



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

Date: 03/18/2026

Time: 01:00 PM

Location: CR 229 & Videoconference

Committee: EDU

Department: Education

Person Testifying: Keith T. Hayashi, Superintendent of Education

Title of Bill: HB2344, HD1, RELATING TO SCHOOL FACILITIES.

Purpose of Bill: Establishes a temporary, independent Public School Realignment and Closure Commission to develop and recommend a comprehensive package of school consolidations, realignments, and closures based on the federal Base Realignment and Closure model. Requires an expedited approval process by the Governor and Legislature. Appropriates funds. Effective 7/1/3000. (HD1)

Department's Position:

The Hawai'i State Department of Education (Department) offers comments on House Bill (HB) 2344, H.D. 1.

The Department acknowledges that enrollment has been on a steady decline of approximately 1% annually. It is important to emphasize that school enrollment has not only been declining, but has been shifting as new housing developments have rapidly grown in certain communities. The Department's mission has tremendously evolved over the years– and how space is utilized to meet the mission has changed as well. For example, many school spaces are used for various programmatic and student support purposes, e.g., career and technical education, family resource centers, transition centers, food pantries, health centers, etc. Therefore, the Department feels it is important for student learning to be a critical priority in any school consolidation process.

Recommendations and Considerations:

1. The Department recommends the following in Section 2 of the bill:

1. In subsection (c), line 18, remove "department of education" from the list of ineligible entities to serve on the commission, to conform with the amendment made by the House Committee on Education to include an educational administrator on the Commission (page 3, lines 12-13).
2. That subsection (f)(1)(D) be reworded to "Equity considerations, examination of student learning and equity, including the impact of a potential consolidation, realignment, or closure on students, particularly to students most vulnerable."

2. The Department has concerns regarding the implementation timeline in Section 3, "the board of education and department of education shall take all necessary actions

to implement the commission's approved recommendations pursuant to section 2 (k) no later than July 1, 2028." Depending on the recommendations of the commission, the Department may potentially require more time in order to ensure appropriate transitions for students, especially those most vulnerable, and personnel matters which may have collective bargaining implications.

Department Approach on School Consolidation

Section 302A-1129, Hawai'i Revised Statutes, authorizes the Board of Education (Board) to open and close schools. Chapter 8-38, Hawai'i Administrative Rules (HAR), Consolidation of Public Schools, sets forth criteria and a process for closing schools, referred to as "consolidation."

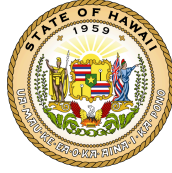
The Department is in the process of school consolidations under the requirements of Chapter 8-38, HAR. The Department's approach to school consolidation prioritizes its commitment to student learning and equity. A core value of the process is to ensure that equitable access to resources and opportunities are available for all students, particularly those most vulnerable. The Department acknowledges the fiscal savings considerations that are examined in school consolidation processes, and seeks to balance the fiscal exercise alongside an examination of student opportunities and outcomes.

In alignment with Chapter 8-38, HAR, the Department developed a timeline and phased methodological approach to identifying clusters of schools to be recommended to be studied for potential consolidation. In March 2025, the Department presented to the Board a timeline and approach to conducting a school consolidation study, which began with extensive stakeholder feedback that took place between Fall 2024 to Summer 2025. This engagement included discussions with principals in each of the state's 15 complex areas, former leads and staff during previous school consolidations, and experts and staff from other states that conducted school consolidations. There were common themes raised:

1. Concerns with the timeline and ensuring that teachers and staff would have ample time and opportunity to apply for transfers in the event their school was selected for consolidation, and to allow students and families ample transition time.
2. Maintaining a connection to the school upon its closure. Hawai'i high school graduates, perhaps more than most states, have a strong connection to their schools - it is often part of their identity. Teachers, administrators, and staff also develop a strong connection to their schools. If a school were to close, people have expressed the desire either for something to commemorate the school, or for the school facility/property to be used for a community purpose.
3. Recognition that while there is a steady decline in enrollment statewide, there are areas where the population is growing and schools are running out of space to accommodate the need.

Thank you for the opportunity to testify and offer comments on HB2344, H.D. 1.

JOSH GREEN, M.D.
GOVERNOR



ROY M. TAKUMI
CHAIRPERSON

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

Senate Committee on Education
Wednesday, March 18, 2026
1:00 p.m.
Hawaii State Capitol, Room 229

Measure: House Bill 2344 HD1, Relating to School Facilities

Purpose of Measure:

Establishes a temporary, independent Public School Realignment and Closure Commission to develop and recommend a comprehensive package of school consolidations, realignments, and closures based on the federal Base Realignment and Closure model. Requires an expedited approval process by the Governor and Legislature. Appropriates funds. Effective 7/1/3000.

