability has a direct impact on student achievement, school culture, and teacher retention. Research consistently demonstrates that principal effectiveness is closely linked to student success. I am currently a doctoral student researching principal retention, and my work underscores the importance of direct supervisory support in sustaining school leaders.

A 2022 survey by the National Association of Secondary School Principals (NASSP) found that one out of two school leaders was considering a career change or early retirement due to high stress. The survey also reported that as many as seventy percent of school leaders experienced verbal or physical aggression within the past year, and seventy-three percent indicated a need for greater mental or emotional health support. These data points are not abstract—they reflect the lived reality of school leaders today.

In my research and professional experience, one of the most effective strategies for increasing principal retention is consistent, accessible, and knowledgeable supervisory support. The Complex Area structure provides exactly that. Weakening that structure risks accelerating leadership turnover at a time when stability is essential for continuous school improvement.

This bill would move us backward at a time when we should be strengthening the systems that directly support schools. Our students deserve stable leadership. Our teachers deserve responsive support. And our principals deserve a structure that enables them to focus on instructional leadership rather than navigating increased layers of administration.

For these reasons, I respectfully urge you to oppose SB3334 SD1.

Thank you for the opportunity to testify.

Jill LaBoy



**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
**KA 'OIHANA HO'ONA'AUAO**  
**EWA MAKAI MIDDLE SCHOOL**  
91-6291 Kapolei Parkway  
Ewa Beach, Hawai'i 96706

February 23, 2026

To the Honorable Chair and Members of the Senate Committee on Ways and Means,

My name is Dr. Corey Barton, and I am the Principal of Ewa Makai Middle School. I am writing to express my **strong opposition** to SB3334 SD1, which seeks to repeal the "complex area" structure and replace it with a system of "districts" led by District Superintendents.

As a school leader, I have seen firsthand how the current Complex Area Superintendent (CAS) model provides an essential, supportive structure for our students and schools. The current model groups high schools with their feeding elementary and middle schools, ensuring that administrative support is localized and manageable.

I am deeply concerned that SB3334 SD1 is a step backward for the following reasons:

- **Diluted Support for Schools:** By reestablishing larger districts, this bill risks making administrative oversight more distant and disconnected from the daily realities of the classroom. A structure that provides localized support for a smaller number of schools is inherently more effective than one that creates larger districts with less direct support.
- **Return to an Unsuccessful Structure:** The proposed change mirrors previous structures that did not work. It is unclear how moving back to a larger district model—which often creates more bureaucracy—supports schools and students better.
- **Increased Administrative Layers:** While the bill claims to eliminate "unnecessary administrative burdens," it actually establishes several new positions, including a District Superintendent for Academics and multiple Deputy District Superintendents for each district.
- **Undue Influence in Principal Evaluations:** The bill proposes making the School Community Council (SCC) responsible for 50% of a principal's evaluation. Granting a non-professional body such significant weight is highly concerning. It places principals at risk of being subject to political influence and small interest groups vying for power. Such a structure risks disunifying the school, creating unnecessary barriers for school leaders, and failing to support the primary goal of helping our students.

The risks of increasing SCC authority include:

- **Prioritizing Special Interests:** Principals may feel pressured to prioritize the demands of the most vocal council members over data-driven decisions that benefit the entire student body.
- **Erosion of Trust:** When actions are perceived as attempts to appease a specific group, trust in school leadership is diminished.
- **Operational Paralysis:** Leaders might become hesitant to implement necessary but unpopular policies or discipline structures if they conflict with the personal interests of SCC members.
- **Misaligned Incentives:** A principal's success should be tied to student growth and safety, not how well they navigate internal council politics.

In the current structure, a CAS provides professional, manageable support. By replacing this with larger districts and increased SCC authority, the principal loses a professional advocate and gains a political overseer.

I urge you to oppose SB3334 SD1 and maintain the complex area structure that allows for meaningful, localized support for our schools.

Thank you for your time and for the opportunity to provide testimony on this critical matter.

Sincerely,



Dr. Corey Barton  
Principal

**SB-3334-SD-1**

Submitted on: 2/23/2026 9:05:22 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Kevin Dias	Individual	Oppose	Written Testimony Only

Comments:

TO: The Honorable Donovan Dela Cruz, Chair; The Honorable Sharon Moriwaki, Vice Chair; and Members of the Senate Committee on Ways and Means

FROM: Kevin Dias, Principal, Kaimukī Middle School

DATE: February 23, 2026

RE: OPPOSITION to SB3334 SD1 – Relating to Education

Aloha Chair Dela Cruz, Vice Chair Moriwaki, and members of the Committee,

As a sitting principal currently serving within the Hawaii Department of Education (HIDOE), I am writing to express my firm opposition to SB3334 SD1. While the measure seeks to improve accountability, it does so by dismantling the very leadership structure that provides the most direct accountability for school leaders.

**1. The Impact on the Scope of Administrative Oversight**

The HIDOE is a massive, unified system consisting of 258 public schools and 37 charter schools. It is mathematically and operationally impossible for a single State Superintendent to maintain a functional, direct connection with nearly 300 principals. The Complex Area Superintendent (CAS) is the vital link between Department leadership to the school level necessary to effectively manage a system of this size.

In my daily work, I do not need a distant state-level executive; I need a CAS who understands the specific nuances of my school community. The CAS provides localized oversight that ensures I am held accountable to my stakeholders and the district in real-time. Shifting this responsibility to a centralized office, or even the reconfigured "District" model proposed in this bill, threatens to decouple state mandates from the reality of the classroom.

**2. The CAS as a Vital Resource for High-Need Populations**

The CAS role is far more than a "middle management" supervisor. My school relies on the Complex Area office as a resource hub that facilitates:

- **Specialized Supports:** Direct coordination for Special Education (SpEd), English Learners (EL), and disadvantaged student populations.
- **Professional Continuity:** Teacher mentoring and ongoing professional development that is tailored to our complex's specific goals.
- **Crisis Response:** Immediate, on-the-spot support for facilities emergencies or safety threats. Without a CAS who is geographically accessible and authorized to act, principals are left isolated during times of urgency.

### 3. Concern Regarding the "Dilution" of Principal Selection and Evaluation

I am deeply concerned by the proposed shift in Section 2, which increases the weight of the School Community Council (SCC) in evaluating and selecting principals.

- **The Value of the Current Model:** Our current system—led by a CAS and a committee including sitting principals, teachers, staff, and parents—is a balanced professional model. It ensures that the candidate is vetted not just for "popularity" or "culture," but for the rigorous technical and administrative skills required to lead a school.
- **The Risk of Dilution:** The SCC is a vital advisory body, but it is not designed to conduct professional executive evaluations. By shifting this responsibility primarily to the SCC and then directly to the State Superintendent, the bill removes the tri-level perspective. This dilutes the integrity of the process by placing a heavy burden on school community members who lack professional educational administrative expertise, while simultaneously asking a State Superintendent to make final appointments for schools they are far removed from.

In conclusion, SB3334 SD1 risks creating a system where the most critical decisions - who leads our schools and how they are supported - are made by those furthest removed from the campus. The CAS position is a functional necessity for a district of this scale. I urge this committee to defer SB3334 SD1 and instead focus on strengthening the current complex area structure.

Mahalo for the opportunity to testify.

Sincerely,

Kevin Dias

Principal, Kaimukī Middle School

**February 23, 2026**

**Senate Bill 3334**

**Ways and Means Committee**

**Dear Honorable Chair Donovan Dela Cruz and Members of the Committee,**

**Leadership. Accountability. Modeling Respect.** These principles were emphasized by Senator Donna Mercado Kim on the Senate floor on February 17, 2026. I wholeheartedly agree that every educator, citizen, leader, and child in Hawai'i should live by these values. I also agree that the government should "examine leadership structures," because "our students, educators, and the people of Hawai'i deserve a department that leads with professionalism, integrity, and respect".

As a career educator and a fierce advocate for children with disabilities—including my own—I have seen firsthand that a Complex Area Superintendent (CAS) does far more than evaluate principals. They oversee staff, often exceeding 100 employees. They are the frontline responders who listen to and take action for parents, teachers, support staff, the Superintendent, and the community.

While I am concerned that this bill lacks the due diligence and "modeling of respect" required to understand these multi-faceted duties, I will focus my testimony on the fiscal implications of this proposal.

As the key fiscal committee in the Senate, the Ways and Means Committee (WAM) is responsible for ensuring state expenditures align with the needs of residents while managing economic uncertainty. In 2004, the District Superintendent and Deputy Superintendent positions were removed. Now, this proposal seeks to restore them. As an educator, I would like to demonstrate a simple logical equation that suggests this will not result in cost savings:

- **Current Model:** 1 Complex Area Superintendent = 1 Position
- **Proposed Model:** 1 District Superintendent + 1 Deputy Superintendent = 2 Positions
- **Net Change:** +1 position per area over the current baseline.

Since 2004, the educational landscape has shifted. Technology demands instant communication, and recent mandates now include computer science, youth suicide awareness, and social-emotional learning. These are noble requirements and they require robust accountability and implementation.

Removing the CAS position in favor of a District Superintendent with an undefined number of Deputies removes the very accountability this bill seeks to advance. Creating positions based on arbitrary budget lines rather than actual needs will have devastating effects on the educators and students who, to quote Senator Mercado Kim, "deserve better."

Thank you for your time and consideration.

**Respectfully,**



**Dr. Tierney Barcarse, PhD**  
Educator and Parent

**Date:** Wednesday, February 25, 2026  
**Time:** 10:55 am  
**Location:** Conference Room CR 211 &  
Videoconference  
**Committee:** WAM

**BILL: SB 3334, Relating to Education** Elimination of Complex Area Superintendent Positions

**TESTIFIER(S): Dr. Jhameel Duarte, Principal, Kīpapa Elementary School**

**POSITION: OPPOSITION AND COMMENTS**

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

I am writing to express my strenuous opposition to the elimination of the Complex Area Superintendent position. Throughout my tenure in the Leilehua-Mililani-Waiāluā (LMW) and 'Aiea-Moanalua-Radford (AMR) complexes, I have witnessed firsthand the necessity of this role.

The CAS and their teams are not just administrators; they are the architects of our success. The high academic performance of the LMW and AMR complexes is not accidental—it is the direct result of intentional, visionary leadership at the complex level. Dismantling this system would:

- Sever the Direct Line of Sight: The CAS provides a critical bridge between state-level vision and school-level execution.
- Erode Professional Growth: The mentorship and one-on-one guidance provided by the CAS are essential for maintaining high levels of instructional rigor and leadership excellence.
- Threaten Student Equity: Our current progress toward "strong academics for all students" relies on the accountability and support structures the CAS provides.

I also strongly oppose the proposal to allow the School Community Council to provide 50% of a Principal's annual rating. While community input is valuable, this proposal is fundamentally flawed for the following reasons:

- Gap in Functional Knowledge: The SCC—composed of community members, parents, and students—meets for roughly one hour a month. They lack the visibility into the daily, high-stakes operational and instructional "heavy lifts" that define school leadership.
- Expertise vs. Observation: A CAS works with us daily and understands the complexities of school administration. Entrusting half of a professional evaluation to those without administrative expertise is not only "belittling" but potentially infringes upon our collective bargaining rights.
- Operational Risk: Effective leadership requires making difficult, sometimes unpopular decisions for the long-term health of the school. A rating system based on SCC perception could inadvertently penalize principals for making necessary but difficult choices.

We are moving in the right direction as a state. Now is the time to fortify our leadership structures, not dismantle them. I respectfully urge you to oppose this resolution and protect the systems that allow Hawaii's school leaders to lead with confidence, equity, and excellence.

Mahalo for your time and for considering the voices of those leading our schools.

Sincerely,

Dr. Jhameel Duarte  
Principal, Kīpapa Elementary School  
95-076 Kīpapa Drive, Miiilani, HI 96789  
(808) 305-4200

DATE: February 23,2026

BILL: SB 3334 – RELATING TO EDUCATION

POSITION: OPPOSE

TESTIMONY: Danielle Himalaya, Makakilo Elementary Principal

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

I am writing to you today in opposition to SB 3334. My perspective is shaped by 18 years of dedicated service to Hawaii's keiki—a journey that began as an Educational Assistant, Teacher, Vice Principal, Complex Educational Officer, and continues today in my role as a Principal. In my administrative positions, I have seen firsthand that effective educational leadership is not found behind a distant desk; it is found on our campuses, in our hallways, and within our local school communities.

In my area the Complex Area Superintendent (CAS) oversees approximately 16,500 students, the highest complex enrollment in the state. In a state system of this magnitude, all CAS positions are not a redundant layer of management; they are our vital operational anchor. Under the proposed District Superintendent model, my area is looking at a future where a leader could be responsible for 44 schools and upwards of 35,000 students.

Throughout the years I have seen that an effective CAS is a visible, constant presence. They understand the unique cultural and social fabric of our specific communities because they are physically there to witness it. If we transition to a distant District model, we sacrifice that lived local knowledge for a detached, "one-size-fits-all" approach. A District Superintendent, would be structurally unable to provide the immediate, hands-on support necessary to navigate specific, high-risk logistical challenges in a timely manner needed to best support and service our students, families and school communities.

To understand the necessity of a CAS' localized oversight, one only needs to look at the logistical interdependency of some schools. My campus operates as a "serving kitchen," meaning we lack an on-site cooking facility and rely entirely on a shared cafeteria infrastructure connected with two other schools. In this environment, a single facility issue or safety crisis doesn't just impact one school—it has the potential to jeopardize the operations and services of three campuses simultaneously.

In these moments of crisis, we do not need a distant administrator overseeing 35,000 students; we need the immediate, interconnected coordination that a CAS who knows my school can provide.

I would also like to respectfully express my concerns regarding the proposal to give School Community Councils (SCC) a 50% weight in principal selection. Additionally, I have reservations about expanding the SCC's authority over principal evaluations.

As a Principal, I deeply value the SCC's perspective. They are the voice of our school community, and their existing role in the principal selection process ensures that new leadership aligns with the unique needs and values of our families and staff. In addition, the SCC currently provides critical annual feedback to the CAS regarding a principal performance. This ensures that community concerns are not just heard, but are a formal part of the leadership record.

While community input is indispensable, principalship requires a complex blend of pedagogical expertise, collective bargaining management, and fiscal oversight. The current shared-role model allows the SCC to advocate for the community's heart and soul, while the CAS ensures a principal candidate and sitting principals meet the rigorous professional and administrative demands of the Department. Moving to a 50% weight risks the possibility of over-politicizing a role that requires a delicate balance of community fit and professional mastery.

In closing, consolidating the CAS position into a District-wide model—even with a Deputy District Superintendent—is a step backward. The department moved away from the district structure because localized oversight provides better support for our schools. For a complex with our massive and growing enrollment, the CAS serves as a localized expert who prevents local operational hurdles from escalating into expensive, district-wide liabilities. Eliminating this role is not 'efficiency'; it is an administrative dilution that will inevitably lead to higher long-term costs through decreased oversight and slower crisis response. In a statewide school system this large, the CAS is not a luxury—it is a functional necessity for safe and effective school operation.

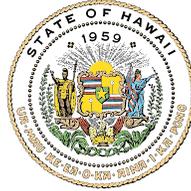
I respectfully request that the Committee DEFER SB 3334.

Mahalo for the opportunity to submit testimony and for your continued dedication to Hawaii Public Schools

Danielle Himalaya  
Makakilo Elementary Principal

JOSH GREEN, M.D.  
GOVERNOR

KARRIN HAUANIO  
PRINCIPAL



KEITH T. HAYASHI  
SUPERINTENDENT

STACEY BELLO  
COMPLEX AREA SUPERINTENDENT

**STATE OF HAWAII**  
DEPARTMENT OF EDUCATION  
**KA 'OIHANA HO'ONA'AUAO**  
PĀHOA ELEMENTARY SCHOOL  
15-3030 PĀHOA VILLAGE ROAD  
PĀHOA, HI 96778  
TEL: 808-313-4400 FAX: 808-965-2180

To: **WAYS AND MEANS COMMITTEE** Senator Donovan M. Dela Cruz, Chair Senator Sharon Y. Moriwaki, Vice Chair

**DATE:** Wednesday, February 25, 2026

**TIME:** 10:55AM

**LOCATION:** Conference Room 211 & Videoconference, State Capitol, 415 South Beretania Street

**Committee:** WAM (Ways and Means)

**BILL:** SB 3334 SD1, **Relating to Education** Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Karrin Hauanio, Principal Pāhoa Elementary School

**POSITION: OPPOSITION AND COMMENTS**

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

My name is Karrin Hauanio, and I serve as the Principal of Pāhoa Elementary School. I am submitting this testimony to express my strong opposition to SB3334 SD1, which proposes a fundamental restructuring of the Department of Education's leadership by eliminating the Complex Area Superintendent (CAS) model.

While I appreciate the Legislature's pursuit of organizational efficiency, this measure—as currently drafted—presents significant risks to the stability and advocacy of rural, Neighbor Island schools.

Our complex area on Hawai'i Island spans an immense geographic area roughly equivalent to the size of the entire island of O'ahu. In a region defined by its vastness and rural isolation, leadership cannot be effectively administered from a centralized or distant office.

Since 2022, I have served in various capacities within this complex, culminating in my appointment as Principal in September 2024. Throughout these roles, the success of myself and that of my school has been directly tied to the accessibility of my Complex Area Superintendent. The ability to receive immediate guidance, site-based troubleshooting, and empathetic leadership is only possible because our current CAS is regionally embedded and intimately understands our community's unique context and socioeconomic landscape.

SB3334 SD1 replaces a proven structure with a "District" model that lacks essential detail. For a school leader, the following unanswered questions in this bill are deeply concerning:

AN EQUAL OPPORTUNITY EMPLOYER

- **Boundary Definition:** How many districts will exist, and how will boundaries be drawn to ensure rural schools are not marginalized?
- **Authority Gap:** Will Deputy District Superintendents possess the same autonomous decision-making authority as current CAS leaders, or will they serve as administrative conduits for a centralized State Office?
- **Crisis Response:** In a rural setting, response time is everything. If leadership spans are increased or consolidated, our ability to manage emergencies—from natural disasters to campus safety—will be dangerously compromised.

Rural schools like Pāhoā already face a steeper climb than our urban counterparts. We manage chronic staffing shortages, complex transportation logistics, and high-needs Special Education coordination with fewer nearby resources.

The CAS structure currently provides a vital layer of "operational infrastructure" that buffers us from the "one-size-fits-all" approach of a centralized system. Removing this layer without a transparent, equivalent replacement threatens to leave rural schools competing for the attention of leaders who may have little to no context regarding our specific community needs.

Structural reform should provide clarity and a guaranteed "floor" for school support. Instead, SB3334 SD1 creates a vacuum. We should not dismantle a leadership framework that is actively supporting school-level operations unless a superior, fully defined, and locally vetted alternative is presented.

For these reasons, I respectfully urge the Committee to hold SB3334 SD1.

Mahalo for your time and for your continued commitment to the students and educators of Hawai‘i Island.

Respectfully submitted,



Karrin Hauanio

Principal, Pāhoā Elementary School

**Date:** Wednesday February 25, 2026

**Time:** 10:55am

**Location:** Conference Room 211 &  
Videoconference

**Committee:** WAM (Ways and Means)

**BILL: SB 3334**, Relating to Education Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Darren Higa

**POSITION: OPPOSITION AND COMMENTS**

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

As a concerned citizen and a stakeholder in our public education system, I am writing to express my **strong opposition** to SB3334 SD1, which seeks to repeal the complex area system and re-establish a district-based organizational structure.

While the intent to improve accountability is noted, this bill as drafted represents a step backward for Hawaii's schools for the following reasons:

**Disruption of Localized Leadership-** The shift from "Complex Areas" to a broad "District" model risks losing the localized, high-school-centric support system that has been in place since Act 51. Complex areas allow for better vertical alignment (K-12) within a specific community. Replacing this with an unspecified number of districts creates unnecessary administrative upheaval without a clear plan for how this will directly benefit student outcomes.

**Ambiguity in District Structure-** Section 2 of the bill leaves the number of districts blank and the specific geographical boundaries undefined. It is fiscally irresponsible to pass legislation that fundamentally restructures our largest state department without a clear understanding of the costs associated with establishing these new district offices, staffing them, and managing the transition.

**Undermining Principal and Community Autonomy-** The bill grants District Superintendents and Deputy District Superintendents significant authority over school principals. Furthermore, Section 18 mandates that School Community Council (SCC) evaluations account for 50% of a principal's selection. While community input is vital, this specific weighting—coupled with the Superintendent of Education's final authority—could lead to a politicized selection process that overlooks professional pedagogical expertise.

**Excessive Administrative Burden-** At a time when resources should be directed toward the classroom, teachers, and student facilities, this bill focuses on creating new layers of management, including "Superintendents for Academics" and multiple "Deputy District

Superintendents." We should be streamlining the DOE to support schools, not expanding the administrative hierarchy.

The stability of our education system is paramount. SB3334 SD1 introduces too many unknowns and risks centralizing power away from the individual school communities. I respectfully urge the committee to **hold this bill** and instead focus on initiatives that provide direct support to our educators and students.

Thank you for the opportunity to testify on this important matter.

Sincerely,

Darren Higa

**SB-3334-SD-1**

Submitted on: 2/23/2026 9:59:45 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sean Uwaine	Individual	Oppose	Written Testimony Only

Comments:

I firmly oppose SB3334.

In my 18.5 years with the Hawai‘i Department of Education, I have consistently felt supported by my Complex Area Superintendents. Most recently, Dr. Rochelle Mahoe’s strategic leadership of complex area initiatives — including the EL Design Team, the CLSD Literacy Team, and the Math PLC — created meaningful professional learning opportunities, provided space for sharing best practices, and intentionally built leadership capacity within our schools.

While there has always been a need for school administrators, I — like many educators — have often viewed the role as incredibly demanding and difficult to sustain over time. The responsibilities are significant, and without strong structural support, the workload can quickly become overwhelming and impact long-term effectiveness and work-life balance. However, because of the sustained support from my Complex Area Superintendent and Superintendent Hayashi’s commitment to strengthening leadership development through the Leadership Institute, I have felt called to step into a temporary Vice Principal assignment through the end of this school year.

The Complex Area Superintendent structure is essential because it provides direct, contextualized support to school leaders while maintaining alignment with statewide priorities. It ensures that schools are not operating in isolation and that leadership development is intentional and systemwide. Just as importantly, it creates the conditions that make school leadership sustainable and strengthen the pipeline of future leaders. My decision to step into administration is a direct result of that structure working as intended. Weakening it would undermine leadership growth, reduce meaningful support to schools, and ultimately impact the students we serve.

For these reasons, I respectfully but strongly oppose SB3334.

**SB-3334-SD-1**

Submitted on: 2/23/2026 10:24:57 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Meagan Liu	Individual	Support	Written Testimony Only

Comments:

It is very clear that persons that have been appointed into the roles of Principal are put there by their colleagues due to personal relationships not by actual skill level. The DOE is known for its abuse of hiring family members and friends instead of qualified staff and teachers. I do believe that everyone in the DOE umbrella including the Superintendent should undergo a performance evaluation yearly to ensure that students in the state of Hawaii have skilled people ensuring real learning. This is the only way we will ever set our students up to be successful in their future. Continued ignorance towards accountability of employees only hinders any kind of advancement. Hawaii will continue to be among the lowest in the nation if we don't act now. Real education is a right! The DOE should make sure that anyone who represents them is able and capable of doing their very best. They should not hold positions due to who they know. Our children deserve better!

**SB-3334-SD-1**

Submitted on: 2/23/2026 10:27:20 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

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

Comments:

Aloha Chair Dela Cruz, Vice Chair Moriwaki, and WAM Committee Members,

My name is Jon Henry Lee and I am the Complex Area Superintendent for Campbell-Kapolei. I respectfully submit this testimony in opposition to SB 3334SD1 and ask for your consideration in maintaining the current structure of complex area support for our schools. This system is a vital and effective link in the tri-level educational structure.

Complex areas provide essential personnel and resources that reduce the administrative and operational burdens that would otherwise overwhelm our school-level staff. Our critical functions include:

- Addressing Administrative Burden: Managing significant operational tasks that would otherwise further divert principals and vice-principals from instructional leadership.
- Providing Emergency Support: Offering timely assistance and on-site decision-making during crises.
- Resolving Complex Discipline: Addressing long-term student discipline issues and serving as decision-makers for serious personnel cases.
- Facilitating Legal Connection: Serving as the direct connection to deputy attorney generals for principals in need of legal counsel or support.

Beyond these formal duties, it is the personal and professional connections that exist among the people in our Campbell-Kapolei schools that drive us to serve the complex area and inspire long-term commitments to our students. For us, our complex area is synonymous with community. Community is an extension of family, and that is what we are in Campbell-Kapolei.

The Ewa, Ewa Beach, Kapolei, Barbers Point, and Ko Olina areas are all unique and special places that I have had the great pleasure of serving for almost the entirety of my 28 years as an educator. We have schools such as Ewa Elementary School, which has a rich and enduring history, rooted in strong traditions that span more than 103 years. It was established in 1922 to educate plantation children, well before statehood was even conceivable. A short drive down the road from there is the newly established Honouliuli Middle School (2020), which is building an identity for their community that is literally growing every day.

We have military-impacted schools with robust and award-winning transition practices and Hawaiian immersion programs that preserve and perpetuate the cultural values, practices, and

language of our land. These are just a few of the many high-quality programs and opportunities our schools provide—each deserving of strong and continued support. In total, we have 18 schools in Campbell-Kapolei that serve the largest enrollment in the state with over 16,400 students. We represent almost 11% of the entire DOE enrollment in a single complex area, the idea of combining us with another geographic area defies logical sense. Enrollment in our area is expected to grow exponentially with housing developments actively delivering homes now or in the very near future in Ewa Beach, East Kapolei, and West Kapolei. At this time, schools in our area are in dire need of additional administrative support, not less.

As a former vice principal and principal with nearly 20 years of school-level administrative experience in the Campbell Kapolei Complex, I understand firsthand the high expectations rightfully placed on our schools and their leaders. The responsibility and pressure of being entrusted with children require a robust and sustainable network of support. Grounded in my years of service, and with deep respect for the work we all do in service of our schools, I oppose SB 3334 SD1 and ask that you join me in supporting our students, staff, administrators, and community by also doing so.

**SB-3334-SD-1**

Submitted on: 2/23/2026 10:28:09 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lisa DeLong	Testifying for HIDOE KK Principals	Oppose	Written Testimony Only

Comments:

Department: Education

Title of Bill: SB3334 SD1 RELATING TO EDUCATION

Position: OPPOSE

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

We respectfully submit this testimony in strong opposition to SB3334 SD1.

As educational leaders with extensive experience in Hawai‘i’s public school system, we believe this bill would significantly disrupt the organizational structure that currently supports schools and students. While the proposal seeks to reestablish districts and eliminate Complex Areas, it does not clearly define how many districts would be created or how oversight would be meaningfully structured. Reverting to a broader district model risks recreating the very challenges that led to the formation of Complex Areas under Act 51 — namely, the need for tighter-knit work units, closer supervision, and more responsive, school-centered support systems.

The work of school leaders today is more complex than ever. Principals are navigating rigorous curriculum implementation, integrating emerging technologies such as AI, addressing post-pandemic chronic absenteeism, and supporting student mental health and well-being. In this environment, proximity and responsiveness matter. Complex Area Superintendents currently serve as critical partners — aligning instructional initiatives, advocating for facilities and safety needs, mentoring and evaluating principals, and strengthening relationships with families and community partners.

Expanding supervisory spans to cover significantly more schools across broader geographic regions would dilute that support. Effective leadership depends on relationships, knowledge of school context, and timely responsiveness. Increasing the number of schools under a single supervisory structure risks making meaningful guidance and advocacy far less attainable.

Additionally, the provision requiring School Community Councils to submit principal evaluations raises concerns. While community voice is essential, formal evaluation structures must preserve professional integrity, objectivity, and trust. When individuals who are supervised by principals participate directly in formal evaluations, it introduces the potential for bias,

conflicts of interest, or perceived retaliation. Evaluation systems should support professional growth and accountability in ways that maintain fairness and clarity of roles.

Most importantly, principals are trained professionals entrusted with leading schools. Those in the field understand the operational, instructional, and community needs of their campuses. Structural changes of this magnitude should strengthen — not weaken — the systems of support that allow school leaders to focus on student success.

For these reasons, we respectfully urge the Committee to reconsider SB3334 SD1.

Mahalo for the opportunity to provide testimony.

Respectfully,

Kenneth Agcaoili, Principal, Kalāheo High School

Jamie Dela Cruz, Principal, Waimānalo Elementary & Intermediate School

Lisa DeLong, Principal, ‘Aikahi Elementary School

Allyson Doherty, Principal, Kailua Elementary School

Maureen Dunn-Anzai, Principal, Keolu Elementary School

Jill LaBoy, Principal, Kailua High School

Nathan Maeda, Principal, Kailua Intermediate School

Brett Matsukawa, Principal, Mōkapu Elementary School

Stacey Oshio, Principal, Olomana School

Resha Ramolete, Principal, Kainalu Elementary School

Heidi Rezendes, Principal, Blanche Pope Elementary School

Noel Richardson, Principal, Enchanted Lake Elementary School

Chanda Rowley, Principal, Ka‘elepulu Elementary School

Kau‘i Tanaka, Principal, Maunawili Elementary School

**SB-3334-SD-1**

Submitted on: 2/23/2026 10:37:18 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Johnnie-Mae L. Perry	Individual	Oppose	Written Testimony Only

Comments:

I, Johnnie-Mae L. Perry, Oppose w/comment

3334 SB RELATING TO EDUCATION.

SB3334 EVIDENCE BASE THAT THIS SB WILL IMPROVE THE DOE SYSTEM? ITS ABOUT THE STUDENTS FUTURE AND HI ECONOMY. HUGE BUDGET AND UNSATISFACTORY OUTCOME FOR RURAL SCHOOLS.

**SB-3334-SD-1**

Submitted on: 2/23/2026 11:12:55 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Salynn Gonsalves	Testifying for DOE, Kapa'a Elementary School	Oppose	Written Testimony Only

Comments:

**Testimony of Salynn Gonsalves, Principal**

**Opposing SB 3334 SD 1, Relating to Education**

**February 23, 2026**

**Position: Strong Opposition**

**Aloha Chairperson, Vice Chairperson, and members of the Committee,**

**My name is Salynn Gonsalves, and I am submitting this written testimony in strong opposition to Senate Bill 3334, Senate Draft 1 (SB 3334 SD 1).**

**Concerns Regarding Administrative Restructuring**

**SB 3334 SD 1 proposes to eliminate the existing Complex Area Superintendent (CAS) position and replace it with District and Deputy District Superintendent positions. I believe this change will fundamentally disrupt the current administrative structure, leading to a decrease in efficiency and a loss of cohesion within the public school system.**

**The Hawaii Department of Education relies on a tri-level leadership model that balances state-level oversight with school-level execution. The CAS serves as the critical liaison in this model, translating state initiatives into actionable support for individual school needs. In our monthly principal meetings, the CAS provides the direct clarification and professional development necessary to implement complex mandates.**

**As a principal on a neighbor island, the direct support of a CAS is indispensable. The current Complex Area structure is designed to support the specific needs of interconnected schools within a localized geographical area. Reverting to a District model particularly one that adds an additional layer of "Deputy" bureaucracy threatens to create confusion regarding authority and will slow down communication, at a time when stability is vital for our students and staff. This organizational overhaul risks fragmentation and instability.**

**Concerns Regarding Principal Selection Criteria**

**The proposed bill also mandates that a School Community Council (SCC) evaluation account for 50% of the overall selection process for a principal. While I deeply value and support community input, I strongly oppose mandating such a high, fixed percentage for this specific process.**

**The selection of a school principal requires a rigorous, comprehensive evaluation of professional qualifications, instructional leadership, and operational management. While the SCC offers essential perspectives on school culture and community relations, giving that input a mandatory 50% weight is disproportionate. This shift risks prioritizing local popularity or narrow interests over proven educational leadership and the ability to manage complex school operations.**

**The principal selection process must prioritize candidates equipped to lead academic improvement and maintain school safety. Community input should remain a significant data point, but it should not equal half of the total weight in a professional hiring decision that must be based on educational expertise.**

**I respectfully urge this committee to OPPOSE SB 3334 SD 1. The changes proposed in this bill regarding administrative structure and principal selection risk undermining the progress of our Department. A stable leadership environment and a selection process that balances professional qualifications with community feedback are vital for the continued success of our keiki.**

**Thank you for the opportunity to submit this testimony.**

**Respectfully submitted,**

**Salynn Gonsalves, Principal**

**Date:** 02/25/2026  
**Time:** 10:55 AM  
**Location:** 211  
**Committee:** WAM

**Department:** Education  
**Person Testifying:** Kathy Silva, Vice Principal  
**Title of Bill:** SB3334 SD1, Relating to Education

**Position: OPPOSE**

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

Thank you for the opportunity to testify in **opposition** to SB3334 SD1. My name is Kathy Silva, and I currently serve as a high school Vice Principal. My perspective is informed by 30 years of experience within the Hawai'i Department of Education, including my time as a School Renewal Specialist working directly under a Complex Area Superintendent (CAS).

SB3334 threatens the stability of the CAS role—a position essential for school success. In my experience, a centralized state office cannot replicate the localized support a CAS provides. They possess a deep understanding of the unique geographic and socioeconomic challenges facing our specific communities.

- **The "Two-Way Bridge":** The CAS translates state policies into actionable steps for schools while advocating directly to the State Superintendent.
- **Operational Lifeline:** For a principal overwhelmed by daily operations, the CAS is a 24/7 lifeline.
- **Emergency Response:** During facility failures or safety threats, the CAS provides immediate localized support; without them, schools could wait days for a centralized response.

Having worked in both the Nānākuli-Waianae and Campbell-Kapolei complex areas, I have been mentored by several Complex Area Superintendents. While their leadership styles differed, they all shared a common dedication to the communities they served. I have seen firsthand how these leaders provide the "institutional glue" that kept the school leadership rooted in the needs of students and families

The proposal to have School Community Councils (SCC) submit principal evaluations is equally concerning. While community input is invaluable, SCCs are advisory bodies composed of volunteers; they are not trained personnel evaluators. Requiring a volunteer body to conduct professional, merit-based evaluations risks:

- **Politicization:** School leadership may be judged based on popular opinion rather than measurable educational outcomes.
- **Contractual Violations:** This may violate established labor agreements that guarantee a fair, professional, and standardized evaluation process.
- **Lack of Objectivity:** Volunteers may lack the necessary training to conduct the objective, data-driven reviews required for professional positions.

For these reasons, I respectfully ask the Committee to **hold this measure**.

Mahalo for your consideration of this testimony.

**SB-3334-SD-1**

Submitted on: 2/23/2026 11:31:53 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Samantha Tomori	Individual	Oppose	Written Testimony Only

Comments:

**To:** Chair Senator Donovan M. Dela Cruz and Members of the Hawai'i Senate Committee on Ways and Means

**From:** Samantha Tomori, Resource Teacher, Big Island of Hawai'i

**Date:** February 23, 2026

**Subject: STRONGLY OPPOSE SB3334** – Relating to the Department of Education Organizational Structure

Aloha e Chair Senator Donovan M. Dela Cruz and Members of the Hawai'i Senate Committee on Ways and Means,

My name is Samantha Tomori, and I serve as a Resource Teacher supporting schools across a rural, socio-economically disadvantaged complex area on the island of Hawai'i. I am writing today to express my **strong opposition to SB3334**.

While I appreciate the legislature's intent to improve accountability, this bill—which proposes a massive structural overhaul by repealing Complex Areas in favor of a new "District" system—threatens to destabilize the very schools that need consistency the most.

On the big island, our current structure allows for localized support that understands the unique geographic and economic challenges of rural Hawai'i. Transitioning to an unspecified "District" model risks centralizing power or creating larger, more detached administrative hurdles.

SB3334 replaces Complex Area Superintendents with a new hierarchy of District Superintendents for Academics and Deputy District Superintendents. As a resource teacher, I see firsthand that our students do not need more evaluators or high-level deputies; they need the leadership of our Complex Area Superintendent, someone who can advocate for local needs such as the lack of stable internet, transportation issues for families, and the limited resources in remote areas.

Our students in disadvantaged rural areas are already fighting uphill. They do not need a "reorganization" that adds more layers of management while potentially stripping away the local voices that advocate for them. Stability, not restructuring, is what our schools require to thrive.

I respectfully urge the committee to **defer SB3334** and instead focus on legislation that addresses teacher retention and direct school funding.

Mahalo for the opportunity to testify,

Samantha Tomori

Resource Teacher

Ka'ū Kea'au Pāhoa Complex Area

## **Testimony in Opposition to SB3334 SD1**

Relating to the Restructuring of the Hawaii State Department of Education

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

My name is Keith Sakanashi, and I am a first-grade general education teacher in an inclusion classroom at a Title I elementary school serving a high population of English Learners across Hawai'i. I respectfully submit testimony in opposition to SB3334 SD1.

The elimination of the Complex Area Superintendent position removes a critical layer of localized instructional leadership. Complex Area Superintendents understand the unique needs of their school communities and provide targeted support. Replacing this structure with District Superintendents for Academics and Deputy District Superintendents may increase bureaucracy rather than streamline it—particularly when the number and scope of districts remain undefined.

In high-needs schools like mine, leadership stability matters. Teachers rely on consistent guidance and clear lines of communication. Frequent restructuring diverts time, attention, and resources away from classrooms and into administrative transition. Students—especially those with Individualized Education Programs, English Learners, and students in poverty—cannot afford disruptions caused by organizational uncertainty.

Before implementing such large-scale structural changes, I urge the Legislature to require clear data demonstrating that this reorganization will directly benefit students, improve academic outcomes, and enhance equity statewide. Structural change alone does not guarantee improved achievement; strong instructional support, stable leadership, and adequate classroom resources do.

For these reasons, I respectfully ask that you oppose SB3334 SD1.

Mahalo for the opportunity to testify.

Sincerely,  
Keith K. Sakanashi

February 23, 2026

Aloha,

I am writing to express my concerns regarding the potential elimination of the Complex Area Superintendents and the implementation of District Superintendents as described in SB 3334. The previous senate hearing alluded to concerns with specific Complex Area Superintendents; those should be addressed with the specific staff involved. It is unnecessary, and ultimately harmful, to remove this layer of support and guidance to all 15 complex areas. With more schools for the District Superintendents to oversee compared to the current CAS structure, there will be less support available to each individual school. Parents will have less avenues to turn to when concerns arise, and students will have fewer advocates that are familiar with their specific school and community.

I am also concerned with the overall sentiment expressed that the DOE is “failing” and that specific people are “the problem.” As a parent of an elementary school child in the Kaimuki-McKinley-Roosevelt Complex Area, I am pleased overall with the quality of education being provided, and communicate any concerns to the school when needed. The system itself definitely has a lot of shortcomings, but instead of hyperfixating on whose fault it is, we as a community should be working together to improve the situation. Some legislative solutions would be increasing pay for teachers and school staff, expanding the Grow Our Own Teachers Initiative, and implementing free school meals for all students. Bigger picture, we are in a cost of living crisis and need more investment in supporting families, so they can be less stressed and more present with their children.

Thank you for the opportunity to testify in opposition to SB 3334 and in favor of more support for schools, students, and families.

Sincerely,

Phenicia Crawford

**SB-3334-SD-1**

Submitted on: 2/24/2026 12:03:08 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Traciann Dolim	Testifying for Hawaii Department of Education - Pohakea Elementary School	Oppose	Written Testimony Only

Comments:

**TO:** Committee on Ways and Means

Senator Donovan Dela Cruz, Chair

Senator Sharon Moriwaki, Vice Chair

Senator Lynn DeCoite; Senator Brandon J.C. Elefante; Senator Troy N. Hashimoto; Senator Lorraine R. Inouye; Senator Dru Mamo Kanuha; Senator Michelle N. Kidani; Senator Donna Mercado Kim; Senator Chris Lee; Senator Herbert M. “Tim” Richards III; Senator Glenn Wakai; Senator Kurt Fevella

**DATE:** February 25, 2026

**TIME:** 10:55 AM

**LOCATION:** Conference Room 211 & Videoconference, State Capitol, 415 South Beretania St.

**BILL:** SB3334 SD1 Relating to Education

**TESTIFIER:** Traciann Dolim, TA Principal, Pohakea Elementary School, Campbell-Kapolei Complex Area

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

As an educator of 32 years—including eleven as an administrator, I am writing to express my strong opposition to SB 3334 SD1. My testimony is rooted in the frontline reality of our schools, where the role of the Complex Area Superintendent (CAS) is not only important but essential for student success. I urge you not to repeal these vital positions, as doing so would dismantle a leadership structure that works.

The assertion that a "gap" exists between leadership and our communities does not reflect the reality of our current system. The CAS I have worked with is a constant presence, visiting every school under their charge to ensure a seamless educational pathway from Pre-K through college and career. They take the time to understand the unique design of each campus by engaging directly with vice principals, teachers, staff, and students. By attending school and community events, the CAS maintains a direct line to families. The CAS is able to provide a level of responsiveness to principals, parents, and the community that is often measured in minutes or hours rather than days. Furthermore, they provide the critical oversight necessary to hold principals accountable for student achievement through rigorous annual evaluations.

Establishing District Superintendents for Academics and Deputy District Superintendents at this time is a regressive move that ignores the lessons of the past. This proposal threatens to return us to a departmental structure from over twenty years ago, disrupting a system that is currently functional and stable. At a moment when Hawaii is fighting to recruit and retain essential workers—from bus drivers and educational assistants to teachers and administrators—our schools require continuity, not an overhaul that weakens our existing foundations.

I also firmly advocate for maintaining the current status and purpose of School Community Councils (SCC). Having served as a member of both the School Community Based Management and SCC, I deeply value these bodies as collaborative spaces for sharing perspectives and problem-solving for student achievement and school improvement. However, it is vital to remember that School Community Councils were never intended for personnel management. The current process already strikes a necessary balance of being robust and inclusive: while the CAS may strategically recruit candidates based on firsthand knowledge of a school's specific needs, all applicants—whether recruited or self-applied—must undergo a rigorous interview with a panel of parent, community member, school personnel and neighboring administrators.

Finally, as a voter and a dedicated educator, I am deeply disappointed by how the professionals and community members testifying against this bill have been treated. I personally felt my previous testimony was disregarded as unimportant, which undermines the very democratic process we teach our students to respect. I submit this testimony to reaffirm the vital importance of our CAS'. I ask you to listen to the educators who do this work every day and **reject** SB 3334 SD1.

Respectfully,

Traciann Dolim

TA Principal, Pohakea Elementary School

Campbell-Kapolei Complex Area

**SB-3334-SD-1**

Submitted on: 2/24/2026 12:45:27 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Bryce Kaneshiro	Individual	Oppose	Written Testimony Only

Comments:

Aloha Senators,

I am writing to express my strong opposition to SB 3334 SD1. The complex area superintendent (CAS) position was established to ensure closer administrative oversight of our schools. The current structure, where one CAS oversees 1-4 high schools and their feeder schools, achieves this goal better than what the bill is proposing. Reverting these responsibilities to district superintendents would widen their reach significantly, directly contradicting the stated purpose of this bill.

