

**SB-3334-SD-1**

Submitted on: 2/27/2026 8:24:12 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Maili Costa	Testifying for Department of Education	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: 2/27/2026 9:34:36 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

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

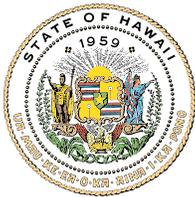
Comments:

As a school leader in Kohala, I am submitting comments with concerns.

I want to express appreciation to the Ways and Means Committee for considering the feedback provided on SB 3334 and removing areas of concern (removing CAS positions and altering the principal evaluation process). I reiterate the essential role of the West Hawaii CAS in driving continuous improvement for our West Hawaii schools. Despite her vast area of responsibility, she consistently provides immediate support and keeps our remote communities connected to vital state initiatives.

In regards to SD2, want to express concerns with the Superintendent losing managerial rights to create leadership positions within the Hawaii Department of Education and strongly oppose the Board of Education evaluating Complex Area Superintendents (the responsibility of the Superintendent).

Thank you for considering these comments with concerns.



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

HONOLULU DISTRICT OFFICE

February 27, 2026

Testimony: **SB 3334 SD 1 and 2 Comments with Concerns**

Submitted By: Linell Dilwith, Complex Area Superintendent for Kaimuki, McKinley, Roosevelt Schools

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

Thank you for taking the time to carefully consider the concerns raised regarding SB 3334 SD1. I sincerely appreciate the Committee's thoughtful revisions in SD2, particularly the removal of references to the Department's internal structure—including complex areas and districts—and the provisions related to School Community Councils' input into principal selection and evaluation. Those changes reflect that you heard and understood the operational and governance concerns expressed by educators and leaders across the state.

However, despite these important amendments, I must respectfully express continued and serious concerns with SB 3334, SD2.

First, capping the number of superintendent-level positions significantly impedes the managerial rights of the Superintendent. The Superintendent must retain the flexibility to design and adjust leadership structures in response to evolving needs, emergencies, and transitions. Artificially limiting the number of leadership positions restricts the Superintendent's ability to deploy appropriate supports where and when they are most needed.

We have seen firsthand how critical this flexibility is during times of crisis. During the Maui wildfires, for example, Maui Complex Area Superintendents required additional executive-level support to respond to unprecedented operational and instructional challenges. In times of transition—when a Complex Area Superintendent departs and a successor is preparing to assume the role—it is often necessary to designate temporary or shadow support to ensure continuity of leadership. A statutory cap undermines the ability to respond swiftly and responsibly in these situations.

Second, requiring the volunteer Board of Education to conduct written performance evaluations of each Complex Area Superintendent every two years is unnecessary, and strongly opposed. The current system of line authority—where Complex Area Superintendents report to the Deputy Superintendent of Academics—provides appropriate supervision, accountability, and individualized support. This structure allows for differentiated guidance based on the unique needs of specific schools and communities. It is both operationally sound and aligned with established governance practices.

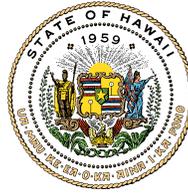
Shifting evaluation responsibilities to the Board risks blurring governance and management roles, placing an undue burden on volunteer board members, and disrupting the clarity of the existing accountability structure.

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

Finally, I strongly disagree with the provision requiring the Superintendent to provide copies of Complex Area Superintendent performance evaluations to legislators upon request. This requirement is unnecessary and represents a significant overreach. The current line authority system already ensures that any areas of concern are addressed appropriately within the Department. Mandating the disclosure of personnel evaluations to legislators compromises established supervisory processes and risks politicizing performance management.

In closing, while I appreciate the Committee's responsiveness in amending portions of the bill, SB 3334, D2 still contains provisions that unnecessarily restrict the Superintendent's managerial authority, disrupt effective governance structures, and impose new requirements that are neither operationally necessary nor beneficial to student outcomes.

Thank you for the opportunity to provide testimony.