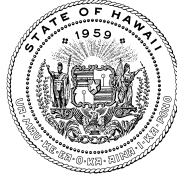
Aloha Chair Kim, Vice Chair Kidani, and Members of the Committee:

The Board of Education (Board) recognizes the intent of and approach proposed in HB2344 HD1 to optimize school facilities, and respectfully offers comments.

The Board agrees the legislation warrants further discussion. The Board also notes that the Department of Education has been steadfastly working on a process to address the downward trend in student enrollment projections—including conducting extensive stakeholder engagement in 2025—and defers to the Department for specific details on this work.

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

JOSH GREEN, M.D.
GOVERNOR
KE KIA'AINA



KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEOH-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

STATE OF HAWAII | KA MOKU'ĀINA O HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ
P.O. BOX 119, HONOLULU, HAWAII 'I 96810-0119

WRITTEN TESTIMONY
OF
KEITH A. REGAN, COMPTROLLER
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
TO THE
COMMITTEE ON EDUCATION

MARCH 18, 2026, 1:00 P.M.
CONFERENCE ROOM 229 AND VIA VIDEOCONFERENCE, STATE CAPITOL

H.B. 2344, H.D. 1

RELATING TO SCHOOL FACILITIES.

Chair Kim, Vice Chair Kidani, and members of the Committee, thank you for the opportunity to submit testimony on H.B. 2344, H.D. 1.

The Department of Accounting and General Services (DAGS) offers **comments** on H.B. 2344, H.D. 1. This measure establishes a temporary, independent Public School Realignment and Closure Commission to develop and recommend a comprehensive package of school consolidations, realignments, and closures based on federal Base Realignment and Closure model. Requires an expedited approval process by the Governor and Legislature.

The measure proposes to establish a temporary public school alignment and closure commission to be placed with DAGS. We recommend that the commission be

placed within the Hawai'i State Department of Education (DOE) under HRS §26-12 because its responsibilities which include school consolidations, realignments, and closures are fundamentally educational decisions that require alignment with statewide academic goals and student needs. The DOE oversees public school operations and policy, ensuring these actions are informed by instructional priorities and community engagement. In contrast, the DAGS under HRS §26-6 focuses on administrative and infrastructure support, which does not encompass the educational considerations essential to this proposed commission's work. Positioning the commission within the DOE promotes coherence, accountability, and trust in shaping Hawai'i's public education system.

We are also concerned that, should this responsibility be placed within DAGS, we lack the resources to be able to provide the commission with administrative support for them to fulfill the duties of the commission. A previous version of this proposal provided \$100,000 in funding but those funds were blanked out in this current version. The lack of funding combined with the lack of resources will result in DAGS not being able to fully support this commission as it would require DAGS to set aside its statutorily established mission. Additionally, even if the \$100,000 is restored, we do not believe that amount would be sufficient for a commission tasked with such a comprehensive and statewide review of public school facilities within the proposed timeframe. The commission's responsibilities include developing criteria, conducting public hearings, analyzing extensive data, and preparing a detailed report with justifications and cost estimates. These tasks typically require significant resources, including hiring experts, conducting site visits, and ensuring public engagement. Additional funding may be

necessary to ensure the commission can meet its deadline and deliver a meaningful report.

Thank you for the opportunity to provide testimony on this measure.



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 Education

Testimony by
Hawaii Government Employees Association

March 18, 2026

H.B. 2344, H.D. 1 – RELATING TO SCHOOL FACILITIES

The Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO opposes the intent of H.B. 2344, H.D. 1, which establishes a temporary, independent Public School Realignment and Closure Commission to develop and recommend a comprehensive package of school consolidations, realignments, and closures based on the federal Base Realignment and Closure model.

The Board of Education (BOE) already maintains a clear, community-centered framework for school consolidation. Chapter 8-38, Hawaii Administrative Rules, outlines the conditions that trigger a consolidation study, establishes required procedures and analytical criteria, and mandates public notice and hearings to ensure meaningful community input before any decisions are made.

The Department of Education has testified that it is currently following this established process and plans to identify schools for potential consolidation by Summer 2027. Creating a new commission at this time is unnecessary. It risks duplicating, conflicting with, or delaying the work already underway.

Thank you for the opportunity to provide testimony on H.B. 2344, H.D. 1.