Previous Senate hearings regarding this bill have demonstrated support not for maintaining the "status quo," but rather against returning to an outdated system that existed 25 years ago.

I urge you to seriously consider the perspectives of those of us actively working within the department.

Please oppose SB 3334. Thank you for the opportunity to testify.

Sincerely,

Bryce Kaneshiro Extracurricular Administrator - Department of Education

**Date:** Monday, February 23, 2026

**Time:** 3:30 pm

**Location:** Conference Room CR 229 & Videoconference

**Committee:** WAM

**Department:** Ka'ū-Kea'au-Pāhoa Complex Area

**BILL:** SB 3334, Relating to Education: Elimination of Complex Area Superintendent Positions

**TESTIFIER:** 'Iwalani Harris

**POSITION:** STRONGEST OPPOSITION

Aloha Senator Donovan M. Dela Cruz, Chair, Senator Sharon Y. Moriwaki, Vice Chair and  
Members of the Committee:

My name is 'Iwalani Harris, and I am writing to express my strongest opposition to SB 3334. I speak today not just as a concerned educator of over 30 years, but also as someone who has dedicated the last decade serving our Hawaii Island complex area, first as a resource teacher and now as a District Educational Specialist.

Having served under two different Complex Area Superintendents (CAS), I have seen firsthand how indispensable this role is for our rural communities. My perspective is rooted in the following critical concerns:

- **Proven Crisis and Recovery Leadership:** During the unprecedented challenges of the pandemic, I witnessed our 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. SB 3334 threatens to eliminate the very leadership that guided us through our most difficult times.
- **Protection of Rural Communities:** As a District Educational Specialist, I know that our geographic, cultural, and socio-economic challenges are unique. Centralizing power in Honolulu ignores the realities of life in rural Hawaii. The CAS serves as our direct line of advocacy; without them, our schools risk becoming isolated "islands of operation" without a cohesive regional strategy or a voice at the state level. Would you eliminate the Mayors of each island? Even having one Mayor for this island is a HUGE responsibility. The same goes for the Complex Area Superintendent!
- **Preservation of the Tri-Level Leadership Framework:** The CAS is the vital conduit between individual school needs and state initiatives. Eliminating this position severs the communication link between the "schoolhouse" and the Department of Education's central leadership. This bill fails to provide any clear or viable replacement for these duties, risking systemic neglect and burnout for those left to pick up the pieces. Those left would be the Resource Teachers and District Educational Specialists who provide support for priority areas like reading, math, social-emotional learning, etc. The CAS helps us navigate and provides us guidance like a captain (kapena) of the canoe (wa'a).

- **Integrity of Professional Evaluation:** I am deeply concerned by the proposal to give School Community Councils (SCC) 50% weight in principal selection. My decade of experience has shown that the merit-based, professional evaluation currently facilitated by the CAS is essential for maintaining school integrity. Moving away from this model risks allowing the selection process to be disrupted by personal grievances rather than professional competence. The CAS meets with parents, community members, educators, and students. Will those one-on-one meetings be done by the School Community Council chair?

For ten years, I have worked alongside our Complex Area Superintendents to ensure our schools receive the specialized support they require. I have served as a Vice Principal, Curriculum Coordinator, and a Classroom Teacher for twenty-five years prior, and I have been given guidance at the school level from the Complex Area Superintendent because they are the closest to the schools. How does the restructure that is being proposed support students and educators in our rural communities? Each community is unique! The new structure is not a cost-savings measure and moves the central office further away from the heart of the schools. Another concern that I have is the fact that "the school community council's evaluation shall account for fifty per cent of the overall evaluation in the selection of a principal." The School Community Council are NOT educators! This is a dangerous move to give the council that much power!

Our Complex Area Superintendent provides direct support to our schools. From being at the table at Civil Defense meetings for volcanic eruptions, working with student transportation office and bus companies for bus transportation concerns, as well as celebrating alongside educators and students such as our monthly KKPCA Newsletter that is also shared with politicians, our annual summit where everyone gathers from each school to re-commit to serving our students and families in Ka'ū-Kea'au-Pāhoā with ne'epapa, to move as a whole unit working together in unison, to support the vision and goals of our schools, complex area, and state, as well as meeting WITH students with the formation of the Complex Area Superintendent Student Advisory Council to understand school from their perspective. The Complex Area Superintendent is not someone who shows up for year-end celebrations rather she is with us at schools, sitting with resource teachers to understand their challenges and their bright spots, as well as listening to parent concerns. I ask again, how will this restructuring support schools, students, and educators for each diverse community?!

I urge this Committee to hold SB 3334 and maintain the current leadership structure that is vital to the success of our students and our community.

Mahalo for the opportunity to testify.

Respectfully,

‘Iwalani Harris

District Educational Specialist and educator of 34 years

**SB-3334-SD-1**

Submitted on: 2/24/2026 4:22:50 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Hana Mauldin	Individual	Oppose	Written Testimony Only

Comments:

Committee on Education,

I am writing in strong opposition of SB 3334. I am a teacher within the Ka‘ū-Kea‘au-Pāhoa (KKP) Complex Area.

The removal of the CAS position to then be replaced by a district superintendent and deputy superintendents is redundant. The CAS position already does the things that are outlined in this bill:

1. Student academic outcomes and progress;
2. Fiscal management and operational efficiency;
3. Leadership effectiveness and personnel management; and
4. Stakeholder engagement, including feedback from principals, educators, parents, and the community."

Also there is a lack of clarity regarding a "district". If each county is going to become a district, the island of Hawai'i is large enough to fit all the islands with room to spare. My complex area is the same size as Oahu and to have to have 1 district superintendents and a few deputy superintendents will be the same as how the complex is currently divided. It takes our CAS and our complex area officers 90mins to dirve between Keonopoko Elementary and Na'alehu Elementary Schools, it's 70 miles one way. If we were to switch to 1 superintendent for our island, they would never be able to visit our schools like our current CAS is able to to do.

Thank you for your time,

Hana Mauldin

WRITTEN TESTIMONY ON SB 3334 SD 1

Submitted by Glen Miyasato, Principal Fern Elementary School

February 24, 2026

Aloha Honorable Senators of the Ways and Means Committee:

Your ongoing support of our public schools is greatly appreciated. I am very concerned about SB 3334 SD1 which would eliminate the complex area superintendent (CAS) position in the D.O.E. system. Please do not pass this bill.

Now in my 47th year serving the keiki of Hawai`i's public schools, I have an understanding of effective responsiveness and leadership for our schools. School principals like myself have the "on the ground" key role of not only keeping our students and staff safe but to ensure that each student achieves to their highest potential. The complex area superintendent (CAS) is essential to helping principals achieve these two "must dos" in the following ways:

- Being the only reliable, timely, and direct link to State resources and guidance during campus emergencies. Principals can always rely on the CAS's immediate answer to an emergency cell phone call.
- Doing regular walkthroughs of our school's classrooms to give honest and supportive feedback from complex and statewide perspectives on our school's progress.
- Taking the time to do deep data analysis of school data and combining that with observations from the regular walkthroughs to give the principal and school honest and supportive feedback for continuous improvement.
- Being the essential direct line of communication and school-level input from the 258 schools to the Superintendent.
- Being the reliably available guide and thought partner to principals during their most stressful times.

In my long career with the Hawaii D.O.E. I have been privileged to serve as a school administrator when there was a District Superintendent (DS) and a Deputy District Superintendent and now, with a Complex Area Superintendent (CAS). Without question, I recognize that the CAS is much more knowledgeable, responsive, and supportive of the needs of our schools than the DS could be.

Please do not eliminate our most trusted and reliable communication link to the BOE and State DOE leaders.

Mahalo.

**To:** The Senate Committee on Education  
**From:** Brian Godsill, Principal, Kalāheo Elementary School  
**Date:** February 23, 2026  
**Re:** Testimony in Strong Opposition to SB 3334

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

As the principal of Kalāheo Elementary School, I am in strong opposition to SB 3334. While I support the intent of community engagement, this bill introduces structural changes that threaten the stability and coherence of our statewide system. I am specifically concerned with the following:

#### 1. The Vital Role of Complex Area Superintendents (CAS)

In a unique district like Hawai'i, the CAS is not a "middle-management" layer; rather, he/she is an essential anchor for instructional and operational leadership.

- **Essential Support:** CAS provides critical guidance during crises, personnel matters, and the implementation of state mandates.
- **System Alignment:** Removing this role would fragment our schools, disrupt the leadership mentorship pipeline, and place an unsustainable compliance burden on principals.
- **Stability:** Leadership cannot exist in isolation. The CAS structure ensures that equity and accountability are maintained across all islands.

#### 2. Risks of School Community Council Led Evaluation and Hiring

School Community Councils (SCCs) are vital for advisory input, but personnel evaluation and hiring require specialized professional expertise and adherence to labor laws.

- **Professional Standards:** Principal evaluations must remain grounded in uniform instructional standards and data, not shifting local dynamics.
- **Confidentiality & Equity:** Expanding SCC authority into hiring risks politicizing leadership roles and compromising the professional integrity and confidentiality required in personnel matters.

In conclusion, strong schools require strong, stable systems. SB 3334 risks dismantling the very structures that provide consistency and support for our students and staff. I urge the Senate to reconsider this measure and instead engage in a dialogue that strengthens leadership without compromising our unified governance.

Mahalo for your dedication to Hawai'i's students and for considering my testimony.

Sincerely,

Brian Godsill

Principal

Kālaheo Elementary School

**Date: 2/25/26**  
**Time: 10:55 AM**  
**Location 211**  
**Committee: WAM**

**Department: Education**  
**Person Testifying: John Hamilton**  
**Title of Bill: SB3334 SD1 Relating to Education**

**Position: OPPOSE**

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

My name is John Hamilton, and I have served as a school principal and educator in the Department of Education for almost 20 years. I rise in strong opposition to this bill, not out of resistance to change, but out of deep respect for what it actually takes to support schools, students, and communities well.

At first glance, this bill appears to be a simple change in title—reverting the Complex Area Superintendent back to District Superintendent. But titles matter because structures matter. And structures shape outcomes.

Because the bill does not specify the number of districts, it is reasonable to assume a return to the former seven-district model. That is precisely the system we moved away from twenty years ago under Act 51, and we did so for good reason. Even then, we recognized that schools needed tighter-knit leadership teams, closer supervision, faster response times, and stronger, more personal support. Today, that need is not smaller—it is exponentially greater.

The work of school leadership has become more complex, more urgent, and more demanding. We are charged with implementing rigorous curriculum, navigating the rapidly evolving role of artificial intelligence, reversing post-pandemic chronic absenteeism, and addressing unprecedented student mental health and well-being challenges. These are not theoretical concerns; they are daily realities.

Complex Area Superintendents are essential in this environment. They know their schools. They align instructional initiatives. They advocate with state agencies when facilities are unsafe. They coach, mentor, and evaluate principals. They build partnerships with community organizations. They respond to families. They act quickly, personally, and with deep local understanding.

To double or triple the number of schools under their supervision by reverting to a district model would make this work functionally impossible.

Right now, a Complex Area Superintendent oversees between 9 and 28 schools within a defined geographic area. Under this bill, a district superintendent and two deputies would be responsible for 258 schools spread across more than 10,000 square miles—on top of their existing responsibilities. That is not reform. That is dilution. And when leadership is diluted, support weakens, response slows, and students pay the price.

Principals rely on their Complex Area Superintendents for swift, informed, and personalized guidance. Eliminate that role, and you do not simply rearrange an org chart—you weaken the very system schools depend on to function effectively.

We all share the same goal: stronger schools and better outcomes for students. This bill, however well-intended, moves us in the opposite direction.

Mahalo for the opportunity to testify, and thank you for your thoughtful consideration



**HAWAII GOVERNMENT EMPLOYEES ASSOCIATION**  
AFSCME Local 152, AFL-CIO

**RANDY PERREIRA**, Executive Director • Tel: 808.543.0011 • Fax: 808.528.0922

The Thirty-Third Legislature, State of Hawaii  
The Senate  
Committee on Ways and Means

Testimony by  
Hawaii Government Employees Association

February 25, 2026

S.B. 3334, S.D. 1 — RELATING TO EDUCATION

The Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO strongly opposes S.B. 3334, S.D. 1, which repeals the Complex Area Superintendent (CAS) position and clarifies that School Community Councils (SCCs) shall submit principal evaluations to the Superintendent of Education, who shall have final authority to appoint a principal. It also requires the Department of Education (Department) to adopt rules.

We are perplexed and deeply concerned by this proposal, which claims to “revisit” Act 51 (Session Laws of Hawaii 2004) due to concerns about the implementation and effectiveness of structures it created. One of the most significant and intentional outcomes of Act 51 was the creation of the complex area system and the hiring of CASs. Prior to Act 51’s decentralization reforms, the Department operated under a District Superintendent model in which each superintendent oversaw three times as many schools as a CAS currently supports. The excessive span of control made it extremely difficult for District Superintendents to provide principals with the direct, timely instructional leadership and operational support needed at the school level. The CAS structure fixed this long-standing problem and remains essential to the functioning of the tri-level system in place today.

Rather than improving this system, the amended version of this measure may be introducing an additional layer of bureaucracy by replacing CASs with multiple district superintendents and deputy district superintendents. This restructuring risks further complicating lines of authority and accountability. Instead of reducing inefficiencies, it threatens to create new ones—while distancing leadership even further from the schools they are meant to support.

With respect to SCCs, there is already a well-established process for SCCs to provide feedback on their principal’s performance. In addition, the formal evaluation of a school principal is conducted through the Comprehensive Evaluation System for School Administrators (CESSA), which is governed through a negotiated Memorandum of Understanding between the

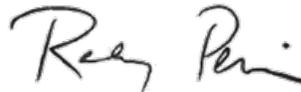
Department and HGEA. The procedures governing principal selection are also contractual provisions collaboratively developed between the employer and the union and therefore, this proposal would directly conflict with legally binding collective bargaining agreements.

It is also important to recognize that implementation of Act 51 remains a work in progress, and meaningful improvements continue to occur. A recent example is the long-awaited conversion of vice principals from 10-month to 12-month employees—an explicit commitment of Act 51 that finally came to fruition only two years ago with the support of the Governor and Superintendent. This was a 20-year “IOU,” now fulfilled, demonstrating that the system continues to mature and align with Act 51’s original goals.

Repealing the CAS structure and altering principal selection and evaluation authority would not strengthen the public school system—it would reverse two decades of progress, destabilize support for school administrators, and create new uncertainty for schools and communities. Rather than dismantling foundational components of Act 51, the legislature should affirm the Board of Education’s authority over the Department and require it to improve its systems and operations while maintaining the negotiated processes governing principal evaluation and selection.

Thank you for the opportunity to provide testimony on S.B. 3334, S.D. 1.

Respectfully submitted,



Randy Perreira  
Executive Director

## **Testimony in Opposition to Senate Bill 3334**

Aloha Chair, Vice Chair, and Members of the Senate,

My name is Keevan Matsumoto, and I serve as Vice Principal at Kaimuki High School. I respectfully submit this testimony in opposition to Senate Bill 3334.

I strongly believe in shared leadership, community voice, and meaningful engagement with families. At the same time, I have deep concerns that SB3334 would significantly weaken the operational stability, instructional coherence, and leadership infrastructure that our schools rely upon every day. Specifically, I am concerned about (1) the elimination of Complex Area Superintendent (CAS) positions and (2) proposed changes to principal evaluation and hiring procedures that require School Community Council (SCC) involvement.

### **Elimination of CAS Positions**

In Hawai'i's centralized statewide system, Complex Area Superintendents are not an extra layer of bureaucracy—they are a critical layer of coherence and direct support. As a school-based administrator, I see firsthand how essential CASs are in aligning schools to state priorities, ensuring compliance with federal and state mandates, and providing direct leadership during crisis situations and high-stakes decision-making.

Eliminating CAS positions would:

- Create inconsistencies in implementation across schools and complex areas.
- Remove essential instructional and operational guidance for principals and vice principals.
- Increase the workload and compliance burden on school leaders without adding authority or resources.
- Weaken systemwide alignment around student achievement, attendance, and accountability goals.

CASs serve as thought partners in school improvement planning, staffing decisions, safety protocols, and instructional monitoring. Their role is especially vital for schools serving high-needs populations (like Kaimuki High School), where coordinated support is critical. Removing this level of leadership would not decentralize effectively—it would destabilize.

### **Changes to Principal Evaluation and Hiring Procedures**

The proposal to require SCC involvement in principal evaluation and hiring raises serious concerns regarding governance, objectivity, confidentiality, and equity across schools.

SCCs play an important advisory role in school-level planning and community engagement. However, expanding their authority into personnel evaluation and hiring would:

- Compromise the confidentiality and integrity of personnel processes.
- Introduce inconsistencies across campuses due to differing levels of training and capacity.
- Risk politicizing leadership decisions rather than grounding them in instructional leadership expertise.

- Blur lines of accountability within a centralized statewide system.

Principal evaluation and hiring are complex processes that require deep knowledge of leadership standards, collective bargaining agreements, compliance requirements, and systemwide priorities. These responsibilities must remain within a structured, professionally trained framework to ensure fairness, consistency, and legal integrity.

### **Conclusion**

While SB3334 may be well-intended in its effort to increase community voice, its proposed changes would have unintended consequences that weaken leadership structures and reduce system coherence. Strong schools require strong leadership systems. Eliminating CAS positions and restructuring evaluation and hiring processes without a clear statewide framework would destabilize schools—particularly those serving vulnerable and high-needs students.

I respectfully urge the Senate to reject SB3334 and instead engage principals, CAS, educators, and community partners in collaborative dialogue to strengthen—not dismantle—the leadership structures that support Hawai'i's public schools.

Mahalo for the opportunity to provide testimony and for your continued commitment to the students, families, and educators of Hawai'i.

Respectfully,



Keevan K. Matsumoto  
Vice Principal  
Kaimuki High School

**SB-3334-SD-1**

Submitted on: 2/24/2026 7:24:05 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Jason Okamoto	Testifying for Hawaii DOE	Oppose	Written Testimony Only

Comments:

Aloha Chair, Vice-Chair, and Members of the Committee,

My name is Jason Okamoto and I am the principal of Mānoa Elementary School. I am writing today to express my **opposition** to SB 3334. While I appreciate the legislature’s intent to streamline the education system, this bill introduces several changes that threaten the stability of school leadership and the quality of support provided to our students.

First, the proposition to repeal the Complex Area Superintendent (CAS) position and replace it with an undefined “administrative framework” is detrimental. For a principal, the CAS is not just an "administrative burden"; they are the primary point of contact for critical compliance, curriculum, and operational support. In our statewide system, the CAS plays a critical role in bridging the gap between important high-level state policies and school-level implementation and action.

Based on proposed SB 3334, the lack of clear support, in the form of an “appropriate authority” designated by later DOE rules, creates immediate uncertainty regarding who I, as a principal, should turn to for guidance on complex legal or instructional issues.

Additionally, SB 3334 mandates that an SCC's evaluation account for 50% of the overall evaluation used in the selection of a principal. While community input is vital, placing half of the hiring weight on a volunteer council—who may not be trained in professional educator standards or human resources—undermines the professional nature of school leadership.

This shift creates some additional risks, making the principalship a "popularity contest" rather than a selection based on proven instructional leadership and administrative expertise. Principals are already subject to rigorous professional accountability and must engage in continuous growth as a condition of their position. A selection process that weighs a lay-council's opinion equally with professional qualifications devalues the expertise required to run a school.

Finally, the bill removes the CAS from the appeal process when a principal and an SCC disagree. Instead of a local superintendent who understands the specific school's context, the appeal will now go to a designated "authority," then the Superintendent, and finally the Board. This adds layers of bureaucracy rather than removing them, potentially stalling important school-level decisions.

In conclusion, SB 3334 removes a vital layer of local support (the CAS) and replaces it with ambiguity while simultaneously destabilizing the professional standards for hiring and evaluating school leaders. For these reasons, I respectfully ask that you hold this bill.

Thank you for the opportunity to testify.

Jason Okamoto

**SB-3334-SD-1**

Submitted on: 2/24/2026 7:31:25 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Jay Lin	Individual	Oppose	Written Testimony Only

Comments:

**Chair and Members of the Committee:**

Thank you for the opportunity to provide testimony on **SB 3334, SD1**, which proposes to repeal the Complex Area Superintendent (CAS) positions and shift authority over principal selection and evaluation more directly under the State Superintendent of Education.

I respectfully submit testimony in **opposition** to this measure for both structural and personal reasons.

Hawai‘i operates as a **single statewide school district** under the Hawai‘i State Department of Education. In this context, the Complex Area is not an unnecessary administrative layer. It is the essential bridge between state-level direction and school-level implementation. Strong tri-level leadership (State to Complex to School) ensures:

- Clear communication
- Alignment between policy and practice
- Supportive and rigorous accountability
- Strategic hiring and leadership development
- Systemwide coherence

Without this middle structure, expectations can blur, and schools risk becoming isolated from one another and from statewide priorities. Eliminating the CAS positions would weaken local leadership, reduce support for principals, and risk overcentralized decision-making in Honolulu rather than empowering regional leaders who understand the cultural, geographic, and community contexts of their schools.

**From my personal experience** as Vice Principal at Kailua-Kalaheo and Principal at Campbell-Kapolei, the mentorship and access provided by my Complex Area Superintendents have directly strengthened my leadership. At its best, the CAS role is developmental and partnership driven. I have benefited from executive coaching, guidance through complex personnel matters, alignment support, and candid feedback that sharpened my decision-making.

Close leadership matters, especially in hiring, maintaining expectations, and preserving alignment across schools. When leadership becomes distant, school culture and morale suffer, and students ultimately feel the impact. The CAS role helps prevent that fragmentation by

keeping leadership connected, responsive, and capable of addressing school-level challenges in real time. During particularly challenging periods including staffing shortages, high-needs placements, community conflict, and accountability reviews, the Complex Area Team partnered in solutions, providing resources, clarity, and stability when it mattered most.

Research consistently supports the importance of aligned mid-level leadership. Organizations such as **The Wallace Foundation** and the **Learning Policy Institute** highlight the value of coaching, clarity, and supervisory support in strengthening principal effectiveness and retention. Studies on distributed leadership similarly emphasize the value of intermediate leadership structures in maintaining coherence and shared expectations across schools.

Further, under current law, School Community Councils play an important role in evaluating principals and advising on school leadership. While SB 3334, SD1 would retain the councils' ability to submit evaluations, it consolidates final appointment authority solely with the Superintendent. Such centralization may weaken local accountability and diminish the meaningful influence of parents, educators, and community stakeholders. Strong public education systems rely on shared governance and community partnership, and removing CAS positions risks moving away from that principle.

In a geographically and demographically diverse state like Hawai'i, the Complex Area structure provides stability, alignment, and responsiveness that centralized leadership alone cannot fully replicate. For me, the CAS role is not bureaucratic. It is **infrastructure**.

For these reasons, I respectfully urge the Committee to **oppose SB 3334, SD1**. I share these reflections in the spirit of professional dialogue as we consider how best to support one another and our schools moving forward.

**Mahalo for your time and consideration.**

January 11, 2026

## **Testimony in Opposition to S.B. NO. 6334**

Dear Chairperson and Members of the Committee,

I am writing to express my strong opposition to Section 2 of S.B. NO. 6334, which proposes the repeal of the Complex Area Superintendent (CAS) position within the Department of Education. The removal of this critical role would significantly undermine the effectiveness of the Hawaii public school system and negatively affect the quality of education provided to Hawaii's students.

I have worked with Complex Area Superintendents since 2003, and during this time my experience has been that Complex Area Superintendents are vital to the DOE system. They take personal responsibility in the progress of their schools, know their principals and their needs intimately, and work tirelessly to ensure that Hawaii's students receive the best education possible. The Complex Area Superintendents I have worked with, which include complexes on every island, have a strong understanding of the role of the principal and the challenges they face and so are able to use this knowledge when coaching and supervising their complex principals.

Complex Area Superintendents play a vital role in bridging the gap between the State Department of Education's vision and the unique needs of local communities. Their proximity to schools allows them to have a deep understanding of the challenges and opportunities within their respective areas. This local insight is essential for tailoring state policies to meet the specific needs of students, teachers, and families in each community while keeping the integrity of the policies.

Furthermore, Complex Area Superintendents ensure that the HIDOE expectations are met across schools. They provide direct oversight and support to principals and educators, helping to implement statewide educational goals while addressing the unique circumstances of each school. Their presence ensures accountability and consistency in the delivery of quality education, and in my experience they are present. The Complex Area Superintendents I have worked with live their job; they are available at all hours of the day and night and their weekends are often filled with school and DOE activities.

One of the most critical functions of Complex Area Superintendents is their ability to address issues and concerns in a prompt and effective manner. By being engaged with the schools, they can respond quickly to challenges, whether they involve student safety, academic performance, or operational matters. Removing this layer of leadership would

create a gap in oversight and problem-solving, leaving schools and communities without the immediate support they need to thrive.

While the bill suggests that the Department of Education can reassign the duties of Complex Area Superintendents, this approach risks overburdening other administrators and diluting the focus on individual school needs. The proposed changes could lead to delays in decision-making and a lack of accountability, harming the students and communities the DOE is meant to serve.

In conclusion, I believe the Complex Area Superintendent position is an essential part of Hawaii's public education system. Their role ensures that the DOE's vision is realized at the local level, high standards are upheld across schools, and issues are addressed promptly and effectively. I urge the committee to amend Section 2 of S.B. NO. 6334 and preserve this critical layer of leadership and oversight.

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

Sincerely,

*Babette Moreno*

Babette Moreno, Ed.D.

Straight A Solutions, LLC

281.384.4568

[babette@straightasolutions.com](mailto:babette@straightasolutions.com)



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

Date: 02/25/2026  
Time: 10:55 AM  
Location: 211  
Committee: WAM

Department: Education  
Person Testifying: Robin Valencia  
Title of Bill: SB3334 SD1 RELATING TO EDUCATION

Position: OPPOSE

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

As an Educational Officer with 30 years of experience in the Hawai'i Department of Education, I am writing to express my **strong opposition to SB3334 SD1.**

This bill appears to simply revert the title of the Complex Area Superintendent back to District Superintendent. But since it does not specify how many districts there will be should the bill pass, it can be assumed that it will be based on the existing seven districts, which was the former model of dividing schools. If that is the case, it must be acknowledged that even twenty years ago, when Act 51 separated the districts into the Complex-Areas, there was a need for tighter knit work units, closer supervision and supports, and increased responsiveness between school and district offices. Today, this is even more so the case. Our jobs as Educational Officers are much more complex and demanding with the need to support schools with viable curricula, continuous school improvement, address computer science and artificial intelligence, workforce development, reduce post-pandemic chronic absenteeism, support student and educator well-being and mental health, address the specialized needs of our students identified with disabilities, or are English Language Learners, and/or homeless.

Supporting schools immersed in this increased level of complexity, Complex-Area Superintendents play a critical role by knowing their schools well, the geographical areas they reside in, the unique qualities and challenges of these areas, all while setting a clear, unified vision that aligns instructional initiatives; acting as a liaison with state entities often advocating on behalf of schools such as ensuring unsafe facility concerns are addressed; coaching, mentoring and evaluating principals to encourage continuous improvement on behalf of students; networking with and recruiting neighborhood partners to collaborate with schools and offer opportunities to students that build a greater sense of kuleana to their community; and interfacing with parents and care-givers to address concerns while fostering positive relationships. Doubling or tripling the number of schools they need to supervise by converting complex-areas back to districts would make that job insurmountable given current conditions.

As Educational Officers, we rely on our Complex-Area Superintendent to act swiftly and provide personalized counsel informed by a thorough knowledge of our complex area and schools. At present, should the position be eliminated and these essential responsibilities reassigned to a district superintendent then responses and impact will surely be diluted. Instead of being managed by someone overseeing 13 schools within a limited geographic area of 60 square miles, the superintendent and two deputy superintendents would need to play a similar role for 41 schools covering 4,028 square miles in addition to all their regular duties.

Lastly, the bill calls for School Community Councils to play a role in evaluating the principal and I feel this is inappropriate. The School Community Council includes members from Bargaining Unit 5 and the classified staff, both of whom are evaluated by the principal. Hence there is serious risk of bias, quid pro quo, and/or claims of retaliation when you have parties subject to being evaluated serving as evaluators. Whether influenced by a fear of retaliation or motivated by a

personal grievance, subordinates have a difficult time impartially evaluating their supervisors. In the end, this subverts the goal of using the evaluation results for professional development and diminishes trust in the authenticity of the evaluations.

Mahalo for your consideration of this testimony.

**SB-3334-SD-1**

Submitted on: 2/24/2026 7:35:59 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Sonja Samsonas	Testifying for Kauluwela Elementary School	Oppose	Written Testimony Only

Comments:

**To: Committee on Education Senator Michelle N. Kidani, Chair Senator Donna Mercado Kim, Vice Chair**

**Dear Chair Kidani, Vice Chair Kim, and Members of the Committee:**

**I am writing to express my strong opposition to SB3334, which seeks to dismantle the existing "Complex Area" organizational structure of the Department of Education and replace it with a centralized "District" system. While the intent of the bill is to improve accountability and reduce administrative burden, the proposed measures will likely achieve the opposite: increasing administrative costs, creating organizational instability, and alienating local school communities.**

**I oppose this measure for the following reasons:**

**1. Creation of Costly Administrative Bloat**

**SB3334 mandates a new hierarchy of "District Superintendents," "Superintendents for Academics," and "one or more Deputy District Superintendents" for every district. By establishing these high-level executive positions—whose salaries are capped only by that of the State Superintendent—the bill creates a massive new layer of bureaucracy. These funds would be far better spent directly in classrooms on teacher salaries, student mental health services, and classroom supplies.**

**2. Destruction of the K-12 "Complex" Continuity**

**The current "Complex" model ensures that high schools and their "feeder" elementary and middle schools work in tandem to provide a seamless educational pathway for students. By deleting the definition of "Complex" (Section 6), this bill severs those vital local links. Forcing schools into a larger, more rigid**

**"District" model risks a "one-size-fits-all" curriculum that ignores the specific geographic and cultural nuances of our diverse island communities.**

### **3. Erosion of Local Autonomy and Decision-Making**

**Under SB3334, the State Superintendent gains the power to appoint District Superintendents, shifting power further away from school-level leadership and the Board of Education. This top-down approach contradicts the foundational goals of Act 51 (2004), which sought to empower schools and local stakeholders.**

### **4. Disruption of Essential Programs**

**The Department of Education is currently implementing critical long-term initiatives, including expanded Computer Science access (Section 8) and Youth Suicide Prevention training (Section 14). Forcing a total structural reorganization during the 2026 school year will cause significant "organizational whiplash," diverting the attention of educators away from student safety and achievement and toward navigating a new bureaucratic maze.**

### **Conclusion**

**SB3334 is a step backward for Hawaii's public education system. Instead of streamlining the department, it risks inflating the executive budget and disrupting the educational continuity our students rely on. We should be focusing on supporting our teachers and students directly, rather than rearranging the administrative chart.**

**I respectfully urge the Committee to hold SB3334.**

**Thank you for the opportunity to testify.**

**Sincerely,**

**Sonja Samsonas**

**Kauluwela Principal**

**Date:** February 25, 2026

**Time:** 10:55am

**Location:** Conference Room 211 and Videoconference

**Committee:** WAM

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

**BILL:** SB 3334 Relating to Education: Elimination of the Complex Area Superintendent Position

**Testifier:** Malaea Wetzel

**Position: OPPOSITION AND COMMENTS**

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

I respectfully submit this testimony in opposition to SB 3334, which proposes eliminating the Complex Area Superintendent (CAS) position within the Hawai'i State Department of Education (HIDOE).

I have served as the proud principal of Hale'iwa Elementary for 16 years, working under four Complex Area Superintendents, all of whom were accomplished principals prior to serving as CAS. I offer this testimony from the perspective of a school-based leader, informed by operational reality, and grounded in service to a rural community within Hawai'i's unique statewide school system.

While I understand the intent to reduce "administrative burdens," SB 3334 does not fully account for the essential regional leadership that CASs provide, particularly for rural, small, and underserved schools.

### **The CAS Is a Critical Line Leadership Role**

The CAS is not an administrative layer; it is a line officer position with direct responsibility for supporting schools and students. In HIDOE, line officers include the Superintendent, Deputy Superintendents, CASs, Principals, and Vice Principals. Other administrators serve in staff roles, designed to support—rather than replace—line leadership.

Eliminating the CAS does not reduce bureaucracy; it removes a key leadership link between schools and the state system.

### **Operational Reality: What CASs Do for Schools**

From a school-level perspective, the CAS is the primary point of contact when urgent or complex issues arise. I rely on my CAS for:

- Emergencies involving student or staff safety

- Legal matters, including special education due process
- Complex parent concerns
- Navigating compliance requirements while maintaining instructional focus
- Securing staffing and resources needed to meet student needs

As the principal of the smallest school in my complex area, CAS advocacy is especially important. Because CASs are former principals, they understand the realities of school leadership and can effectively advocate upward, ensuring that state-level decisions reflect on-the-ground conditions.

### **Lack of Clarity Regarding Replacement Structure**

SB 3334 provides insufficient clarity regarding how CAS responsibilities would be reassigned. If the intent is to revert to a district superintendent model, this would significantly increase the number of schools overseen by fewer leaders—a structure that has previously proven unsustainable.

Such a shift would likely lead to delayed responses, diminished support, and leadership burnout, with direct consequences for schools and students.

### **Concerns Regarding Expanded SCC Authority**

The proposal to assign 50% weight to School Community Council evaluations in principal selection raises serious concerns, including potential conflicts with union agreements and erosion of the professional, merit-based evaluation currently supported through CAS oversight.

Without regional leadership, principal selection risks being influenced by narrow interests rather than professional qualifications and demonstrated leadership effectiveness.

### **Risk of Over-Centralized Governance**

HIDOE is the only statewide school system in the nation, serving approximately 165,000 students across diverse geographic, cultural, and socioeconomic contexts.

CASs oversee complex areas, enabling nimble, context-aware leadership. Eliminating this role risks concentrating authority in Honolulu-based offices and reducing responsiveness to rural communities like the Waialua Complex, where I serve, and our neighbor island communities.

### **Conclusion**

SB 3334 reflects a misunderstanding of how Hawai'i's public education system operates. The CAS position is not redundant; it is essential to equity, responsiveness, compliance, and instructional stability across a complex statewide system.

Eliminating CASs would not reduce administrative burden; it would shift that burden to schools, weaken system coherence, and place students at greater risk.

For these reasons, I respectfully urge the Committee to hold SB 3334.

Thank you for the opportunity to provide testimony.

Respectfully submitted,

*Malaea Wetzel*

[Malaea Wetzel \(Feb 24, 2026 07:26:40 HST\)](#)

Malaea Wetzel

Principal, Hale'iwa Elementary School

# Legislative testimony\_ SB 3334-WAM

Final Audit Report

2026-02-24

Created:	2026-02-23 (Hawaii-Aleutian Standard Time)
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## "Legislative testimony\_ SB 3334-WAM" History

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**SB-3334-SD-1**

Submitted on: 2/24/2026 7:46:35 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Doe Principal	Individual	Oppose	Written Testimony Only

Comments:

As a school principal, an long time educator in the DOE and a concerned citizen, I strongly oppose this bill for the following reasons:

Our jobs as school leaders is much more complex and demanding with the need to meeting academic standard, school & community safety, reduce post-pandemic chronic absenteeism, support well-being and mental health, etc..

Supporting schools immersed in this increased level of complexity, Complex-Area Superintendents play a critical role by knowing their schools well, setting a clear, unified vision that aligns instructional initiatives; acting as a liaison with state entities often advocating on behalf of schools such as ensuring unsafe facility concerns are addressed; coaching, mentoring and evaluating principals to encourage continuous improvement on behalf of students; networking with and recruiting neighborhood partners to collaborate with schools and offer opportunities to students that build a greater sense of kuleana to their community; and interfacing with parents and care-givers to address concerns while fostering positive relationships.

As principals, we rely on our Complex-Area Superintendent to act swiftly and provide personalized counsel informed by a thorough knowledge of our schools. At present, should the position be eliminated, it will surely negatively impact students achievements and school safety.

Lastly, the bill calls for School Community Councils to play a role in evaluating the principal and I feel this is inappropriate. The School Community Council includes members from Bargaining Unit 5 and the classified staff, both of whom are evaluated by the principal. Hence there is serious risk of bias, quid pro quo, and/or claims of retaliation when you have parties subject to being evaluated serving as evaluators. Whether influenced by a fear of retaliation or motivated by a personal grievance, subordinates have a difficult time impartially evaluating their supervisors. In the end, this subverts the goal of using the evaluation results for professional development and diminishes trust in the authenticity of the evaluations.

Mahalo for your consideration of this testimony.

Aloha Senate Committee Members,

My name is Leonard Padayhag, and I serve as a School Renewal Specialist (SRS) in the Kaimuki–McKinley–Roosevelt Complex Area. I respectfully submit this testimony in strong opposition to SB 3334.

In my district-level role, I see firsthand the breadth and complexity of work required to effectively support our schools. This includes coordinating statewide initiatives, providing direct school-site support, responding to concerns from principals, teachers, and families, and ensuring strong alignment between state, complex area, and school priorities. The Complex Area Superintendent (CAS) serves as the chief administrative officer within each complex area, providing essential instructional, operational, and fiscal leadership. Eliminating this position would remove a critical layer of support and create additional strain on school leaders who are already navigating increasingly complex responsibilities.

SB 3334 proposes to eliminate the CAS position and replace it with a broadly defined “appropriate authority” or “administrative framework.” This shift creates ambiguity in leadership and accountability. Rather than maintaining a dedicated regional leader who understands the unique needs, demographics, and challenges of each complex area, the bill risks creating fragmented authority structures that could isolate schools and weaken communication between campuses and the Department of Education. Clear lines of leadership and decision-making are essential for school improvement and student success.

The bill also proposes shifting principal evaluations to School Community Councils. While community voice is important, principal evaluation is a multifaceted process that requires professional expertise in instructional leadership, systems management, and state accountability requirements. Moving this responsibility to councils may unintentionally politicize evaluations and reduce consistency and fairness across schools.

Finally, SB 3334 would negatively impact families. The CAS currently serves as the first level of appeal for parent concerns, including disputes and student disciplinary matters. Removing this accessible, local point of contact and redirecting families to a more centralized authority will likely slow response times and make it more difficult to resolve issues in a timely, responsive, and culturally grounded manner.

For these reasons, I respectfully urge you to reject SB 3334. Our schools benefit from our current leadership structure - through strong, clearly defined regional leadership that supports principals, ensures accountability, and maintains meaningful connections with families and communities.

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

Respectfully,

Leonard Padayhag  
School Renewal Specialist, Educational Officer  
Kaimuki-McKinley-Roosevelt Complex Area  
4967 Kilauea Avenue  
Honolulu, HI 96816

**SB-3334-SD-1**

Submitted on: 2/24/2026 7:58:26 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Donna Miles	Individual	Oppose	Written Testimony Only

Comments:

**Dear Chair Donovan Dela Cruz, Vice Chair Kim, and Members of the Committee:**

**I have served as an Educational Administrator for over 26 years across four states and one foreign country. Having experience in systems similar to those proposed in SB3334, I must formally express my strong opposition to this bill for the following reasons:**

**It seeks to dismantle the existing "Complex Area" organizational structure of the Department of Education and replace it with a centralized "District" system. While the intent of the bill is to improve accountability and reduce administrative burden, the proposed measures will likely achieve the opposite: increasing administrative costs, creating organizational instability, and alienating local school communities.**

**I oppose this measure for the following reasons:**

1. Creation of Costly Administrative Bloat

**SB3334 mandates a new hierarchy of "District Superintendents," "Superintendents for Academics," and "one or more Deputy District Superintendents" for every district. By establishing these high-level executive positions—whose salaries are capped only by that of the State Superintendent—the bill creates a massive new layer of bureaucracy. These funds would be far better spent directly in classrooms on teacher salaries, student mental health services, and classroom supplies.**

2. Destruction of the K-12 "Complex" Continuity

**The current "Complex" model ensures that high schools and their "feeder" elementary and middle schools work in tandem to provide a seamless educational pathway for students. By deleting the definition of "Complex" (Section 6), this**

**bill severs those vital local links. Forcing schools into a larger, more rigid "District" model risks a "one-size-fits-all" curriculum that ignores the specific geographic and cultural nuances of our diverse island communities.**

### 3. Erosion of Local Autonomy and Decision-Making

**Under SB3334, the State Superintendent gains the power to appoint District Superintendents, shifting power further away from school-level leadership and the Board of Education. This top-down approach contradicts the foundational goals of Act 51 (2004), which sought to empower schools and local stakeholders.**

### 4. Disruption of Essential Programs

**The Department of Education is currently implementing critical long-term initiatives, including expanded Computer Science access (Section 8) and Youth Suicide Prevention training (Section 14). Forcing a total structural reorganization during the 2026 school year will cause significant "organizational whiplash," diverting the attention of educators away from student safety and achievement and toward navigating a new bureaucratic maze.**

### Conclusion

**SB3334 is a step backward for Hawaii's public education system. Instead of streamlining the department, it risks inflating the executive budget and disrupting the educational continuity our students rely on. We should be focusing on supporting our teachers and students directly, rather than rearranging the administrative chart.**

**I respectfully urge the Committee to hold SB3334.**

**Thank you for the opportunity to testify.**

**Sincerely,**

Donna "Lexi" Miles



**SB-3334-SD-1**

Submitted on: 2/24/2026 8:04:05 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Albert Hetrick	Individual	Oppose	Written Testimony Only

Comments:

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

My name is Albert Hetrick, and I submit this testimony as a deeply concerned educator with 27 years of experience in the State of Hawai‘i, including 15 years as an administrator and 10 years as the Principal of Aliamanu Middle School. I stand in firm opposition to the proposed bill.

While this measure appears to simply rename the Complex-Area Superintendent role to District Superintendent, its practical effect of consolidating Complex Areas back into the former seven districts would be detrimental. Twenty years ago, Act 51 created Complex Areas precisely to establish tighter work units and increase responsiveness—a need that is even more critical today given the immense complexity of our jobs, which now include addressing viable curriculum, AI integration, chronic absenteeism, and student mental health.

Complex-Area Superintendents (CASs) are so important to the support of schools. They achieve impact by knowing their schools intimately, aligning instructional initiatives, advocating for facility concerns, coaching and evaluating principals, and building kuleana through community partnerships. Doubling or tripling the number of schools a supervisor oversees, as converting back to districts would do, makes this essential, personalized support impossible.

As principals, we rely on our CASs for quick, informed responses when concerns are present which happens more times than you think. . Reassigning these responsibilities to a District Superintendent and two deputies— who would suddenly manage 258 schools across 10,000 square miles—this would inevitably dilute their response and impact.

I must strongly oppose the proposal that permits School Community Councils (SCCs) to evaluate principals. The composition of the SCC, which includes members from Bargaining Unit 5 and classified staff, is highly problematic because these individuals are evaluated by the principal. This arrangement inherently risks bias or the potential for claims of retaliation. Asking subordinates to offer an unbiased evaluation of their supervisor significantly diminishes the credibility and trust essential for a genuine evaluation process.