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
HO'OKELE ELEMENTARY SCHOOL  
511 KUNEHI STREET  
KAPOLEI, HI 96707

**Date:** March 2, 2026

**Time:** 10:00am

**Committee:** WAM

**Department:** Education

**Title of Bill:** SB 3334, SD2

**Person Testifying:** Bryan Rankie

Chair Dela Cruz, Vice Chair Keith-Agaran, and members of the Committee,

I am providing testimony on the Proposed Senate Draft 2 of SB 3334 in my capacity as Principal of Ho'okele Elementary School.

First and foremost, I would like to express my sincere appreciation to the Committee on Ways and Means for listening to the feedback provided by school leaders and stakeholders. By removing the provisions regarding School Community Council (SCC) involvement in principal selection and evaluation, as well as the proposal to revert to a district-based model, you have demonstrated a high level of responsiveness to the concerns of those of us on the ground. This collaborative approach is vital to the success of our schools, and I thank you for pivoting toward a draft that preserves the integrity of school-level leadership.

However, regarding the new provisions introduced in Proposed SD2, I offer **comments with concerns** based on how these changes would impact the daily operations of my school and the broader Campbell-Kapolei Complex Area.

The proposal to mandate a statutory limit of no more than 27 individuals in superintendent or subordinate superintendent positions is deeply concerning. As the

Principal of Ho'okele Elementary, I see firsthand the immense pressure on our current leadership.

The Campbell-Kapolei Complex Area already has the highest enrollment in the State of Hawaii. With thousands of residential units still under development in our area, our student population continues to surge. Capping the number of leadership positions at the state level would effectively "lock in" a structure that is already stretched thin. It would inhibit the Department's ability to expand or potentially create a new complex area to manage the growth in West O'ahu. If our leadership is overburdened, the support that flows down to the school level is diminished, directly impacting our ability to serve our students effectively. The Superintendent must retain the managerial right to create leadership positions based on the shifting demographic needs of our islands.

In addition, proposed SD2 requires the Board of Education (BOE) to conduct written performance evaluations of each Complex Area Superintendent (CAS). I believe this is a role that should remain within the Department of Education.

In my daily work, my SCC does not work directly with the CAS. There is a risk that if external bodies or councils provide input on a CAS, their evaluation may be based unfairly on the actions of individual principals rather than the CAS's actual systemic oversight. Similarly, the Board of Education may not be positioned to witness the granular, day-to-day operational support that a CAS provides to their schools.

Just as a principal's evaluation should be handled by their direct supervisor who understands the nuances of the school, the evaluation of a CAS should be left to the Superintendent. This ensures that leadership is held accountable by those who have a full, professional understanding of the work being performed.

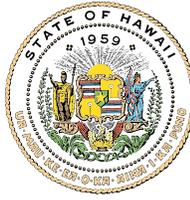
In conclusion, while I am grateful for the removal of the most problematic sections of the previous draft, I urge the Committee to reconsider the statutory cap on leadership and the shift in evaluation authority. We need a system that is flexible enough to grow with our community and an evaluation structure that is based on direct professional oversight.

Thank you for the opportunity to testify and for your continued support of our public schools.

Sincerely,

A handwritten signature in black ink, appearing to read "B Rankie". The signature is fluid and cursive, with a large initial "B" and a stylized "R".

Bryan Rankie  
Principal Ho'okele Elementary School



**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
**KA 'OIHANA HO'ONA'AUAO**  
**MAUI DISTRICT OFFICE**  
54 S. High Street, 4<sup>th</sup> Fl.  
Wailuku, HI 96793

**Date:** February 28, 2026  
**Committee:** Chair Dela Cruz, Vice Chair Moriwaki and members of the WAM Committee  
**Department:** Education  
**Person Testifying:** Rebecca Winkie, HLLM Complex Area Superintendent  
**Title of Bill:** SB 3334, SD2 Relating to Education

f

**Position: Comments with Concerns**

Thank you for hearing the voices from the field regarding SB No 3334, SD1, as indicated by the revisions found in SB No 3334, SD2, thereby preserving the current number of superintendent-level positions and removing provisions related to School Community Councils' input to principal selection and evaluation.

While the intent to increase fiscal management and administrative efficiency within the Department of Education (DOE) is a worthy goal, SB No 3334, SD2 still raises some concerns. The current proposal may not only blur the Superintendent's line of authority within his team, but it may also infringe upon the Superintendent's managerial rights to create positions as needed.