Respectfully submitted,

Randy Perreira
Executive Director



www.AlohaILHawaii.org

Mar 18, 2026

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Roxanne U. Bolden

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Vice Chair

Zora Shove

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Scott Suzuki
Sheila Castaneda
Jennifer Hartssock

The Honorable Donna Mercado Kim, Chair
Senate Committee on Education
The Thirty-Third Legislature
State Capitol
State of Hawaii
Honolulu, Hawaii 96813

SUBJECT: HB2344 HD1 – Relating to School Facilities

Chair and Members of the Committee:

Aloha Independent Living Hawaii (AILH) is a statewide Center for Independent Living (CIL) serving people with all types of disabilities. **We offer comments on HB2344 HD1** and respectfully request amendments to ensure that any school consolidation, realignment, or closure process explicitly protects students with disabilities and prioritizes their rights under federal law.

HB2344 HD1 would establish a temporary, independent Public School Realignment and Closure Commission to develop a single, comprehensive list of school consolidations, realignments, and closures based on objective criteria, with an expedited “all-or-nothing” approval process by the Governor and Legislature and implementation by July 1, 2028. While we recognize the fiscal and operational pressures facing our public school system, we are deeply concerned that the bill’s current structure does not adequately center the rights and needs of students with disabilities, who make up approximately 11.3% to 11.7% of Hawaii’s public school enrollment—the lowest percentage in the nation.

Independent Living Perspective: Why School Consolidation Matters for Disabled Students

From an Independent Living philosophy, access to neighborhood public schools is a cornerstone of community integration and equal opportunity.



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School consolidation decisions have profound, long-term impacts on students with disabilities, including:

- **Transportation barriers and safety risks.** Longer bus rides, earlier pick-up times, and increased reliance on specialized transportation can make attending school physically exhausting, unsafe, or logistically impossible for students with mobility impairments, chronic health conditions, or complex medical needs.
- **Loss of continuity in services.** When schools close or consolidate, students with Individualized Education Programs (IEPs) or Section 504 plans often experience disruptions in therapies, behavioral supports, assistive technology access, and relationships with trained staff who understand their needs. Transition periods can trigger regression in skills and academic progress.
- **Violations of least restrictive environment (LRE) requirements.** Federal law under the Individual with Disabilities Education Act (IDEA) requires that students with disabilities be educated with their nondisabled peers in their home schools to the maximum extent appropriate, and removal from general education settings should occur only when the nature or severity of disability makes inclusive education unachievable even with supplementary aids and services. Consolidations that force disabled students into farther schools, reduce access to inclusive programs, or concentrate special education in separate facilities risk violating LRE.
- **Disproportionate harm to rural and underserved communities.** Many neighbor island and rural schools serve as anchors for families of students with disabilities, providing not only education but also on-site health services, family resource centers, and early intervention supports. Closure of these campuses can eliminate the only accessible, culturally grounded service hub for miles.

Research consistently shows that separating students with disabilities from their nondisabled peers in restrictive or distant settings harms academic



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and social outcomes, and that inclusive neighborhood schooling produces the strongest long-term results. Yet consolidation processes that prioritize enrollment numbers, cost per pupil, and facility utilization without explicit disability impact analysis can inadvertently replicate exclusion and segregation.

Key Concerns with HB2344 HD1 as Currently Drafted

While HB2344 HD1 includes “equity considerations, including the impact of a potential consolidation, realignment, or closure on students from disadvantaged communities” in the criteria, this language is vague and does not explicitly name disability as a protected category or require compliance with IDEA, Section 504, and the Americans with Disabilities Act (ADA). The bill also:

1. **Lacks disability representation on the Commission.** The nine-member Commission must include expertise in public finance, urban planning, real estate, education administration, or facilities management and must include one educational administrator, but there is no requirement for a member with expertise in disability rights, special education law, or Independent Living philosophy.
2. **Does not require disability impact analysis.** The criteria list enrollment trends, facility condition, cost, capacity, geographic proximity, property reuse, and equity for “disadvantaged communities,” but do not explicitly require analysis of impacts on students with IEPs, 504 plans, or other disability-related needs, nor compliance with LRE or FAPE (free appropriate public education) mandates.
3. **Provides insufficient time for meaningful transitions.** The bill requires implementation by July 1, 2028, but the Department of Education has testified that “the Department may potentially require more time in order to ensure appropriate transitions for students, especially those most vulnerable,” particularly given the need to address personnel matters with collective bargaining implications



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and to maintain continuity of specialized services.

4. **Bypasses the existing community-centered process.** Chapter 8-38, Hawaii Administrative Rules, already establishes criteria, procedures, and public notice and hearing requirements for school consolidation. The DOE has been following this process, with extensive stakeholder engagement underway since 2024 and identification of clusters planned for Summer 2027. Creating a parallel, external commission with a faster, binding timeline risks conflicting with or undermining this deliberate, community-engaged approach that centers student learning and equity.

Specific Amendment Requests

We respectfully request the following amendments to HB2344 HD1:

1. Add disability expertise to the Commission.

In Section 2(b), require that at least one Commission member have demonstrated expertise in disability rights, special education law, or disability advocacy.