Mahalo nui loa for your time and consideration of this testimony.

**Albert Hetrick**

Proud Principal,

Aliamanu Middle School

**Date:** February 24, 2026

**Name and Role:** Tiffany Pratt, Principal

**BILL: SB 3334, Relating to Education:** Elimination of Complex Area Superintendent Positions

**POSITION: OPPOSITION AND COMMENTS**

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

My name is Tiffany Pratt, and I am a Principal with 30 years of experience in the Hawai'i Department of Education. I have served under the previous District Superintendent model and the current Complex Area Superintendent (CAS) structure. I am writing to express my **strong opposition** to SB 3334.

Every hour spent defending the basic infrastructure of our school system is an hour taken away from **our students**. When the legislature "throws a curveball" like **SB 3334, it disrupts the hard work and positive momentum we are building in our schools**. Our focus should be on the social-emotional needs, well-being, and academic success of our children, not on restructuring a system that is currently working.

My opposition is based on three critical concerns:

## **1. Protection of the Tri-Level Leadership Framework**

The CAS position is not a "middle-management" luxury; it is a vital communication bridge. Principals do not have the capacity to attend state-level meetings to learn about every new legislative mandate or initiative. The CAS translates state vision into school-level action. Currently, we have a Superintendent whose vision aligns with the field; dismantling the CAS position now would sever the feedback loop that allows principals to have a voice in state-level decision-making. In our complex area, our CAS coordinates our efforts, resources, and initiatives, allowing for easier access to support and programs.

## **2. Risks of Expanding School Community Council (SCC) Authority**

The proposal to give SCCs a 50% weight in principal selection is a "slippery slope" that threatens the stability of school leadership:

- **Administrative Shortage:** We are already struggling to fill Principal and Vice Principal positions. If hiring becomes subject to the whims of an SCC who is unaware of all the intricacies of our educational system, or is there for self-interests, those positions will remain vacant. No one will apply to lead a school where the hiring process is based on personal politics rather than professional merit.

- **Contractual & Professional Integrity:** This shift creates a "de facto" hiring power that conflicts with existing union agreements and bypasses the professional, merit-based oversight currently provided by the CAS. Our CAS knows the details of our school and understands our individual students' and community needs. They are an essential part of the principal selection process.

### 3. Student-Centered

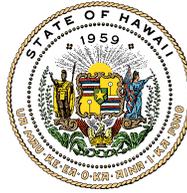
As a current resident of Hawai'i Island who previously worked on O'ahu for 14 years, I know firsthand that **student** needs are not uniform across the state. Removing leadership in complex areas threatens to centralize attention towards Honolulu. Neighbor Island schools and rural complexes like Nānākuli-Waianae face unique geographic, cultural, and socio-economic challenges. Our **students** need representation in all complex areas. Without a CAS to advocate for these specific needs, our voices will be lost in a centralized system that doesn't understand our local context. Our students will lose out if the elimination of Complex Area Superintendent Positions passes.

**Closing: The current system is working.** Abolishing the CAS position would stall our progress and force us to restart from scratch at the expense of our **students'** stability. I urge the Committee to **hold SB 3334** and allow us to keep our focus where it belongs: on our **students**.

Mahalo for the opportunity to testify.

Respectfully,

Tiffany Pratt, Principal



**STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
HO'OKELE ELEMENTARY SCHOOL  
511 KUNEHI STREET  
KAPOLEI, HI 96707**

**Date:** February 25, 2026

**Time:** 10:55am

**Committee:** WAM

**Department:** Education

**Title of Bill:** SB 3334, SD1

**Person Testifying:** Bryan Rankie

**Position:** Opposition and Comments

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

As the Principal of Ho'okele Elementary School within the Campbell-Kapolei Complex Area, I am writing to formally state my strong opposition to SB 3334, SD1. I urge this committee to consider the significant operational disruptions this measure would impose on our school community. Serving as a leader on the front lines of our educational system, I see firsthand that our current organizational structure is not a bureaucratic hurdle, but rather a vital catalyst for school success and stability.

I oppose this measure based on the following critical operational factors:

**1. Bilateral Advocacy and Localized Alignment**

The Complex Area Superintendent (CAS) serves as a vital conduit between state leadership and the campus. This is a reciprocal relationship: the CAS ensures that state initiatives are implemented with an understanding of our specific community's needs, while simultaneously serving as a dedicated advocate who brings the unique complexities of the Campbell-Kapolei area back to the state level. Without this specialized advocacy, the voice of our specific community will be lost in a broad, centralized bureaucracy.

**2. Manageable Span of Control vs. Diluted Support**

The current Complex Area model works precisely because the number of schools and students under a CAS is manageable. This allows for deep, meaningful collaboration and direct oversight. Moving to a "District" model will drastically increase the number of schools under a

single administrator's purview. When a leader is responsible for a massive geographic region with vastly different demographics, their ability to provide individualized support to a school like Ho'okele is naturally diminished. We risk moving from a system of active partnership to one of distant, generalized supervision.

### **3. Mentorship Grounded in Experience**

The CAS is a professional mentor whose guidance is rooted in their extensive knowledge, skills, and experience. I have navigated high-stakes situations where my CAS provided the necessary perspective to reach a successful resolution. This high-level mentorship requires the CAS to have a deep "working knowledge" of my campus—a level of familiarity that is impossible to maintain if that leader is overburdened with an excessive number of schools across a large district.

### **4. Operational Instability and Professional Evaluations**

Ho'okele Elementary relies on a stable administrative environment to focus on our primary mission: student achievement. This bill introduces significant organizational flux and proposes a shift in the principal appointment process that risks politicizing school leadership. We must maintain an objective, professional vetting process to ensure our schools are led by the most qualified educators.

In summary, the current Complex Area structure is a highly functional model that effectively bridges the gap between state-level vision and local-level execution. By maintaining a manageable span of control, it ensures that schools like Ho'okele receive the tailored support and rapid responsiveness necessary for a safe and productive learning environment. Expanding this into a broader, overextended district model will inevitably dilute the quality of collaboration and support that our individual schools rely on—a shift that would ultimately be a disservice to our students, staff, and the Campbell-Kapolei community. I respectfully urge your committee to protect the stability of our schools and hold SB 3334, SD1.

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

Sincerely,



Bryan Rankie  
Principal, Ho'okele Elementary School

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:09:19 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Ryan Kusuda	Testifying for Waikiki Elementary, Hawaii Department of Education	Oppose	Written Testimony Only

Comments:

**TO:** The Honorable Donna Mercado Kim, Chair; The Honorable Michelle N. Kidani, Vice Chair; and Members of the Committee on Education (EDU) **FROM: Ryan Kusuda**, Principal, Waikīkī Elementary School

**RE: SB 3334, SD1 – RELATING TO EDUCATION (OPPOSE) HEARING: 2/24/2026**

Aloha Chair Kim, Vice Chair Kidani, and Members of the Committee,

My name is Ryan Kusuda, and I am the Principal of Waikīkī Elementary School. I stand in **opposition to SB 3334, SD1.**

While I appreciate the Committee’s intent to improve accountability, the move from the "Complex Area" model to a "District" model with an "unspecified number" of District and Deputy Superintendents is a step toward political centralization and administrative instability.

**1. A Return to "Top-Down" Governance** In 2004, the Legislature passed **Act 51** specifically to move away from the centralized "District" model because it was too removed from the classroom. The Act's intent was to **"place a far greater number of decisions... directly in the hands of individual schools and their leaders"**. By re-establishing "Districts" and "Deputy District Superintendents", this bill creates a top-heavy structure that contradicts the "Accountable Empowerment" model our state has spent 20 years building.

**2. Strategic Instability and the Loss of Professional Expertise** The current CAS role is a meritocratic position requiring deep expertise in "fiscal and resource management, school safety, and civil rights". By repealing this role in favor of an "unspecified number" of new appointees, the Legislature risks:

- **Personnel Turmoil:** Wholesale removal of the "highest ranking educational leaders closest to the schools" creates a leadership vacuum in complexes like mine (Farrington-Kaiser-Kalani).
- **Political Influence:** Replacing established, localized support with new "District" titles suggests a move toward political patronage rather than the "thought-partnership" and instructional coaching currently mandated by the CAS position.

**3. Fragmenting Academic and Operational Support** The SD1 focuses heavily on "District Superintendents for Academics". However, the current CAS is responsible for the **totality** of the school program. As a principal, I rely on my CAS to be a "safeguard to external distractions". Splitting these roles or centralizing them into a new district office removes the "interface with state offices" that currently mitigates procurement violations and reduces IEP process-based settlements.

Accountability is achieved through proximity and professional mentorship, not through the creation of new titles and the centralization of "final authority" in the State Superintendent's office. I urge you to look at the history of Act 51: we moved to Complex Areas because they are "attuned to the local and cultural context". We should not discard this localized success for an untested and unspecified "District" structure.

I respectfully urge the Committee to **hold SB 3334, SD1**.

Sincerely,

Ryan Kusuda, Principal



JOSH GREEN, M.D.  
GOVERNOR

Keith Hayashi  
SUPERINTENDENT

Kasey Eisenhour  
PRINCIPAL

STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
KA 'OIHANA HO'ONA'AUAO  
KEONEPOKO ELEMENTARY SCHOOL  
15-890 KAHAKAI BOULEVARD  
PAHOA, HAWAII 96778  
TELEPHONE: (808) 313-4501  
FAX: (808) 965-2138

Stacey Bello  
COMPLEX AREA SUPERINTENDENT

February 24, 2026

Dear Members of the Hawaii State Legislature,

I am writing in strong support of maintaining the Complex Area Superintendent (CAS) positions within the Hawaii Department of Education (HIDOE). As a principal at Keonepoko Elementary School, I am deeply concerned about the potential impact of legislation that would eliminate this critical level of leadership within our public education system.

Complex Area Superintendents serve as an essential bridge between school-level leadership and the state office. They provide instructional guidance, operational support, accountability oversight, and immediate problem-solving assistance that principals rely upon daily. Their leadership ensures alignment across schools, consistent implementation of initiatives, and timely responsiveness to each community's unique needs.

For principals—particularly those of us serving on neighbor islands—the CAS role is not an abstract administrative layer; it is a vital source of accessible leadership. Unlike our colleagues on O'ahu, who may have more direct access to central office leadership and resources, neighbor island principals depend heavily on our Complex Area Superintendent for in-person guidance, advocacy, and coordinated support. Eliminating this position would create a significant leadership gap, increasing isolation and reducing the responsiveness that our schools require.

At Keonepoko Elementary, the support of our Complex Area Superintendent directly impacts student outcomes. CAS leadership strengthens school improvement efforts, supports compliance and fiscal stewardship, assists in navigating complex personnel matters, and ensures that principals remain focused on what matters most—teaching and learning. Without this level of support, the burden on principals would increase substantially, diverting time and energy away from instructional leadership and student-centered work.

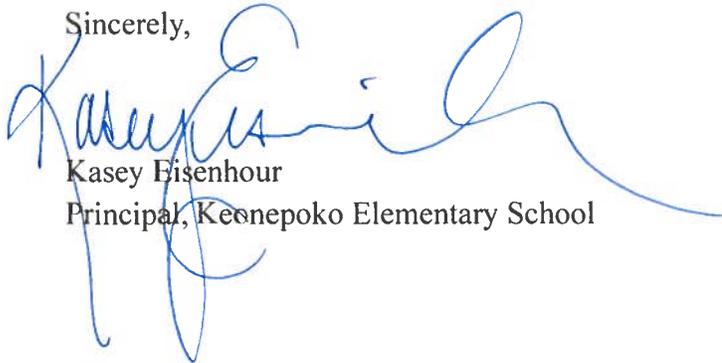
Hawai'i's public school system is unique in its statewide structure. That structure requires thoughtful layers of leadership to ensure equity, cohesion, and responsiveness across islands and communities.

Removing the Complex Area Superintendent level would not streamline the system; rather, it would weaken the support network that sustains schools and students statewide.

I respectfully urge you to preserve the Complex Area Superintendent positions within the Hawaii Department of Education. Maintaining this leadership tier is an investment in strong schools, supported principals, and successful students across all islands.

Mahalo for your consideration and for your continued commitment to Hawai'i's keiki and public education system.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kasey Eisenhour', with a long, sweeping flourish extending to the right.

Kasey Eisenhour  
Principal, Keonepoko Elementary School

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:17:58 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Christopher D. Yim	Individual	Oppose	Written Testimony Only

Comments:

**Aloha Chair Dela Cruz and Members of the Committee,**

**My name is Babā Yim, and I am the Po‘okumu of Ke Kula Kaiapuni ‘O Ānuenue, the only K-12 Kula Kaiapuni (Regular DOE Hawaiian Immersion School) on O‘ahu. I submit this testimony in strong opposition to Senate Bill 3334.**

**I have served the DOE in the Hawaiian Immersion Program for the past 22 years, 10 of which have been as an administrator. While I value shared decision-making and community engagement, SB3334 proposes changes that would significantly and negatively impact effective school leadership, operational stability, and instructional continuity. Specifically, I am concerned about (1) the elimination of CAS positions and (2) proposed changes to principal evaluation and hiring procedures requiring School Community Council (SCC) involvement.**

**1. Elimination of CAS Positions**

**Complex Area Superintendents (CAS) play a critical and irreplaceable role in Hawai‘i’s uniquely centralized school system. CAS serve as the essential link between schools and the state-level DOE, providing instructional leadership, compliance guidance, and timely decision-making support.**

**Eliminating CAS positions would:**

- 1. Remove a vital layer of instructional and operational leadership support for principals.**
- 2. Increase fragmentation and inconsistencies across schools and complex areas.**
- 3. Shift additional responsibilities to principals without corresponding capacity or authority.**
- 4. Undermine systemwide coherence in implementation of state and federal mandates.**

**From a principal’s perspective, CAS are not redundant—they are essential partners in school improvement, crisis response, personnel guidance, and accountability. Their removal would weaken—not strengthen—school leadership and student support structures. Especially as a Kaiapuni Administrator, our school would not get the specific**

**supports we need to effectively engage with DOE processes and initiatives, while still maintaining the integrity of the Hawaiian Immersion Program.**

## **2. Changes to Principal Evaluation and Hiring Procedures**

**SB3334's proposal to require School Community Council (SCC) involvement in principal evaluation and hiring raises serious concerns related to governance, objectivity, confidentiality, and equity.**

**While SCCs play an important advisory role, expanding their authority into evaluation and hiring functions would:**

- Compromise the professional integrity and confidentiality of personnel processes.**
- Introduce inconsistencies across schools due to varying SCC capacity, training, and composition.**
- Risk politicizing leadership decisions rather than grounding them in instructional leadership expertise.**
- Blur accountability lines within a centralized statewide system.**

**Principals are evaluated and hired within a framework that balances instructional leadership, compliance, labor agreements, and systemwide priorities. These processes require trained evaluators with a comprehensive understanding of educational leadership standards, legal requirements, and DOE expectations. SCCs are not designed, trained, or resourced for this role.**

## **Conclusion**

**SB3334, will have harmful consequences for school leadership, system coherence, and ultimately student learning. The elimination of CAS positions and the restructuring of principal evaluation and hiring processes would weaken leadership pipelines and destabilize schools—particularly those serving high-need communities and especially Kaiapuni Schools.**

**I urge the Senate to reject SB3334 and instead engage principals, CAS, educators, and community stakeholders in thoughtful dialogue to strengthen—not dismantle—effective leadership structures within the Hawai'i State Department of Education.**

**Mahalo for the opportunity to provide this testimony and for your continued commitment to Hawai'i's students and public schools.**

## LEGISLATIVE BRIEF

Subject: **Strong Opposition to SB 3334, SD 1 – Relating to Education**

To: Senate Committee on Ways and Means

From: Kori Takaki, Principal, Kealakehe High School

Date: February 24, 2026

### Summary

I strongly oppose SB 3334, SD 1. The bill proposes structural changes that would:

- Dismantle the Complex Area structure
- Grant School Community Councils (SCCs) 50% authority over principal selection and evaluation

These changes risk school stability, professional leadership integrity, and consistent student outcomes.

### Key Concerns

#### 1. Dismantling the Complex Area Structure

- CAS model brings decision-making closer to schools, provides regional oversight, and supports students from elementary through high school. This model has been in place and refined over the last 20+ years and was designed to simulate local leadership without decentralizing funding or authority.
- Reverting to a centralized district model like the pre-1996 structure would diminish timely, localized support—especially on neighbor islands and weaken instructional partnerships.

#### 2. Graduation Outcomes

- The current CAS model shows improved results: graduation rates increased from 78.9% in 2002 (old district model) to 86% in 2025.

#### 3. SCC Authority & Principal Hiring

- Granting SCCs 50% hiring authority creates dual accountability, risks inconsistent policy implementation, and may conflict with HGEA contracts.
- Politicization of Leadership: Research shows decisive local council authority increases risk of decisions driven by personal agendas, local politics, or factional interests.
- SCCs function best in an advisory role, enhancing trust, legitimacy, and alignment with local values rather than as supervisors.

#### 4. Unsupported Justifications

- Claims about students graduating at a “4th-grade reading level” are unsubstantiated. Literacy is a K–12 journey; the CAS model bridges elementary and high school to support progress.

### Conclusion & Recommendation

- Dismantling the CAS structure: removes essential instructional support and oversight.
- Altering hiring processes: undermines merit-based leadership, risks politicization, and weakens equity across schools.

**Action Requested: Oppose SB 3334, SD 1** to preserve strong school leadership and continue student progress in Hawai'i.

Mahalo,



Kori Takaki

Principal, Kealakehe High School

Subject: **TESTIMONY IN STRONG OPPOSITION TO SB 3334, SD 1 Relating to Education**

**TO:** The Senate Committee on Ways and Means

**FROM:** Kori Takaki, Principal, Kealakehe High School

**DATE:** February 24, 2026

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

My name is Kori Takaki, and I serve as the principal of the largest high school on the Big Island. I am writing to express my **strong opposition to SB 3334, SD 1.**

While the intent of any education bill should be the betterment of student outcomes, this measure proposes a structural regression that threatens the stability of our schools, ignores collective bargaining agreements, and undermines professional leadership. I am not seeing a clear "problem" because this bill appears to be a structural solution to a cultural complaint. Suggesting to reorganize the DOE to fix a cloud defined as general parent dissatisfaction is unrealistic and will likely cause chaos in the system and distract schools from the important work of student achievement.

In addition, the bill lacks clarity both in its description and in the language that is underlined within the bill itself.

<p>The suggestion to repeal complex area superintendents with an unspecified number of district superintendents seems incomplete and unclear. →</p>	<p><b>Description</b> <i>Reestablishes the organizational structure of the Department of Education by repealing complex areas and establishing an unspecified number of districts across the State. Repeals the position of Complex Area Superintendent and establishes the positions of District Superintendent for Academics and Deputy District Superintendents who are required to undergo annual performance evaluations. Clarifies that School Community Councils shall submit principal evaluations to the Superintendent of Education, who shall have final authority to appoint a principal. Requires the Department of Education to adopt rules. Makes conforming amendments. (SDI)</i></p>
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<p>What's outlined in the bill goes further to say that the council's evaluation shall account for 50% of the overall evaluation in the selection of a principal. The previous discussion of the bill insinuated that SCC's would also be evaluating Principals performance. →</p>	<p>(3) Participate in principal selection and evaluation, and transmit any <del>such</del> evaluations to the <del>complex area</del> <u>district</u> superintendent; <u>provided that the school community council's evaluation shall account for fifty</u></p>
<p>The clarification that School Community Councils shall submit principal evaluations to the superintendent of education who has final authority to appoint a principal is unclear because the superintendent already has final authority when the complex area superintendent puts forth a selected candidate for hire. →</p>	<p><u>per cent of the overall evaluation in the selection of a principal; provided further that the superintendent of education shall have final authority to appoint a principal; and</u></p>

As the sitting principal of a large high school, I would like to highlight several key concerns regarding this bill:

**1. The vital role and impact of the Complex Area Superintendent (CAS).**

- a. The shift from District Superintendents to the Complex Area structure was a deliberate effort to bring decision-making closer to schools, fostering cohesive, mission-driven leadership in all schools under leaders like the late Art Souza, who established the ILT framework in the West Hawaii Complex Area, and continued today by West Hawaii CAS Janette Snelling through strong PLCs and complex-wide learning targets. As a principal of a large high school, I have seen how the complex model provides essential longitudinal oversight from elementary through graduation and ensures timely, localized support, something that would be significantly diminished by reverting to a centralized district model, particularly on neighbor islands where distance from central office already presents challenges.

**2. Graduation rate comparisons between the former District Model and the current Complex Area Model.**

- a. The data indicates that the current Complex Area model is producing stronger outcomes than the former district structure, with statewide graduation rates rising from approximately 78.9% in 2002 under the old model to about 86% in 2025 under the current system.

**3. Concerns about granting School Community Councils (SCC) inappropriate authority over principal hiring.**

- a. SB 3334's proposal to grant School Community Councils 50% authority over principal selection and evaluation would alter Hawai'i's current centralized accountability structure by introducing shared authority between the DOE and

local councils, creating a dual-reporting dynamic that could lead to inconsistent implementation of state initiatives, potential conflicts with existing HGEA contractual provisions, and variability in leadership standards across schools; specifically, Politicization of Leadership: while community input is valuable, research cautions that when local governing bodies hold decisive hiring authority, there is increased risk that decisions may be influenced by local political dynamics or factional interests rather than uniform, systemwide criteria, which can affect equity, consistency, and professional autonomy across campuses.

- b. Community councils are most effective in an advisory role, providing legitimacy, trust, and alignment with local values, while granting them supervisory authority can lead to politicization, higher turnover, and reduced professional autonomy for principals.

**4. Recurring narrative regarding "4th-grade reading levels" at graduation.**

- a. There is no public DOE report validating this claim that I could find. In high schools, literacy is measured in the 11th grade via standardized proficiency test (SBAC) and there is an alternative test for those with severe cognitive deficits.
- b. While some students, such as those in Special Education, Certificate track or English Language Development programs may graduate with different literacy profiles, our mission is to help every student reach their individual potential. Broad generalizations should not be used to justify dismantling a successful administrative structure.
- c. As I see it, this is a classic "sticky" political talking point. It sounds dire, it's easy to repeat, and it justifies "radical" change. Even if it lacks data, it creates an emotional sense of urgency. However, the reality is that Literacy is a K-12 journey. Blaming the current administrative structure for a high schooler's reading level ignores the fact that the CAS model was specifically designed to bridge the gap between elementary feeders and high schools, which is exactly what the ILT and PLC work does in our West Hawaii Schools specifically.

Dismantling the Complex Area structure would be a major loss for school principals, removing the close instructional support and regional oversight that allows schools to operate effectively. Separately, altering the principal hiring process would undermine the integrity and consistency of leadership selection, replacing a professional, merit-based system with one vulnerable to political influence and uneven decision-making.

**I respectfully urge the Committee to oppose SB 3334, SD 1** to preserve both strong school leadership and the progress we have made for Hawai'i's students.

Mahalo for the opportunity to share my testimony.

Sincerely,



**Kori Takaki**

Principal, Kealakehe High School

## **Suggestions for Amendment to SB 3334 SD 1: The "Professional Partnership" Model**

My opposition is not about community input; it is about preventing structural destabilization. I strongly support community voice and would like to strengthen engagement without undermining system coherence.

Should the committee decide to advance this bill, I would like to offer the following amendments that would help to preserve strong school leadership and the progress we have made for Hawai'i's students.

### **1. Formalize SCC Advisory "Input," Not "Authority"**

- Giving SCCs 50% power over hiring creates "dual accountability" and politicizes a professional role. A suggestion would be to amend the bill to mandate a Formal Community Feedback Report. During a Principal's hiring, the SCC would submit a written "Community Impact Statement" directly to the Superintendent. This ensures parent and community voices are documented and legally required to be considered in the evaluation, without violating HGEA contracts or bypassing professional qualifications.

### **2. Strengthen the CAS Role via "Public Accountability Sessions"**

- Rather than eliminating the CAS, require each Complex Area to hold bi-annual "State of the Complex" Town Halls. The CAS and area Principals would present local data (like the graduation and PLC progress, etc.) and take direct questions. This solves the "transparency" issue without destroying the support structure that principals rely on.

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:18:51 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Catherine H. Payne	Individual	Oppose	Written Testimony Only

Comments:

February 24, 2026

**Testimony Regarding SB3334, SD 1**

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

My name is Catherine H. Payne. I am opposed to SB3334, SD 1

I was principal of Farrington High School when Act 51 was passed by the legislature to support the transition of the Department of Education to a system that better reflected the most effective educational practices for schools in the new century. This legislation was developed in consultation with principals, DOE leadership, community groups, and employee organizations. One of the key elements was to give more local control to communities and schools so that services and programs could specifically target their unique needs. Complex areas replaced districts and fifteen complex area superintendents replaced seven district superintendents and seven deputy district superintendents. School-community councils were added to each school and empowered to review school budgets and yearly plans. They also provided input on principal evaluations and selections. This legislative vehicle did support many positive changes within the Department of Education.

Initially training, funding and support were available to the school-community councils, but as the years went by, the schools had to take this on, with principals trying to recruit members and support the councils. The efficacy of the councils varied widely among the schools. I saw this on accreditation visits, during my brief role as an interim complex area superintendent, and later in my role on the Board of Education. In many schools it was difficult to find individuals who were able and willing to give the time needed for professional learning and meeting. This will be a significant problem if more authority over principals is given to the school-community councils.

The specific issues and concerns that would be addressed by eliminating the position of complex area superintendents are not clear to me in my reading of the bill. The return to District and Deputy District Superintendents with individuals in those positions to be appointed and evaluated by the Board of Education does not, in my view, streamline the bureaucracy. Perhaps this will be further clarified, but as the bill stands I can envision many problems that would arise were this bill to pass. The role of the complex area superintendent includes the direct supervision

of principals in both supporting their efforts to increase student achievement and holding them accountable for issues that may negatively impact their schools. The complex area superintendents are close to the schools and principals and best-suited to respond quickly when situations requiring intervention arise.

If there are concerns that leadership changes implemented by Act 51 are no longer serving students and schools, I would encourage you to direct the Department of Education to conduct an evaluation that would address the specific concerns of your committee. After data are gathered and shared there could be a collaborative process to implement changes that are consistent with the most current research on public education leadership.

Mahalo for considering my testimony

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:20:10 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Iris McGuire	Individual	Oppose	Written Testimony Only

Comments:

I am writing to express my strong opposition to the Bill 3334 that would eliminate the position of Complex Area Superintendent (CAS).

The CAS is more than just an Administrator. They are the bones of the DOE body. They assure that our students, families and community are connected and part of the educational system. They are on the ground building relationships, trusts and communications that provide a safe and secure avenue for the DOE to move forward positively.

The CAS works across all aspects of the DOE - instruction, finance, operations, human resources, compliance, student and staff services, as well as athletics. The CAS ensures that all programs and services are available and equitable. Education based Athletics is key to the success of many in our society. The CAS provides balanced oversight to ensure that schools serve the whole child.

During the COVID-19 pandemic and lava mitigation, the CAS was instrumental in continuing the education of our keiki on the Big Island. It was a challenge, especially for the KKP Complex due to our vast land coverage and poor economic status of our families. This did not discourage them, instead the CAS got schools Admin, teachers and staff to rally behind them and assure continued service to our most vulnerable group. - our kids.

In today's increasing climate of hostility and, at times violence directed toward administrators and school officials, the CAS serves as a critical support system. We should not be looking at eliminating, but empowering our people in the DOE. The CAS is the person between the upper powers and the outer island people who are lost in the shuffle on many occasions.

For outer island communities, the CAS provides the essential advocacy and voice of protection for our kids and communities that are unfamiliar to the Honolulu-based people. The CAS knows their community, their staff and their needs. Eliminating them would eliminating the opportunities from our vulnerable kids.

If concerns exist regarding performance or effectiveness in certain areas, the solution is not to eliminate the position altogether. Instead, the focus should be on placing the right individuals in these leadership roles, professionals who understand education-based athletics, academic excellence, fiscal responsibility, and community engagement. Strengthening leadership through careful selection and accountability will move education and athletics forward far more

effectively than removing a vital structural support. Eliminating the CAS position would weaken coordination, reduce advocacy for local schools, and place additional strain on principals and state level administration, that would eventually bleed down to the teachers, staff and our students.

I also oppose the SCC having 50% weight on principal performance. This could lead to unfavorable decisions made on emotion and personal bias. Principals should be evaluated on a criteria that is the same across all avenues. It should be on the needs of their individual schools and a similar criteria. This provides the potential of many grievances and personal gain.

For these reasons, I respectfully urge yo to oppose this bill and instead invest in strong, qualified leadership within the existing structure.

Thank you for your time and thoughtful consideration.

Iris McGuire, CMAA

District Educational Specialist - Hawaii Island

**Date:** Friday February 24, 2026

**Time:** 8:08 am

**Location:** Video Conference Room CR 221 &  
Videoconference

**Committee:** EDN

**Department:** Ka'u, Kea'au, Pahoia Complex Area

**BILL: SB 3334, Relating to Education:** Elimination of Complex Area Superintendent Positions

**TESTIFIER:** M. Malia Naeole-Takasato

**POSITION: OPPOSITION AND COMMENTS**

Aloha Senator Donovan M. Dela Cruz, Chair and Senator Sharon Y. Moriwaki, Vice Chair and Members of the Committee:

As a Comprehensive Literacy State Development Resource Teacher (CLSD RT) serving directly under the Complex Area Superintendent (CAS) in our complex area, I work daily on the front lines supporting schools, teachers, and students—particularly with the implementation of the Hawaii DOE's eight literacy levers, the CLSD Federal grant, instructional coaching, and targeted interventions for our most vulnerable learners.

I am writing to strongly oppose **SB 3334**, which seeks to repeal the CAS position. This proposal overlooks the indispensable regional leadership that the CAS provides, especially in rural, neighbor island, and underserved complexes like Ka`ū, Kea`au, and Pāhoa (KKP).

My opposition stems from four key concerns grounded in my KKP complex area experience with our CAS:

1. **Undermining the Tri-Level Leadership Framework.** In my role, I rely on the CAS to advocate for resources, align complex-wide strategies (such as the Hawaii Department of Education's (Eight) Literacy Levers - initiatives, CLSD grant), CAS ensures that school-level realities inform decisions at the state level. Eliminating this position would isolate schools as disconnected "islands," weakening our ability to respond cohesively to regional challenges and diluting direct advocacy for our students and educators. Erosion of this leadership framework will ultimately lead to the breakdown of systems at the school level.

2. **Lack of Clear Plan for Reassigning CAS Responsibilities** Section 17 of the bill provides insufficient detail on how critical CAS duties—such as overseeing complex-area special education services, supporting resource teachers like myself, coordinating multi-school interventions, and providing principal supervision—would be reassigned. Reverting to a district superintendent model would overload several leaders with dramatically more schools, likely resulting in reduced support, delayed responses to urgent needs (e.g., crisis interventions), and increased burnout across the system. This ambiguity risks creating gaps that directly impact classroom support and student outcomes.
3. **Inappropriate Expansion of School Community Council (SCC) Authority in Principal Selection.** Assigning 50% weight to SCC evaluations in principal hiring raises serious concerns from my perspective, supporting school-level operations:
  - It conflicts with existing union contracts and established hiring protocols.
  - Many stakeholders who make up a School Community Council are not trained educators. Additionally, most are not trained educational administrators. To leave the selection, oversight, and progress monitoring of our schools to the SCC is simply frightening.
4. **Decentralize the DOE and break the hold of Honolulu-centric decision-making.** The State often overlooks the distinct geographic, cultural, linguistic, and socio-economic realities of school communities outside O‘ahu—particularly those on the Neighbor Islands and in rural areas such as Ka‘ū, Kea‘au, and Pāhoā. In my complex KKP, our CAS visits schools on a weekly basis. Through these regular on-site engagements, the CAS collects timely, context-specific data that allows us to celebrate each school's strengths while directly addressing its areas of need. The CAS also establishes systems for frequent, meaningful sharing of effective practices across schools, enabling successful strategies to be replicated where they fit best locally. A fully centralized structure would eliminate current practices and systems in KKP that are responsive to our schools. The elimination of CAS will likely distance decision-making from our communities, dilute local accountability, and—without the tailored support provided by a dedicated CAS—widen existing inequities for our students, especially in geographically isolated or underserved areas. The current decentralized approach, with an empowered CAS, truly provides access to support, which leads to equitable outcomes for all keiki.

For these reasons, rooted in my direct daily work under the CAS, I respectfully urge the Committee to **hold SB 3334** and maintain the regional leadership structure that ensures our schools, teachers, and students receive the specialized support they require. Mahalo nui loa for the opportunity to provide testimony from a resource teacher's perspective.

Respectfully,

M. Malia Naeole-Takasato  
Comprehension Literacy State Development Resource Teacher  
Ka'ū, Kea'au, and Pāhoa Complex Area  
Hawai'i State Department of Education

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:23:54 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Richard Billingsley	Individual	Oppose	Written Testimony Only

Comments:

Chair Dela Cruz and Committee Members,

I am writing to express my strong opposition to SB 3334. While the bill aims for accountability, replacing the "Complex Area" structure with a centralized "District" system will create instability and alienate our school communities. I oppose this measure for the following reasons:

- **Administrative Bloat:** The bill creates a new, expensive layer of high-level executive positions. These funds should be directed to classrooms and teacher salaries, not a new bureaucratic hierarchy.
- **Loss of K-12 Continuity:** Eliminating the "Complex" model severs the vital link between feeder schools and high schools, forcing a "one-size-fits-all" approach that ignores our communities' unique cultural nuances.
- **Erosion of Local Autonomy:** Shifting appointment power to the State Superintendent centralizes authority and moves decision-making further away from local stakeholders and school-level leadership.
- **Organizational Instability:** A total structural reorganization in 2026 will distract educators from ongoing, critical initiatives.

SB 3334 prioritizes administrative charts over student success. I respectfully urge the Committee to hold this bill.

Thank you for the opportunity to testify.

**To:** The Honorable Donovan M. Dela Cruz, Chair; The Honorable Sharon Moriwaki, Vice Chair; and Members of the Senate Committee on Ways and Means

**From:** Ervin Pasalo, Hokulani Elementary School Principal

**Date:** February 24, 2026

**Subject: OPPOSITION to SB 3334, Relating to Education**

I am writing to express my firm opposition to **SB 3334**, which seeks to repeal the 15 Complex Area Superintendent (CAS) positions and reorganization to 7 District Superintendents. This measure threatens to destabilize the Department of Education (DOE) by removing essential complex area support and creating a dangerous administrative bottleneck.

### **Primary Reasons for Opposition:**

- **Loss of Regional Expertise:** The "Complex Area" model was designed to ensure that leadership remains responsive to the unique geographical and socio-economic needs of our complex areas. Eliminating CAS positions removes the critical bridge between state-level policy and school-level reality.
- **Excessive Centralization:** One district office cannot effectively manage the nuances of every campus in its district unlike the complex area oversight currently provided by the CAS layer.
- **Harm to School Morale:** This bill has already sparked significant outcry from educators and administrators. This shift creates unnecessary instability at a time when schools should be focusing on student wellness and academic achievement.
- **Lack of Justification:** There is no specific data suggesting that the removal of complex area superintendents will improve student outcomes or teacher retention. In fact, removing these support structures is likely to increase the administrative burden on principals, leading to higher turnover in school leadership.

### **Conclusion**

SB 3334 represents a step backward for Hawaii's public education system. Instead of centralizing power, the legislature should focus on empowering local school communities and providing the regional resources necessary for schools to thrive.

I respectfully urge the Committee on Ways and Means to **HOLD** this measure.

Mahalo for the opportunity to testify,

Ervin Pasalo

Testimony on SB3334- Corey Allen (Principal, HIDOE)

Dear Committee Members,

As a Principal in the Hawai'i Department of Education, I am proud to hold a great responsibility to my students, my teachers, my staff, my families, and ultimately my community. I submit this testimony today as a representative of one school, in opposition to SB3334. My school alone serves over 550 students. This requires a faculty and staff of at least 100 people, which in turn also serves a parent population of roughly 1,000. One could argue that I am in charge of or serving 1,650 individuals every day.

This bill, which calls for the dismantling of the complex area superintendent position, does so in the efforts to do away with the unclear authority structures of our current situation. It seeks to empower our school community councils, and practically direct all final authority such as Principal selection to the superintendent of the state. Unfortunately, this proposition does not take into account the sheer numbers that are at play.

The average size of a school district in the United States serves roughly 5,000 students. For comparison's sake, superintendents of these mainland school districts serve a cohesion of schools or communities that our complex area superintendents of Hawaii serve. However, our local numbers outweigh the mainland average significantly.

My one school exists in one complex, which consists of 7 elementary schools, one middle school, and one high school. This complex exists amongst two other complexes in a complex area. Therefore, a complex area consists of roughly 3 middle schools, 3 high schools, and between 10-15 elementary schools. Using my school as an example, this implies that whoever leads the complex area oversees at least 1,900 employees, serving over 10,000 students, and serving 19,000 parents. This is looking at the numbers conservatively. It's actually much higher.

This bill doubles or triples those responsibilities, taking a position that is already stretched thin and making it virtually impossible to manage efficiently. The above-Principal level decisions will be bottle-necked at the proposed district superintendent or state level. While the intention of this bill is to localize more decisions, it will effectively leave Principals stranded when situations require resources from outside of the school.

Our complex area superintendents work hard. They are a significant part of the bond the Hawai'i Department of Education leadership strives to maintain to ensure all students of Hawaii are given the same opportunities. Please don't make that job harder than it already is.

Sincerely,  
Corey Allen, Principal



Bill: SB 3334 SD 1  
Name: Melody Habon  
Position: Opposition

I am writing to express my strong opposition to SB 3334 SD 1. While I appreciate the legislature's intent to reduce administrative burdens, this bill as drafted risks dismantling the very support structures that allow our schools to thrive. Rather than moving forward, this proposal threatens to return us to a centralized, "top-down" management that distances decision-making from the students it affects.

### The Value of the Complex Area Superintendent

As a first-year principal, my Complex Area Superintendent (CAS) is not just a supervisor; they are a direct lifeline.

- Visible Leadership: Unlike a distant district office, my CAS is present on our campuses, understands our unique community needs, and provides tailored, individualized support.
- Proven Efficacy: Having worked within the complex area office myself, I have seen firsthand how this model provides high-leverage support across operations, academics, and health and safety.

### Risks of Re-Centralization

The transition from "complex areas" to "districts" is more than a name change; it is a structural regression.

- Dismantling Networks: This bill risks breaking established, high-functioning support networks that schools rely on for daily stability.
- Autonomy vs. Authority: In the Campbell-Kapolei Complex, we have successfully moved away from rigid mandates toward a school design model that ensures alignment with our students' needs.
- "Top-Down": SB 3334 SD 1 grants district superintendents "authority over principals... to ensure consistent direction." This language undermines the local autonomy and innovation we have worked so hard to achieve.

I respectfully request that you oppose SB 3334 SD 1 and instead look for ways to strengthen the existing complex area structures that empower our principals and teachers.

**Date:** 02/25/2026  
**Time:** 10:55 AM  
**Location:** 211  
**Committee:** WAM

**Department:** Education

**Person Testifying:** Allyson Doherty

**Title of Bill:** SB3334 SD1 RELATING TO EDUCATION

**Position:** OPPOSE

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

My name is Allyson Doherty. I serve as an elementary school principal in Hawai'i and am a doctoral candidate researching the sustainability of elementary school principals. I respectfully submit testimony in opposition to SB 3334 SD1.

My research examines what allows elementary principals in Hawai'i to remain and thrive in their roles. Early-career principals consistently identified complex area guidance, mentorship, and peer networks as the most critical supports sustaining them in the position. The Complex Area Superintendent serves as a coordination and translation layer between state mandates and school-level implementation. Removing that layer does not eliminate the work; it shifts that responsibility directly to the principal.

At a time when Hawai'i is already experiencing principal turnover, increasing workload while removing support will further destabilize schools. Leadership stability is directly connected to student achievement, teacher retention, and school climate.

If the Legislature's goal is to empower principals, the most effective path is not structural reorganization but capacity building. Principals need relief from administrative burden so we can focus on teaching and learning. We need sufficient staffing, operational support, and funding structures to implement the initiatives the Legislature values, including student well-being supports, free meals, and fair wages for school employees.

I respectfully urge the committee to defer SB 3334 SD1 and work collaboratively with school leaders to design solutions grounded in the realities of Hawai'i schools.

Mahalo for your time and consideration.

Allyson Doherty  
Principal, Kailua Elementary School  
Doctoral Candidate, University of Hawai'i at Mānoa

**Date:** 02/25/2026  
**Time:** 10:55 AM  
**Location:** 211  
**Committee:** WAM

**DEPARTMENT:** Education  
**BILL:** SB3334, Relating to Education Elimination of Complex Area Superintendent Position  
**TESTIFIER:** Daniel Larkin

**POSITION:** OPPOSITION AND COMMENTS

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

As a school principal at a high needs school for five years and a DOE employee for nearly 20 years I express my personal strong opposition to SB 3334. This bill seeks to remove a critical position from our current system, for no apparent reason. For nearly every principal, vice principal, and core DOE employee I know, we all acknowledge that the CASs are the lynchpin to provide support, guidance, and difficult decision making that is needed.

I am unclear what the purpose of the bill is. For the Department, the Complex Area Superintendent (CAS) is not a layer of bureaucracy; it is a layer of connection. Why would we remove a strong connection between the schools and the Department or Superintendent's offices only to replace it with the same quantity of personnel but degradation capability?

I would like to reinforce from our (Farrington Complex Principals) testimony the key points of why our current system is, although not perfect, better than what is proposed.

*1. Proximity, Trust, and the "Layer of Connection" within the Tri-Level Leadership*

*The CAS provides schools with clear, specific direction on how to improve instruction and strengthen systems. This guidance does not come from a distance; it comes from proximity, trust, and sustained relationships.*

- *Tailored Support: The CAS provides support to diverse school communities, each with unique cultural, academic, and socioeconomic needs.*
- *The "First Responder": This role responds in real-time to the situations that occur every day: the student in crisis, the staffing emergency, the family in need, or the school trying to do more with less. Removing this role creates a leadership vacuum that will be felt most sharply by students and educators who already face the greatest challenges.*

*2. Preserving the Integrity of Principal Selection*

*This bill centralizes principal hiring authority in a way that weakens local insight.*

- *Indispensable Perspective: Complex Area Superintendents bring deep knowledge of school culture and leadership capacity. This insight is vital when selecting principals who can truly serve their unique communities.*
- *Risks of Misalignment: Eliminating this perspective risks placing leaders without the necessary fit or experience to succeed. Furthermore, shifting 50% of the evaluation weight to School Community Councils (SCC) risks turning professional hiring into a popularity contest, overriding merit-based qualifications.*

*3. Operational Unfeasibility and Systemic Neglect*

*Hawaii's DOE is a unique, single statewide district overseeing 258 public schools. It is mathematically and operationally unreasonable to expect a centralized leadership structure in Honolulu to maintain a direct connection with individual principals while understanding the complexities of each individual school.*

- *Loss of Advocacy: Without a CAS, our schools risk becoming "islands of operation," lacking a direct line of advocacy at the state level. Each CAS understands the complexities and needs of individual schools through conversations with those at the school, walkthroughs and observations – these specific needs are brought back to the tri-level leadership giving schools voice.*
- *Systemic Overload: Reassigning these duties to a smaller number of individuals will lead to systemic neglect and inevitable leadership burnout at various levels.*

#### *4. Preventing "Honolulu-Centric" Governance*

*For rural complexes and our colleagues on the Neighbor Islands, a hyper-centralized structure ignores our unique geographic and cultural challenges. In public education, structure is not about efficiency alone; it is about responsibility, responsiveness, and trust. The CAS embodies these values.*

I fully believe this proposed change does not streamline the system—it distances leadership from the people it is meant to serve. I truly believe this bill is a bad idea for the DOE at this time and I respectfully urge the Committee to HOLD SB 3334 to maintain the regional leadership structure essential to school stability and student achievement.

Respectfully,

Daniel Larkin  
Principal

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:35:47 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Allison J Tinnin	Individual	Oppose	Written Testimony Only

Comments:

**Department: Hawaii Department of Education**

**BILL: SB 3334, Relating to Education Elimination of Complex Area Superintendent Positions**

**TESTIFIER(S): Allison Tinnin**

**POSITION: OPPOSITION AND COMMENTS**

**Aloha:**

**I am writing to express my opposition to SB 3334. While I understand the intent to reduce "administrative burdens," and the committee's desire to improve our school system, this bill fails to recognize the essential regional leadership that Complex Area Superintendents (CAS) provide, particularly for rural and underserved communities.**

**My opposition is based on four critical concerns:**

**1. Erosion of the Tri-Level Leadership Framework**

**The CAS is not just an administrative layer; they are the vital conduit connecting individual school needs with state-level initiatives. Eliminating this position severs the communication link between the school and the Department of Education's central leadership. Without a CAS, our schools risk becoming "islands of operation," lacking a cohesive regional strategy or a direct line of advocacy at the state level. This is especially true for those of us who are in rural parts of the outer islands. The CAS works closely with our schools and is able to be our voice and advocate in spaces where we otherwise would not be represented.**

**2. Request for Additional Clarity on the Replacement for CAS duties**

**Section 17 of the bill is vague as to how CAS duties would be reassigned. If the thought was to return to district superintendents, that would greatly increase the number of schools under the supervision of a smaller number of individuals, which will lead to systemic neglect and burnout. If the idea is to encourage schools to improve, as was stated in the last**

hearing, this move would actually have the opposite effect. Putting more administrative duties on principals takes away from their ability to be instructional leaders.

### **3. Improper Expansion of School Community Council (SCC) Authority**

The bill proposes giving SCC evaluations a 50% weight in principal selection. We oppose this shift for the following reasons:

- **Union Contract Conflicts:** This creates a "de facto" hiring power for SCCs that contradicts existing labor agreements.
- **Integrity of Evaluation:** This shift bypasses the professional, merit-based, evaluation currently facilitated by a highly trained CAS. I am concerned that, without regional oversight, the selection process could be easily disrupted by a small number of disgruntled individuals rather than focused on professional competence. The critical functions of hiring and evaluations must not be entrusted to a group of individuals lacking formal evaluation training and having an inconsistent scope of knowledge of the Principal's essential duties and responsibilities. While I truly believe in community voice and the value it holds, this is not the way to lift up the voices of our SCC's.

### **4. Risk of "Honolulu-Centric" Governance**

Removing regional leadership altogether threatens to centralize power entirely in Honolulu. For rural complexes like mine, a centralized structure ignores our unique geographic, cultural, and socio-economic challenges. This bill risks creating a hyper-centralized system that lacks accountability to the specific communities it is meant to serve.

For these reasons, we urge the Committee to hold SB 3334 and maintain the regional leadership structure that ensures our schools, teachers, and students receive the specialized support they require. Mahalo for the opportunity to testify.

Respectfully,

Allison Tinnin

Vice Principal, Kohala Elementary

To: **WAYS AND MEANS COMMITTEE** Senator Donovan M. Dela Cruz, Chair Senator Sharon Y. Moriwaki, Vice Chair

**DATE:** Wednesday, February 25, 2026

**TIME:** 10:55AM

**LOCATION:** Conference Room 211 & Videoconference, State Capitol, 415 South Beretania Street

**Committee:** WAM (Ways and Means)

**BILL: SB 3334 SD1, Relating to Education** Elimination of Complex Area Superintendent Positions

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

**POSITION: OPPOSITION AND COMMENTS**

Aloha Senator Donovan M. Dela Cruz, Chair Senator Sharon Y. Moriwaki, Vice Chair,

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 this testimony in strong opposition to SB3334 SD1.

Our complex area spans a geographic footprint roughly the size of the island of O'ahu. It includes rural communities separated by distance, limited infrastructure, and unique socioeconomic challenges. In a region this large and this rural, accessible and regionally embedded leadership is not an administrative luxury - it is essential operational infrastructure.

When I speak about the importance of our Complex Area Superintendent, I am speaking from lived experience. In my first year as principal, our town's water tank ran dry on the second day of school, forcing an emergency campus closure. In another year, two upper elementary students left campus and were missing for hours, requiring coordination with law enforcement and search and rescue teams. When a young student in our community passed away unexpectedly, the emotional impact on our school required immediate system-level support and coordination. In each of these moments, my CAS was physically present, on campus within the hour, assisting with decision-making, coordinating with state offices, supporting communication with families, and ensuring that operational, legal, and safety protocols were followed. That level of responsiveness is only possible because leadership is regionally positioned and understands our community context. It is not something that can be replicated from a centralized office, no matter how capable state leadership may be.

SB3334 SD1 eliminates the Complex Area Superintendent structure and replaces it with a district model, yet the bill does not clearly define how many districts will exist, how boundaries will be drawn, whether leadership capacity will be reduced, or whether Deputy District Superintendents will hold the same authority and accessibility as current CAS leaders. For a rural complex area the size of O'ahu, this ambiguity is deeply concerning. If districts are consolidated or leadership spans increase, response time during crises will slow. If oversight becomes more centralized, rural schools may find themselves competing for attention with larger, urban campuses. If Deputy District Superintendents function in a

diminished or support-only role, principals will lose direct, empowered regional advocacy at the very moments we need it most.

Day-to-day operations in rural schools are already complex. We manage staffing shortages, transportation challenges, compliance requirements, special education coordination, and community needs with fewer resources and longer response chains than our urban counterparts. The Complex Area structure provides a stabilizing layer that keeps those systems functioning. Removing that layer without clearly articulating how equivalent capacity will be preserved creates unnecessary risk for schools like mine.

Structural reform of this magnitude should provide clarity before dismantling an existing framework that is actively supporting school operations. As written, SB3334 SD1 removes a defined leadership structure without clearly establishing how rural and Neighbor Island schools will maintain the same level of access, responsiveness, and advocacy.

For these reasons, I respectfully urge you to reconsider advancing SB3334 SD1 in its current form.

Mahalo for your time and for your commitment to the students and communities we serve.

A handwritten signature in blue ink, appearing to read "A. Medeiros", is enclosed in a light gray rectangular box.

Adria Medeiros

Principal, Mountain View Elementary School



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

**Date: Tuesday, February 24, 2026**

**Time: 10:55am**

**Committee: Ways & Means**

**Department: Hilo-Waiākea Complex Area Principals**

**BILL: SB 3334, Relating to Education Elimination of Complex Area Superintendent Positions**

**TESTIFIER(S): Hilo-Waiākea Complex Area Principals**

**POSITION: OPPOSITION AND COMMENTS**

Aloha Chair Dela Cruz and Members of the **Ways & Means** Committee:

We are writing to express our opposition to SB 3334. While we understand the intent to reduce "administrative burdens," this bill fails to recognize the essential regional leadership that Complex Area Superintendents (CAS) provide, particularly for rural and underserved communities.

The erosion of the tri-level leadership framework, consisting of the state Department of Education, the complex area, and individual schools, threatens the very foundation of the reforms established by the **Reinventing Education Act of 2004 (Act 51)**. This structure was designed to ensure that meaningful authority exists as close to the schools as possible, and any move toward re-centralization or bypassing these levels undermines the academic achievement, safety, and well-being of Hawaii's students. Furthermore, returning to a larger District model would spread leadership too thin, making it impossible for superintendents to provide immediate hands-on guidance.

The following points highlight why maintaining this three-tiered leadership framework is essential for the success of public education:

**1. Preservation of School-Level Support**

The Act was specifically designed to move away from a system where principals faced the "nearly impossible task" of managing every detail without institutional support or financial discretion. By stripping localized support in the form of the CAS position, this bill risks drowning unique student needs in a wave of hampering bureaucracy and top-down oversight.

## 2. The Vital Intermediate Role of Complex Areas

The complex area system was created as a deliberate decentralized structure to replace the old district system. Complex area superintendents serve a critical function that cannot be effectively managed from a state-wide level:

- **Support and Accountability:** They are responsible for assisting principals and School Community Councils (SCCs) in obtaining necessary services and ensuring the success of school academic and financial plans.
- **Oversight:** They provide a layer of accountability by reviewing school plans to ensure they align with statewide policies and the best interests of the students.
- **Continuum of Learning:** The complex area structure facilitates the adoption of logical, sequential curricula that follow students as they move through the continuum of grades.

## 3. Efficiency and Reduced Bureaucracy

A key purpose of the tri-level framework is to reduce the bureaucracy that historically slowed down the Department of Education. The Act identifies that educational responsibilities spread across too many state agencies can create "roadblocks to progress". By consolidating functions, such as human resources, capital improvement, and fiscal management, within a clear, tiered educational structure, the system becomes more transparent and responsive. Eliminating or weakening any level of this framework would likely re-introduce these systemic impediments, making it harder for schools to function.

## 4. Collaborative Accountability

The tri-level framework is the engine of the educational accountability system. This system requires that:

- State-level leadership (the Board and Superintendent) sets broad policy and provides resources.
- Complex area superintendents are evaluated on their ability to support schools.
- Principals and school level administrators are held accountable for performance at the ground level.

Weakening this framework erodes the "lines of responsibility and mutual obligation" that ensure every level of the system, from the top to the bottom, is working toward the same goals of academic excellence and civic responsibility.

Additionally, we oppose the improper expansion of School Community Council (SCC) authority, as the bill proposes giving SCC evaluations a 50% weight in principal selection and evaluation.

We oppose this shift for the following reasons:

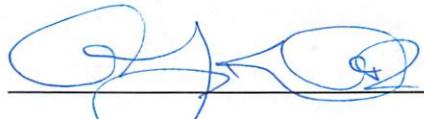
- Collective Bargaining Conflicts: This creates a "de facto" hiring power for SCCs that contradicts existing labor agreements.
- Integrity of Evaluation: This shift bypasses the professional, merit-based evaluation currently facilitated by the Complex Area Superintendents. We are concerned that, without regional oversight, the selection process could be easily disrupted by a small number of disgruntled individuals rather than focused on professional competence.

For these reasons, we respectfully urge the Committee to reject SB 3334 and preserve the integrity of the current system that effectively serves Hawai'i's students, schools, and communities.

Respectfully,



Kelcy Koga, Waiakea High



Adrian De Mello, Hilo High



Lisa Souza, Waiakea Intermediate



Travis Toriano, Hilo Intermediate



Vincent Venzon, Keaukaha Elementary



Kimberly Castillo, Kapiolani Elementary



Jennifer Sueoka, Ha'aheo Elementary



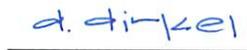
Dawn Palmerson, Kaumana Elementary



Tyson Tomono, Hilo Union Elementary



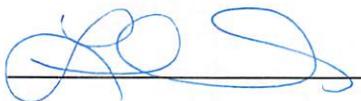
Ken Watanabe, Waiakea Elementary



David Dinkel, Kalaniana'ole Elementary



Suzanne Ochi, Waiakeawaena Elementary



Lindsay Miyashiro, E.B. de Silva Elementary

**BILL: SB 3334\_SD1, Relating to Education** Elimination of Complex Area Superintendent Positions

**TESTIFIER(S): Stacy Kawamura, Honowai Elementary School Principal**

**POSITION: OPPOSITION AND COMMENTS**

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

I am writing to express my opposition to SB3334\_SD1. While I stand on the original testimony submitted to the Senate Education Committee in conjunction with my Waipahu Complex Principal colleagues, I have additional comments regarding the bill and the amendments presented.

“Repealing complex areas and establishing an unspecified number of districts across the state” is an interesting proposition. Without a specified number of districts, what exactly am I supporting or opposing? Working off the assumption that the legislature is wanting fewer positions at this middle level between schools and state Superintendent, it is reasonable to project that a District Superintendent will be in charge of a larger area (and more schools) than our current Complex Area Superintendents. I fail to see how managing more schools over a larger area will help the system be more responsive to local community needs and concerns. Principals manage challenging situations as they arise, but when we need additional guidance and support, turning to a District Superintendent who will be responsible for supporting two or three times more schools than our current Complex Area Superintendent and expecting a timely and supportive response seems counterintuitive. The additional pressure and load that principals will inevitably bear is concerning.

I also reiterate my opposition to allowing the School Community Council (SCC)’s evaluation of principals to account for 50% of the overall evaluation in the selection of a principal. The current selection process already allows for both stakeholder input and analysis of experience and leadership by proven educators. Managing school operations is a complex task and principals have been certified and trained to do so. Yes, we should all be expected to work well with our communities, but I would caution against allowing the opinion of a volunteer group, like the SCC, to have such influence into determining how effective we are at our jobs, or whether we should even be selected for it in the first place.

Consequently, I ask the Committee to hold SB 3334 and preserve the area leadership necessary for providing our students and staff with tailored and timely support. Thank you for the opportunity to testify and your consideration is appreciated.

Respectfully,

Stacy Kawamura  
Principal, Honowai Elementary School

**Date:** Wednesday, February 25, 2026

**Time:** 10:55 a.m.

**Location:** Conference Room 211 & Videoconference

**Committee:** Ways and Means

**Department:** Waiialua Complex Area Principals

**BILL: SB 3334, Relating to Education** Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Waiialua Complex Area Principals

**POSITION: OPPOSITION AND COMMENTS**

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

We are writing to express our opposition to SB 3334. While we understand the stated intent of reducing “administrative burdens,” this bill fails to recognize the essential regional leadership that Complex Area Superintendents (CAS) provide—particularly for rural communities like ours.

Our opposition is based on the following critical concerns:

**1. Erosion of the Tri-Level Leadership Framework**

The CAS is not merely an administrative layer; it serves as the vital conduit connecting individual school needs with state-level initiatives. Eliminating this position severs the communication link between each individual school site and the DOE's central leadership. Without a CAS, schools risk becoming isolated operations, lacking cohesive regional strategy and consistent advocacy at all levels.

**2. Lack of Clarity Regarding Reassignment of CAS Responsibilities**

Section 17 of the bill does not clearly explain how CAS duties would be reassigned. If the intent is to revert to a district superintendent model, this would significantly increase the number of schools overseen by fewer individuals. Such consolidation would likely result in diminished support, systemic oversight gaps, and leadership burnout. This would directly impact our ability to be effective school leaders and ensure the best possible support for both our students and teachers.

**3. Improper Expansion of School Community Council (SCC) Authority**

The bill proposes assigning 50% weight to SCC evaluations in principal selection. We strongly oppose this shift for the following reasons:

- **Conflict with Existing Labor Agreements:** Granting SCCs this level of influence effectively creates a de facto hiring authority that may conflict with established union contracts and negotiated processes.

- **Compromised Integrity of the Evaluation Process:** Principal selection is currently guided by professional, merit-based evaluation facilitated by the CAS. Removing regional oversight increases the risk that the process could be influenced by a small number of dissatisfied individuals rather than grounded in objective professional standards.

#### 4. Risk of Over-Centralized Governance

Eliminating regional leadership would centralize authority in Honolulu. For rural complexes such as ours, as well as the Leeward coast and for our colleagues on the Neighbor Islands, a fully centralized structure does not adequately account for unique geographic, cultural, and socio-economic realities. This bill risks creating a hyper-centralized system that lacks responsiveness and accountability to the communities it is meant to serve.

We need only look at the frustration to schools caused by the DOE’s state facilities department to see the dangers of over-centralization. Schools currently struggle with a massive backlog of repairs, inefficient procurement, and a lack of responsiveness from a central office that is disconnected from the daily physical realities of our campuses. Removing the CAS—the one advocate who understands our local infrastructure needs—would only exacerbate these problems. This bill risks creating a hyper-centralized system that lacks the responsiveness and accountability required to maintain our schools and serve our communities.

#### 5. Volatility and Lack of Technical Expertise Within SCC Structure

The provision granting SCCs 50% weight in principal hiring and evaluation is structurally unsustainable. High military transience and parents working outside the complex contribute to frequent turnover in SCC membership, resulting in limited institutional knowledge. Additionally, principal evaluation is a technical executive function requiring specialized expertise in pedagogy, school leadership, and labor relations. Shifting half of this responsibility to a rotating volunteer body undermines professional, merit-based standards.

For these reasons, we respectfully urge the Committee to hold SB 3334 and maintain the regional leadership structure that ensures schools, educators, and students receive the focused support they require.

Thank you for the opportunity to testify.

Respectfully submitted,

Waialua Complex Area Principals

Christine Alexander



Waialua High and Intermediate  
Principal

Malaea Wetzel



Malaea Wetzel (Feb 24, 2026 07:45:34 HST)

Haleiwa Elementary  
Principal

Varissa Pata



Varissa Pata (Feb 24, 2026 08:38:22 HST)

Waialua Elementary  
Principal

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:49:20 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Shane Nakamura	Individual	Oppose	Written Testimony Only

Comments:

I oppose this bill.

I work under my principal who works directly with our (CAS), I have seen many examples of how closely they work together. The CAS knows the unique needs of every school and provides tailored guidance, accountability, and support that directly impact student success. The CAS has always offered valuable support to all of the schools he services.

I also don't understand why the School Community Council would be the sole principal evaluator. While SCC members are valued, they are not trained educational professionals. They do not have the background to make these types of decisions. Its like asking a carpenter to do open heart surgery. The training is just not there. You need people with strong educational backgrounds to be in charge of this process.

Thank you for your consideration.

Thank You,

Shane Nakamura

VP Aliamanu Elementary

To Chair Donovan Dela Cruz and Members of the Committee:

I am grateful for the opportunity to voice my opposition to Senate Bill 3334, whose proposal would effectively end the Complex Area Superintendent position and place in its stead a District Superintendent and Deputy District Superintendent. On its face, this bill would seem to streamline the Department of Education, and help direct funding to the classrooms, as we all would want. In actuality, however, the enactment of this bill would cause irreparable harm to our current school system, rather than bringing any intended support. Complex area Superintendents serve a vital purpose in our Hawaii Department of Education; they provide a focused vision and immediate support to our schools and keiki in the nation's only unified Department of Education.

As you may know, Hawaii's Department of Education is the only centralized, statewide DOE in the United States of America. This means Superintendent Hayashi is responsible for the overseeing and well being of over 165,000 public school students. This is a terrifyingly large load, especially when you consider that many of these students are in schools on islands other than where our state offices are located. With that in mind, our superintendent has Complex Area Superintendents who help to manage the load. Our CAS work hand in hand with school administration to provide immediate support in situations where answers are needed, and action must be taken. In truth, our CAS should already be thought of as district superintendents, as each oversees more than one complex. For example, in Honolulu, CAS Linell Dilwith oversees the Kaimuki Complex, McKinley Complex and Roosevelt Complex, while CAS Rochelle Mahoe oversees the Farrington Complex, Kalani Complex and Kaiser Complex. Each of these individual complexes has its own unique challenges and our CAS currently have to be able to administer to all. Imagine being the Senator or Representative over Kalihi, Hawaii Kai and Kahala; or Makiki, Papakolea, Kaimuki, Palolo, McCully and Kakaako? Yet they do an admirable job. Now imagine placing this all under one single person. Instead of further centralizing our system, we should instead be considering a superintendent over each individual complex.

Within our current system, our CAS provide a needed vision and guidance for our schools. Each of our high schools have middle and elementary schools that feed into them, and each has its own identity. It is this identity that most, if not all Hawaii graduates cling to strongly, even decades after graduation. How do you best provide support for Kaimuki High School, which is struggling with enrollment, Chapter 19 issues, and a disillusioned community? To McKinley, with its proud traditions, but declining enrollment, and large Pacific Islander population, many of which become disaffected from school? To Roosevelt, with high academic achievement, but the need to nurture our Native Hawaiian students? I can testify that CAS Diliwith provides our complex with support that is directed to our individual situations. Now imagine placing on that same superintendent's shoulders Kalani, Kaiser and Farrington Complexes. We do not need a more centralized DOE. We need to decentralize, and put feet on the grounds and campuses of our schools, where our Keiki are.

If you are firm in passing this bill, there is probably nothing I can say to dissuade you. If your minds are already made up, it is likely that you did not even read to the end of this testimony, or you had a clerk do it for you. If you are, however, coming to this bill and testimonies with an open mind and heart, I will close with this thought and plea: If you enact this bill, we move away from strong, localized support towards a bureaucracy-minded system that values the ninety and nine over the one. We will see more administrators quit in frustration, more schools in trouble and in the news, and more suffering keiki in the years to come. We will see more schools in disarray, as they frantically attempt to fit their unique population, community, and school legacy in a one-size-fits-all approach to education, in order to adhere to the standards set by a distant state and federal leadership. Complex Area Superintendents are a vital

part of our statewide system, and should be strengthened and supported rather than pushed aside. My plea to the members of this committee is rather than moving to a more centralized system, let us embrace what makes Hawaii special, the school spirit and pride that define each of our unique, individual complexes, and help support our keiki on their journey to grow up to be the leaders of tomorrow.

I respectfully urge the Committee to hold SB3334.

Thank you for the opportunity to testify.

Sincerely,

Kyle Morikone, EdD  
Vice Principal, Royal School  
Kalani High School Class of 1995

**Date:** February 25, 2026

**Time:** 10:55 AM

**Committee:** WAM

**Bill No:** SB 3334 SD1, Relating to Education

**Testifier:** Carli Miyashiro

**Position:** Opposition and Comments

Aloha e Chair Dela Cruz, Chair, Vice Chair Moriwak, and Members of the Committee:

I am writing to express my strong opposition to SB 3334 SD1, which proposes repealing the Complex Area Superintendent (CAS) position, establishing an unspecified number of districts across the State, establishing positions of District Superintendent for Academics and Deputy District Superintendents, and clarifying that the School Community Council (SCC) submits principal evaluations to the Superintendent of Education. I believe the structural changes proposed in this bill threaten the stability of our schools and create further disconnect between the Department of Education and our schools.

I oppose this measure for the following reasons:

1. Section 2 of SB 3334 SD1 creates an administrative redundancy that will hinder school operations. Currently, 15 CASs provide integrated oversight. The proposed model shifts this to a dual-leadership structure (District Superintendent for Academics and at least one Deputy District Superintendent) across an unspecified number of districts. If the current seven districts are used, we would see 14 specialized administrators replacing 15 integrated ones. This decoupling of academics and operations forces principals to navigate two separate chains of command for a single initiative. By creating these administrative silos, SB 3334 SD1 replaces streamlined support with a hurdle that requires principals to secure double approval before taking action.
2. SB 3334 SD1 repeals the "Complex" and "Complex Area" definitions and replaces them with an unspecified number of Districts. In the current model, each complex consists of 9 to 28 schools. In the proposed model, districts would consist of 40 or more schools. The two proposed personnel cannot effectively supervise the delivery of administrative and instructional support services across such a large geographic and demographic spread. For example, Hawai'i Island is considered one district. The schools are geographically separated, with vast differences between the communities. Furthermore, in the Leeward District, the needs of schools in Wai'anae differ drastically from those of students in Pearl City. The Superintendents will now need to support and understand the communities in these vastly different areas.

3. Section 2(c) requires the Board of Education (BOE) to conduct annual performance evaluations of the district leaders on stakeholder engagement. The BOE is centralized in Honolulu. They may not have the proximity required to measure how parents on neighbor islands actually perceive a district leader or how effectively they engage with the stakeholders. Stakeholder engagement will look different for each area. The current CAS model allows for much more authentic, face-to-face accountability.

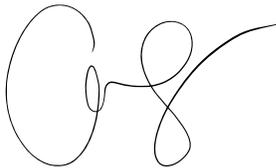
4. There is concern with the proposal to weigh SCC evaluations at 50% for the principal selection. I agree that community input is a vital component of schools; however, the 50% weight seems disproportionate. Principal selection should remain merit-based, centered on instructional leadership and professional expertise. Hiring of principal positions should not become a popularity contest within the SCC. Leaders must be chosen to move a school forward, and not just because they align with a specific agenda.

In my educational career, I have been supported by the CAS in my Complex Area. As an educator, the CAS has supported new ideas, such as a complex, wide-ranging elementary school math competition and a school-wide curriculum night. As an administrator, the CAS has worked with schools during possible gun threats, providing guidance and leadership during those troubling times. The CAS regularly attends sporting events, after-school activities, parent nights, and more throughout the year to stay in touch with the community they serve. A CAS truly knows a school's strengths and the neighborhood's needs. Removing this vital lifeline to the schools only causes more challenges in getting quick support when needed.

For these reasons, I respectfully request that you hold SB 3334.

Mahalo for the opportunity to testify.

Respectfully,

A handwritten signature in black ink, appearing to read 'Carli Miyashiro', with a long, sweeping flourish extending to the right.

Dr. Carli Miyashiro  
Vice Principal  
Ho'okele Elementary

JOSH GREEN, M.D.  
GOVERNOR

Kim Williamson  
Principal



KEITH T. HAYASHI  
SUPERINTENDENT

STACEY BELLO  
COMPLEX AREA  
SUPERINTENDENT

STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
KA 'OIHANA HO'ONA'AUAO  
PĀHOA HIGH AND INTERMEDIATE SCHOOL  
15-3038 PĀHOA VILLAGE ROAD  
PĀHOA, HAWAII 96778

To: WAYS AND MEANS COMMITTEE Senator Donovan M. Dela Cruz, Chair Senator Sharon Y. Moriwaki,  
Vice Chair

DATE: Wednesday, February 25, 2026 TIME: 10:55 AM LOCATION: Conference Room 211 &  
Videoconference, State Capitol COMMITTEE: WAM (Ways and Means)

BILL: SB 3334 SD1, Relating to Education; Elimination of Complex Area Superintendent Positions  
TESTIFIER: Kim Williamson, Principal, Pāhoā High and Intermediate School

POSITION: STRONGEST POSSIBLE OPPOSITION

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

My name is Kim Williamson, and I serve as the Principal of Pāhoā High and Intermediate School. I am submitting this testimony to voice my absolute opposition to SB3334 SD1. This measure is not merely an "administrative reorganization," it is a direct threat to the safety, stability, and operational integrity of rural schools on Hawai'i Island.

Pāhoā High and Intermediate does not operate in a controlled, urban environment. We operate in a region where geography is a constant adversary. Our complex area is the size of O'ahu, yet this bill suggests that we can "streamline" leadership without sacrificing the immediate, boots-on-the-ground support that keeps our campus running.

To be clear: in a rural crisis, proximity is policy. My CAS regularly keeps the principals of our complex area informed of students who are missing, who are in crisis, and assists us in the resources we need. In 2018, as my community was threatened by imminent destruction from a lava flow that took homes and devastated our infrastructure, our complex area superintendent was at every community meeting helping the three schools of our complex deal with the devastation and organize safety plans for our students. In the 18 years I have been a part of the KKP, I have personally known all three of our complex area superintendents and was able, even as a teacher, to reach out to them with my concerns and needs. I need a Complex Area Superintendent (CAS) who is empowered to make executive decisions on-site and is not someone removed from the community.

SB3334 SD1 is dangerously vague. It dismantles a functioning leadership structure and replaces it with an undefined "district" model that offers no guarantees of equity.

- Diluted Authority: By replacing a CAS with a "Deputy District Superintendent," you are effectively demoting the very leaders who advocate for our specific, rural needs.
- Operational Risk: We already struggle with staffing shortages, isolation, and limited infrastructure. Removing the regional layer of leadership that navigates these hurdles for us is an abdication of the state's responsibility to Neighbor Island students.
- Lack of Clarity: This bill asks us to trade a proven, essential support system for a "district" model that lacks defined boundaries or clear lines of authority. We cannot gamble with the safety of our students on a "wait and see" administrative experiment.

Structural reform should solve problems, not create them. For a school like Pāhoa High and Intermediate, the CAS position is not a "middle-management luxury"—it is our lifeline to the Department of Education's resources and emergency response capabilities.

I strongly urge this committee to kill SB3334 SD1. Do not prioritize a perceived administrative convenience over the actual, lived safety and support requirements of our rural school communities.

Mahalo,



Kim Williamson Principal

Pāhoa High and Intermediate School

## **RE: Testimony in Opposition to SB 3334 SD1, Relating to Education**

Aloha Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee on Ways and Means,

My name is Jade Pham Wall, and I serve as a Vice Principal in the Hawaii Department of Education. This is my second written testimony on this measure, and I am writing today specifically to address the changes reflected in SB 3334 SD1. I speak not only as an educator, but as a proud public school graduate and a citizen with a profound stake in the future of our state, and I remain in opposition to SB 3334 SD1.

I absolutely love my job. To me, being a Vice Principal is the best job in the world. When I was a teacher, I believed that was the best job in the world. Regardless of your role—teacher, Principal, Complex Area Superintendent, Superintendent—being a public school educator is arguably one of the most difficult and demanding jobs there is, and yet you have a unique power to impact a child’s life in ways that no other sector can.

As school-level leaders, we are highly trained and highly credentialed professionals who know our students, families, and systems best. We welcome efforts to strengthen transparency and accountability in public education, and we agree that our communities deserve clearer insight into how decisions are made. But **those goals are best achieved when legislative, district, and school-level leaders work together to thoughtfully refine existing structures**—not through rapid, radical changes, such as major restructuring of our complexes and districts, made without input from those who live and work in it every day.

I also welcome deeper dialogue. **As aspiring and newer school leaders, many of us plan to serve Hawai‘i’s students for the next thirty years.** We are eager to come together with you and with our senior leaders to collaboratively imagine and build the future of public education in Hawai‘i, so that changes to our structures reflect not only today’s needs but the long-term realities for those who will inherit this system after us.

**I am also troubled by the tone of the last hearing.** As a school leader and constituent, I was appalled by the way some of our educational leaders were spoken to. For example, being told “Maybe it’s you. You’re the problem,” being asked “Do you feel you can handle your position? You seem overwhelmed,” and hearing “They’re here for only one bill,” as if their time and presence were somehow less legitimate. These were unnecessary remarks that felt uncalled for, especially toward front-line professionals who came in good faith to share their expertise and concerns. I expect more from the legislators we vote into office. I am also appalled that a senator’s account on the Senate floor misrepresented the behavior of school leaders, while the disrespect shown by a fellow senator toward those same leaders went unacknowledged.

For these reasons, I respectfully urge you to pause SB 3334 SD1 and choose partnership with school-level leaders. I look forward to continuing to serve, and to leading alongside the next generation of leaders who will carry Hawai‘i’s public schools into the future.

Sincerely,



Jade Pham Wall, MEdT  
Vice Principal, Ala Wai Elementary School  
National Board Certified Teacher; National Milken Educator  
PhD Student, Exceptionalities in Education

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:04:44 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kyle Shimabukuro	Individual	Oppose	Written Testimony Only

Comments:

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

I am writing to express my strong opposition to SB 3334.

Although the intent of this bill is to reduce administrative burdens, I believe it would actually increase burdens on education leaders and take away the leadership, support and expertise provided by our current complex area superintendents.

I am disappointed that the Education Committee passed this bill without seriously addressing the concerns documented in written and in-person testimony. Instead, several senators implied that this kind of opposition was evidence to support elimination of the complex area superintendent position and a need to change the selection and evaluation process for principals.

Respectfully Submitted,

Kyle Shimabukuro

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:04:46 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Dani Hitt	Individual	Oppose	Written Testimony Only

Comments:

Chair, Vice Chair, and Members of the Committee:

My name is Dani Hitt, and I currently serve as a HICISL Vice Principal Intern at President Theodore Roosevelt High School. I respectfully submit this testimony in strong opposition to SB3334, SD1.

While I support thoughtful examination of governance structures within the Hawai‘i State Department of Education (HIDOE), this measure proposes eliminating the Complex Area Superintendent (CAS) structure without clear evidence that doing so would improve student outcomes or strengthen leadership coherence across our tri-level system.

The Complex Area Superintendent model was not created arbitrarily. It emerged through Act 51, which reorganized HIDOE by dissolving traditional district superintendents and establishing complex areas aligned by feeder patterns (elementary, middle, and high schools together).

The rationale behind Act 51 was clear:

- To reduce bureaucratic fragmentation
- To align schools by natural feeder patterns
- To improve instructional coherence from elementary through high school
- To create regional instructional leaders focused on teaching and learning rather than compliance

CAS positions were designed as instructional leadership roles that could connect policy, curriculum, staffing, and resource allocation across K–12 pathways. Eliminating CAS effectively reverses the intent of Act 51 without presenting evidence that the prior district model was more effective or equitable.

In my previous testimony, I urged the Legislature to strengthen, not dismantle, effective leadership structures within HIDOE. That position remains firm.

As someone working within the system daily, I see firsthand how the CAS::

- Provide instructional supervision grounded in school context
- Align literacy, graduation, and college-and-career readiness initiatives across complexes

- Support principals through coaching, evaluation, and systems navigation
- Bridge communication

Removing this layer creates risk at a time when schools are managing:

- Teacher recruitment and retention challenges
- Increasing student mental health needs
- Complex federal and state accountability requirements
- Literacy and graduation improvement initiatives

Structural instability at the regional leadership level will not accelerate improvement. Before dismantling a structure established under Act 51, the Legislature should:

1. Commission an independent evaluation of CAS effectiveness.
2. Analyze student outcome trends pre- and post-Act 51 to determine whether feeder-pattern alignment improved coherence.
3. Engage principals, CAS leaders, educators, and community stakeholders in structured dialogue.
4. Pilot reforms before implementing statewide structural change.

Major structural reforms should be data-driven, not reactive.

Hawai‘i’s public education system operates within a unique statewide governance structure. Stability, clarity of supervision, and instructional coherence are essential to student success.

The CAS model was created intentionally through Act 51 to correct fragmentation and strengthen K–12 alignment. SB3334 risks undoing that reform without sufficient evidence that doing so will benefit students.

I respectfully urge the Committee to reject SB3334, SD1 and instead engage educational leaders in collaborative, evidence-based dialogue to strengthen, rather than dismantle, effective leadership structures within HIDOE.

Thank you for the opportunity to testify.

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:04:53 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Rebecca Gebreyesus	Individual	Oppose	Written Testimony Only

Comments:

## Written Testimony re: SB3334

### Official Stance: Strong OPPOSITION

Aloha, my name is Rebecca Gebreyesus and I am the principal of Leihōkū Elementary in the Nanakuli-Waianae Complex Area. I stand in vehement opposition to SB3334. While I understand the desire for administrative efficiency, this bill, as currently drafted, threatens the stability of our schools, the clarity of our leadership tri-level (School, Complex, State), and the equity of representation for rural and non-Honolulu centric communities.

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#### Key Concerns and Commentary

##### 1. Erosion of the Tri-Level Leadership Framework

The Complex Area Superintendent (CAS) is not merely an administrative layer; it is the essential conduit connecting individual school needs with state-level initiatives. Without a CAS, our schools risk becoming islands of operation without a cohesive regional strategy or a direct line of advocacy at the state level.

Within our community, our CAS is not only a long time resident of the Wai'anae community, but she has shown a dedication to the health, education, and well being of our students and their families for decades. Because of CAS Hauge, there are nurses on every campus who provide, or facilitate providing, physicals for sports, dental care, vision care, and immunizations among other things. Our CAS has a vision for our community and she helps to organize and lead the principals of our complex for the overall benefit of this community. Simply put, this would NOT happen without her guidance and leadership. I am in charge of a school of almost 800 students and 150 adults. The range of challenges that can happen in a single day are sometimes staggering. My ability to reach out to my CAS for support, knowing that she will answer my call 24/7, from issues ranging from legal concerns to health issues, to academic questions, is absolutely critical. I don't think I would be able to do this job without her support, I know for sure that I wouldn't be able to do it with the same degree of effectiveness.

## 2. Contradictory and Vague Language

We find the language of SB3334 inherently contradictory. The bill acknowledges that CASs are a "vital support system," yet simultaneously seeks their elimination. Furthermore, the proposal to "utilize its administrative framework" as a replacement is dangerously vague.

- **Lack of Vision:** There is no provided visual or organizational chart detailing what replaces the CAS.
- **Historical Precedent:** If the intent is to return to the "Deputy Superintendent" model, we must note that this model failed in the past. Expecting two deputies to manage 42+ schools in the Leeward District is a logistical impossibility that will lead to burnout and systemic neglect.

## 3. Concerns Regarding School Community Council (SCC) Authority

Section 11 of the bill suggests granting SCCs a 50% weight in the selection of principals, with final authority resting with the Superintendent. I strongly oppose this for the following reasons:

- **Sustainability of the SCC:** It has been very difficult to gain steady participation in my SCC. Even when we find members who are willing to commit to their role, they are not always able to be consistently available for meetings. Although my SCC committee members are concerned and supportive members of my school community, they have a limited understanding of the full scope of my duties as a principal. I do not think that it is in the best interest of our students to place the responsibility of selecting a principal on the shoulders of this group.
- **SCC already has a voice:** Currently, potential principals are interviewed and selected by panels on which SCC members have a seat. They have an opportunity to give feedback on questions which are related specifically to their areas of interest/expertise.
- **Conflict of Interest/Policy:** Current statutes dictate that SCCs do not have the authority to hire or fire principals. Giving a 50% weight creates a "de facto" hiring power that contradicts existing labor agreements and Department policies.
- **Integrity of Evaluation:** Shifting final authority to the Superintendent and SCCs bypasses the professional, merit-based evaluation currently facilitated by the CAS, who understands the specific nuances of our community.

## 4. Risk of "Honolulu-Centric" Governance and Lack of Focus on Student Support

Removing regional leadership threatens to centralize power in Honolulu. For rural complexes like Nanakuli-Waianae and for our colleagues on the Neighbor Islands, a centralized structure ignores our unique geographic, cultural, and socio-economic challenges. Furthermore, student needs are not uniform across the state. Removing leadership by complex areas fails to address the fact that our students need representation in all complex areas. Without a CAS to advocate for these specific needs, our voices will be lost in a centralized system that doesn't understand our local context.

This bill risks creating "CAS-like" positions that lack accountability to the specific communities they serve.

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## **Conclusion**

I cannot support a measure that dissolves a proven leadership structure without presenting a clear, researched, and concise plan of action. Any changes to the Department's administrative framework must be made in consultation with our union and through a transparent process that prioritizes student outcomes over bureaucratic restructuring.

Until such a plan is presented, I respectfully urge the committee to hold this bill.

Thank you for the opportunity to submit testimony.

Respectfully,

Rebecca Gebreyesus

Principal, Leihōkū Elementary

**Date:** Wednesday February 25, 2026

**Time:** 10:55am

**Location:** Conference Room 211 &  
Videoconference

**Committee:** WAM (Ways and Means)

**BILL: SB 3334**, Relating to Education Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Linda Voong

**POSITION: OPPOSITION AND COMMENTS**

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

As a concerned citizen and a stakeholder in our public education system, I am writing to express my **strong opposition** to SB3334 SD1, which seeks to repeal the complex area system and re-establish a district-based organizational structure.

While the intent to improve accountability is noted, this bill as drafted represents a step backward for Hawaii's schools for the following reasons:

**Disruption of Localized Leadership-** The shift from "Complex Areas" to a broad "District" model risks losing the localized, high-school-centric support system that has been in place since Act 51. Complex areas allow for better vertical alignment (K-12) within a specific community. Replacing this with an unspecified number of districts creates unnecessary administrative upheaval without a clear plan for how this will directly benefit student outcomes.

**Ambiguity in District Structure-** Section 2 of the bill leaves the number of districts blank and the specific geographical boundaries undefined. It is fiscally irresponsible to pass legislation that fundamentally restructures our largest state department without a clear understanding of the costs associated with establishing these new district offices, staffing them, and managing the transition.

**Undermining Principal and Community Autonomy-** The bill grants District Superintendents and Deputy District Superintendents significant authority over school principals. Furthermore, Section 18 mandates that School Community Council (SCC) evaluations account for 50% of a principal's selection. While community input is vital, this specific weighting—coupled with the Superintendent of Education's final authority—could lead to a politicized selection process that overlooks professional pedagogical expertise.

**Excessive Administrative Burden-** At a time when resources should be directed toward the classroom, teachers, and student facilities, this bill focuses on creating new layers of management, including "Superintendents for Academics" and multiple "Deputy District

Superintendents." We should be streamlining the DOE to support schools, not expanding the administrative hierarchy.

The stability of our education system is paramount. SB3334 SD1 introduces too many unknowns and risks centralizing power away from the individual school communities. I respectfully urge the committee to **hold this bill** and instead focus on initiatives that provide direct support to our educators and students.

Thank you for the opportunity to testify on this important matter.

Sincerely,



Linda Voong

*My name is Eleanor Gonsalves, and I am the Principal of Royal School.*

*I am writing to express my strong opposition to SB 3334. While the bill's stated intent is to reduce administrative burden and clarify authority, the proposed elimination of the CAS position and the restructuring of principal selection processes will have the opposite effect: it will create a leadership hierarchy that will make it difficult for schools to receive the immediate support when it is needed.*

*The CAS position is not an "unnecessary administrative burden"; it is a vital localized leadership hub. Hawaii has a unique single-district system. Without the CAS, the Department of Education becomes a massive, distant bureaucracy.*

*CASs understand the specific socio-economic and cultural nuances of their specific complexes. They serve as a critical liaison, translating high-level state policy into actionable school-level strategies.*

*Under current law, the CAS is the first line of appeal for school community councils and student discipline. Removing this local oversight will lead to a bottleneck of appeals at the State Superintendent's office, delaying justice for students and parents. Much will go by the waste side waiting for answers and support.*

*I urge the committee to defer SB 3334 and instead build conversations within the Department on effective leadership structures within the DOE.*

**Date:** Wednesday, February 25, 2026

**Time:** 10:55 AM

**Committee:** EDN

**Department:** Education

**BILL:** SB 3334 SD1, Relating to Education Elimination of Complex Area Superintendent Positions

**Testifier:** Bruce Naguwa

**Position:** Opposition and Comments

Aloha Chair Mercado Kim, Vice Chair Kidani, and Members of the Committee,

My name is Bruce Naguwa. Having served the Department of Education as both a Principal and a Deputy District Superintendent for the Leeward District, I am writing to express my opposition to SB 3334. While consolidation may appear efficient on paper, it threatens to dismantle the localized support systems that our schools and students rely on for implementation of Federal, State and Local initiatives to improve student achievement.

In my experience overseeing the Leeward District, our office was responsible for six distinct complex areas: Waianae, Nanakuli, Kapolei, Campbell, Waipahu, and Pearl City. A "one-size-fits-all" district model ignores a fundamental reality: Hawaii's schools are unique to the population they serve.