2. Strengthen disability-specific impact criteria.

In Section 2(f)(1)(D), revise the equity language to explicitly state:

*“Equity considerations, including compliance with the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, and the impact of a potential consolidation, realignment, or closure on students with disabilities, including students with IEPs or 504 plans; students experiencing homelessness under the McKinney-Vento Act; students in foster care; and students in rural and underserved areas, from disadvantaged communities**; provided that the Commission shall assess whether consolidation would result in violations of the least restrictive environment requirement or loss of access to specialized supports and services.**”*



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3. Mandate consultation with disability stakeholders.

Add a new subsection in Section 2(f) requiring that:

“The Commission shall consult with the Special Education Advisory Council, disability rights organizations, Centers for Independent Living, and parents of students with disabilities during the development of criteria and prior to finalizing recommendations.”

4. Extend implementation timeline for vulnerable populations.

In Section 3, revise to:

*“The board of education and department of education shall take all necessary actions to implement the commission’s approved recommendations pursuant to section 2(k) **in a manner that ensures continuity of services for students with disabilities and other highly vulnerable student groups, including compliance with IDEA transition planning requirements; no later than December 31, 2028, or such later date as necessary to comply with federal law and collective bargaining obligations.**”*

Conclusion

School consolidation may be necessary to address enrollment decline and fiscal constraints, but the process must be designed to protect—not harm—students with disabilities. AILH urges the Committee to ensure that HB2344 HD1, if it moves forward, explicitly centers disability rights, compliance with federal law, meaningful stakeholder engagement, and sufficient time for safe, equitable transitions. We also encourage the Committee to consider whether the existing BOE/DOE consolidation process under Chapter 8-38, HAR, which already prioritizes student learning, equity, and community engagement, may be a more appropriate path forward than an external commission model.

Thank you for the opportunity to testify.

Aloha,



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Roxanne U. Bolden

Roxanne Bolden
Executive Director

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HB-2344-HD-1

Submitted on: 3/17/2026 12:32:15 AM

Testimony for EDU on 3/18/2026 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Susan Pcola_Davis	Individual	Oppose	Written Testimony Only

Comments:

I Strongly **OPPOSE**

I had to read HD1 twice. I needed to understand WHO will benefit from passage of this bill. Then I read all of the testimony from both hearings and came to the conclusion that this measure ONLY benefits School Facility Authority.

The testimonies reflect an opposition to this bill. Those that support it do not understand the "law of unintended consequences!"

Both the Department of Education and Board of Education have had agendas with this topic and have not received positive public testimony.

I agree that the BRAC process is very fallible. As a retired federal employee, the effects of consolidations have not resulted in positive returns on investment. A perfect example is the disjointed operations between Joint Base Pearl Harbor and Hickam Air Force Base. The DoD combined the Air Force with the Navy both of which have completely different missions. The results have been redundancy, inability to share resources because of their distinctness, and frustrated employees. No, you will not read this in the newspaper.

One testimony states, "The creation of a temporary commission with an expedited "all or nothing" vote would duplicate and conflict with the already established and transparent process. The federal Base Realignment and Closure model may be fitting for military base planning but it runs counter to the BOE's established requirement for community hearings and engagement.

A temporary commission detached from the existing BOE's process risks decisions that are less responsive to the local educational needs of our single statewide school district made up of many communities that are geographically isolated. A one size-fits-all efficiency model risks imposing school closures and consolidations where viable alternatives are not realistically accessible to families and school employees."

Another testimony, "This bill proposes a process to establish a comprehensive package of school consolidations, realignments, and closures based on a federal BRAC model. We are greatly concerned with applying the BRAC process to determine school consolidation, realignment, and closure. While the primary drivers for BRAC are operational readiness and savings, job loss and impact are part of its evaluation criteria. Given the limited scope of expertise...,Leaving these

decisions to individuals without an understanding of public employment and their challenges would be detrimental."

The decisions should remain with the Department of Education which takes great care in understanding the school cultures and communities. This is NOT an endeavor to be taken lightly!!

Even DAGS recognizes, "We would recommend that the Public School Realignment and Closure Commission be placed within the Hawai'i State Department of Education (DOE) under HRS §26-12 because its responsibilities which include school consolidations, realignments, and closures are fundamentally educational decisions that require alignment with statewide academic goals and student needs. The DOE oversees public school operations and policy, ensuring these actions are informed by instructional priorities and community engagement. In contrast, the Department of Accounting and General Services (DAGS) under HRS §26-6 focuses on administrative and infrastructure support, which does not encompass the educational considerations essential to this proposed commission's work. Positioning the commission within the DOE promotes coherence, accountability, and trust in shaping Hawai'i's public education system."

This bill should be deferred!