- **Diverse Needs:** The challenges facing a school in Pearl City are vastly different from those in Waianae.
- **Responsiveness:** The current Complex Area Superintendent (CAS) model ensures that leadership is close to the classroom. When a school faces a crisis, whether it involves facilities, personnel, or community relations, a CAS can respond with a level of speed and nuance that a centralized District Superintendent simply cannot.
- **Tailored Initiatives:** Under the CAS model, resources and curriculum supports are tailored to the specific demographic and geographic needs of the complex. Reverting to a seven-district model would create a bureaucratic distance that leaves individual school needs overlooked and underserved.

I also wish to voice my serious concerns regarding the proposal to weight School Community Council (SCC) evaluations at 50% for principal selection.

While community input is a vital component of a healthy school, a 50% weight is disproportionate and dangerous. Principal selection must remain a merit-based process centered on instructional leadership and professional expertise. High-stakes hiring decisions should not be vulnerable to the personal agendas or "popularity contests" of a few individuals who may not represent the broader stakeholder consensus. We must ensure our leaders are chosen for their ability to move a school forward, not their alignment with a specific agenda.

The strength of our education system lies in its ability to see and support every student. Replacing the regional leadership of CAS positions with a distant district model is a step backward for equity, access and efficiency.

Senator Mercado Kim's and Senator De Corte's justification to change the current leadership structure to remove the CAS position is not based on educational benefits to both schools and students. The CAS positions provide vital resources to the schools in a timely manner and are difficult to replicate. Also, the Senators did not provide information on a leadership structure that would provide better services to the schools and students attending public schools in Hawaii.

I urge the Committee to hold SB 3334 and maintain a structure that provides our schools with the individual attention and professional leadership they deserve.

Mahalo for the opportunity to testify.

Respectfully,

**Bruce Naguwa**

Former Principal & Deputy District Superintendent

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:17:42 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Jennifer Luke-Payne	Individual	Oppose	Written Testimony Only

Comments:

Aloha kakou,

As a school principal with 28 years of experience as an educator in the DOE, I strongly oppose this bill for the following reasons: This bill appears to simply revert the title of the Complex-Area Superintendent back to District Superintendent. But does not specify how many districts there will be. Should the bill pass, it can be assumed that it will be based on the existing seven districts, which was the former model of dividing schools. If that is the case, then one should refer to the history of the DOE. Twenty years ago when Act 51 separated the districts into the Complex-Areas, there was a need for tighter knit work units, closer supervision and support, and increased responsiveness between school and district offices. Today the need is even greater. Our jobs as school leaders are much more complex and demanding with the need to implement viable curriculum, address AI, reduce post-pandemic chronic absenteeism, support well-being, mental health, and so many other cultural, social, environmental, and educational issues.

Complex-Area Superintendents play a critical role by knowing their schools well being, setting a clear, unified vision that aligns instructional initiatives; acting as a liaison with state entities often advocating on behalf of schools such as ensuring unsafe facility concerns are addressed; coaching, mentoring and evaluating principals to encourage continuous improvement on behalf of students; networking with and recruiting neighborhood partners to collaborate with schools and offer opportunities to students that build a greater sense of kuleana to their community; and interfacing with parents and care-givers to address concerns while fostering positive relationships. Doubling or tripling the number of schools they need to supervise by converting complex-areas back to districts would make that job insurmountable given current conditions.

As principals, we rely on our Complex-Area Superintendent to act swiftly and provide personalized counsel informed by a thorough knowledge of our schools. At present, should the position be eliminated and these essential responsibilities reassigned to a district superintendent then responses and impact will surely be diluted. Instead of being managed by someone overseeing 9 to 28 schools within a limited geographic area of 550 to 1000 square miles, the superintendent and two deputy superintendents would need to play a similar role for 258 schools covering 10,000 square miles in addition to all their regular duties.

Lastly, the bill calls for School Community Councils to play a role in evaluating the principal and I feel this is inappropriate. The School Community Council includes members from Bargaining Unit 5 and the classified staff, both of whom are evaluated by the principal. Hence

there is serious risk of bias, quid pro quo, and/or claims of retaliation when you have parties subject to being evaluated serving as evaluators. This bias subverts the goal of using the evaluation results for professional development and diminishes trust in the authenticity of the evaluations. In addition, a principal's job is extensive. If one hasn't done the job for at least four years one cannot understand what it takes to be a principal. With this thought in mind the Complex Area Superintendent who at one point was a principal is better equipped to evaluate, support, and guide principals. In my understanding evaluations are to improve people's job performance, not to punish. The School Community Councils does not understand what it takes to be a principal, neither will they have the experience to support principals to improve in job performance. In the end placing the role of evaluator on the School Community Councils will cause more harm than good. Mahalo for your consideration of this testimony.



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
KA 'OIHANA HO'ONA'AUAO  
WAIPAHAU HIGH SCHOOL  
94-1211 FARRINGTON HIGHWAY  
WAIPAHAU, HI 96797  
(808) 307-9555

**Department: Department of Education Waipahu Complex**

**BILL: SB 3334, Relating to Education Elimination of Complex Area Superintendent Positions**

**TESTIFIER(S): Waipahu Complex Principals - Alika Ahu, Pat Anbe, Alvan Fukuhara, Shanell Kagamida, Stacy Kawamura, Kai Kuboyama, Hanh Nguyen, Zachary Sheets**

**POSITION: OPPOSITION AND COMMENTS**

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

We are writing to express our opposition to SB 3334. While we understand the intent to reduce "administrative burdens," this bill fails to recognize the essential leadership that Complex Area Superintendents (CAS) provide—particularly for rural and underserved communities.

Our opposition is based on three critical concerns:

### **1. Erosion of the Tri-Level Leadership Framework**

Beyond simple administration, the CAS acts as a crucial lifeline between grassroots school needs and state initiatives. Eliminating this position would essentially sever the direct line of communication between the schools and DOE state leadership. This leaves schools isolated without a shared direction, and more importantly, a representative to champion their specific needs at the top level.

### **2. Impact on Student Achievement/Well-Being: Concern regarding the unilateral abolishment of CAS duties/responsibilities and localized support**

If this bill passes, it removes the CAS position without any clear answers about what comes next. Section 17 of the bill is vague as to how CAS duties and responsibilities would be reassigned. Specifically, one of the many responsibilities of the CAS is to oversee school improvement processes and plans for every school in the complex area. These plans have a direct impact on how schools address student achievement and well being. Removing the position without a specific plan or structure will create a gap in communication and support.

Another example to illustrate this point: When updates to the delivery of special education services occur, our CAS provides the localized oversight necessary to ensure our teachers are

#### **AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER**

##### **Continuous Notice of Non-Discrimination**

The Hawaii State Department of Education (Department) and its schools do not discriminate on the basis of race, color, national origin, ancestry, sex, gender identity, gender expression, sexual orientation, age, disability, and religion in its programs and activities, including employment and admissions as applicable. Please direct inquiries regarding Department nondiscrimination policies and/or complaints of prohibited conduct to the Civil Rights Compliance Branch as follows:

Civil Rights Compliance Branch, Hawaii State Department of Education, P.O. Box 2360, Honolulu, Hawaii 96804, (808) 784-6325 or relay [CRCB@k12.hi.us](mailto:CRCB@k12.hi.us), Beth Schimmelfennig, Director, Rhonda Wong, Compliance, Anna Tsang, Title VI, Blue Kaanehe, Title VII, Nicole Isa-Iijima, Title IX, Krysti Sukita, ADA/504, Dana Takahra-Dias, Title IX- Gender Equity in Athletics, Alphonso Braggs, Diversity, Equity, and Inclusion

properly trained and that all of our schools remain in legal compliance with federal mandates. Without this middle-tier support, a crisis—such as a sudden staffing shortage or a complex IEP (Individualized Education Program) dispute—would be funneled to a centralized Superintendent’s office that is managing hundreds of schools. The resulting delay in guidance would not only stall our instructional progress but could leave the Department vulnerable to legal challenges, ultimately diverting precious resources away from the students who need them most.

We strongly oppose this change.

### 3. Improper Expansion of School Community Council (SCC) Authority

We oppose the proposal to assign a 50% weight to SCC evaluations in the principal selection process for several critical reasons. This change effectively grants SCCs hiring authority that violates current labor agreements and union contracts. Second, it undermines the objective, merit-based assessment managed by the CAS. SCC members are not trained in the stewardship of school operations - budget management protocols, personnel legalities, state performance standards, or state-mandated evaluation frameworks, to name a few. In addition, high turnover in SCC membership will reduce our capacity as principals to execute multi-year plans, which ultimately would be detrimental to student achievement and longitudinal growth for students. While well intentioned, shifting evaluation and hiring of principals to a lay council risks turning professional evaluations into subjective measures of popularity or reaction to singular, localized issues.

Consequently, we ask the Committee to hold SB 3334 and preserve the area leadership necessary for providing our students and staff with tailored and timely support. Thank you for considering this testimony.

Respectfully,

  
Zachary Sheets  
Principal, Waipahu High School

  
Hanh Nguyen  
Principal, August Ahrens Elementary School

  
Alika Ahu  
Principal, Kalei’opu’u Elementary School

  
Kai Kuboyama  
Principal, Waipahu Elementary School  
Adult

  
Alvan Fukuhara  
Principal, Waipahu Intermediate School

  
Stacy Kawamura  
Principal, Honowai Elementary School

  
Shanell Kagamida  
Principal, Waikele Elementary School

  
Pat Anbe  
Principal, Waipahu Community School for  
Adult

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Civil Rights Compliance Branch, Hawaii State Department of Education, P.O. Box 2360, Honolulu, Hawaii 96804, (808) 784-6325 or relay [CRCB@k12.hi.us](mailto:CRCB@k12.hi.us), Beth Schimmelfennig, Director, Rhonda Wong, Compliance, Anna Tsang, Title VI, Blue Kaanehe, Title VII, Nicole Isa-Iijima, Title IX, Krysti Sukita, ADA/504, Dana Takahra-Dias, Title IX- Gender Equity in Athletics, Alphonso Braggs, Diversity, Equity, and Inclusion

# **TESTIMONY IN OPPOSITION TO S.B. 3334, S.D. 1**

RELATING TO THE DEPARTMENT OF EDUCATION

**TO:** The Honorable Chair and Members of the Committee on Ways and Means

**FROM:** Felicia Friend Linton, Complex Academic Officer; Former School Principal, Vice Principal, and Teacher

**RE:** Opposition to S.B. 3334, S.D. 1 – Education; Department of Education; Administration

## **Summary**

As a career educator with over three decades of experience in Hawaii's public education system—having served as a teacher under the previous district structure and as a leader at every level of the current Complex Area model—I strongly oppose S.B. 3334, S.D. 1.

While this measure seeks "efficiency," it ignores the practical reality of what it takes to lead a school effectively. Reverting to a district-wide model and centralizing appointment authority will isolate principals, remove critical safety nets, and ultimately harm student outcomes by distancing leadership from the campus.

## **Points of Opposition**

### **1. The CAS is a Critical Lifeline for Principals**

The role of a school principal is incredibly taxing and complex. Speaking from my own professional experience as a former principal: I would not consider serving as a principal without the direct, localized support of a Complex Area Superintendent (CAS). The CAS serves as a mentor, a problem-solver, and a vital bridge between state-level mandates and school-level execution. Removing this layer of support or expanding the "district" size will leave principals stranded, leading to higher burnout and turnover among school leaders.

### **2. Lessons from the Past: The Invisibility of District Leadership**

This bill proposes reestablishing a district structure that many of us "old-timers" remember all too well. Having taught under that former system, I can attest that we seldom saw the leadership in our schools. Large districts create "invisible" administrators who are confined to offices rather than classrooms. By contrast, the current CAS model was designed to bring leadership closer to the students. Reverting to a district model is a step backward into a system that failed to provide the "personal insight" this Committee claims to value.

### **3. Current Capacity and the Risk of Over-Extension**

Even under the current structure, our Complex Area Superintendents are stretched to their limits. Due to increased job demands and administrative requirements, even the best CASs are often unable to be on campus as much as they—or the schools—desire. If we increase the size of their jurisdictions or add more bureaucratic reporting requirements, we will ensure that leadership remains entirely desk-bound. We should be looking for ways to increase their presence in schools, not diluting their impact through structural upheaval.

#### **4. Protecting the Integrity of the Selection Process and CBAs**

Under the current system, School Community Councils (SCCs) have a voice in selecting their principals, ensuring the candidate fits the unique needs of the community. Crucially, the final decision-making power currently resides with the CAS, who extends a formal recommendation to the Superintendent. This process is not just a matter of policy; it is part of our Collective Bargaining Agreement (CBA) with the State of Hawaii.

This bill disrupts this established chain of command. I am deeply concerned that moving toward a model that over-relies on the SCC in hiring—without the professional vetting of a CAS—invites individuals who may have their own personal "agendas" or who lack the specialized knowledge of what an effective principal needs to be successful. We risk allowing those without professional expertise to make decisions that impact the long-term success of our youth. We lose the essential professional oversight of a leader who knows the school's culture and can objectively judge a candidate's capabilities.

#### **Conclusion**

Structural changes should be designed to support the "front lines"—our teachers and principals. S.B. 3334, S.D. 1 does the opposite; it centralizes power and removes the very support systems that make the principalship a viable and sustainable role. Based on my years in the classroom, various district roles, the vice principal role, and the principal's office, I urge you to reject this measure.

**I respectfully request that your Committee hold this bill.**

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:24:26 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Michael Murakami	Testifying for Department of Education	Oppose	Written Testimony Only

Comments:

The current Complex Area structure is a functional, proven system that ensures accountability and streamlined communication. Critically, the CAS provides the essential line of communication and immediate guidance that Principals require to manage their schools effectively. By removing the CAS, we strip Principals of their direct support system, forcing them to seek guidance from a distant, centralized office or an unproven model that lacks the necessary local context. The CAS is the vital, singular point of contact for investigations in their complex; without them, the ability to initiate and complete disciplinary actions is compromised. Moving to an unproven model—as proposed in SB3334—does not "trim bureaucracy"; it creates a dangerous barrier to effective investigations, burdens the Superintendent, and undermines the school's ability to function.

I respectfully urge the committee to defer SB3334 and preserve the Complex Area Superintendent positions.

Thank you for the opportunity to testify.

**Date:** February 25, 2026

**Time:** 10:55 AM

**Bill No.:** SB3334 SD1 — *Relating to Education*

**Testifier:** Kendra Singletary

**Position:** Opposition

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

My name is Kendra Singletary, and I am the Vice Principal at Honouliuli Middle School. I have served the students and families of the Leeward Coast since 2009. I respectfully submit testimony in opposition to SB3334 SD1, *Relating to Education*.

This bill proposes considerable structural changes within the Department of Education, including repealing the Complex Area Superintendent (CAS) positions, creating an unspecified number of new districts, establishing district-level superintendents, and revising School Community Council (SCC) involvement in principal evaluations. While I recognize the intent to improve leadership and streamline administration, I feel these changes would destabilize schools, expand bureaucracy, and erode the equity and community responsiveness essential to Hawai'i's public education system.

### **1. Loss of Localized and Responsive Support**

The current Complex Area structure enables each CAS to deeply understand the distinct cultural, socioeconomic, and geographic contexts of the schools they serve. CASs provide relationship-based leadership, giving timely guidance and support tailored to local needs. Replacing this structure with broad district-level leadership responsible for 40 or more schools would distance decision-makers from communities. The educational needs in Wai'anae differ greatly from those in Pearl City or Hilo; effective leadership must remain close to the ground to reflect those differences.

### **2. Risk of Bureaucratic Inefficiency**

Dividing leadership between a District Superintendent for Academics and a Deputy Superintendent for Operations introduces unnecessary fragmentation. Many school decisions involve both academics and operations simultaneously. Under this model, principals would need to navigate two separate leadership structures, which would slow response times and complicate collaboration. The CAS model, by contrast, fosters integrated and efficient decision-making.

### **3. Equity and Accountability Concerns**

Hawai'i's Department of Education serves students from varied linguistic, cultural, and socioeconomic backgrounds. True equity requires responsiveness to school- and community-based contexts. Centralizing authority at the district level threatens to dilute that responsiveness and weaken support for historically underserved populations, including Native Hawaiian, Pacific Islander, rural, and immigrant communities.

Moreover, assigning district leader performance evaluations to the Board of Education, which is centrally located in Honolulu, elicits concerns about fair and authentic community accountability, particularly for schools on the neighbor islands.

### **4. Principal Evaluation Process**

Community participation is an essential part of school leadership, but weighting School Community Council (SCC) evaluations at 50% in principal selection is disproportionate. Leadership selections should be merit-based and focused on instructional expertise, professional qualifications, and a clear vision for equity and student success. SCC input should inform, rather than dominate, the evaluation process.

### **5. Timing and Educational Stability**

While schools nationwide still struggle with the pandemic's lingering effects on mental health and staffing, Hawai'i's public schools are demonstrating a robust recovery. According to the 2024-25 Strive HI report, the state has seen consistent gains in core subjects—with science proficiency rising to 43% and language arts to 53%—alongside improved attendance and college enrollment. Sustaining this momentum requires stability and relationship-centered leadership; major administrative restructuring at this stage would only divert critical resources away from student progress.

The Complex Area Superintendent model provides essential, community-based support that sustains effective leadership and equity across our schools. Replacing it with an undefined district system risks weakening that stability and weakening direct support to schools.

For these reasons, I respectfully urge the committee to defer or reject SB3334 SD1 and instead welcome educators, families, and community stakeholders into a collaborative review process that centers on equity, student voice, and long-term system improvement.

Mahalo for the opportunity to submit testimony and for your continued commitment to the students and educators of Hawai'i's public schools.

Respectfully,



Kendra Singletary

Vice Principal

Honouliuli Middle School

**Date:** Wednesday February 25, 2026

**Time:** 10:55am

**Location:** SC Conference Room 211 &  
Videoconference

**Committee:** WAM

Aloha Senator Dela Cruz and Members of the Committee:

My name is Dr. John Walje IV, proud principal of Helemano Elementary, and I am writing to express my **strong opposition** to SB 3334. While I understand the legislative intent to reduce administrative overhead, the elimination of the Complex Area Superintendent (CAS) position would inadvertently dismantle the very leadership structure that allows high-performing and diverse complexes, like Leilehua-Mililani-Waiialua (LMW), to sustain their academic momentum.

My opposition is based on the following four critical concerns from the perspective of a school leader within the LMW Complex Area:

### **1. Preservation of Regional Accountability and Advocacy**

The CAS is far more than an administrative layer; they are the primary advocate for our specific community's needs. In the LMW Complex Area, this role ensures that the unique requirements of our military-impacted, rural, and suburban schools are not overshadowed by state-wide generalizations. A centralized, "one-size-fits-all" governance model cannot provide the same level of responsiveness or deep understanding of our regional successes. Eliminating this position severs the direct line of accountability between the schoolhouse and the state, leaving our schools without a dedicated leader who understands our specific community trajectory.

### **2. Mitigation of Operational Risk and Disruption to Excellence**

Section 17 of SB 3334 provides no clear roadmap for how the essential duties of a CAS would be reassigned. For a complex like LMW, which is currently moving "ahead of the curve" in achievement and making steady gains in closing the achievement gap, this lack of clarity presents a significant operational risk. High-performing schools require stability to maintain their momentum. By removing the CAS without a proven, localized replacement, the state is effectively experimenting with the governance of our schools at the expense of our students' stability and continued success.

### **3. Efficiency Through Localized Decision-Making and "Red Tape" Reduction**

While proponents suggest this bill reduces "administrative burden," our experience in LMW suggests the opposite. Under the current leadership structure, the CAS office actually *reduces* the burden on principals by filtering state requirements and clearing the "red tape" that often slows down school-level progress. Centralization historically leads to slower response times and "Honolulu-centric" solutions that do not fit the Mililani, Wahiawa, or Waiialua contexts. Retaining

the CAS position ensures that decision-making stays close to the students, allowing us to remain agile and responsive.

#### **4. Strategic Leadership as a Catalyst for Equity**

The proposed elimination of the Complex Area Superintendent (CAS) position overlooks the critical role this office plays in maintaining high-performing educational ecosystems. In the Leilehua-Mililani-Waialua Complex Area, CAS Ernest Muh provides the strategic oversight necessary to navigate one of the most diverse student populations in the state. His leadership has been instrumental in clearing administrative "red tape," allowing school leaders to focus on three high-leverage priority areas that ensure both academic and social success. By serving as a localized advocate and strategist, CAS Muh keeps our schools ahead of the curve in achievement while simultaneously closing the achievement gap. A hyper-centralized system without a CAS would lack the nuance required to provide equitable solutions to a complex area that balances military, local, and rural needs, ultimately jeopardizing the sustained progress we have fought to achieve.

#### **5. Inherent Volatility and Lack of Technical Expertise in School Community Councils**

The provision granting the SCC 50% weight in principal hiring and evaluation is fundamentally unsustainable. Our high military transience combined with parents working outside the complex creates a "revolving door" membership that lacks institutional knowledge. Furthermore, principal evaluation is a technical executive function requiring specialized training in pedagogy and labor relations; shifting 50% of this weight to a fluctuating volunteer body undermines professional merit-based standards.

For these reasons, we respectfully request that you hold SB 3334. Thank you for the opportunity to testify.

Respectfully Submitted,

John E. Walje IV, EdD

Principal

Helemano Elementary School

**TO:** Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee  
**FROM:** Marc Kawahara, Kalihi Kai Elementary School Principal  
**DATE:** February 24, 2026  
**RE:** OPPOSITION to SB 3334 – Department of Education Leadership

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While the stated goal of SB 3334 may be aimed at administrative efficiency, its actual impact would be the dismantling of the vital link between state-level policy and school-level reality. The Complex Area Superintendent (CAS) is not a bureaucratic hurdle; the position serves in a key role for our "Tri-Level" leadership model. Removing this role shifts our schools from a community-based support system to a disconnected, top-down governance model. This would make it more difficult for principals like myself to address the individual and specific student and community needs at each school and make the system far less efficient. The role of a principal is very challenging and the CAS serves as a lifeline of support and guidance, so we can have a great impact on our students.

#### Erosion of "First Responder" Leadership

The CAS functions as the primary support system for school principals. Because they operate within the community, they provide real-time, responsive leadership that a centralized office in Honolulu simply cannot replicate.

- Contextual Guidance: A CAS understands the specific cultural and socioeconomic pulse of their district.
- The CAS understands the specific school and community needs in their area which differs greatly from district to district and from one island to another. An example of this is the recent CLSD Literacy Grant which was led by the FKK CAS and Complex Area Team. The FKK CAS and Team were able to support and facilitate implementation of the literacy grant to increase its impact in Farrington Complex Schools and the overall support for our students.
- Crisis Management: When a school faces a staffing emergency or a student crisis, the CAS is the "first responder" who provides immediate, on-the-ground stability. They are able to provide immediate guidance and direction when timely decisions are critical.

#### Compromising Principal Selection and Merit

SB 3334 seeks to centralize hiring while simultaneously shifting 50% of the evaluation weight to School Community Councils (SCC). This creates two significant risks:

- Loss of Professional Insight: CASs possess the professional expertise to identify a candidate's leadership capacity. Without their input, we risk hiring principals based on

administrative checklists rather than "fit" and community need. Knowledge of curriculum, instruction, and assessment as well as an understanding of the Department of Education system and unique community needs are critical when hiring and evaluating principals.

- The "Popularity Contest" Risk: While community input is vital, a 50% weight for SCCs risks politicizing the principal position, potentially prioritizing local popularity over proven pedagogical merit and systemic qualifications.

### The "Honolulu-Centric" Divide

Hawaii is a unique, single-district state. Expecting a centralized office to manage 258 diverse schools across multiple islands is operationally impossible.

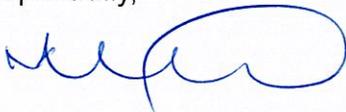
- Neglect of Rural and Neighbor Islands: This bill would effectively silence the voices of rural and Neighbor Island schools. Without a dedicated CAS, these schools become "islands" without a direct advocate in the state's leadership hierarchy.
- Systemic Overload: Shifting the workload of the CAS to a smaller, centralized group will lead to rapid burnout and a "bottleneck" effect, where critical decisions are delayed because leadership is stretched too thin.

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Structure in education should facilitate responsiveness and trust, not just numerical efficiency. In addition, there is a risk that restructuring roles will not result in the intended operational or financial benefits. SB 3334 would effectively "blind" the Department to the nuanced needs of individual campuses. By removing the CAS, we are not streamlining the system; we are distancing leadership from the very students and educators they are meant to serve. In the Farrington Complex, a large majority of our student population is EL, live in poverty and transiency, and have many other high needs. Our CAS is a huge source of support and is critical in helping us to be effective in our challenging roles.

I respectfully urge the Committee to not support SB 3334.

Respectfully,



Marc Kawahara

Kalihi Kai Elementary School Principal

STATE OF HAWAI'I  
DEPARTMENT OF EDUCATION  
KA 'OIHANA HO'O NA'AUAO  
*THE 'AIEA COMPLEX Principals*

February 24, 2026

**To:** The Hawai'i State Legislature

**Re:** Opposition to SB3334, Relating to Education

We, **the 'Aiea Complex Principals**, collectively submit this testimony to express our strong opposition to SB3334. This bill, which proposes to abolish the Complex Area Superintendent (CAS) position, fundamentally changes the leadership structure of the Department of Education (DOE) in a way that will significantly compromise school support, undermine operational autonomy, and ultimately harm our students.

In a massive, centralized district like ours, it is impossible for a single state office to provide meaningful mentorship to every principal. The CAS is a critical middle-management role that bridges the gap between individual schools and the central state office. Our opposition is based on the following critical points:

### 1. Loss of Localized Leadership and Principal Mentorship

- **Coaches for CEOs:** The CAS serves as a vital mentor, acting as a coach for school principals to grow leadership capacity and provide actionable feedback.
- **Local Advocacy:** The CAS is the highest-ranking leader "closest to the schools," capable of addressing daily academic and operational issues without waiting for a state-level decision.
- **Strategic Administrative Insulation:** This role serves as a filter, protecting schools from state-level administrative distractions so that teachers can focus on instruction.
- **Feeder-Pattern Alignment:** By managing the entire K-12 pipeline, the CAS ensures that what a child learns in 'Aiea's elementary schools directly prepares them for 'Aiea Intermediate and 'Aiea High School.

### 2. Unreasonable Scope of Responsibility

- **Scale of the DOE:** Hawai'i oversees 258 schools, and a single complex area typically manages at least 1,900 employees and 10,000 students.
- **Administrative Bottleneck:** Redirecting large-scale issues from nearly 300 schools directly to the State Superintendent will create an unmanageable bottleneck.
- **Addressing High-Needs Students:** It is administratively impossible for a single central office to effectively manage the nuanced needs of students. In 'Aiea, our demographics include a 48.7% eligibility rate for free or reduced lunch and an increasing English Learner population of 9.7%.

### 3. Governance and Principal Selection

- **Constitutional Autonomy:** The DOE is governed by the Board of Education, not the Legislature; this bill interferes with that established structure.

- **Localized Knowledge:** While the Superintendent has final authority, it is the CAS who possesses the most balanced knowledge of ‘Aiea’s unique school culture.
- **Quality of Leadership:** Allowing a layman board with little educational background to evaluate principals threatens the retention of experienced, effective school leaders.

#### 4. Navigating Modern Pressures

Leading the ‘Aiea Complex in 2026 requires localized expertise to handle specific challenges, including:

- **Closing Achievement Gaps:** Our CAS helps us address gaps in SBA Math and ELA proficiency among high-needs subgroups.
- **Attendance Issues:** We rely on complex leadership to monitor and improve regular attendance for Pacific Islander and Native Hawai‘ian students.
- **Crisis Management:** The CAS is essential for handling localized safety concerns and staffing shortages in real-time.

Eliminating the CAS position will not decrease administrative burden; it will only create larger systemic issues that harm our students and community. **As the unified leadership of the ‘Aiea Complex, we stand opposed to SB3334.**

Sincerely,

*The Principals of the ‘Aiea Complex Schools*

**Date:** Tuesday, February 24 2026  
**Committee:** EDN

**Department:** Maui District, Department of Education

**BILL: SB 3334, Relating to Education:** Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Richard Carosso

**POSITION: OPPOSITION AND COMMENTS**

February 24, 2026

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

My name is Richard Carosso, Principal of Lahainaluna High School. I respectfully submit this testimony in opposition to SB 3334, which proposes the elimination of Complex Area Superintendents.

In the aftermath of the August 2023 fires, the leadership of our Complex Area Superintendent (CAS) was indispensable. During an unprecedented crisis, our CAS served as a critical buffer for Lahaina principals—shielding schools from layers of bureaucracy, managing media pressures, and helping us communicate with our communities in a unified and consistent manner. This allowed us, as school leaders, to remain focused where we were needed most: on the immediate and long-term needs of our students and staff.

Our CAS was instrumental in coordinating resources and facilitating inter-agency support. The scope of recovery required collaboration with MEMA, FEMA, the Army Corps of Engineers, the EPA, and County agencies. These efforts were beyond the capacity of individual school sites, and the State level was understandably too far removed to respond to the highly localized and urgent needs we faced. The Complex Area structure provided the necessary bridge—ensuring that schools were supported, heard, and connected to critical resources.

Equally important, our CAS served as a strategic thought partner and sounding board for principals navigating extraordinary circumstances. She recognized shared challenges across schools—particularly around student and staff mental health, operational disruptions, and evolving DOE expectations—and helped coordinate shared solutions. This alignment prevented fragmentation and strengthened our collective response.

The Complex Area also provided essential logistical oversight, including coordination of transportation, food service, and the unique needs of Ka Papahana Kaiapuni schools.

These operational systems required cross-school leadership and problem-solving that individual campuses could not effectively manage alone during crisis conditions.

Most importantly, the strength of our Complex Area lies in relationships. The structure is small enough to foster trust, collaboration, and genuine understanding of each school community. Our CAS knows our schools, our students, and us as leaders. Through regular Complex Area principal meetings, we have built professional trust and shared purpose. These relationships cannot be replicated in a larger, more centralized structure.

Especially in times of crisis, leadership must be close enough to understand context and agile enough to respond quickly. The Complex Area model provided exactly that for Lahaina schools.

For these reasons, I respectfully urge you to oppose SB 3334.

Mahalo for the opportunity to provide testimony.

*Richard Carosso*

Richard Carosso  
Principal, Lahaina High School

## Testimony Against SB3334

**To:** Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee on Ways and Means

**From:** Debra Heyler, Vice Principal in the Honolulu District

**Date:** February 24, 2026

**Subject:** STRONGLY OPPOSE Bill SB3334

I am writing to express my strong opposition to this bill, which proposes the repeal of the complex area structure and the removal of the Complex Area Superintendent (CAS) position. Based on my experience in the field, this reorganization would disrupt the critical support systems that ensure our schools run effectively and safely.

### The Vital Role of the CAS: A Personal Perspective

The current complex area structure is not a bureaucratic layer; it is a functional necessity for school success. A CAS provides a level of localized oversight that a centralized District Superintendent cannot match. I have experienced the value of this firsthand:

When my principal was suddenly out on leave, my CAS was able to step in immediately. My CAS placed me as the Temporary Assigned (TA) Principal and provided the direct support and encouragement I needed to effectively fulfill my duties during a critical transition.

Under the proposed restructuring, a "District" would cover a much larger area. This increased span of control would make it incredibly difficult for a leader to provide the personalized growth and mentorship I received. When a leader isn't mentored effectively, it is our school community and our students who ultimately feel the impact.

### Pillars of the Current Model

The CAS role is essential for:

- **Timeliness in Critical Responses:** As shown in my TA experience, the CAS provides immediate, on-the-ground support required to stabilize a school during emergencies or leadership transitions.
- **Uniformity and Consistency:** They ensure that state-wide policies and initiatives are implemented with fidelity across all schools, which is vital for student achievement and well-being.
- **Expert Mentorship:** Our CAS knows the specific strengths and growth areas of our administrators. They provide the professional advice we need to become better leaders—guidance rooted in a deep understanding of our school's unique culture.

### Concerns Regarding Principal Evaluations

The proposal to have **School Community Councils (SCC)** submit principal evaluations is deeply concerning. While community engagement is a cornerstone of our schools, the SCC is not the appropriate body for professional performance oversight:

1. **Lack of Technical Benchmarks:** SCC members generally do not have the specialized training or knowledge of the specific professional benchmarks required to measure a principal's effectiveness objectively.
2. **Risk of Personal Bias:** Shifting evaluations to the SCC opens the door for performance reviews based on personal connections or subjective "likability" rather than professional output and data-driven results.

## **Conclusion**

We need localized, expert oversight to maintain the progress we have made in our complex areas. Increasing the size of these areas and removing the CAS position will only dilute the support available to school leaders and, by extension, our students. I urge you to vote **NO** on this measure.

Mahalo for the opportunity to testify.

February 24, 2026

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

I am writing to express my strong opposition to SB 3334. This bill fails to recognize the essential regional leadership that Complex Area Superintendents (CAS) provide to all aspects of our schools.

The CAS has an incredible role in connecting our school's specific needs with state-level initiatives. Without this position, schools will lack the cohesive and regional strategy and support needed. The CAS has a strong understanding of the nuances of the schools in our local area and provides critical direct support to our campuses related to personnel, fiscal, facilities, curriculum and staff development, and specialized programs.

Reassigning the duties of the CAS to an unknown number of district-level superintendent for academics and deputy district superintendents for school operations and administration just does not make any sense. This idea of a separate, redistributed, and added layer of authority has not been thought out or planned well and will cause a severe disruption at every level.

Schools face unique challenges of their community and without the direct, specific support of the CAS who closely works with and understands the schools, schools will be negatively impacted. Schools do not operate in silos of academics vs operations.

I urge the Committee to hold SB 3334 and maintain the current leadership structure, which includes the CAS overseeing all aspects of the complex area, to ensure our schools receive the big picture and detailed support needed.

Thank you for your time and the opportunity to testify.

Respectfully,

Robyn Tom  
TA Vice Principal  
Roosevelt High School

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:36:42 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Cherilyn Inouye	Individual	Oppose	Written Testimony Only

Comments:

To the Members of the Ways and Means Committee,

I am opposed to Senate Bill 3334, specifically to the proposed elimination of the Complex Area Superintendent positions in the Hawai'i Department of Education. As a former DOE student, teacher, vice principal, principal, and now district educational specialist, I have served in the DOE for almost two decades and am a product of our public schools. Our Complex Area Superintendents play a critical role in providing our schools with support with professional development, resources, staffing, mediation with staff and families, and most importantly, with leadership to ensure that our schools within the Complex Area are providing equitable and quality support to our students. Our Complex Area Superintendents are critical decision makers and eliminating this position will put a greater stress on our schools, district staff, families, and students, and create backlogs and inefficiency as state level or a district wide position would not be able to handle the incredible number of requests, complaints, approvals, and reviews that a Complex Area Superintendent handles. Our Complex Area Superintendent also creates a culture and system of support for our schools and has ensured that Hawaiian culture-based and 'āina-based education in our schools is a priority. Our system is already struggling with staffing vacancies and this would cripple our schools even more and ultimately hurt students, the most vulnerable and at risk students, where the majority of our students of Hawaiian ancestry and with the greatest needs all go to school. Your attempt to "trim the fat" will result in greater inequity for our students and only increase the gap both in achievement and in socio-economic privilege between public and private school students and only supports the elite, privileged class who are able to send their children to private schools, such as our business owners and lawmakers. Please do not pass this bill and allow our Complex Area Superintendents to continue leading and supporting our DOE schools.



**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\*

February 24, 2026

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 SB3334 SD1, Relating to Education. This proposal takes us back to a governance system we had in place until 2001 when we had seven districts each led by a District Superintendent and assisted by a Deputy District Superintendent. Due to Leeward District having a large number of schools and students, we had two Deputy District Superintendents assisting a District Superintendent oversee close to forty schools.

Our current model has a Complex Area Superintendent (CAS) in charge of the Campbell & Kapolei Complex Area schools where our CAS oversees eighteen public schools. This allows our CAS to have intimate knowledge of our school needs and challenges as well as having the ability to respond to questions and/or situations which require a CAS level of knowledge, expertise and access to other resources within our department. During the time I was a Deputy District Superintendent, we needed to be aware of what was happening at close to forty schools, which is much harder to do than when you focus on eighteen schools.

Principals count on the CAS having knowledge of our state leadership team plans which enable them to transmit their plans to us and also to provide feedback. If the three CAS positions are removed from Leeward District, the proposed District Superintendent and Deputy District Superintendent would need to oversee forty schools. This can be done; however, they may not have as much time to devote to each school or situation due to the sheer number of schools and students under their jurisdiction.

Please defer this bill and allow our department to continue operating under our current governance model of schools being supervised by a complex area superintendent who has intimate knowledge of principals and schools within their complex area.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Tamashiro, Jr.".

Stanley G. Tamashiro, Jr.  
Principal

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:38:25 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Gary Kanamori	Individual	Oppose	Written Testimony Only

Comments:

<b>Department:</b> Education	<b>Date:</b> February 25, 2026
<b>Person Testifying:</b> Gary Kanamori	<b>Time:</b> 10:55 am
	<b>Location:</b> 211
	<b>Committee:</b> WAM

**Title of Bill:** SB3334 SD1 RELATING TO EDUCATION

**Position:** OPPOSE

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

My name is Gary Kanamori, and I am writing to express my strong personal opposition to SB3334. I share this perspective not only as a school leader but as a lifelong stakeholder in Hawaii’s public education system. I am a proud graduate of Maui’s public schools and a parent to children currently attending our public schools. My commitment to our schools and our community is rooted in my role as a father and a member of a family that has served this specific community for over 40 years. I am currently the Principal of Pukalani Elementary, and I previously served as the Principal of Princess Nāhi’ena’ena Elementary in Lahaina during the 2023 wildfires.

This bill seeks to reorganize the Department’s regional leadership, but from my perspective on campus, this change would create a dangerous gap in day-to-day operations. Leading a school through the deadliest wildfires in our nation’s history, where two-thirds of my students and one-third of my staff lost their homes, proved that a school cannot function in isolation during a crisis. In the aftermath, Maui’s Complex Area Superintendents, Dr. Rebecca Winkie and Desiree Sides, managed the relentless, high-level coordination with FEMA, the Army Corps of Engineers, and the EPA. These efforts were far beyond the capacity of any individual school. Dr. Winkie provided this essential regional coordination even while displaced from her own home. If these roles were consolidated into a massive District model, no single leader could provide that level of localized, intensive support. This bill would force Principals to choose between navigating federal bureaucracy or being present for their traumatized students and staff.

In my current work at Pukalani Elementary, I rely on a Complex Area Superintendent (CAS) who maintains a manageable number of schools within our complex. This allows for the personalized counsel and swift response times that would be diluted under a larger District model. When facility emergencies or complex personnel issues arise, I need a leader who has a pulse on my specific campus and community. The CAS provides the essential air cover that allows me to remain an instructional leader. Without this regional bridge, the administrative burden of interfacing with the state office falls back onto the Principal, creating an unfunded mandate of time that pulls me out of classrooms and away from my teachers.

Furthermore, I have serious concerns regarding the proposal for School Community Councils to play a role in principal evaluations. This creates an inherent conflict of interest, as I am responsible for evaluating the very staff members who would then sit on the council to evaluate me. This structure risks allowing personal grievances or a fear of retaliation to overshadow professional growth, subverting the authenticity of the evaluation process.

Eliminating the CAS role does not streamline the Department; it removes the vital conduit that ensures the State Superintendent's vision actually reaches our schools. For the safety of our campuses and the stability of our communities, I urge you to maintain the current complex area structure. Mahalo for your time and for your unwavering dedication to our keiki.

Mahalo for your consideration of this testimony,

Gary Kanamori

Principal, Pukalani Elementary School

**To:** Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee  
**From:** Jenna Valbuena, Principal, Linapuni Elementary School  
**Date:** February 24, 2026  
**Position:** Oppose

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

As an experienced educator and school administrator in the Hawai'i Department of Education, I respectfully oppose SB3334.

The current Complex Area structure, established under Act 51, provides schools with closer support, stronger relationships, and more responsive leadership. Returning to a larger district model would dilute that support and make it more difficult to meet the unique needs of our schools and communities.

I am also concerned about shifting principal evaluation responsibilities in ways that may create conflicts of interest and undermine trust in the process.

At a time when schools are facing increasing academic, social, and operational challenges, we need leadership structures that strengthen support, not distance it.

For these reasons, I respectfully urge you to oppose SB3334.

Thank you for your consideration.

Respectfully,

A handwritten signature in cursive script that reads "Jenna Valbuena".

Jenna Valbuena

Linapuni Elementary, Principal

February 24, 2026

Aloha Chair Dela Cruz and Members of the Ways and Means Committee:

My name is Tanya Leinā'ala Hall, and I am the Principal of Queen Ka'ahumanu Elementary School. I am writing to formally express my strong opposition to SB 3334.

While I am a firm believer in the power of community engagement and shared decision-making, the structural changes outlined in SB3334 would have detrimental effects on school leadership, operational stability, and the overall quality of education we provide to our students. Specifically, I am concerned about the following:

I. The Elimination of Complex Area Superintendents (CAS)

In a centralized system like Hawai'i's, the CAS position is a fundamental necessity, not an elective luxury. My CAS provides the essential bridge between the Department's state-level mandates and the daily reality of my campus. Eliminating this role would:

- Remove Critical Support: Principals rely on the CAS for guidance on complex legal, personnel, and instructional issues.
- Increase Fragmentation: Without the CAS, we lose the regional cohesion that ensures all schools in a complex are moving in the same direction.
- Overburden School Leaders: Removing this layer of leadership forces more administrative weight onto principals, detracting from our ability to be instructional leaders for our teachers and students.
- Destruction of the K-12 Complex Continuity: The current Complex model ensures that high schools and their "feeder" elementary and middle schools work together to provide a seamless educational pathway for all students. By deleting the definition of "Complex" (Section 6), this bill severs those vital local links. Forcing schools into a larger, more rigid "District" model risks a "one-size-fits-all" curriculum that ignores the specific geographic and cultural nuances of our diverse island communities.

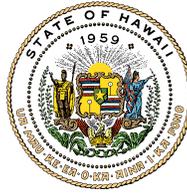
I believe that SB3334 would ultimately destabilize our schools and weaken the leadership pipeline. I respectfully ask this committee to defer or reject SB3334 and instead work with principals and educators to find ways to strengthen our current systems. Furthermore, I would like to extend a warm invitation to any member of this committee to spend a day at Queen Ka'ahumanu Elementary; I would welcome the opportunity to show you firsthand the complexities of our daily operations and the vital, collaborative role my CAS plays in our school's success.

Mahalo for your dedication to our keiki and for considering the perspective of those of us leading on the front lines in our schools. Mahalo for the opportunity to submit testimony for SB3334.

Me ka ha'aha'a,



Tanya Leinā'ala Hall  
Principal  
Queen Ka'ahumanu Elementary School



**STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
CAMPBELL - KAPOLEI COMPLEX AREA**

**TO:** Hawaii Senate Ways and Means Committee | Senator Donovan M. Dela Cruz (Chair), Senator Sharon Y. Moriwaki (Vice Chair) and Members of the Committee

**DATE:** February 25, 2026

**TIME:** 10:55 AM

**LOCATION:** Conference Room 211 & Videoconference, Hawai'i State Capitol

**BILL: SB 3334, Relating to Education** | Elimination of Complex Area Superintendent (CAS) Positions

**TESTIFIER:** Susan Shinkawa, Ed.D., LMHC, District Educational Specialist, Campbell-Kapolei

**POSITION:** OPPOSITION AND COMMENTS

Aloha Senator Donovan M. Dela Cruz (Chair), Senator Sharon Y. Moriwaki (Vice Chair) and Members of the Committee,

As a District Educational Specialist (DES) directly managing Special Education (SPED) and School-Based Behavioral Health (SBBH) in the Campbell-Kapolei complex area, I strongly oppose SB 3334. This bill threatens the stability of specialized student services by removing the critical leadership layer that bridges state mandates with school-level execution. The primary intent of SB 3334 is to "reduce administrative burdens", but in the context of SPED and SBBH, it does the exact opposite. It removes the only leadership role capable of closing the immense gap between State Office mandates and school-level realities.

- The State vs. School Disconnect: The State Office operates at a high level—focused on statewide compliance, legislative reporting, and broad policy. Conversely, our schools are on the ground, dealing with the immediate, complex needs of students. The CAS is the vital bridge that connects these two worlds. Without this bridge, the connection is severed.
- Major Disruptions to SPED and SBBH services: In my role as a DES, I see daily how the CAS facilitates services that the State Office is too far removed to handle:
  - Resource Allocation: When a school in Campbell-Kapolei experiences a sudden influx of high-need students, the CAS has the authority to move resources across the complex area immediately. The State Office moves too slowly for these "on-the-ground" emergencies.

- Crisis Management: In behavioral health, timing is everything. The CAS can approve emergency interventions and provide immediate support. Removing CAS creates an administrative "black hole" in which schools must wait for a distant state official to make decisions.
- Islands of Operation and Legal Risk: Without the CAS, schools will be forced to operate as "islands". This is particularly dangerous for Special Education. If every school interprets state SPED policy differently due to the lack of area-wide oversight, the Department will face increased legal challenges and IDEA (Individuals with Disabilities Education Act) violations. The CAS ensures consistency across the complexes, protecting both students and the Department.
- Loss of Advocacy: The Campbell-Kapolei community has unique socio-economic and geographic needs and continues to grow. The CAS understands these nuances. If leadership is centralized back to the State Office, our students' specific needs will be lost in a "one-size-fits-all" state approach. We cannot expect a state-level staff to understand the specific behavioral health and special education landscape of Campbell-Kapolei classrooms as well as a CAS does.

The gap between the State Office and schools is too wide to be left unbridged. Eliminating the CAS doesn't streamline the system; it decapitates the chain of command and leaves our most vulnerable students without proximate, accountable leadership at the moment they need it most. I urge the Committee to vote NO on SB 3334.

Thank you for the opportunity to testify.

**Respectfully submitted,**



[Susan Shinkawa \(Feb 24, 2026 09:41:13 HST\)](#)

Susan Shinkawa, Ed.D., LMHC  
District Educational Specialist  
Campbell-Kapolei Complex Area  
Hawai'i Department of Education

**Date:** Wednesday February 25, 2026

**Time:** 10:55am

**Location:** SC Conference Room 211 &  
Videoconference

**Committee:** WAM

Aloha Senator Dela Cruz and Members of the Committee:

My name is Dr. Kristin Walje, proud principal of Wheeler Middle School, and I am writing to express my **strong opposition** to SB 3334. While I understand the legislative intent to reduce administrative overhead, the elimination of the Complex Area Superintendent (CAS) position would inadvertently dismantle the very leadership structure that allows high-performing and diverse complexes, like Leilehua-Mililani-Waiialua (LMW), to sustain their academic momentum.

My opposition is based on the following four critical concerns from the perspective of a school leader within the LMW Complex Area:

### **1. Preservation of Regional Accountability and Advocacy**

The CAS is far more than an administrative layer; they are the primary advocate for our specific community's needs. In the LMW Complex Area, this role ensures that the unique requirements of our military-impacted, rural, and suburban schools are not overshadowed by state-wide generalizations. A centralized, "one-size-fits-all" governance model cannot provide the same level of responsiveness or deep understanding of our regional successes. Eliminating this position severs the direct line of accountability between the schoolhouse and the state, leaving our schools without a dedicated leader who understands our specific community trajectory.

### **2. Mitigation of Operational Risk and Disruption to Excellence**

Section 17 of SB 3334 provides no clear roadmap for how the essential duties of a CAS would be reassigned. For a complex like LMW, which is currently moving "ahead of the curve" in achievement and making steady gains in closing the achievement gap, this lack of clarity presents a significant operational risk. High-performing schools require stability to maintain their momentum. By removing the CAS without a proven, localized replacement, the state is effectively experimenting with the governance of our schools at the expense of our students' stability and continued success.

### **3. Efficiency Through Localized Decision-Making and "Red Tape" Reduction**

While proponents suggest this bill reduces "administrative burden," our experience in LMW suggests the opposite. Under the current leadership structure, the CAS office actually *reduces* the burden on principals by filtering state requirements and clearing the "red tape" that often slows down school-level progress. Centralization historically leads to slower response times and "Honolulu-centric" solutions that do not fit the Mililani, Wahiawa, or Waiialua contexts. Retaining

the CAS position ensures that decision-making stays close to the students, allowing us to remain agile and responsive.

#### **4. Strategic Leadership as a Catalyst for Equity**

The proposed elimination of the Complex Area Superintendent (CAS) position overlooks the critical role this office plays in maintaining high-performing educational ecosystems. In the Leilehua-Mililani-Waialua Complex Area, CAS Ernest Muh provides the strategic oversight necessary to navigate one of the most diverse student populations in the state. His leadership has been instrumental in clearing administrative "red tape," allowing school leaders to focus on three high-leverage priority areas that ensure both academic and social success. By serving as a localized advocate and strategist, CAS Muh keeps our schools ahead of the curve in achievement while simultaneously closing the achievement gap. A hyper-centralized system without a CAS would lack the nuance required to provide equitable solutions to a complex area that balances military, local, and rural needs, ultimately jeopardizing the sustained progress we have fought to achieve.

#### **5. Inherent Volatility and Lack of Technical Expertise in School Community Councils**

The provision granting the SCC 50% weight in principal hiring and evaluation is fundamentally unsustainable. Our high military transience combined with parents working outside the complex creates a "revolving door" membership that lacks institutional knowledge. Furthermore, principal evaluation is a technical executive function requiring specialized training in pedagogy and labor relations; shifting 50% of this weight to a fluctuating volunteer body undermines professional merit-based standards.

For these reasons, we respectfully request that you hold SB 3334. Thank you for the opportunity to testify.

Respectfully Submitted,

Kristin L. Walje, EdD

Principal

Wheeler Middle School

## Testimony Opposing SB 3334

**To:** The Honorable Senator Donovan M. Dela Cruz, Chair; The Honorable Senator Sharon Y. Moriwaki, Vice Chair; and Members of the Committee on Ways and Means

**From:** April Hosino, Principal, James Campbell High School

**Re:** SB 3334 – Strong Opposition

I am writing to express my strong opposition to SB 3334. Having dedicated 21 years to the Hawaii State Department of Education and the James Campbell High School community, I am deeply concerned about the potential impact this legislation would have on our schools' operational stability, professional oversight, and the regional unity that our schools depend on. The role of the Complex Area Superintendent (CAS) is not merely administrative; it is the glue that binds individual schools into a cohesively functioning educational community. In the Campbell-Kapolei Complex Area, our Superintendent is the strategic link between the Department of Education and the diverse needs of our school community, ensuring our requirements are met with unified resources and a shared vision.

Personally, as the Interim Principal of James Campbell High School, the largest school in the state, I rely on the CAS for far more than high-level oversight. Their role is absolutely critical to my success and the daily stability of my campus. Our CAS acts as a high-level liaison with business and community leaders, helping to secure resources that I simply could not effectively access in isolation while managing a campus of this magnitude. Furthermore, our CAS ensures that resources are equitably shared by directing support to the students and programs that need it most across the entire complex. This leadership ensures that Ewa Beach and Kapolei schools function as a unified ecosystem, preventing a "silo effect" and ensuring a smooth, supportive K-12 transition for our students as they move through our feeder schools.

While community input is essential, the proposal to grant School Community Councils (SCC) increased power in evaluating and selecting principals is deeply concerning. Principal selection and evaluation already rely on negotiated systems and collective bargaining. Increasing the decision-making power of a frequently rotating council can inadvertently prioritize short-term interests over the long-term strategic health and culture of the school.

Consistent, localized leadership at the complex level is what transforms student outcomes. The collaborative environment fostered by our CAS is exactly what allows me, personally, to stay focused on student achievement at Campbell High. For the sake of our schools and the continued growth within our regions, specifically the Campbell-Kapolei complex, I respectfully request that the committee considers the detrimental effects of this bill and stands with our schools, our principals, and our Complex Area Superintendents by deferring SB 3334.

Mahalo for the opportunity to provide testimony and for your commitment to Hawaii's public education system.

April Hosino  
Interim Principal - James Campbell High School

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:56:55 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kristin Muramoto	Individual	Oppose	Written Testimony Only

Comments:

Date: 02/25/2026

Time: 10:55 am

Location: 211

Committee: WAM

Department: Education

BILL: SB 3334, SD1 Relating to Education

TESTIFIER(S): Kristin Muramoto

POSITION: Oppose

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

I am writing to express opposition to SB 3334.

The Complex Area Superintendent (CAS) serves as much more than an administrative layer. They act as the essential bridge connecting the unique needs of our schools with broader state-level initiatives. Maintaining this position is essential to preserving the integrity of our tri-level framework and strengthening the vital connection between our schools and the Department of Education. A dedicated CAS ensures that schools do not have to operate in isolation. Consolidating leadership may unintentionally impact the representation of rural areas, particularly the Neighbor Islands. A highly centralized model runs the risk of overlooking the unique geographic, cultural, and socio-economic nuances of these communities, potentially reducing our ability to remain highly responsive and closely connected to localized needs.

Finally, this bill raises significant concerns by tasking School Community Councils with evaluating and selecting principals. The composition of the School Community Council creates a structural conflict of interest, as it empowers classified staff and Bargaining Unit 5 members to evaluate the principal who directly supervises them. This issue is compounded by the inclusion of community members who, while valuable, may not possess the necessary working knowledge of school operations to provide a fully informed evaluation or principal selection. This dynamic can inadvertently introduce bias and blur professional boundaries, detracting from the use of evaluations for professional growth and leadership selection while risking a loss of trust in the process. School Community Councils remain most impactful when their valuable community perspectives are utilized to provide input and partnership to schools.

For these reasons, I oppose SB 3334. Mahalo for your consideration.

**Date:** Wednesday February 25, 2026

**Time:** 10:55am

**Location:** SC Conference Room 211  
& Videoconference

**Committee:** WAM

**Department:** Ka'ala Elementary Principal

**BILL: SB 3334, Relating to Education** Elimination of Complex Area Superintendent  
Positions and New SCC Responsibilities

**TESTIFIER(S):** Leighton Nakamoto

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**POSITION: OPPOSITION AND COMMENTS**

Aloha Senator Dela Cruz and Members of the Committee:

My name is Leighton Nakamoto, proud principal of Ka'ala Elementary, and I am writing to express my strong opposition to SB 3334. While I understand the legislative intent to reduce administrative overhead, the elimination of the Complex Area Superintendent (CAS) position would inadvertently dismantle the very leadership structure that allows high-performing and diverse complexes, like Leilehua-Mililani-Waialua (LMW), to sustain their academic momentum.

My opposition is based on the following four critical concerns from the perspective of a school leader within the LMW Complex Area:

**1. Preservation of Regional Accountability and Advocacy**

The CAS is far more than an administrative layer; they are the primary advocate for our specific community's needs. In the LMW Complex Area, this role ensures that the unique requirements of our military-impacted, rural, and suburban schools are not overshadowed by state-wide generalizations. A centralized, "one-size-fits-all" governance model cannot provide the same level of responsiveness or deep understanding of our regional successes. Eliminating this position severs the direct line of accountability between the schoolhouse and the state, leaving our schools without a dedicated leader who understands our specific community trajectory.

**2. Mitigation of Operational Risk and Disruption to Excellence**

Section 17 of SB 3334 provides no clear roadmap for how the essential duties of a CAS would be reassigned. For a complex like LMW, which is currently moving "ahead of the curve" in achievement and making steady gains in closing the achievement gap, this lack of clarity presents a significant operational risk. High-performing schools require stability to maintain their momentum. By removing the CAS without a proven, localized replacement, the state is effectively experimenting with the governance of our schools at the expense of our students' stability and continued success.

### **3. Efficiency Through Localized Decision-Making and "Red Tape" Reduction**

While proponents suggest this bill reduces "administrative burden," our experience in LMW suggests the opposite. Under the current leadership structure, the CAS office actually *reduces* the burden on principals by filtering state requirements and clearing the "red tape" that often slows down school-level progress. Centralization historically leads to slower response times and "Honolulu-centric" solutions that do not fit the Mililani, Wahiawa, or Waialua contexts. Retaining the CAS position ensures that decision-making stays close to the students, allowing us to remain agile and responsive.

### **4. Strategic Leadership as a Catalyst for Equity**

The proposed elimination of the Complex Area Superintendent (CAS) position overlooks the critical role this office plays in maintaining high-performing educational ecosystems. In the Leilehua-Mililani-Waialua Complex Area, CAS Ernest Muh provides the strategic oversight necessary to navigate one of the most diverse student populations in the state. His leadership has been instrumental in clearing administrative "red tape," allowing school leaders to focus on three high-leverage priority areas that ensure both academic and social success. By serving as a localized advocate and strategist, CAS Muh keeps our schools ahead of the curve in achievement while simultaneously closing the achievement gap. A hyper-centralized system without a CAS would lack the nuance required to provide equitable solutions to a complex area that balances military, local, and rural needs, ultimately jeopardizing the sustained progress we have fought to achieve.

### **5. Inherent Volatility and Lack of Technical Expertise in School Community Councils**

The provision granting the School Community Council (SCC) 50% weight in principal hiring and evaluation is fundamentally unsustainable.

- The SCC is characterized by compositional instability. Driven by local economic and residential patterns, frequent turnover leads to a consistent dilution of institutional knowledge. This lack of longitudinal participation prevents the council from maintaining the historical context necessary for effective leadership oversight.

- Principal evaluation is a technical executive function requiring specialized training in pedagogy, data-driven instructional leadership, and labor relations.
- Shifting 50% of this evaluative weight to a fluctuating volunteer body—regardless of their commitment—undermines established professional merit-based standards. A body without long-term continuity or technical training is ill-equipped to manage high-stakes personnel decisions that impact the entire district.

For these reasons, we respectfully request that you hold SB 3334. Thank you for the opportunity to testify.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'Leighton Nakamoto', written in a cursive style.

Leighton Nakamoto

Principal

Ka'ala Elementary School

**SB-3334-SD-1**

Submitted on: 2/24/2026 9:57:30 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Samarra B Lehman	Individual	Oppose	Written Testimony Only

Comments:

I ask that you VOTE NO to SB334. This bill, if passed, would cause a devastating impact on the community, Nānākuli-Wai'anae, I serve as a teacher, By eliminating Complex Area CAS and supports and placing the leeward district which would have one office of leadership for 50 schools would be a disserve to the unique supports needed within the Wai'anae Moku.

CAS and complex supports the schools and there needs. Asking one office to support 9 schools would decrease and not be adequately fulfilled. The unique needs of NW are differently to those in Campbell/Kapolei and that of Pearl City/ Waipahu.

This bill does not strengthen a system of education but rather would fail provide supports needed for each individual school. The bill would diminish supports at are already in place and at the end of the day those who would be hurt the most would be the STUDENTS.

By placing districts we would not be connecting schools to the state level expectations but creating a futher distance from it. This would be systematically detrimental to students in this community as well as detrimental to the most vulnerable groups which just so happen to be the largest Native Hawaiian population in the state.

**Date:** 02/24/2026  
**Time:** 10:55 AM  
**Location:** 211  
**Committee:** WAM

Department: Education  
Person Testifying: Derek Santos  
Title of Bill: SD 3334 SD1 Relating to Education

Position: **OPPOSE**

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 my **continued opposition to SB 3334 SD1**. While the revised language attempts to "revisit the foundational elements" of Act 51, the proposed transition from Complex Areas to a **District Office structure creates a fragmented, top-down hierarchy which will ultimately destabilize our schools.**

**Fragmentation versus Integration:** The revised bill proposes splitting regional leadership into a District Superintendent for Academics and one or more Deputy District Superintendents for Operations – this will lead to Fragmentation vs. Integration. **In a school environment, academics and operations are inseparable.** This will in turn increase bureaucracy. Instead of "eliminating administrative burdens," this creates a "two-boss" system for principals. Rather than a single Complex Area Superintendent (CAS) who understands the holistic needs of a school, principals must now navigate two separate chains of command, leading to slower decision-making and systemic friction.

**Districts are not Communities.** By reverting to a "District" structure, the bill moves away from the Complex Area model, which is rooted in the "feeder-school" philosophy (elementary and middle schools flowing into a specific high school) and ultimately the unique needs of the COMMUNITY. Districts are geographically larger and more impersonal than Complex Areas. A "District Superintendent" overseeing a massive geographic area cannot maintain the "proximity, trust, and sustained relationships" which a CAS currently provides. The **CAS is the "first responder" for our schools.** Replacing them with a centralized District Office ensures that leadership will be reactive and distant rather than proactive and present. Academically each individual complex area has a diverse student population – each with unique strengths and needs and the CAS understands the school community and works with the principal to meet the needs of the school.

**In the Farrington Complex** – we are working through issues of poverty, homelessness, food insecurity, families working multiple jobs to afford to live in Hawaii while managing educating students, new curriculum, state and federal mandates, chronic absenteeism, student well being and mental health, etc. **CAS Mahoe is our go to person.** As a school principal, I do have a vested interest in this bill and the complex area superintendent. **CAS Mahoe is our rock during the storm; a sounding board when issues arise; a source of knowledge; and a pillar of**

**hope.** Being a principal is not an easy job, it is extremely complicated and CAS Mahoe helps by bringing clarity, looking at issues through a solutions lens while helping us to ensure we are in compliance and in alignment with other schools and practices. **CAS Mahoe is able to do these things because of her deep understanding of the schools and community.**

To build upon what former CAS Ann Mahi shared on the Senate floor – “Education is not simply a line item in a budget or bill moving through the committee. It is the promise we make to every child in every classroom across our islands...” – **Our islands are diverse, our communities are unique. When decisions are made based on data points on a spreadsheet rather than the reality of a classroom in Kona, Hana, Kalihi or Kohala – how are we ensuring equity for all students? How are we ensuring we are meeting unique needs? It is through the relationships which the Complex Area Superintendent has nurtured with the community and the people within the community.**

The proposed "District" structure does not streamline the Department; it fragments it. By separating academics from operations and centralizing appointment power, SB 3334 creates the very "unclear authority structures" it claims to solve.

I respectfully urge the Committee to **HOLD SB 3334**. The current Complex Area model provides the integrated, responsive, and localized leadership our students and educators need and most importantly deserve.

## **Aloha Chair, Vice Chair, and Members of the Committee,**

I am writing to express my **strong opposition** to **SB3334**. While the stated intent is to "streamline" the Department of Education, this measure implements a **drastic reduction in force** at the district leadership level. This creates a dangerous administrative bottleneck that jeopardizes Hawaii's ability to meet federal mandates under the Individuals with Disabilities Education Act (IDEA).

### **1. The Capacity Bottleneck: Doubling the "Span of Control"**

By repealing the Complex Area Superintendent (CAS) position in favor of a consolidated district model, this bill forces a **significant reduction in force** for the primary administrators responsible for Local Education Agency (LEA) oversight.

- **The Reality:** The number of schools, students, and IEPs does not decrease.
- **The Bottleneck:** Remaining district leaders will see their "span of control" nearly double. This creates a physical impossibility for a single superintendent to provide the legally required oversight for every school in their expanded jurisdiction.

### **2. Legal Deadlocks in Student Discipline (Chapter 19)**

Under Hawaii Administrative Rules, a superintendent-level official must personally review and approve student suspensions exceeding 10 days. For students with disabilities, these are high-stakes "Manifestation Determination Reviews."

- **The Impact of RIF:** With a smaller pool of authorized signatories, the Department is creating a **procedural chokehold**.
- **The Risk:** Delays in these mandatory timelines due to a reduced workforce will lead to immediate federal non-compliance, resulting in "stay-put" violations and inevitable, costly litigation against the State.

### **3. The Monitoring and Accountability Gap**

The HIDOE Monitoring and Compliance Branch relies on a "Tri-Level" model (State, Complex, School). This bill effectively **collapses the middle tier**.

- **Loss of Proximity:** A reduction in force at this level removes the only administrators with the proximity to schools to provide timely technical assistance.
- **Weakened Oversight:** Moving from a localized complex model to a thinned-out district model makes it impossible to monitor 250+ schools effectively. Centralizing authority while reducing the number of people holding that authority is a recipe for systemic failure.

## **Conclusion**

A **reduction in force** of this magnitude at the regional level does not improve efficiency; it creates a "single point of failure" for federal compliance. We cannot expect half the number of administrators to perform twice the amount of legally mandated work without sacrificing the rights of our most vulnerable students. Eliminating the CAS position without a robust, federally compliant alternative for LEA oversight invites legal challenges from the U.S. Department of Education and risks the loss of federal funding. I urge you to vote **NO** on SB3334 to protect the rights of our most vulnerable students. Thank you for the opportunity to testify and thank you for supporting the education of the students of Hawaii.

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:02:27 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Shely Chang	Individual	Oppose	Written Testimony Only

Comments:

Chair Dela Cruz, Vice Chair Moriwaki, and Committee Members,

Thank you for the opportunity to submit written testimony in opposition to **SB3334 SD1**. I am testifying as an individual citizen. However, I have been an educator for the past 20 years, am the parent of two public school students, and have also served as a PTO president at their school.

I believe that restructuring the Department of Education by removing Complex Area Superintendents and changing how principals are hired and evaluated would be detrimental to our students and the quality of their education. My opposition is not in support of maintaining the status quo, as some have suggested, but rather in support of what is best for our children both my own children and the students I serve.

Thank you for your time and consideration.

Respectfully,  
Shely Chang

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:03:53 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Cindi Rivera	Testifying for Nanakuli-Waianae Complex	Oppose	Written Testimony Only

Comments:

**Testimony in Opposition of SB 3334 SD1**

Chair, Vice Chair, and Members of the Committee,

My name is Cindi Rivera, and I serve as the Induction Program Coordinator within a Complex Area that supports nine public schools in a high-need community. I respectfully submit testimony in **OPPOSITION to SB 3334 SD1**.

While the stated goal of this bill is to "streamline" administration, the reality is that eliminating the Complex Area Superintendent (CAS) would dismantle the essential support systems that keep our schools functioning and our teachers in their classrooms. If the CAS position is eliminated, the "middle" of our support system falls out.

Effective induction is more than a welcoming committee; it is a rigorous professional system. Within our Complex Area, we provide a level of support that a centralized state office cannot sustain:

- **Mentor Professional Standards:** Our complex team provides the structured training and ongoing coaching that school-level mentors need to be effective. Without complex-level oversight, the quality of mentorship would become wildly inconsistent from school to school.
- **Direct Support for Beginning Teachers:** We manage induction for a high number of new educators, providing the "high-touch" contact required to prevent burnout and turnover.

If the CAS position is eliminated, the state office is too far away to provide daily mentorship, and individual schools are too busy with operations to provide their own high-level professional development.

The proposal to have School Community Councils (SCCs) submit principal evaluations to the State Superintendent is deeply concerning. While community input is vital, SCCs are composed of volunteers who may lack the professional pedagogical expertise required to evaluate a school leader's performance fairly and objectively. Removing the CAS—a seasoned educator who understands the daily nuances of school leadership—strips away the professional accountability necessary for a healthy school system.

For the sake of our teachers, our principals, and most importantly, our students, I urge you to **HOLD** this bill and maintain the Complex Area Superintendent structure.

Thank you for the opportunity to provide testimony.

Cindi Rivera

Nanakuli-Waianae Complex Area

Kapolei, HI 96707

8083063593

cindi.rivera@k12.hi.us

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:04:58 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Luse Brown	Testifying for DOE/Classified Records & Transaction	Oppose	Written Testimony Only

Comments:

Our Principals are doing an outstanding job managing our schools, supporting teachers and improving student outcomes everyday. They understand the needs of their students & communities better than anyone outside the school system. Lawmakers should trust their expertise and maintain a hands off approach to DOE. By letting educators lead, we ensure that decisions are made best interest of students and schools.

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:07:02 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Douglas Boyer	Individual	Oppose	Written Testimony Only

Comments:

Members of the Committee:

Thank you for the opportunity to testify in opposition to S.B. 3334, S.D. 1. While this bill is intended to improve focus, accountability, and leadership within the Department of Education, I am concerned that the proposed district structure may unintentionally create inequities between metro districts and rural or neighbor island communities. Although restructuring may appear to streamline oversight, in practice, the demands of large metro districts could dominate leadership attention and resources. Metro areas must manage significantly larger student populations, numerous campuses, complex staffing systems, special education compliance, etc. These responsibilities are urgent, politically sensitive, and often crisis-driven. As a result, district leadership may naturally prioritize the largest and most visible districts, not out of preference but because of the sheer volume and intensity of their operational demands.

At the same time, rural and neighbor island schools face different but equally serious challenges, including geographic isolation, limited staffing pools, struggles with teacher recruitment and retention, fewer course offerings, and reduced access to specialized services. If district superintendents and deputies are stretched thin by the complexity of metro districts or volume, rural schools in the districts risk becoming administratively oversight challenged. Response times may slow, proactive planning may diminish, and in-person engagement may decrease. The bill is designed to build focus, yet structurally, it may concentrate attention where pressures are greatest rather than where needs are most fragile.

True equity does not mean applying a single governance model uniformly across very different communities. It means ensuring that leadership capacity and attention are distributed proportionally and intentionally. A district structure that must simultaneously manage dense urban populations and remote rural schools may unintentionally struggle to maintain a balanced focus. Without clear mechanisms to ensure equitable attention to leadership, the most dense student populations may unintentionally absorb the majority of administrative bandwidth.

For these reasons, I respectfully urge the Committee to carefully consider the unintended consequences of this restructuring. If the goal is improved accountability and stronger leadership, then capacity must be aligned with the geographic and demographic realities of our state. Otherwise, this measure risks stretching district superintendent and deputy superintendent leadership too thin while limiting meaningful focus on rural and neighbor island

schools. I respectfully ask that you defer S.B. 3334, S.D. 1, and conduct a more thorough equity and impact analysis before moving forward with structural changes of this magnitude.

Mahalo

To: The Senate Committee on Ways and Means  
From: Marites Galamgam/TA-Vice Principal, Ka'imiloa Elementary  
Date: February 24, 2026  
Subject: STRONGLY OPPOSE SB 3334 - Relating to Education

Aloha,

I am writing to express my **strong opposition** to SB 3334. While the intent to improve accountability is noted, this measure threatens to dismantle a functional support system for our schools. This bill does not create efficiency, it creates confusion and chaos.

As a school leader in the Campbell Complex, I am concerned that the repeal of the Complex Area Superintendent (CAS) position removes a vital bridge between individual schools and state-level administration. The CAS knows our communities, and provides necessary and immediate, localized support. Replacing CAS with an unspecified number of district superintendents creates massive uncertainty, moving resources and focus away from student learning and toward bureaucratic restructuring. Our students need stability, not a reshuffling of how schools are managed.

Secondly, a change in principal evaluation and appointment processes risks politicizing school leadership. Principals need the stability of clear, consistent oversight from those who understand their specific school communities, not a top-down mandate that complicates their reporting lines. As a former teacher on the School Community Council, with a limited amount of understanding of the Principal roles and responsibilities, I would not have been comfortable with coaching or overseeing my Principal.

For these reasons, I respectfully urge the committee to defer this measure.

Thank you,

Marites Galamgam

TA-VP, Ka'imiloa Elementary School, CK-Complex Area

**TO:** Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee  
**FROM:** Laurie Yogi, Kalihi Kai Elementary School Vice Principal Intern  
**DATE:** February 24, 2026  
**RE:** SB 3334 / SB3334-SD1 – Department of Education Leadership  
**POSITION: Oppose**

Aloha Chair and Members of the Committee,

I respectfully submit this testimony in opposition to SB 3334.

As a Vice Principal intern and long-time educational leader in the Hawai'i Department of Education, I have experienced firsthand the value of the Complex Area Superintendent (CAS) role. The CAS serves as a critical bridge between state-level leadership and the daily realities of our schools. Eliminating this position would weaken a structure that currently supports responsiveness, coherence, and accountability.

In my personal experience, our CAS has strengthened our school's support of student success by serving as a thought partner in the development and refinement of our Academic Plan. While school leaders drive this process, the CAS ensures alignment with system priorities, poses reflective questions that sharpen our focus, and provides feedback that deepens our instructional coherence. This collaborative approach enhances the quality of our planning and keeps our work aligned across levels of the system.

Our CAS demonstrates instructional leadership through her consistent presence across campuses in our Complex Area, walking alongside school leaders to observe classroom instruction and provide actionable feedback that supports continuous improvement. Despite overseeing more than 20 schools, the CAS visits each campus regularly, ensuring her guidance reflects a deep understanding of each school's unique context. When needed, our CAS also partners with principals on student safety and operational decisions, addressing facilities concerns, staffing shortages, and urgent community matters with informed, practical support.

Hawai'i's geographically unique public school system requires responsive, contextual leadership to ensure decisions are made in the best interest of students. Consolidating schools under a significantly larger umbrella would create unintended consequences, including delays in decision-making, diluted oversight, and less personalized support for schools navigating increasingly complex student needs.

For these reasons, I respectfully urge you to oppose SB 3334.

Mahalo for your consideration.

Laurie Yogi  
Kalihi Kai Elementary School Vice Principal Intern

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:15:59 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Mahina Anguay	Individual	Oppose	Written Testimony Only

Comments:

**Testimony in Opposition to Repealing Complex Areas and Eliminating the Complex Area Superintendent Position**

Aloha Chair and Members of the Committee,

My name is Mahina Anguay, and I serve as Principal of Waimea High School on the island of Kaua‘i. I respectfully submit testimony in opposition to the proposal to repeal complex areas and eliminate the position of Complex Area Superintendent (CAS), replacing it with an unspecified number of districts and new district-level roles.

This proposal represents a significant structural shift in the governance of our public schools. I believe structural changes of this magnitude should be driven by clear evidence that they will improve student outcomes, operational efficiency, and equity. At this time, I am not aware of data demonstrating that the current Complex Area structure is failing in ways that would warrant dismantling it.

As a principal in a rural, neighbor-island community, I rely heavily on my Complex Area Superintendent as both a supervisor and a thought partner. The CAS role is not simply “middle management.” It is a critical bridge between school-level leadership and the state system. In real time, my CAS supports complex personnel matters, student discipline issues, crisis response, Title I compliance, special education coordination, and cross-school initiatives. The proximity and accessibility of that leadership matter — especially when urgent decisions must be made.

For neighbor-island schools, this issue is also one of equity. If complex areas are repealed and districts are reorganized, important questions remain unanswered: How large will districts be? Where will district leadership be physically located? Will Kaua‘i remain locally supported, or be grouped with other islands? Increased centralization risks creating additional distance between schools and decision-makers. Rural schools already operate with fewer resources and smaller staffing structures. We cannot afford leadership dilution or delayed responsiveness.

Reorganizing governance structures carries transition costs — reassignment of roles, potential vacancies, disrupted initiatives, and uncertainty at a time when schools are already managing staffing shortages, academic recovery, chronic absenteeism, compliance mandates, and facilities challenges. I feel strongly that stability and continuity of leadership are essential right now.

Perhaps the central question should be: What specific problem is this proposal solving, and what evidence suggests this restructuring will improve student achievement or operational effectiveness? Without clear, outcome-based justification, dismantling a structure that currently provides localized, accountable support to schools risks unintended consequences.

I respectfully urge the Legislature to preserve the Complex Area Superintendent structure or, at minimum, ensure that any proposed changes protect rural equity, maintain local accessibility of leadership, and are grounded in clear evidence of improved outcomes for students.

Thank you for the opportunity to testify.

Mahina Anguay  
Principal, Waimea High School  
Kaua'i

**Date:** Wednesday, February 25, 2026

**Time:** 10:55 AM

**Place:** Conference Room 211 &  
Videoconference, State Capitol, 415 South  
Beretania Street

**Committee:** WAM (Ways and Means)

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

**BILL: SB 3334 SD1, Relating to Education** Elimination of Complex Area Superintendent Positions

**TESTIFIER(S):** Joy Hohnstine

**POSITION: OPPOSITION AND COMMENTS**

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

I am writing to express my opposition to SB 3334. I am deeply concerned that this bill fails to recognize the essential regional leadership that Complex Area Superintendents (CAS) provide—particularly for rural and underserved communities.

My opposition is based on the following concerns which I believe represent a significant risk of exacerbating an 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 Hawai'i State Department of Education in the Ka'ū-Kea'au-Pāhoa Complex Area.

- **Risk of "Honolulu or Town Centric" Governance**

- Removing regional leadership altogether threatens to centralize power entirely in Honolulu. For rural complex areas like mine, and indeed all the Neighbor Island complex areas, a centralized structure ignores our unique geographic, cultural, and socio-economic challenges. This bill risks creating a hyper-centralized system that lacks accountability to the specific communities it is meant to serve.
- Additionally, it is my belief that the decision making which would result from such a shift in leadership would center (or require the use of) solutions that are simply unavailable in rural communities. Such a predicament epitomizes the concept of inequity, as we would be unable to provide, build, or advocate for local solutions to meet local needs. This has the potential to significantly impact the educational opportunity, safety, and wellbeing of the youth and families we serve.

- **Erosion of the Local Leadership Model**

- For an island as geographically spread out as Hawai'i Island, a single district superintendent would be responsible for 41 public schools plus an additional 14 public charter schools over 4000 square miles of land. Providing timely, intentional, and specific support and oversight of that number of schools and over that distance will not only serve as a burden for any district superintendent but will inevitably lead to an imbalance of time and attention being provided to some of our schools, most likely those schools which are

furthest away from any centralized, more populated areas of our island. Our most remote schools would inevitably bear the brunt of that lack of available time and attention. Additionally, it is impractical to expect a single District Superintendent of our island to develop the familiarity, understanding, and relationship with our unique communities given the vast geographic distance of our county. This lack of knowledge will impede responsive decision making which truly represents the strengths and needs of each of our unique school communities.

- The CAS is not merely an administrative layer; they are the vital conduit connecting individual school needs with state-level initiatives. Eliminating this position severs the communication link between the "schoolhouse" and the Department of Education's central leadership. Without a CAS, our schools risk becoming "islands of operation," lacking a cohesive regional strategy or a direct line of advocacy at the state level.
  - Shifting supervision of schools to district superintendents, that would greatly increase the number of schools under the supervision of a smaller number of individuals, which will lead to systemic neglect and burnout.
- **Improper Expansion of School Community Council (SCC) Authority**
    - The bill proposes giving SCC authority in Principal Evaluations. Many schools in more rural areas struggle to maintain a robust SCC. This leaves open the possibility that a school whose SCC struggling to maintain membership will either not be able to meet the annual requirements in a timely manner or will have members who are new to the community, the school, or role and may not yet have the experience needed to conduct an effective evaluation of that school's Principal.

For these reasons, I oppose this bill and respectfully ask the Committee to hold SB 3334 and maintain the regional leadership structure that ensures our schools, teachers, and students receive the specialized support they require. Mahalo for the opportunity to testify.

Respectfully,

A handwritten signature in black ink that reads "Joy C. Anderson". The signature is written in a cursive style with a large, looped initial "J" and "A".

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:17:29 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kelly Sutcliffe	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chair, Vice Chair, and Members of the Senate,

My name is Kelly Sutcliffe, and I am a Vice Principal currently in the HICISL Program for Educational Leadership. I respectfully submit this testimony in opposition to Senate Bill 3334.

SB3334 proposes changes that would significantly and negatively impact effective school leadership, operational stability, and instructional continuity. I am concerned about (1) the elimination of CAS positions and (2) proposed changes to principal evaluation and hiring procedures requiring School Community Council (SCC) involvement.

**1. Elimination of CAS Positions**

Our Complex Area Superintendents (CAS) play a unique and critical role In Hawai‘i’s statewide school system that doesn’t really exist in most mainland districts. Hawai‘i has a single statewide district, not multiple local districts. The Superintendants vision for all schools within the state is the Ne‘epapa" approach, in which public schools operate as a united, collaborative system to move forward together. The CAS serves as the regional leader connecting principals to the central office, and having a critical role in carrying out the Superintendent's vision, helping school's collaborate and work towards shared goals for student success, equity, and continuous improvement.

Eliminating CAS positions would:

1. Create a disconnect between schools and state leadership, and communication would become fragmented, slower and less responsive.
2. Remove a vital layer in the leadership framework, preventing the timely, personal support that our schools need..
3. Decrease individualized support for schools, directly impacting student achievement, principal support, and community engagement.

From a 'learning' Vice Principal's perspective, the CAS has been critical in ensuring that not only myself, but my colleagues are prepared and have the skillset necessary to be effective leaders. Through CAS's support, she meets with us, advises and guides us, intentionally places us in a school setting that will promote growth in our profession, and helps us develop the skills and dispositions necessary to be effective administrators. CAS is present in our schools and is

equipped to support the unique needs of each school in Hawai'i. CAS's have a deep understanding of our student demographics, community perspectives, and achievement data, CAS is able to collaborate closely with district leadership and principals to develop effective school improvement plans and deliver individualized, specialized support tailored to each school. Eliminating this position would be detrimental to our school leaders, and our students.

## **2. Changes to Principal Evaluation and Hiring Procedures**

SB3334's proposal to require School Community Council (SCC) involvement in principal evaluation and hiring raises serious concerns related to governance, objectivity, confidentiality, and equity.

While I value the current role the SCCs play in decision-making, expanding their authority into evaluation and hiring functions would:

- Undermine the professional hiring standards by allowing unqualified, untrained members of the community who may have little to no experience in leadership or instruction to make decisions.
- Risk bias or favoritism in the hiring process.
- Create liability risks and unclear lines of accountability, since principals are district employees and the district (not the SCC) is legally responsible for employment decisions.

School Community Councils (SCCs) should not have authority to evaluate or hire principals because these responsibilities require specialized professional expertise, legal oversight, and systemwide consistency that districts are structured to provide. Principal hiring and evaluation involve complex areas such as instructional leadership standards, personnel law, budgeting, and compliance, which trained district administrators are equipped to assess using formal frameworks. Since principals are district employees, the district holds legal responsibility for employment decisions, contracts, and due process, making clear lines of authority essential. Granting SCCs direct decision-making power could also introduce conflicts of interest, biases or inconsistent standards across schools. SCCs play an important and valuable role in representing community voice, and we value their input and participation, however they should remain an advisory role and not have enhanced authority.

Conclusion:

To conclude, I respectfully oppose SB3334 because it would weaken the leadership structure that supports Hawai'i's unique statewide public school system and disrupt the stability our schools rely on to serve students effectively. Eliminating Complex Area Superintendents (CAS) would remove a critical layer of support, coordination, and accountability that connects schools to the broader system and ensures consistent progress toward shared goals. In addition, expanding the authority of the School Community Council to include principal evaluation and hiring would shift highly specialized personnel decisions away from those with the training and legal authority to make them. While community voice is essential and valued, strong schools depend on clear governance, professional standards, and coordinated leadership. For these reasons, I respectfully

ask that you reject SB3334 to protect effective school leadership, and to support the continued success of Hawai'i's students and educators.

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:23:43 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sandy Cameli	Individual	Oppose	Written Testimony Only

Comments:

To: Senate Ways and Means Committee

Hearing: Feb. 25, 10:55 AM — Conference Room 211 & Videoconference

Aloha Chair and Members of the Committee,

I respectfully urge you to oppose SB 3334 and to preserve the Complex Area Superintendent (CAS) structure within the Hawaii State Department of Education. The CAS system is an equity-centered mechanism that ensures consistent support, oversight, and two-way communication across all 256 public schools on our six islands.

Equity of access and services

- Complex Area Superintendents provide targeted, place-based leadership that levels the field between O’ahu and neighbor-island schools. Central office staff cannot substitute for the on-the-ground presence, contextual knowledge, and rapid response CASs provide to rural and remote schools.
- CASs coordinate resources, professional development, and instructional supports so that small and geographically isolated schools receive the same quality of service as larger urban schools.

Two-way communication and responsiveness

- CASs function as the essential bridge between school-level educators and state leadership. They translate state policy into meaningful practice for principals and teachers, and they elevate local needs, challenges, and promising practices back to the state.
- Removing this layer will weaken feedback loops, delay problem-solving, and disconnect principals and teachers from decisionmakers who understand local constraints.

Personal experience: how CASs support professional growth

- As a classroom teacher, I received professional development directly from my Complex Area Superintendent. That guidance connected me with a District Resource Teacher on the Big Island, which in turn opened opportunities and mentorship that helped me grow into an Educational Specialist at the State level. I firmly believe my professional

trajectory, and my ability to better serve students, were the direct result of CAS-led support, coaching, and pathways for advancement that a centralized system alone would not have provided.

#### Support for principals and school improvement

- Principals, vice principals, and educational officers rely on CASs for coaching, performance feedback, staffing guidance, and implementation support - particularly for complex change efforts (e.g., curriculum transitions, special education services).
- CASs enable consistent supervision and continuity of leadership across a cluster of schools, improving student outcomes and supporting educator retention.

#### Local context matters

- Hawaii's islands vary dramatically in student demographics, transportation, staffing, and community resources. CASs bring sustained, contextual leadership that centralized bureaucracies cannot replicate without significant cost and inefficiency.
- Neighbor-island schools depend on CAS coordination for island-wide hiring, professional learning that fits multi-school schedules, and culturally responsive programming sensitive to local communities.

#### Preserving professional governance and expertise

- School leaders are highly trained, credentialed professionals. Weakening district-level educational leadership in favor of political micromanagement undermines educator expertise and destabilizes school improvement efforts.

#### Recommendation

- Do not pass SB 3334. Maintain and strengthen the Complex Area Superintendent structure as an equity-focused, efficient, and accountable means to support all Hawaii public schools, especially our neighbor-island communities.
- If changes are sought, pursue collaborative, evidence-based refinements (clarified roles, transparent metrics, joint state-CAS performance reviews) rather than abolition.

Mahalo for your consideration. I am available to provide further examples or data on how Complex Area Superintendents directly support equity and student success across Hawaii.

Respectfully,

Dr. Sandy Cameli, Ed.D.

Educational Specialist for HIDOE

**FROM:** Jason Yoshimoto, Principal, Kamilo‘iki Elementary School

**POSITION:** STRONGLY OPPOSE SB 3334 SD 1 – Relating to Education

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

As an educator with over 23 years of experience and the proud Principal of Kamilo‘iki Elementary for the past 11 years, I am writing to express my strong opposition to SB 3334 SD 1.

In our current leadership system, my Complex Area Superintendent (CAS) possesses a deep, understanding of my community. This connections allows my CAS to effectively and efficiently provide individual, school-level, and complex-area support. This localized oversight is vital to meeting the unique needs of my school ‘ohana.

At a time when schools are being asked to diversify support systems to meet the individual needs of students and families, the intent of this bill, which appears to centralize school leadership at the District level, is counterintuitive.

In my specific district, this reorganization is particularly problematic:

- Currently, two CAS positions support two complex areas. Under this bill, these positions would simply be rebranded as one Superintendent and one Deputy.
- This change would force one individual to be responsible for student achievement and operations across double the number of campuses.
- One leader cannot remain as responsive to the needs of twice the number of students, families, and faculty/staff as they were previously.

This proposed shift contradicts the Department’s ongoing efforts to embrace the uniqueness of each learner and school campus. To help students reach their full potential, we need leadership that is present and accessible, not a distant District-level oversight body.

While eliminating CAS positions would certainly achieve the intended goal of "disrupting" the current leadership structure, it comes at a detrimental cost to the pipeline of vital resources. Furthermore, it neglects the negative impact such upheaval has on school culture and faculty/staff morale.

My school community members show up and work tirelessly every day to empower our students with the skills, knowledge and attitudes to create a better Hawai‘i. Please do not disrupt the leadership and support systems that make this possible.

For these reasons, I strongly oppose SB 3334 SD 1. Thank you for your time and for your consideration of this testimony.

Respectfully Submitted,

Jason Yoshimoto  
Principal, Kamilo‘iki Elementary School



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
KA 'OIHANA HO'ONA'AUAO  
LIHIKAI ELEMENTARY SCHOOL  
335 S. Papa Ave.  
Kahului, HI 96732

Date: 2/25/2026  
Time: 10:55am  
Location: 211  
Committee: WAM

Department: Education  
Person Testifying: Barbara Oura Tavares  
Title of Bill: SB3334 SD1 RELATING TO EDUCATION

Position: OPPOSE

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

FROM: Barbara Oura Tavares

Thank you for the opportunity to provide testimony. I am writing in strong opposition to SB3334, specifically the provisions seeking to eliminate the Complex Area Superintendent (CAS) position and replace it with a District Superintendent (DS), as well as the proposal to grant School Community Councils (SCCs) a deciding role in the evaluation and selection of principals.

### Preserving the Complex Area Superintendent (CAS)

The CAS serves as a direct and essential conduit in Hawaii's tri-level system of educational leadership and support. This position acts as the vital nexus between State leaders and our school principals. Under the current model, a CAS supports a focused network of 8 to 28 schools within a specific geographical area. This structure enables acute, personal awareness of local school needs, timely responses to ongoing initiatives, and genuine, on-the-ground support for principals striving to build vibrant school communities.

Reverting to a District Superintendent model would dangerously overextend our leadership. A DS would be responsible for an entire district, encompassing 35-55

schools and potentially spanning multiple islands. The sheer spread and volume of work would be insurmountable, completely erasing the personalization of regional education. Without a CAS, a principal's ability to provide high-quality instructional leadership, execute comprehensive student and staff support, and manage complex CEO-level business functions would be severely crippled. This would be a profound disservice to the community and negligent on all our parts. We struggled with the DS model twenty years ago; reverting to it today, amidst even greater educational complexities, will only yield negative consequences.

### **Opposing the SCC Voice in Principal Evaluation and Selection**

Furthermore, granting SCCs authority to evaluate and hire principals introduces a fundamental conflict of interest. While community and staff input is absolutely valuable, the SCC includes school staff members whom the principal is actively responsible for evaluating and holding to standards of commitment and compliance.

Placing staff in a position to heavily influence their own supervisor's evaluation introduces undeniable bias. This proposed authority would severely damage the school climate. It would prevent authentic dialogue, hinder targeted professional development, and stifle meaningful collegial conversations, driven by an underlying fear of retaliation from either side. Principals must be able to make objective, sometimes difficult decisions for the betterment of the school without the threat that their own evaluations will be used as leverage by the staff they manage.

For the sake of our localized school communities and the integrity of our educational leadership, I strongly urge the Committee to vote **NO** on this bill and the proposed provisions.

Thank you for your time, your service, and your consideration of this testimony.

Sincerely,



Barbara Oura Tavares

Principal - Lihikai Elementary School

**Date:** Wednesday, February 25, 2026

**Time:** 10:55 a.m.

**Location:** Conference Room 211 & Videoconference

**Committee:** Ways and Means

**Department:** Ho'okele School Community Council Members

**BILL: SB 3334, Relating to Education** Elimination of Complex Area Superintendent Positions & SCC Authority Expansion

**TESTIFIER(S):** Ho'okele School Community Council Members

**POSITION: OPPOSITION AND COMMENTS**

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

We are writing to express our opposition to SB 3334. Our opposition is based on the following critical concerns:

**Improper Expansion of School Community Council (SCC) Authority**

The bill proposes assigning 50% weight to SCC evaluations and principal selection. We oppose this shift for the following reasons. School certificated and classified staff, as well as community representation already exist on principal selection committees. All SCC members have input in principal annual evaluations through the SCC.

**Lack of Technical Expertise Within SCC**

Granting SCCs 50% weight in principal hiring and evaluation is of concern. High military populations and parent and community members' varied experience and knowledge contribute to frequent turnover and changes in SCC membership, resulting in limited knowledge to the actual work at the school level. Additionally, principal evaluation requires specialized expertise in pedagogy, school leadership, and labor relations. Shifting half of this responsibility to a rotating, volunteer body could not accurately determine the success of the principal.

For these reasons, we respectfully urge the Committee to hold SB 3334 and maintain the regional leadership structure, hiring and evaluation structures that ensures schools, educators, and students receive the focused support they require.

Thank you for the opportunity to testify.

Respectfully submitted,

Ho'okele School Community Council

Candice Yamamoto (Teacher and School Community Council Chairperson)

Chad Pata (Community Member)

Davis Pata (student)

Virma Menor (Teacher)

Nikki Anzai (Teacher)



**STATE OF HAWAII  
DEPARTMENT OF EDUCATION**

HILO-WAIĀKEA COMPLEX  
75 AUPUNI STREET, RM. 203  
HILO, HAWAII 96720

**Department:** Education  
**Person Testifying:** Dr. Angie Graham  
**Title of Bill:** SB3334 SD1 RELATING TO EDUCATION  
**Position:** **OPPOSE**

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

As Educational Officers with decades of experience in the Department of Education, we are writing to express our **strong opposition** to SB3334 SD1.

Our role as Educational Officers is to provide the "boots on the ground" support that schools need to function effectively. We work daily at the intersection of state policy and school-level reality. From our perspective, the changes proposed in this bill would significantly destabilize the support systems we have built for our students and teachers.

**The Necessity of the Complex Area Model**

The proposal to revert Complex Area Superintendents (CAS) to a District Superintendent model is a step backward. Under Act 51, the shift to Complex Areas was designed specifically to create "tighter-knit work units." As EOs, our ability to move the needle on student achievement relies entirely on our proximity to the schools. In a smaller Complex Area, we know the specific data trends of each school, the unique culture of their staff, and the specific challenges of their geographic community.

If we move back to a massive District model, the support we provide will be spread so thin it will effectively become "diluted," as noted by my colleagues. Instead of being a partner in a school's improvement, my role would shift to a distant administrator managing a massive caseload. We cannot address modern complexities like AI integration, the mental health crisis, and chronic absenteeism from a 30,000-foot district view; these require the high-touch, responsive support only a Complex Area structure allows.

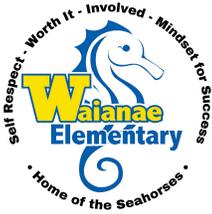
The current Complex Area system allows us to be responsive, personal, and accountable. SB3334 SD1 threatens to dismantle that efficiency in favor of an outdated, centralized bureaucracy.

Mahalo for your consideration of this testimony and for your support of our schools.

Sincerely,

Dr. Angie Graham Educational Officer Hilo-Waiakea Complex, District Educational Specialist

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



## Wai'anae Elementary School

85-220 McArthur St  
Wai'anae, Hawaii 96792  
Office 808-305-2900  
Fax 808-697-7090

### Written Testimony re: SB3334

#### Official Stance: OPPOSITION

Aloha, my name is Sheldon Konno, and I am the principal of Wai'anae Elementary in the Nānākuli-Wai'anae Complex Area. I stand in opposition to SB3334. While I understand the desire for administrative efficiency, this bill, as currently drafted, threatens the stability of our schools, the clarity of our leadership tri-level (School, Complex, State), and the equity of representation for rural and non-Honolulu-centric communities.

#### Key Concerns and Commentary

**1. Erosion of the Tri-Level Leadership Framework**": The Complex Area Superintendent (CAS) is not merely an administrative layer; it is the essential conduit connecting individual school needs with state-level initiatives. Without a CAS, our schools risk becoming islands of operation without a cohesive regional strategy or a direct line of advocacy at the state level.

Within our community, our CAS is not only a longtime resident of Wai'anae but has also shown a dedication to the health, education, and well-being of our students and their families for decades. Because of CAS Hauge, there is expanded health support on every campus that provides or facilitates physicals for sports, dental care, vision care, and immunizations, among other things. Our CAS has a vision for our community, and she helps to organize and lead the principals of our complex for the overall benefit of this community. Simply put, this would NOT have happened without her guidance and leadership. I am in charge of a school of almost 500 students and 100 adults. The range of challenges that can happen in a single day is sometimes staggering. My ability to reach out to my CAS for support, knowing that she will answer my call 24/7, from issues ranging from legal concerns to health issues to academic questions, is absolutely critical. I don't think I could do this job without her support. I know for sure that I wouldn't be able to do it with the same degree of effectiveness.

**2. Contradictory and Vague Language:** We find the language of SB3334 inherently contradictory. The bill acknowledges that CASs are a "vital support system," yet simultaneously seeks their elimination. Furthermore, the proposal to "utilize its administrative framework" as a replacement is dangerously vague.

- **Lack of Vision:** No visual or organizational chart is provided detailing what replaces the CAS.
- **Historical Precedent:** If the intent is to return to the "Deputy Superintendent" model, we must note that this model failed in the past. Expecting two deputies to manage 42+ schools in the Leeward District is a logistical impossibility that will lead to burnout and systemic neglect.

**3. Concerns Regarding School Community Council (SCC) Authority:** Section 11 of the bill suggests granting SCCs a 50% weight in the selection of principals, with final authority resting with the Superintendent. I strongly oppose this for the following reasons:

- **Sustainability of the SCC:** It has been very difficult to gain steady participation in my SCC. Even when we find members willing to commit to their roles, they are not always consistently available for meetings. Although my SCC committee members are concerned and supportive members of my school community, I do not think it is in our students' best interest to place the responsibility for selecting a principal on this group.
- **SCC voice:** Currently, potential principals are interviewed and selected by panels that include SCC members. They have an opportunity to provide feedback on questions related to their areas of interest/expertise. The present principal interview panel is composed of a multidisciplinary team, which demonstrates the complexity and multifaceted nature of the principalship.
- **Conflict of Interest/Policy:** Current statutes dictate that SCCs do not have the authority to hire or fire principals. Giving a 50% weight creates a "de facto" hiring power that contradicts existing labor agreements and Department policies.
- **Integrity of Evaluation:** Shifting final authority to the Superintendent and SCCs bypasses the professional, merit-based evaluation currently facilitated by the CAS, which understands the specific nuances of our community.

**4. Risk of "Honolulu-Centric" Governance and Lack of Focus on Student Support:** Removing regional leadership threatens to centralize power in Honolulu. For rural complexes like Nanakuli-Waianae and for our colleagues on the Neighbor Islands, a centralized structure ignores our unique geographic, cultural, and socio-economic challenges. Furthermore, student needs are not uniform across the state. Removing leadership from complex areas fails to address the fact that our students need representation in them. Without a CAS to advocate for these specific needs, our voices will be lost in a centralized system that doesn't understand our local context.

This bill risks creating "CAS-like" positions that lack accountability to the specific communities they serve.

**Conclusion:** I cannot support a measure that dissolves a proven leadership structure without presenting a clear, researched, and concise plan of action. Any changes to the Department's administrative framework must be made in consultation with our union and through a transparent process that prioritizes student outcomes over bureaucratic restructuring. Until such a plan is presented, I respectfully urge the committee to hold this bill.

Respectfully,



Sheldon Konno, M.Ed  
Principal, Wai'anae Elementary



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

Prince David Kawanakoa Middle School  
49 Funchal Street  
Honolulu, HI 96813

Aloha Chair Donovan Dela Cruz and Members of the Committee:

### Statement of Opposition

I am writing to express my strong opposition to SB 3334, specifically the provisions aimed at eliminating Complex Area Superintendent (CAS) positions and altering the principal evaluation and hiring procedures to require School Community Council (SCC) involvement.

### The Critical Role of the CAS

The proposal to eliminate CAS positions overlooks the vital "bridge" these leaders provide between the state-level Department of Education and individual school realities. In the KMR (Kaimuki-McKinley-Roosevelt) area, our CAS has been instrumental in:

- **Unified Initiatives:** Under her leadership, she has united our area in EL (English Learner) initiatives and success plans, ensuring a cohesive strategy that wouldn't be possible if schools were operating in silos.
- **Streamlined Communication:** Rather than navigating broad mandates, our schools receive information tailored specifically to our demographic needs, saving administrative time and reducing burnout.
- **Expert Oversight:** The CAS provides essential, objective guidance on high-stakes matters including personnel investigations, professional development, and strategic hiring—tasks that require a level of professional expertise and distance that a volunteer council may not possess.

### Concerns Regarding SCC Involvement in Hiring & Evaluation

While community input is valuable, shifting the formal hiring and evaluation of principals to the School Community Council (SCC) presents several risks:

1. **Professional vs. Personal:** Principal evaluation requires deep knowledge of pedagogical leadership and state compliance. SCC members, while dedicated, are often parents or community volunteers who may lack the training to evaluate a school leader's technical performance.
2. **Consistency:** A CAS ensures that evaluations are standardized and fair across the complex. Moving this to an SCC-based model risks making the process susceptible to local popularity or internal politics rather than professional merit.
3. **Hiring Delays:** Adding layers of council approval to the hiring process can lead to vacancies during critical times, whereas a CAS can move decisively to ensure leadership stability.

**Conclusion**

The CAS position is not an "extra layer of bureaucracy"—it is the support system that allows principals to focus on students. Our CAS in KMR provides timely, personalized support that a centralized office or a volunteer council simply cannot replicate.

I respectfully urge the committee to defer SB 3334 and maintain the current leadership structure that prioritizes professional guidance and complex-wide unity.

Thank you for the opportunity to submit a written testimony.

Aloha,



Dale Arakaki, Principal



Brandon Lee, Vice Principal

Prince David Kawananakoa Middle School



# KAULUAKALANA

*Navigating Towards a Hopeful Future*

## **TESTIMONY IN OPPOSITION On Behalf of Kauluakalana**

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

Kauluakalana respectfully offers testimony in opposition to this measure relating to the restructuring of the Department of Education SB3334.

Kauluakalana is a Kailua-based 501(c)(3) nonprofit organization that works in close partnership with Hawai‘i DOE schools to provide place-based, culture-rooted education at Ulupō Nui and Makali‘i. Each year, we serve thousands of students—many of whom are Native Hawaiian—through hands-on learning experiences grounded in ‘ike kupuna, environmental stewardship, and community responsibility. Our work alongside our Complex Area Superintendent (CAS) has been instrumental to the success of these partnerships.

The current complex area structure has allowed for strong vertical alignment between elementary, middle, and high schools in our region. Through collaboration with our CAS, we are able to coordinate programming across grade levels, align learning experiences with DOE priorities, and ensure that students encounter scaffolded, meaningful educational opportunities as they move through the system.

We are seeing tremendous benefits in our community as a result of this structure:

- Greater coordination between schools
- Increased access to ‘āina-based learning opportunities
- Stronger alignment between DOE educators and community partners
- Clear communication channels between principals, teachers, and regional leadership

The CAS structure provides accessible, place-based leadership that understands the unique cultural and geographic context of our schools. That relationship has allowed community organizations like ours to build trust, respond quickly to school needs, and co-create educational programming that strengthens both academic achievement and student identity. Restructuring the DOE by repealing complex areas and replacing them with an unspecified number of districts introduces uncertainty and risks disrupting effective systems that are currently working. Educational reform should be driven by demonstrated need and supported by clear evidence that proposed changes will improve student outcomes. At this time, we are seeing strong collaboration and tangible impact under the existing structure.

Our concern is that large-scale administrative reorganization may divert focus from classrooms and partnerships, weaken regional relationships that have taken years to build,



# KAULUAKALANA

*Navigating Towards a Hopeful Future*

and create instability for students and educators who benefit from continuity in leadership. Kauluakalana strongly believes that educational success in Hawai'i is strengthened when regional leadership remains close to community, culturally grounded, and relational. The current complex area model has enabled that work in our region.

We remain committed to working collaboratively with the Department of Education to strengthen educational outcomes for our shared communities.

For these reasons, we respectfully urge you to defer this measure.

Mahalo for the opportunity to provide testimony in support of strong, community-connected public education.

Respectfully,

Kaleo Wong  
Executive Director  
Kauluakalana

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:38:05 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Michael Zalopany	Individual	Oppose	Written Testimony Only

Comments:

**BILL: SB 3334, Relating to Education Elimination of Complex Area Superintendent Positions**

**POSITION: Opposition & Comments**

**Aloha Senator Donovan M. Dela Cruz, Chair & Senator Sharon Y. Moriwaki, Vice Chair:**

**I am expressing my opposition to SB 3334. Eliminating Complex Area Superintendents (CAS) would be removing a foundational part of Hawaii’s Department of Education. This would create a leadership vacuum within the HODOE. The CAS provides leadership at the complex level, allowing schools’ systems to run efficiently and effectively in their complex areas. Removing the CAS would be like driving an automobile with a leaky break line. The leadership at the CAS level, ensures student successes and addresses their unique needs while giving their communities a strong voice. Don’t remove the brake fluid; keep supporting all our CAS.**

**Additionally, removing Hawaii’s regional leadership, (Complex Area Superintendents) creates a direct threat by centralizing power in Honolulu. For rural complexes like Nanakuli-Waianae and for our colleagues on the Neighbor Islands, a centralized structure ignores our unique geographic, cultural, and socio-economic challenges. This bill risks creating a hyper-centralized system that lacks accountability to the specific communities it is meant to serve.**

**For these reasons, I urge the Committee to hold SB 3334 and maintain the regional leadership structure that ensures our schools, teachers, and students receive the specialized support they require. Mahalo for the opportunity to testify.**

**Respectfully,**

**Michael G. Zalopany  
Roosevelt High School**

**Vice Principal -**



## **TESTIMONY IN OPPOSITION to Senate Bill 3334, SD1**

*Relating to the Department of Education: Superintendent, Complex Area Superintendents, Principal Selection, School Community Councils*

Committee on Ways and Means (WAM)

Hearing: February 25, 2026

Submitted by: Deborah Bond-Upson, Kaneohe, Hawai'i

Chair and Members of the Committee:

I submit this testimony in opposition to SB 3334 SD1. This bill proposes to simultaneously dismantle the Complex Area Superintendent structure, replace it with an unspecified number of new "districts" whose design and function are left entirely to DOE rulemaking, and transfer 50% of principal evaluation authority to School Community Councils — with the Superintendent holding final appointment power over principals statewide. Each of these provisions is problematic on its own. Together, they represent a fundamental restructuring of Hawai'i's public education system without the data infrastructure, the organizational coherence, or the community capacity to support it.

### **I. The Bill Proposes to Dismantle the CAS Structure Without a Plan**

SB 3334 SD1 would repeal all 15 Complex Area Superintendent positions and replace them with a new, unspecified district structure — leaving the number of districts, their boundaries, their staffing, and their functions entirely to DOE rulemaking. The bill provides no transition plan, no timeline, no funding mechanism, and no organizational blueprint for how these new "districts" would actually operate.

This is not a minor administrative change. Complex Area Superintendents currently hold statutory authority over student reconstitution recommendations, student restraint reviews, vandalism and discipline appeals, student exclusion decisions, early learning program oversight, and — centrally — the hiring and support of principals. Eliminating these positions while leaving their replacement to future rulemaking means schools, families, and staff would face an extended period of structural uncertainty precisely when the system most needs stable leadership and clear accountability.

The CGCS report did recommend reducing the number of hierarchical layers and streamlining decision-making — but it did so in the context of a *carefully managed, multi-year redesign* of HIDOE's organizational structure, not an abrupt legislative elimination of a critical middle tier. Disrupting the CAS function before the district has the data systems, performance metrics, and communication infrastructure to manage without it is not reform. It is destabilizing.

### **II. This Bill Ignores the CGCS Report's Most Urgent Findings**

In December 2024, Superintendent Hayashi requested a high-level organizational review from the Council of the Great City Schools, one of the nation's most respected peer-learning organizations for large urban school systems. The CGCS team found that HIDOE suffers from:

- Fragmented, siloed data systems with too many disparate technology platforms, duplication of effort, and no unified data governance
- No coherent performance management infrastructure — no system-wide KPIs, no data warehouse, no common formative assessment
- Unclear roles and responsibilities at every tier of the three-level system, with staff who often did not understand how their work connected to student outcomes
- Operational silos that prevent collaboration, produce conflicting guidance to schools, and slow decision-making

The CGCS explicitly recommended that HIDOE *consolidate* fragmented data and technology systems into a unified platform, *establish* cross-functional data governance, *build* a research and evaluation capacity, and *reduce* structural complexity in a deliberate, sequenced way. SB 3334 SD1 does none of this. Instead, it proposes to eliminate the CAS layer — one of the few structural anchors connecting state policy to school-level practice — while the underlying data and accountability infrastructure remains broken.

It is deeply ironic that the Senate Education Committee moves to restructure the district's organizational chart while the systems that would allow any new structure to actually function — integrated data, clear KPIs, coherent communication channels — remain fragmented, underfunded, and siloed. You cannot reorganize your way to effectiveness without first building the information architecture that makes accountability possible.

### **III. Act 51 of 2004 Created the Framework — But Its Community Pillars Have Not Been Adequately Supported or Accountable**

To understand what is at stake in SB 3334, it is essential to recall the legislative intent of the Reinventing Education Act of 2004, known as Act 51. That landmark legislation established a coherent, interconnected framework for school improvement built on five pillars:

1. The Weighted Student Formula (WSF) — a funding equity mechanism that allocates dollars based on student need, giving Hawai'i one of the most equitable school funding distributions in the nation
2. Information technology investments — direct technology funding to schools to support instruction and management
3. Principal empowerment — through the Hawai'i Principals Academy and expanded site-based decision-making authority
4. School Community Councils — to provide structured community voice in school governance and planning
5. Parent-Community Networking Centers (PCNCs) — school-based family engagement hubs designed to connect families, volunteers, and community to the work of schools

Two decades later, the WSF remains a genuine achievement — Hawai'i continues to rank among the most equitable funding systems in the country. But the community engagement pillars of Act 51 have been quietly hollowed out:

- SCCs, as documented throughout this testimony, are meeting inconsistently, failing to post required minutes, and in too many schools lack adequate support and training.
- PCNCs, which were envisioned as robust school-based family engagement centers, have in many schools devolved into a single part-time coordinator position working only 17–19 hours per week — wholly insufficient to build the sustained family-school-community partnerships Act 51 intended.

SB 3334 proposes to assign consequential new duties — principal evaluation — to SCCs that are already under-resourced, while doing nothing to restore the PCNC infrastructure that was meant to support the very family engagement these councils require to function well.

### **IV. Act 51's Technology Decentralization Has Created a Data Crisis**

Act 51's principal empowerment provisions directed significant technology funding to individual schools rather than to the district — a deliberate choice at the time to give principals control over their instructional technology environments. In 2026, that decentralization has produced a serious unintended consequence: HIDOE is now at risk of data loss and system failure because district-level data infrastructure has been chronically underfunded while schools — which should not, in the modern technology environment, bear primary responsibility for managing complex data systems — have been left to manage fragmented platforms without the technical capacity to do so safely or effectively.

The CGCS report documents this directly: HIDOE has "too many disparate technological systems, duplication of efforts, lack of cohesive guidance, lack of effective progress monitoring," and overlapping reporting and visualization tools across units. The solution is not more school-level technology autonomy — it is a well-funded, centrally governed data and technology infrastructure that serves every school, complex area, and state office from a unified platform. This requires *increasing* investment at the district level, not dismantling the district's organizational capacity.

### **V. What a Spot-Check of 20 School Websites for Required SCC Posting of members, agendas, minutes**

As part of preparing this testimony, I conducted a spot-check of 20 HIDOE school websites — spanning high schools, middle schools, and elementary schools across O'ahu, Maui, Hawai'i Island, and Moloka'i — to determine whether each school's SCC page was findable, whether minutes were posted, and what the most

recent evidence of activity was. The results were initially alarming, but the process of verifying and correcting my findings revealed something more important than simple non-compliance.

When correct URLs were identified, most schools are genuinely making good-faith efforts to comply with HRS §302A-1124. However, SCC reporting was often difficult to find, not up to date, or difficult to follow.

Of 20 schools verified:

 Compliant — SCC Page + Minutes Posted (12 of 20 — 60%)

School	Island	Level	SCC URL
Farrington High	O'ahu	High	<a href="http://farringtonhighschool.org/scc/">farringtonhighschool.org/scc/</a>
Kaimuki High	O'ahu	High	<a href="http://sites.google.com/k12.hi.us/khsscc/home">sites.google.com/k12.hi.us/khsscc/home</a>
Hilo High	Hawai'i	High	<a href="http://hilohs.k12.hi.us">hilohs.k12.hi.us</a>
Mililani High	O'ahu	High	<a href="http://mililanihs.org/apps/pages/scc">mililanihs.org/apps/pages/scc</a>
Moloka'i High*	Moloka'i	High	<a href="http://molokaihighschool.org/apps/pages/...scc">molokaihighschool.org/apps/pages/...scc</a>
Waimea High*	Hawai'i	High	<a href="http://waimeahigh.org/apps/pages/...scc">waimeahigh.org/apps/pages/...scc</a>
King Intermediate	O'ahu	Middle	<a href="http://king.k12.hi.us/parents-community/family-engagement-page">king.k12.hi.us/parents-community/family-engagement-page</a>
Waiākea Intermediate	Hawai'i	Middle	<a href="http://waiakeainter.org">waiakeainter.org</a>
Kailua Elementary	O'ahu	Elementary	<a href="http://sites.google.com/k12.hi.us/kailua/home">sites.google.com/k12.hi.us/kailua/home</a>
Helemano Elementary*	O'ahu	Elementary	<a href="http://helemano.k12.hi.us/apps/pages/...scc">helemano.k12.hi.us/apps/pages/...scc</a>
Hahaione Elementary	O'ahu	Elementary	<a href="http://hahaionees.k12.hi.us/.../school-community-council-scc">hahaionees.k12.hi.us/.../school-community-council-scc</a>
Momilani Elementary*	O'ahu	Elementary	<a href="http://momilani.k12.hi.us/support/school-community-council">momilani.k12.hi.us/support/school-community-council</a>

\* Exemplary pages — multiple years of minutes, bylaws, or rosters posted

 Partial — SCC Page Exists But Minutes Incomplete or Absent (7 of 20 — 35%)

School	Island	Level	Issue
Kalaheo High	O'ahu	High	Google Doc link present; no organized minutes
Kapolei High	O'ahu	High	Last documented meeting in 2025; not current
Kahuku High & Int.	O'ahu	High/Middle	Next mtg Mar 10, 2026; minutes "to be posted"
Maui High	Maui	High	SCC page exists; no minutes visible
Highlands Intermediate	O'ahu	Middle	Agenda only from Nov 4, 2025; no minutes
Waiākeawaena Elementary	Hawai'i	Elementary	Community Engagement page active; no minutes
Ha'aheo Elementary	Hawai'i	Elementary	Last posted minutes: March 2022

**✗ Non-Compliant — No Accessible SCC Content (1 of 20 — 5%)**

School	Island	Level	Issue
Kihei Elementary	Maui	Elementary	SCC page returns no content

**VI. Related Finding: HIDOE Has No Centralized URL Directory**

The most significant discovery from this spot-check is not about SCC compliance per se — it is about public transparency and access. My initial checks flagged multiple schools as non-compliant or having broken websites because I was using incorrect or outdated URLs. Every one of those findings was corrected once the right URL was identified — often only through direct knowledge or additional searching.

HIDOE maintains no centralized, authoritative, up-to-date public directory of school website URLs and SCC page locations. A parent, a legislator, a journalist, or a community member trying to independently verify whether their school's SCC is meeting and posting minutes has no reliable starting point. This is itself a transparency and accountability failure — and it is precisely the kind of fragmented information infrastructure the CGCS report identified as a system-wide problem requiring urgent attention.

Four schools in this spot-check deserve recognition as positive models of what SCC compliance looks like and what all schools should be expected to replicate:

- Moloka'i High — four consecutive years of Annual Agenda/Minutes matrices linked and organized by school year
- Waimea High — bylaws posted, multiple years of meeting notes and slides, clean navigation
- Helemano Elementary — nine consecutive years of agendas and minutes linked via organized Google Drive folders, SY 2017-18 through SY 2025-26
- Momilani Elementary — full named member roster, Q1-Q3 minutes already posted for SY 2025-26, most recent meeting February 4, 2026

The HIDOE should publish and maintain a verified, current master directory of all school website URLs and SCC page locations — and should recognize and replicate the practices of model schools — before assigning SCCs the additional high-stakes responsibility of evaluating principals.

**VII. SCCs Cannot Yet Carry the Full Weight This Bill Places on Them**

Even with a more encouraging compliance picture than initially found, the bill's core SCC provisions remain premature. Making SCC evaluations worth 50% of a principal's overall assessment and giving the

Superintendent final appointment authority rests on assumptions that all SCCs are functioning, trained, and equipped to exercise high-stakes personnel judgment consistently and fairly.

The DOE's own 2022 self-assessment survey found that only 56.3% of SCCs reported regularly posting agendas or minutes — and that student members had "little or no understanding" of their council's responsibilities. The 7 partially compliant schools in this spot-check — including one whose last posted minutes are from 2022 — demonstrate that meaningful gaps remain even among schools making genuine efforts. SCCs already hold underutilized authority under BOE Policy 500-19, including the right to request waivers from state policies and collective bargaining provisions — yet this power goes largely unused because the foundational capacity is absent. Adding principal evaluation authority before that foundation is solid is premature.

### **VIII. Key Steps to Advance our Schools Delivery of Excellent Education to our Students and Families**

Before the Legislature restructures the district, the following foundational steps must come first:

1. Fund and implement the CGCS recommendations for data system consolidation, unified technology governance, and a district-level data warehouse before any organizational restructuring is attempted
2. Require HIDOE to publish and maintain a centralized, verified, current public directory of all school website URLs and SCC page locations
3. Restore the PCNC program to its Act 51 intent — adequately staffed and resourced as genuine family engagement infrastructure, not a 17–19 hour per week part-time position
4. Publicly audit all 238 SCCs for compliance with existing HRS §302A-1124 requirements and publish results centrally and annually
5. Restore dedicated DOE staffing for SCC support, training, and compliance monitoring
6. Require structured, mandatory training for all SCC members — including on the waiver process, the Academic and Financial Plan, and principal evaluation criteria — before new responsibilities are assigned
7. Design any CAS restructuring transparently — with a detailed transition plan, defined district boundaries, staffing models, cost estimates, and full stakeholder engagement — not through post-enactment rulemaking

The Legislature created Act 51's framework in 2004 with a coherent, interconnected vision. Twenty-two years later, its equity achievements — especially the Weighted Student Formula — are real and worth protecting. But its community engagement and technology provisions have been underfunded and allowed to weaken. The answer is not to pile new responsibilities onto structures that are under-resourced, nor to dismantle the organizational layer connecting state vision to school reality. The answer is to invest in the foundational infrastructure — data systems, community capacity, and transparent public access — that Act 51 always required and that HIDOE has never fully had.

I respectfully urge the Committee to hold or substantially amend SB 3334 SD1.

Mahalo for your consideration.

Deborah Bond-Upson  
Kaneohe, Hawai'i

**TESTIMONY OF JUSTIN S. N. MEW**

44-Year Employee, Hawai'i Department of Education  
27-Year School Administrator  
Honolulu, Hawai'i

**TO:** Senate Ways and Means Committee

**RE:** SB 3334 (2026 Regular Session) – Relating to Education

**POSITION:** Strong Opposition

**HEARING DATE:** February 25, 2026

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Chair and Members of the Committee,

Aloha and thank you for the opportunity to testify in **strong opposition** to SB 3334.

I submit this testimony as a 44-year employee of the Hawai'i Department of Education and a 27-year school administrator who has served our public schools across multiple phases of reform and restructuring. My perspective reflects both long-term institutional knowledge and daily operational experience.

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## **I. Repeal of the Complex Area Superintendent Position**

SB 3334 proposes to repeal the Complex Area Superintendent (CAS) position. I respectfully urge the Committee to reconsider this action.

Hawai'i operates the only single, statewide public school district in the nation. Within this structure, the CAS serves as a critical layer of leadership that:

- Provides direct supervision and professional evaluation of principals
- Ensures instructional coherence across elementary, middle, and high schools within a complex
- Aligns state-level policy with school-level implementation
- Oversees compliance with federal and state mandates
- Supports crisis response, safety oversight, and operational accountability
- Understands the specific cultural and geographic context of each community

Eliminating the CAS position would not streamline the system; rather, it would centralize authority in a way that distances leadership from schools and overextends the capacity of the Superintendent.

In a geographically diverse state such as Hawai'i, localized leadership is essential for coherence, responsiveness, and accountability.

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## **II. School Community Councils and Principal Evaluation**

SB 3334 would allow School Community Councils (SCCs) to submit principal evaluations to the Superintendent with fifty percent (50%) account for the overall evaluation in the selection of a principal.

While SCCs play a valuable advisory and governance role, they are not trained evaluators of school leadership. SCC members are typically non-educators and do not receive formal training in:

- Instructional leadership standards
- Administrator evaluation frameworks
- Legal and regulatory compliance requirements
- Collective bargaining agreements
- Student privacy and due process protections

Principal evaluation requires professional expertise and familiarity with:

- Instructional leadership expectations
- Data-driven school improvement
- Special education and civil rights compliance
- Budget management and procurement
- Personnel supervision
- School safety protocols

Allowing untrained bodies to contribute formal evaluation input risks:

- Subjectivity over professional standards
- Politicization of school leadership
- Inconsistent application across schools
- Erosion of due process protections

Principals are required to make complex and sometimes unpopular decisions in the best interest of students and compliance with law. Evaluation systems must preserve professional integrity and stability.

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### **III. Governance and System Stability**

This bill combines:

- Removal of an intermediate supervisory structure (CAS), and
- Introduction of evaluation input from untrained advisory bodies (SCCs),

while centralizing appointment authority in the Superintendent.

This restructuring risks weakening clear lines of supervision and accountability within an already complex statewide system.

Structural changes of this magnitude should be approached with caution and broad stakeholder consultation, including principals, complex area superintendents, teachers, and community representatives.

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## **Conclusion**

For these reasons, I respectfully urge the Committee to defer SB 3334.

Our students deserve stability.

Our schools require coherent leadership.

Our principals must be evaluated by trained educational professionals.

Mahalo for the opportunity to provide testimony.

Respectfully submitted,

**Justin S. N. Mew**

44-Year Employee, Hawai'i Department of Education

27-Year School Administrator

Honolulu, Hawai'i

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

Thank you for the opportunity to submit testimony. I am writing today primarily to express my strong support for retaining our Complex Area Superintendent (CAS) positions and to respectfully state my opposition to the provisions in SB 3334 SD 1 that seek to eliminate them.

The CAS model is uniquely suited to Hawaii's single statewide school district because it builds a crucial bridge between the state level and our local communities. A Complex Area Superintendent oversees a high school and its direct feeder middle and elementary schools. This "complex" model ensures that K-12 curriculum, community initiatives, and student support services are perfectly aligned as a child grows up in their specific neighborhood. Eliminating the CAS position in favor of broader "District Superintendents" will disconnect leadership from the localized, community-specific needs of our feeder schools.

Furthermore, I have deep concerns regarding SB 3334 SD 1's provision to make the School Community Council (SCC) evaluation account for 50% of a principal's selection. While community input is vital, selecting a principal requires extensive professional expertise in educational leadership and human resources—skills that a CAS is specifically trained to utilize. Placing 50% of the hiring weight on a volunteer council could inadvertently introduce bias, conflicts of interest, and inconsistency into the hiring of our most critical school leaders.

While I oppose the structural changes in SB 3334 SD 1, I would like to express my strong support for the other bills on today's agenda, which will directly benefit our students, teachers, and communities:

- Support SB 2549 SD 1: Student transportation is a crisis in many of our districts. Holding nonperforming bus contractors accountable, imposing penalties, and requiring updates to the legislature is a necessary step to ensure our kids can safely and reliably get to school.
- Support SB 2687 SD 1: Piloting a 100th Infantry Battalion history curriculum honors our local heroes and provides our high school students with an invaluable, place-based understanding of Hawaii's unique contributions to world history.
- Support SB 2877 SD 1: The Student-Authored Book Publication Pilot Program in Kalihi is a wonderful initiative that will empower 5th graders, foster a deep love for literacy, and give students a tangible sense of pride in their writing.
- Support SB 2391 SD 1: Providing annual salary step increases for public and charter school teachers is essential for retention. Our teachers deserve fair, predictable compensation for their satisfactory service and dedication to our keiki.

In conclusion, I urge the committee to protect the localized leadership provided by our Complex Area Superintendents by amending or deferring SB 3334 SD 1, and I humbly ask for your support in passing SB 2549, SB 2687, SB 2877, and SB 2391.

Thank you for your time, your service, and the opportunity to testify.

Sincerely,

Brynn Alcain

To: The Senate Ways and Means Committee

From: Daryl Agena, Principal of Kapolei Middle School

Date: February 24, 2026

RE: **Testimony in Strong Opposition to S.B. No. 3334, S.D. 1 – Relating to Education**

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Aloha Everyone,

I am writing to express my firm **opposition** to S.B. No. 3334, S.D. 1. As a school principal, I am deeply concerned that this bill replaces a successful, mentorship-based leadership model with a rigid, high-stakes bureaucracy that threatens the stability of our school communities.

### **The CAS: A Lifeline for New Principals**

In my first few years as a principal, my **Complex Area Superintendent (CAS)** was my most critical support system. The transition into school leadership is a steep climb; while peer support is valuable, we cannot constantly lean on other principals who are managing their own unique campus crises.

The CAS fills this gap by serving as a dedicated "thought-partner" who:

- **Provides Specialized Guidance:** They help troubleshoot "unexpected situations" and resolve day-to-day operational issues that are unique to each campus.
- **Builds Leadership Capacity:** They provide frequent, actionable feedback focused on instruction and data analysis.
- **Acts as a "Buffer":** They protect principals from external distractions, allowing us to focus on teaching and learning.

### **Concerns Regarding S.B. No. 3334, S.D. 1**

#### **1. Destabilizing Principal Evaluations**

Section 18 of the bill mandates that the School Community Council (SCC) evaluation shall account for 50% of the overall evaluation in the selection of a principal. While stakeholder feedback is vital, elevating it to 50% of a high-stakes evaluation is dangerous.

- **Risk of Retaliation:** This structure allows a small group of "irate parents or teachers" to disproportionately influence a principal's career based on personal grievances or unpopular but necessary academic decisions.

- **Loss of Professional Oversight:** Currently, the CAS mediates accountability so principals experience support in their growth. This bill strips away that professional nuance in favor of a potentially volatile popularity contest.

## 2. Erosion of Localized Support

The bill repeals "complex areas"—the natural alignment of high schools and their feeder schools—and replaces them with broad "districts".

- **Generic Leadership:** A District Superintendent overseeing a larger area cannot provide the "one-on-one" mentorship required to address the "individual challenges, strengths, and ideas" of every unique school.
- **Top-Heavy Bureaucracy:** The bill adds multiple "Deputy District Superintendents" and administrative staff, diverting resources away from the frontline support currently provided by the CAS.

## Conclusion

Principals need a partner who understands their school's unique DNA, not a distant supervisor or an evaluation system vulnerable to localized politics. My CAS provided the stability I needed to lead effectively. S.B. No. 3334, S.D. 1 threatens to leave school leaders—especially those new to the role—isolated and without the specialized protection they need to serve their students.

For these reasons, I respectfully request that you **defer** S.B. No. 3334, S.D. 1.

Thank you for your consideration.

# TESTIMONY BEFORE THE SENATE COMMITTEE ON WAYS AND MEANS

RE: SB3334, SD1 – RELATING TO THE DEPARTMENT OF EDUCATION

DATE: February 24, 2026

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Dear Chair Donovan Dela Cruz:

My name is Lehua Brown, and I serve as the Complex Academic Officer (CAO) for the Kaimukī–McKinley–Roosevelt Complex Area. I am writing to express my continued and strong opposition to SB3334, SD1.

While the Senate Draft 1 attempts to provide clarity by establishing "District Superintendents" and "Deputy District Superintendents," these amendments remain a disservice to the Hawai'i Department of Education (HIDOE), its 22,000+ employees, and, most importantly, the students and communities we serve.

My opposition is based on over 25 years of experience as a teacher, vice principal, district educational specialist, and CAO. Based on this tenure, I believe SB3334, SD1 poses the following risks:

## 1. Dismantling the K-12 “Complex” Continuity

The shift from "Complex Area" to "District" leadership is largely semantic and fails to address the loss of the **Complex Area model**. The current model allows for a high degree of responsiveness to a specific group of feeder schools (the "Complex"). Reverting to a broader District-level hierarchy dilutes the specialized, localized support that principals rely on for daily operations, emergency management, and instructional coaching. High Schools and their feeder schools will be forced from their current educational pathways into a larger district wide model that does not take into account the geographic and cultural nuances of our diverse island communities.

## 2. Deepening the Operational Bottleneck

Despite the introduction of District Superintendents in SD1, the bill still centers an unsustainable amount of final authority—specifically regarding principal hiring and the transmission of evaluations—within the Office of the Superintendent.

- **Scope of Oversight:** The Superintendent cannot effectively serve as the final arbiter for nearly 300 K–12 principals, while also managing Community Schools for Adults (CSAs) and Alternative Learning Centers.
- **Impact on Employees:** This centralization will inevitably lead to administrative delays in hiring and performance feedback, leaving our school leaders in a state of professional limbo and demoralizing the workforce.

### 3. Inadequate Role for School Community Councils (SCCs)

SD1 continues to push for an expanded role for the SCC in the formal evaluation and hiring process. While stakeholder voice is vital, the SCC is a volunteer body. Expecting them to navigate the complexities of collective bargaining, Hawaii Revised Statutes, and pedagogical standards without professional HR training is an unfair burden on our community members and a liability for the Department.

### 4. Direct Negative Impact on Students

When leadership structures are destabilized, the "trickle-down" effect hits the classroom:

- **Loss of Consistency:** The "Complex" model ensures that a student's journey from elementary to high school is vertically aligned. Breaking this structure risks fragmented transitions for our learners.
- **Slower Crisis Response:** By removing the local CAS layer, the distance between a school-level crisis and a decision-maker increases, potentially compromising student safety and school stability.

### Conclusion

SB3334, SD1 offers a solution in search of a problem. Our current structure was designed to bring the Department closer to the schools; this bill moves it further away. By centralizing authority and creating a more detached district hierarchy, we are doing a disservice to the educators who lead our schools and the families who trust us with their children's future.

I respectfully urge the Committee to **reject SB3334, SD1**.

Mahalo for the opportunity to provide testimony and for your commitment to Hawai'i's public education system.

Respectfully submitted,



Lehua Brown,  
Complex Academic Officer  
Kaimukī–McKinley–Roosevelt Complex Area

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**SB-3334-SD-1**

Submitted on: 2/24/2026 10:50:37 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Catherine Lott	Individual	Oppose	Written Testimony Only

Comments:

I am writing to strongly oppose bill SB3334.

I work in a complex area that has a very strong Complex Area Superintendent. My CAS is a very integral part of our schools. She is very visible and supportive and provides us with continuity across all of our schools. Without her support for our principals and the lens of what is needed to support our very rural area, we would not be making such strong gains.

I have also served on the school community council for more than 7 years as a parent representing the community. I can fully tell you that the parents and the community members DO NOT know nor understand the needs of the schools. They cannot make decisions for what is best and cannot decide who should principal. That idea is absolutely a farce.

This decision to remove the CAS and put the decisions at the state level will hurt our rural schools.

please vote this measure down.

sincerely,

Catherine Lott

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:51:22 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Errol Hahn	Individual	Oppose	Written Testimony Only

Comments:

I rise in opposition to SB 3334 which eliminates the Complex Areas and Complex Area Superintendents and to change both to Districts with District and Deputy Superintendents. To return to what is already known to be a cumbersome decision making structure makes not sense at all!.

I have served in the Military for over 20 years. I have served in the DOE for 28 years. I have been elected in the Neighborhood Board for my community and participated in numerous charitable activities as a volunteer. I remebered the DOE having Superintendents and Deputy Superintendents for districts in my earlier days. The organization at that thime was relatively inefficient in regards to quick decision-making and support to the community. Academic achievement were amongst the lowest performing in the Nation. It was quite frequent as a community member and parent then... when just recently retiring from the Military... that parents as well as community members could see or speak to the District Superintendent. Were were often referred to a staff member ...or the Deputy and had no speedy resolutions or decisions to the commuity concerns...simply because our concern had to be adjudicated by an over worked District Superintendent...who was rarely available to deal with public challenges.

Later the DOE restructered the Districts and broked districtis into more manageable areas and assigned a Complex Area Superintendent. This immediately enhanced the decision making authority and increase responsiveness to the community at large. Community Concerns were more quickly addressed and access to someone with decision authority was made available. The CAS position is vital for in connecting to our community here in Central District. To revert back to a old paradigm of District Superintendents is absurd.

I also was in the DOE throughout the inception of schools having a School Community Council (SCC). These are made up of volunteers who have the time or an agenda to participate. The enactment of this Senate bill would only weaken the ability of the DOE to select qualified and forthright individuals to be Principals, overseeing our children in school. CASs do currently include members from all role groups to participate in selecting excellent people for DOE schools. Procedure is fair and honest. Giving 50% rights to select principals is unwise as some SCCs members would push forth their own agenda with out "Professional Prowess" to select. The CAS must have final decision making authority as he/she and the principals will be ..and are entrusted with the safety of our children and their education. Additionally, as a SCC member, I know we had a chance to rate our Principal at our school.

I do have more to share. I am hoping the Senate does not return to the PAST...but move towards the future. Streamlining decision making authority through effective structures are vital to the success of our children in Hawaii. More of our children are becoming successful today than in the past.

Again, I am strongly opposed to SB 3334.

Respectfully,

Errol Hahn,

LTC, USA (Retired)

Retired DOE Teacher, Administrator

Former Neighborhood Board Member

Former SCC Member

Parent and Grandparent

Date: 02/25/2026

Time: 10:55 AM

Location: 211

Committee: WAM

Department: Education

Person Testifying: Sabrina Feliciano

Title of Bill: SB3334 SD1 RELATING TO EDUCATION

Position: OPPOSE

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

Thank you for your dedicated support of our public school system. I am writing to you as a school principal to express my **strong opposition to SB 3334**. While the bill aims to streamline administration, repealing the Complex Area Superintendent (CAS) position would effectively dismantle the most critical leadership bridge principals have, leaving us isolated and our schools destabilized.

To me, a CAS is not an "administrative layer"; CASs are a vital advocate, an essential thought partner, and a lifeline. I urge you to consider the following:

- **A Crucial Leadership Bridge:** In a single-district system as massive as ours, the CAS prevents the Department of Education from becoming a distant, unresponsive bureaucracy. My CAS understands the unique cultural and socio-economic heartbeat of my specific community. She takes our unique situations and supports us in meeting critical needs. CASs translate high-level state mandates into actionable, local strategies, ensuring that my school isn't just a number, but a supported environment.
- **The Principal's Essential Sounding Board:** The role of a principal has grown increasingly complex, requiring us to navigate everything from chronic absenteeism to post-pandemic mental health crises. My CAS is the person I call for immediate, personalized counsel. Whether it is a veteran principal seeking a strategic partner or a newer leader needing mentorship, the CASs provide the objective, "on-the-ground" feedback that ensures we meet statewide standards and are serving our students,

families, and communities effectively. The CASs hold us accountable to doing what is right for our schools.

- **Immediate Advocacy in Times of Need:** When an emergency strikes or a facility safety issue arises, I cannot wait for a response from a distant central office overseeing 250+ schools. My CAS is my most immediate and reliable advocate. Removing CASs would create an insurmountable span of control, diluting the support and responsiveness that schools depend on for a safe learning environment.
- **Preserving Local Accountability:** The CAS currently serves as a vital first line of appeal for parents and students. Eliminating this local oversight would result in a massive bottleneck at the state level, delaying resolutions and eroding the trust our families have in the system.

Efficiency is a noble goal, but it should not be achieved by severing the connection between our schools and state leadership. We need our CASs to act as the "helping hand" that allows us to lead effectively.

Furthermore, SB 3334 suggests that School Community Councils play a role in principal evaluations—a move I find highly inappropriate. Effective leadership requires an objective evaluation from a supervisor, like a CAS, who understands the complexities of the role. When subordinates are tasked with evaluating their supervisor, the process is instantly compromised by the risk of bias or retaliatory claims. This undermines the trust necessary for authentic professional development and replaces objective oversight with a system vulnerable to personal agendas."

I respectfully urge this committee **not to pass SB 3334**. Please protect the current structure and leadership that keeps our schools anchored and supported.

Sincerely,

Sabrina Feliciano

Principal, Pu'uhale Elementary School

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:54:55 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Je Ann Williams	Individual	Oppose	Written Testimony Only

Comments:

Honorable Chair, Vice Chair, and Members of the Committee,

Aloha! My name is **Je Ann Williams**, and as a **Vice Principal** here in our beautiful islands, I appreciate the opportunity to share my perspective and respectfully offer my opposition to SB3334 in favor of keeping our leadership close to home. Our current Complex-Area model is one of our greatest strengths, and as an administrator, I see how much our students benefit when our supervisors truly know our campuses; whether we are navigating AI in the classroom or supporting student mental health, having a leader who is just a phone call away and intimately engaged with our unique communities makes all the difference. Moving back to a large "District" model risks stretching our leaders too thin and diluting the personalized support we rely on to thrive. Furthermore, I have concerns regarding the proposal for School Community Councils (SCCs) to evaluate principals, as evaluations work best when they come from a place of professional objectivity; because the SCC includes the very teachers and staff a principal leads, asking them to evaluate their supervisor can create unnecessary tension that detracts from our shared mission. We all want what is best for Hawai'i's keiki, and I believe the best way to support them is by maintaining the strong, localized, and professional support system we have already built. Mahalo for your hard work and for considering the "boots on the ground" perspective of our school administrators; I kindly ask you to **defer SB3334**.

Warmly,

**Je Ann Williams** Vice Principal

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:55:52 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Miki K. Tomita Okamoto	Individual	Oppose	Written Testimony Only

Comments:

I am writing in opposition of SB3334. Our HIDEOE Complex Area Superintendents provide critical services and supports to their Complex and individual schools as well as staff and students.

Person testifying:                   Evangeline G. Casinas

Date:                                    February 24, 2026

Title of Bill:                         SB 3334 SD1 RELATING TO EDUCATION

I am writing to strongly oppose SB 3334 SD1. This bill as currently drafted proposes changes to the structure of the Hawai'i State Department of Education. It repeals the Complex Area Superintendent and establishes three more positions. Further, it is vague.

While the goal of streamlining administration is understandable, the elimination of the CAS position would create a severe bottleneck at the top level. School principals require prompt, decisive support for personnel issues, crisis response, and student safety. A single Superintendent cannot provide over 250 principals with the immediate, high-level attention that a dedicated CAS offers.

The Department had a deputy superintendent role previously and this bill seeks to eliminate the CAS role, revive the district deputy superintendent with a focus on academics AND add more deputy superintendents to an undefined number of districts?

Beyond crisis management, CAS Hauge from the Nanakuli-Wai`anae Complex Area ensures operational stability and family support by:

- Translating the Department's strategic plan into actionable complex area goals.
- Providing timely approvals and critical feedback on school-level decisions.
- Building leadership capacity and maintaining a localized system of support.
- Deploying complex area resources during a crisis.
- Implementing family engagement events to distribute and connect families to resources.

The CAS role is a middle layer lifeline of support for our school leaders, families, and students. Repealing this role from the law and establishing new positions without a clear plan is costly and will lead to confusion and neglect at the campus level.

Respectfully, I ask the committee to oppose SB 3334 SD1.

## Written Testimony

February 24, 2026

TO: Senate Ways & Means Committee  
Person Testifying: Jeffrey Shitaoka  
RE: SB3334 SD 1 Relating to Education  
Position: Oppose  
Hearing Date: 02/25/2026

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

I am writing in strong opposition to SB 3334.

As a principal in the Hawai'i Department of Education, I welcome open and constructive discourse on improving public education in our state. Civil discourse among our citizens is healthy for our communities, our schools, and much needed in our democracy.

I oppose SB 3334 because I view the removal of Complex Area Superintendents in favor of District Superintendents and Deputy District Superintendents as being less responsive to the diverse needs of our schools. Each Complex Area is unique and the current structure that includes leadership from the Complex Area Superintendents is responsive and is not a system that needs to be restructured.

Thank you for providing a venue for me to share my testimony.

Kind regards,



Jeffrey Shitaoka  
Principal, Niu Valley Middle School



**STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
CAMPBELL - KAPOLEI COMPLEX AREA**

**TO:** Chair Senator Donovan M. Dela Cruz, Vice Chair Senator Sharon Y. Moriwaki  
**TIME:** 10:55 AM  
**PLACE:** Conference Room 211 & Video Conference  
State Capitol  
415 South Beretania Street  
**TESTIFIER:** Noel Hakoda, Ed.D., M.Ed., M.Ed.T., TA School Renewal Specialist, Campbell-Kapolei  
Complex  
**POSITION:** OPPOSITION AND COMMENTS

Aloha Chair Dela Cruz and Vice Chair Moriwaki,

As a former high school science teacher, Vice Principal at both secondary and elementary levels, and current TA School Renewal Specialist for the Campbell-Kapolei complex area, I strongly oppose SB 3334.

Though the primary intent of SB 3334 is to "eliminate provisions that have created unnecessary administrative burdens and unclear authority structures", it will not. By replacing Complex Area Superintendents with a District and Deputy District Superintendent, it dilutes the multi-faceted administrative support provided to schools by Complex Area Superintendents. Furthermore, it does not directly address the concerns brought into discussion from the Education Committee on February 13, 2026.

Complex Area Superintendents and offices are able to provide personalized support for schools and Principals from a whole child perspective. They provide multifaceted and specialized support to Principals and schools. By assigning "a superintendent for academics for each district and one or more deputy superintendents for each district to provide support and leadership with school operations and administration", it fractures this necessary support that is currently provided by Complex Area Superintendents from a multi-disciplinary approach and moves away from the "whole child" perspective.

Thank you for taking the time to review this testimony and consideration of the voices of those who work in concert with our Complex Area Superintendents.

Respectfully,

A handwritten signature in black ink, appearing to read "Noel Hakoda".

Noel Hakoda, EdD  
TA School Renewal Specialist  
Campbell-Kapolei Complex Area  
Hawai'i Department of Education

**SB-3334-SD-1**

Submitted on: 2/24/2026 11:29:05 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Mitchell Wendorff	Individual	Oppose	Written Testimony Only

Comments:

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

**FROM:** Mitchell Wendorff; Vice Principal of Iao Intermediate

**DATE:** 2/24/26

**SUBJECT:** STRONG OPPOSITION to SB 3334 – Relating to Education

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

I am writing to express my **strong opposition to SB 3334**, which proposes to eliminate the positions of Complex Area Superintendents (CAS) and fundamentally restructure the Hawai‘i Department of Education. I urge the committee to instead recognize and support the vital role that Complex Area Superintendents play in the success of our public school system.

The current Complex Area structure is designed to provide localized, responsive leadership. Complex Area Superintendents serve as the critical bridge between the state-level Department of Education and the individual needs of our schools, students, and families.

**Localized Oversight:** Unlike a centralized district model, the CAS structure allows for leadership that is deeply familiar with the specific cultural, geographical, and socioeconomic contexts of their schools—whether in urban Honolulu, rural Maui, or West O‘ahu.

**Principal Support and Accountability:** The CAS provides direct mentorship and evaluation for school principals. Eliminating this role would create a massive administrative gap, leaving principals without the necessary support systems to manage daily academic and operational challenges.

**Concerns Regarding SB 3334**

While the bill is framed as a way to "streamline bureaucracy," it risks doing the exact opposite:

1. **Weakened Oversight:** Removing the CAS layer removes the most immediate level of accountability for school performance.

2. **Centralization of Power:** Shifting more authority over principal hiring to the state superintendent—as proposed in the bill—distances the decision-making process from the communities that those schools serve.
3. **Disruption to Progress:** Our schools are currently focused on recovering from learning losses and advancing career-readiness programs. A total structural overhaul at this time would be an unnecessary and costly distraction.

## **Conclusion**

Complex Area Superintendents are not just "bureaucrats"; they are the boots-on-the-ground leaders who ensure our schools are safe, our teachers are supported, and our students are meeting high standards. Rather than repealing these roles, we should be empowering them with the resources they need to continue their work.

For these reasons, I respectfully request that you **hold SB 3334**.

Mahalo for the opportunity to testify.

Sincerely,

Mitchell Wendorff

Vice Principal of Iao Intermediate in Wailuku, Maui.

## **Testimony in STRONG OPPOSITION to SB 3334, SD1**

To: Senate Committee on Ways and Means (WAM)

Hearing Date: February 25, 2026

Measure: SB 3334, SD1 – Relating to Department of Education Reorganization

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

I am Sabrina Fallejo Uganiza and have the honor of serving as the Complex Area Human Resource Officer for the Pearl City-Waipahu Complex Area. I am writing to express my strong opposition to SB 3334. As an employee working directly under the supervision of Complex Area Superintendent (CAS) Richard D. Fajardo, I can state with certainty that the CAS position is not a "bureaucratic layer." The CAS is the vital backbone and bridge of and to our 18 schools.

The CAS is integral to the daily function and long-term growth of our schools and students. In my experience with CAS Fajardo, I have directly witnessed a level of leadership that cannot be replicated by a centralized state office. CAS Fajardo, and all CASs, make the difficult yet necessary decisions to ensure every school and classroom is safe and led by capable, high-level individuals committed to Hawai'i and our students. He deliberately and wholeheartedly guides the 18 schools of Pearl City-Waipahu toward a unified goal of excellence and intentionality through long-term growth initiatives that are yielding tangible, positive results.

I strongly urge this committee to defer this bill based on critical operational and fiscal concerns. SB 3334 proposes a massive overhaul of the HIDOE hierarchy during a period of fiscal uncertainty. The cost of dissolving the Complex Area structure to create new "Districts" is a significant expenditure that provides no direct benefit to the classroom. This is a deliberate waste of taxpayer-funded progress. This bill destabilizes local oversight and completely shifts final authority for principal appointments and evaluations which removes local accountability. CAS Fajardo knows his schools, his students, and the community he serves. He does not take his role or responsibility lightly nor does he ever forget who he works tirelessly for, *our students*.

More importantly, removing the CAS position and restructuring the Complex Area creates an incredibly dangerous delay in addressing urgent safety and personnel issues. In my position, I know the importance of effective leadership and that it requires being on the ground to manage the complexities of a workforce serving thousands of students. SB 3334 replaces this vital presence with a distant bureaucracy, increasing the State's liability and risking the stability of our learning and working environments.

In conclusion, SB 3334 is an expensive and disruptive solution to a problem that does not exist in our complex. We have sound, wholehearted leadership that keeps our students safe and our schools growing. Removing the CAS position is a short sighted, harmful decision that will cause immediate and everlasting harm to the Pearl City-Waipahu community, schools, and students.

**I strongly urge the Committee to DEFER SB 3334.**

Thank you for the opportunity to provide written testimony.

Respectfully submitted,



Sabrina Fallejo Uganiza, Ph.D.

Complex Area Human Resource Officer, Pearl City-Waipahu

**Department: Waikoloa Elementary and Middle School**

**BILL: SB 3334, Relating to Education** Elimination of Complex Area Superintendent Positions

**TESTIFIER: Michelle Barber**

**POSITION: OPPOSITION AND COMMENTS**

Aloha Chair Delacruz, and Members of the Ways and Means Committee:

I am writing to express my opposition to SB 3334. While I understand the intent to reduce "administrative burdens," this bill fails to recognize the essential regional leadership that Complex Area Superintendents (CAS) provide—particularly for rural and underserved communities.

**Opposition to SB 3334**

**1. Erosion of the Tri-Level Leadership Framework:** The CAS is not merely an administrative layer; they are the vital conduit connecting individual school needs with state-level initiatives. Eliminating this position severs the communication link between the individual schools and the Department of Education's central leadership. Without a CAS, our schools risk becoming "islands of operation," lacking a cohesive regional strategy or a direct line of advocacy at the state level.

**2. Lack of Structural Detail and Increased School-Level Burden:** Section 17 of the bill is dangerously vague regarding how CAS duties would be reassigned. The current proposal fails to provide a concrete structure to replace the CAS. I am deeply concerned that this lack of detail will result in the school level being more heavily burdened with administrative responsibilities while simultaneously having fewer resources and less regional support to manage them.

Hawaii Island in particular is very large geographically and although our population is not as large as Oahu, the distance alone would make it difficult for less than three people to lead. Waikoloa is already geographically isolated from other communities and I am concerned that this would further isolate us from leadership.

**3. Improper Expansion of School Community Council (SCC) Authority:** The bill proposes giving SCC evaluations a 50% weight in principal selection. I oppose this shift for several reasons:

- **Expertise vs. Advocacy:** As noted by HPAC, SCC members often speak from the perspective of emotional advocates rather than education experts. While community input is vital, a 50% weight allows non-professional sentiment to override pedagogical and administrative merit.
- **Integrity of Evaluation:** This shift bypasses the professional evaluation currently facilitated by the CAS. Without regional oversight, the selection process risks being

disrupted by a small number of vocal individuals rather than focusing on professional competence.

- **Contractual Conflicts:** This creates a "de facto" hiring power for SCCs that contradicts existing labor agreements.

**4. The Necessity of Regional Scale and Expertise:** Hawaii's single statewide school district is unique and massive. In the continental U.S., districts are significantly smaller and more localized. It is functionally impossible for a single Superintendent to effectively manage all 250+ schools without the localized expertise of CASs who understand the unique needs of their complex areas. Eliminating the CAS is not a streamlining of bureaucracy; it is a disregard for the sheer scale of our educational system.

**5. Risk of "Honolulu-Centric" Governance:** Removing regional leadership threatens to centralize power entirely in Honolulu. For rural complexes like those of us on the Neighbor Islands, a centralized structure ignores our unique geographic, cultural, and socio-economic challenges. This bill risks creating a hyper-centralized system that lacks accountability to the specific communities it is meant to serve.

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## Conclusion

For these reasons—the lack of structural clarity, the potential for overwhelming school-level staff, and the erosion of expert-led regional leadership—I urge the Committee to **hold SB 3334**. We must maintain a regional leadership structure that ensures our schools, teachers, and students receive the specialized support they require.

**Mahalo for the opportunity to testify.**

Respectfully,



Michelle Barber

Waikoloa Elementary and Middle School Principal

Aloha Chair, Vice Chair, and Members of the Committee:

My name is Jessica Barbera, and I am a public school teacher in Hawai'i. I am submitting testimony in opposition to SB 3334 because I am deeply concerned about how this bill would affect school leadership, teacher support, and ultimately student learning.

From a teacher's perspective, strong, stable leadership matters. Complex Area Superintendents play a critical role in supporting principals, aligning instructional priorities, and ensuring consistency across schools. When systems, initiatives, or expectations change, CAS support helps principals translate policy into practice in a way that protects teachers from constant shifts and mixed messages. Eliminating this position risks creating fragmented leadership and placing additional strain on principals, which inevitably flows down to teachers and classrooms.

I am also concerned about the proposal to significantly increase the role of School Community Councils in principal evaluations and selection. While family and community voice is important, personnel decisions require professional expertise in instruction, evaluation, labor agreements, and educational law. Teachers rely on principals who are selected and supported using consistent, transparent, and evidence-based criteria. Varying expectations from school to school could lead to inequities, instability, and decisions driven more by popularity or short-term pressures than by instructional leadership.

Additionally, teachers are already navigating increasing demands such as curriculum shifts, assessments, intervention requirements, and staffing shortages. This bill risks adding more instability to an already stretched system by changing leadership structures without clearly strengthening instructional support for schools. When leadership is unclear or unsupported, teachers often absorb the impact through increased workload, unclear expectations, and reduced instructional focus.

From the classroom, these leadership changes are not abstract; students feel them directly. When leadership is inconsistent or unsupported, services such as intervention, special education coordination, and schoolwide instructional initiatives become less cohesive, affecting students who rely most on stable systems and consistent expectations.

For these reasons, I respectfully urge the Committee to hold SB 3334 and engage educators directly in conversations about how to strengthen, not dismantle, leadership systems that support teachers and students across Hawai'i.

Mahalo for the opportunity to share my perspective.

Respectfully,

Jessica Barbera

**SB-3334-SD-1**

Submitted on: 2/24/2026 12:27:30 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Francine Fernandez	Individual	Oppose	Written Testimony Only

Comments:

**Thank you for the opportunity to testify in opposition to SB3334, HD1.**

**This testimony reflects the perspective of experienced leaders who have worked under both the former district structure and the current complex area structure. Based on that experience, we believe eliminating the Complex Area Superintendent (CAS) position would recreate many of the structural challenges the Department previously worked to address.**

**SB3334, HD1, would significantly expand the number of schools overseen at the district level. When one leader is responsible for too many schools, responsiveness suffers. Schools are not identical. Each has different student needs, staffing realities, and community concerns. Effective leadership requires being on campus, understanding local context, and being available when problems arise. A larger span of control can make timely oversight more difficult, delay response, potentially compound the initial concern, and may be misinterpreted as dismissive.**

**The CAS role is not simply another administrative layer. It is the level of leadership that works most directly with school principals. CASs mentor principals, help resolve staffing and budget issues, respond to community concerns, and evaluate principal performance. That work requires time, attention, and regular interaction with schools. If responsibility is stretched across too many campuses, oversight becomes less meaningful and more reactive.**

**Principals today manage complex operations: student safety, staffing shortages, parent concerns, compliance requirements, and academic performance. In difficult situations, whether a personnel issue, a community conflict, or an emergency, the CAS is often the first call. Removing this role does not eliminate the need for leadership; it shifts that responsibility upward to officials who will have far more schools to oversee and less time to address each one.**

**Hawai'i operates a unique statewide system without separate local districts. The complex area structure provides an important bridge between individual schools and central leadership. Eliminating it risks creating a gap between schools and decision-makers, while increasing the workload of district leaders beyond what is manageable.**

**This measure is intended to streamline the system. However, expanding the span of control at the district level may reduce accountability rather than strengthen it. When leaders are responsible for too many schools, they inevitably become less accessible and less effective.**

**For these reasons, particularly concerns about expanded span of control, reduced responsiveness to school communities, and weaker oversight of principals, we respectfully urge the Committee to oppose SB3334, HD1.**

**Thank you for the opportunity to provide testimony.**

# Testimony in Strong Opposition to SB 3334 SD1

**To:** Chair, Vice Chair, and Members of the Committee

**From:** Kealii Freitas, Vice Principal, Jarrett Middle School

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

I am a sitting Vice Principal at a challenging middle school in Honolulu District. If the Principal is the Captain of the ship, the VP is the one in the engine room trying to keep the pipes from bursting while simultaneously mediating a dispute over a stolen bag of Li Hing Mui.

I write in **strong opposition** to SB 3334 SD1.

## 1. "District" is a Distance, Not a Solution

In my world, "response time" isn't a metric on a spreadsheet; it's the difference between a calm afternoon and a viral video on social media. My Complex Area Superintendent (CAS) is my direct tactical support.

SB 3334 wants to swap my CAS for a "District Superintendent for Academics." Respectfully, when I'm in the middle of a multi-student physical altercation or a serious Title IX investigation, I don't need an "Academic District" response. I need the person who knows my campus layout, my security team, and my community. Centralizing leadership into "Districts" is like trying to manage a kitchen fire by calling a corporate office in another zip code.

## 2. The Principal Pipeline: Why This Bill Stops My Career Path

Perhaps most concerning to me personally is the proposed restructuring of Principal selection. Currently, I am working toward becoming a Principal. However, seeing the proposed shift toward a more centralized, disconnected selection process gives me serious pause.

Why would a Vice Principal take the "leap" into the top seat if the support structure above them is being dismantled? We want to lead schools where we are supported by a CAS who knows our strengths, not a distant District panel that sees us as a resume in a stack of 500. By removing the localized mentorship of the CAS, this bill doesn't just change an org chart—it effectively clogs the leadership pipeline. It makes the "big chair" look less like a leadership opportunity and more like a desert island.

### 3. The "30-Minute Tour" vs. The 8-Hour Reality

This bill feels like it was written by people who have seen schools in movies but haven't been in a hallway during a passing period lately. I invite any supporter of this bill to shadow me for a full day:

- **The "Parental Feedback" Session:** Sit with me while a parent—who is understandably stressed—threatens my staff because of a bus route change or a disciplinary consequence.
- **The Crisis Response:** Watch how quickly we rely on our CAS for immediate, legal, and operational guidance when drugs or alcohol are recovered on campus.
- **The Dismissal Gauntlet:** Stand with me at the gate during a tropical downpour while 800 teenagers try to find their rides.

### Conclusion

As a VP, I deal in the "Immediate." This bill deals in the "Theoretical." Our schools need stability, clear lines of communication, and a CAS who can be on my campus in twenty minutes—not a District official who needs a GPS to find the front office. If you want us to step up and lead these schools as future Principals, don't take away the very safety net that makes the job possible.

I respectfully urge you to defer or oppose SB 3334 SD1.

Mahalo for your time (and seriously, the offer to help with middle school dismissal is always open—bring a rain jacket!).

**SB-3334-SD-1**

Submitted on: 2/24/2026 2:31:27 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kristen Ono	Testifying for DOE	Oppose	Written Testimony Only

Comments:

I am writing in strong opposition to SB3334. As a school administrator serving as a vice principal, I work daily with students, teachers, families, and district leadership. The proposal to eliminate the complex area superintendent position raises serious concerns about leadership continuity, responsiveness, and direct support for schools.

Complex area superintendents serve as an essential bridge between schools and state-level leadership within the Hawai‘i State Department of Education. They understand the unique needs of the schools within their geographic regions and provide direct, timely support in areas such as staffing, crisis response, compliance, and instructional leadership. In my role, I rely on this structure for guidance, advocacy, and collaborative problem-solving. Removing this layer of leadership would likely create gaps in communication, increase bureaucratic delays, and reduce our ability to respond quickly and effectively to student and staff needs.

School leaders are already navigating significant challenges, including staffing shortages, increasing student mental health concerns, academic recovery efforts, and growing community engagement demands. Without complex area leadership, responsibilities currently shared across multiple levels may shift downward, placing additional strain on principals and vice principals and diverting attention away from instructional leadership and student support.

Hawai‘i operates under a uniquely centralized statewide education system. Further consolidating authority at the top risks distancing decision-making from the communities directly impacted. Eliminating that structure may unintentionally weaken equity efforts rather than strengthen them, as decisions could become less informed by local conditions and needs.

For these reasons, I respectfully oppose SB3334 and hope that we can engage in deeper, collaborative discussions with school-level administrators, educators, and community stakeholders to determine how we can best serve the interests of Hawai‘i’s students.

Thank you,

Kristen Ono

Vice Principal

**SB-3334-SD-1**

Submitted on: 2/24/2026 3:29:34 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Michelle Nakamura	Individual	Oppose	Written Testimony Only

Comments:

**Aloha Chair and Members of the Hawai‘i Senate Ways and Means Committee,**

**My name is Michelle Nakamura, and I currently serve in a temporarily assigned Vice Principal position at Kauluwela Elementary School. This semester I am beginning my preparations for the HICISL Vice Principal program as I get ready for my intern year starting this summer. Because of this, I am experiencing firsthand how future school leaders are trained and supported. For these reasons, I respectfully urge you to defer or oppose SB3334 SD1.**

**The support we receive from our Complex Area Superintendent (CAS) is invaluable. The CAS is directly involved in helping develop future administrators by creating opportunities for leadership, providing guidance when we step into new roles, and ensuring we receive meaningful training experiences.**

**As candidates in the HICISL program prepare for our intern year, the CAS helps determine placements that will give us the experiences we still need. That kind of mentorship matters. I have taught in both elementary and middle school. A CAS understands that background and can help place me in a setting that expands my experience. If this responsibility shifts to a centralized system, I wonder how those decisions will be made. Will placements truly focus on developing strong leaders, or simply on filling openings?**

**Right now, while serving in a temporarily assigned VP role, I see how important it is to have someone who knows our schools and communities. When challenges arise and our principals are not available, our CAS is someone we can reach out to for guidance. They understand our students, our staff, and the realities of our campuses.**

**I work at Kauluwela Elementary School on A‘ala Street. Our school community has specific needs and challenges that require understanding and relationships. Having a direct connection to our CAS means the person supporting us already knows our complex area and our students. It is difficult to imagine the same level of support coming from someone far removed from our schools.**

**Strong schools require strong leaders, and strong leaders are developed through mentorship, relationships, and understanding of the communities they serve.**

**For these reasons, I respectfully ask that you defer or oppose SB3334 SD1 and allow more time to consider the impact this change could have on the development of future school leaders and the support systems our schools rely on.**

**Mahalo for your time and consideration.**

**Respectfully,  
Michelle Nakamura**

**TO:** Chair Donovan M. Dela Cruz, Vice Chair Sharon Y. Moriwaki, and Members of the Senate Committee on Ways and Means

**FROM:** Alison Cameron District Educational Specialist, School-Based Behavioral Health, Pearl City-Waipahu Complex Area

**RE: TESTIMONY IN OPPOSITION TO SB3334 SD1** (Relating to Education; Department of Education; Complex Areas; Districts; Superintendents)

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

My name is Alison Cameron, and I am a District Educational Specialist for School-Based Behavioral Health in the Pearl City-Waipahu Complex Area. I have served the Department of Education since 2001. I am also the parent of a recent Campbell High School graduate. I am writing to express my **strong opposition to SB3334 SD1**.

Restructuring the Department of Education by eliminating the Complex Area Superintendent (CAS) position is a solution in search of a problem. The CAS is the highest-ranking leader closest to our schools; they understand our specific community's needs in a way a centralized state office cannot. Effective leadership at the complex level allows for deep-rooted relationships with school and program administrators, ensuring close oversight and continuous improvement.

**My primary concerns regarding SB3334 SD1 are as follows:**

- **Creation of an Administrative Vacuum:** Without a CAS, our principals, program leaders, and support teams lose their primary mentor, supervisor, and direct line of support. This leaves school-level and complex area leadership isolated while managing increasingly complex operational, academic, and behavioral health issues.
- **Organizational Destabilization:** This bill replaces a proven structure with "unspecified" districts. We should not dismantle a system serving 170,000 students without a fully vetted, detailed alternative. A restructuring of this magnitude should never be undertaken in a rushed manner; the resulting chaos would directly jeopardize student achievement and well-being.
- **Fiscal Irresponsibility and Unknown Costs:** While this bill may be framed as a cost-saving measure, the long-term price is immeasurable. Restructuring the entire DOE during a budget cycle is an inefficient use of taxpayer funds. Furthermore, because the bill leaves the number of districts "unspecified," the Committee is being asked to approve a massive administrative shift without a clear price tag or analysis of the resulting overhead.
- **Erosion of Local Voice:** This measure centralizes the authority to appoint principals to the State Superintendent. This effectively sidelines School Community Councils and the local leaders who best understand the unique culture and requirements of our neighborhood schools.

Every complex area has its own culture, and it is vital to have leadership that lives and breathes that culture. I strongly urge the Committee to **hold this bill** and prioritize stability for our students, staff, and school/complex area leaders.

Mahalo for the opportunity to testify and for your consideration of these serious concerns.

Sincerely,

Alison Cameron  
Alialoha125@yahoo.com

SB3334

How does this bill improve the system structure?

It is very confusing why this bill is changing Complex Area Superintendents to District without identifying districts. Political districts?

It is unclear how this system structure would be any better than what currently exists.

What were you thinking? At the Education Committee meeting only one person came forward from Donna Kim's district and member of the school community board (SSC) complaining about her Complex Area Superintendent.

One Complex Area Superintendent is getting replaced by (1) Superintendent of Academics and (1) or more Deputy Superintendents. Yet there isn't a plan on how this would be implemented. These positions are appointed by the Superintendent of Education. Is this Keith or another position?

Annual performance reviews will be done by the Board of Education. Why? The BOE meets once a month and does not interact with these positions.

Section 6 deletes the definitions of "complex", "complex area", and "complex superintendent". However does not

include the "district" definitions. Only district has a definition.

How is this going to work? 50%

Each school community council shall:

(3) Participate in principal selection and evaluation, and transmit any [such] evaluations to the [~~complex area~~]-district superintendent; provided that the school community council's evaluation shall account for fifty per cent of the overall evaluation in the selection of a principal; provided further that the superintendent of education (Keith?) shall have final authority to appoint a principal; and

Section 13 Salaries. How does this work?

deputy superintendent, assistant superintendents, [~~complex area~~] district superintendents[-], and deputy district superintendents. The salaries of the deputy superintendent, assistant superintendents, [~~and complex area~~] district superintendents, and deputy district superintendents, shall be set by the board; provided that the salaries of the deputy superintendent, assistant superintendents, [~~and the complex area~~] district superintendents, and deputy district superintendents shall not exceed the superintendent's salary."

**SB-3334-SD-1**

Submitted on: 2/24/2026 6:46:03 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Alice Luck	Testifying for Hee Coalition	Oppose	Written Testimony Only

Comments:

HE'E writes in opposition to this bill to repeal the Complex Area Superintendent (CAS) positions.

HIDOE is the only single, statewide public school system in the nation. As such, schools require meaningful, localized support from their Complex Areas in addition to guidance from the state office. This structure is consistent with other states that operate with a central office and local school districts to ensure schools receive responsive, place-based leadership. Eliminating CAS positions would remove a critical layer of support that connects schools to the broader system while remaining grounded in the realities of their communities.

Our Complex Areas encompass diverse communities with unique cultural, geographic, and socioeconomic contexts. Effective leadership must understand and respect the local culture and the distinct strengths and challenges of each community. A centralized, state-level approach cannot adequately address the nuanced needs of schools across such varied regions. Complex-level leadership allows schools to work collaboratively within their geographic and cultural communities to develop solutions tailored to their students, rather than relying on a one-size-fits-all model.

If the intent of this bill is to create greater effectiveness and oversight of the CAS role, eliminating the position would create more harm than good. Instead, the Legislature could consider establishing complex area councils to strengthen accountability at the complex level. Such councils would provide structured engagement with parents, educators, and community members, ensuring that Complex Areas remain responsive and transparent while preserving essential support for schools.

Accountability should exist at the level where collaboration and problem-solving occur. Holding schools accountable solely at the state level risks disconnecting decision-making from the communities most affected. A complex-based accountability structure allows schools and CAS leadership to work together to identify challenges, share resources, and implement solutions that are tailored to their specific contexts.

With respect to critiques that CAS may lack “personal insight into school-level issues necessary to find effective solutions,” the appropriate response is not to eliminate the role but to strengthen it. The Department should prioritize selecting CAS candidates with demonstrated experience and

strong relationships within their school communities and provide the leadership development necessary for them to succeed.

The Coalition acknowledges that HIDOE faces serious systemic issues, some of which may require thoughtful reorganization. However, the proposal before you does not advance that necessary discussion in a productive way. Instead, it would eliminate the first line of coordinated, community-connected support for our schools and undermine efforts to create responsive, culturally grounded, and collaborative solutions.

For these reasons, we respectfully urge you to oppose this bill.

**SB-3334-SD-1**

Submitted on: 2/24/2026 8:50:29 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Deborah K Namohala (Kalei)	Individual	Oppose	Written Testimony Only

Comments:

**Testimony in STRONGEST OPPOSITION to Bill 3334**

**To: HEARING COMMITTEE ON BILL 3334**

**Date:** February 24, 2026

**Subject:** OPPOSITION to Bill 3334 – Relating to Education

I am writing to express my strong opposition to Bill 3334. I believe this legislation represents a significant step backward for our education system.

While I understand that some complexes may be facing challenges, and certain Senators feel the schools in their specific districts are struggling, Bill 3334 is not the correct solution. Dismantling a system that is currently working in many areas is counterproductive.

In many of our communities, the Complex Area Superintendent (CAS) model is highly effective. It allows schools to flourish through localized leadership and tailored support. By destroying a structure that works, we risk undermining the success of our highest-performing schools and districts rather than fixing the specific issues found elsewhere.

We should focus on providing targeted support to struggling complexes without disrupting the areas where students and educators are currently thriving. I urge the committee to vote **NO** on Bill 3334.

**SB-3334-SD-1**

Submitted on: 2/24/2026 10:06:51 PM

Testimony for WAM on 2/25/2026 10:55:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Bryceton Carvalho	Individual	Oppose	Written Testimony Only

Comments:

**Testimony in Strong Opposition to HB 3334**

**Submitted by: Bryceton W. K. Carvalho**

The proposed restructuring of the Hawaii Department of Education through HB 3334 represents a step backward for leadership, accountability, and community-focused education. While the bill aims to improve efficiency, it ignores the foundational purpose of the Complex Area Superintendent (CAS) position: to provide localized oversight that bridges the gap between state-level mandates and the unique needs of individual school communities. Eliminating this structure will not streamline the department; instead, it will create an administrative bottleneck that sacrifices educational effectiveness for a negligible reduction in personnel.

Moving from 15 Complex Area Superintendents to a system of potentially seven District and seven Deputy District Superintendents, 14 total, offers no meaningful improvement in organizational efficiency. It does, however, create an unsustainable span of control for the proposed District Superintendents. By consolidating oversight, this bill places an undue burden on leadership, slowing down critical decision-making processes and removing the direct support system that principals currently rely on to manage their campuses. Efficiency is not found in simply renaming positions; it lies in maintaining a manageable leadership ratio that enables responsive, agile governance.

Furthermore, the shift to a district-based model threatens to erase the unique cultural and socioeconomic identities of Hawaii’s diverse communities. Complex areas are intentionally designed to reflect the shared values of the student populations they serve. A district-wide model is too broad to honor these nuances, forcing vastly different communities into a single, diluted leadership bucket. For example, a district-wide approach cannot effectively address the specific challenges of a community like Kalihi while also managing one like Hawaii Kai. Although both communities fall within the Honolulu District, they have very different needs and values. The current complex model is superior because it ensures that leadership remains rooted in the immediate reality of the neighborhood rather than the larger district.

This loss of precision extends to data and accountability. By moving toward a district structure, reporting becomes overly general, risking the masking of the struggles of at-risk populations. In the current complex structure, data is gathered and analyzed in smaller, more reflective groups. This allows decision-makers to identify specific gaps and allocate resources with precision.

Transitioning to a broader district lens will marginalize our most vulnerable students, as their specific needs will be lost in the aggregate data of a much larger, less cohesive group.

Finally, the proposal to increase the School Community Council's (SCC) role in principal evaluation and selection to 50% is fundamentally flawed. Although the SCC currently plays an important role in the principal and school accountability process, many schools struggle to maintain consistent participation on their SCC boards. Additionally, there is a significant risk that these boards will be influenced by personal agendas rather than professional standards. Because the principal is the most impactful leader on a school campus, their selection and evaluation must remain an objective, professional process led by a qualified Superintendent. Without CAS oversight, we lose the safeguard of fair and objective leadership selection. To protect the integrity of our schools and the success of all students and staff, I strongly urge this committee to oppose HB 3334.

**SB-3334-SD-1**

Submitted on: 2/25/2026 8:04:28 AM

Testimony for WAM on 2/25/2026 10:55:00 AM

Submitted By	Organization	Testifier Position	Testify
Kaleo K.	Individual	Comments	Written Testimony Only

Comments:

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

While the perspectives of principals and DOE leadership are important, I respectfully ask that you also consider the voices of those working directly with our keiki every day.

Many teachers who are face-to-face with students, along with numerous parents, support meaningful DOE reform. While they may not always submit formal testimony, they are speaking out — particularly on social media and in public comment sections. A quick look at posts or news articles about the DOE reveals hundreds of firsthand accounts describing how the current system is falling short for our students and families.

In my own experience, the CAS from our district has not been transparent about policies and has often been unresponsive, while DOE leadership frequently deflects questions if they respond at all. While the CAS may be helpful to principals, families often experience **a lack of access, communication, and support.**

To ensure both leadership structure and community accountability, I respectfully offer the following **amendments for consideration:**

- Place **DOE-nominated CAS candidates on the ballot** for each respective area to allow community input.
- Require a **DOE representative to regularly attend Neighborhood Board meetings** to directly address community concerns.
- Establish a **DOE 311-style system** to track, document, and provide transparency regarding community concerns and resolutions.
- Allow **Kaipuni schools to have their own dedicated CAS** to address the unique and ongoing needs of Kaipuni communities, as proposed in HB1496.
- Require the BOE to include a **standing “Community Concerns” agenda** item at its meetings, ensuring that parents and community members have a clear and consistent opportunity to voice their concerns.

Mahalo for the opportunity to testify and for your consideration of these amendments.