Mandating biennial performance evaluations of Complex Area Superintendents (CASs) by the Board of Education (BOE) risks establishing a dual reporting structure that could bypass the Superintendent's role as Chief Executive Officer and disrupt the chain of command. The existing departmental process is effective and ensures that CASs receive meaningful performance evaluations that support their critical role in bridging the gap between state-level strategy and school-level implementation while also providing daily, localized assistance to complex area schools.

Statutory caps on superintendent-level positions may impose legislative limits that constrain the DOE's capacity to adjust its leadership structure in a timely manner, particularly when facing unforeseen circumstances or transitions, e.g., being able to appoint a temporary Deputy CAS when needed. This lack of staffing flexibility would prevent the DOE from providing necessary interim support and smooth transitions in leadership, ultimately impacting the stability and effectiveness of complex area operations and services provided to schools.

For the Department to operate efficiently and effectively, the Superintendent must maintain clear authority over his team. I respectfully encourage the committee to consider other ways to achieve these goals without limiting the current executive structure or establishing new statutory mandates on the Department of Education.

Thank you,

Rebecca Winkie  
Complex Area Superintendent  
Hāna-Lahainaluna-Lāna'i-Molokai



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

**Senate Committee on Ways and Means  
Monday, March 2, 2026  
10:00 a.m.  
Hawaii State Capitol, Room 211**

**Measure: Senate Bill 3334 Proposed SD2, 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 offers comments on the proposed SD2 for Senate Bill 3334.

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

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

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

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

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

**Date:** Monday, March 2, 2026

**Time:** 10:00 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, SD2 RELATING TO EDUCATION

Position: COMMENTS AND CONCERNS

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

I would like to express my sincere appreciation to the Ways and Means Committee for thoughtfully considering the concerns raised in SD1. The revisions in this second version reflect a clear commitment to listening, collaboration, and crafting legislation that better supports our schools and students.

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

I would also like to offer some perspective on the provision establishing a statutory cap of 27 "superintendent-level positions." While I understand and appreciate the intent to promote efficiency and accountability, a fixed cap could unintentionally limit the State Superintendent's ability to respond to emerging needs or evolving organizational demands. Effective leadership structures must remain adaptable to changing circumstances, and statutory limits may reduce the flexibility necessary to meet future challenges.

On a personal note, I greatly benefited from serving as a deputy complex area superintendent prior to assuming the complex area superintendent role. That transitional experience provided invaluable preparation for the responsibilities I now carry. A rigid cap could limit similar leadership development pathways for future superintendents, ultimately affecting succession planning and long-term system stability.

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

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

Ernest Muh  
Complex Area Superintendent  
Leilehua–Mililani–Waialua Complex

**SB-3334-SD-1**

Submitted on: 2/28/2026 8:53:39 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

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

Comments:

Date: February 27, 2026

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

Department: Education

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

**Title of Bill: SB 3334, SD2 Relating to Education**

**Position: Comments with Concerns**

Thank you for considering the perspective of educators on SB No 3334, SD1, as evident on the revision to SB No 3334, SD2. While I support the intent to increase fiscal and administrative efficiency within the Department of Education, I am concerned that the current proposal of SB 3334, SD2, inadvertently risks undermining the superintendent’s executive authority and, ultimately, disrupting the operational effectiveness of our public school system.

At the core of the issue is the proposed changes to leadership management. Under the Hawaii State Constitution, the Board of Education (BOE) appoints the superintendent to serve as the chief executive officer. By mandating that the BOE conduct the biennial performance evaluations of Complex Area Superintendents (CAS) and imposing statutory caps on leadership positions, the bill creates a critical disconnect.

Shifting evaluative authority away from the superintendent fractures the chain of command. Leaders cannot be held accountable for the performance of their team if they do not maintain the authority to manage, evaluate, and direct their subordinates. Furthermore, embedding personnel constraints into statute limits the Department’s ability to be agile and responsive to the evolving needs of the system, schools and students.

Complex Area Superintendents serve as the vital link between state-level strategy and school-level implementation. The role is a delicate balancing act: CASs supervise principal performance, drive K-12 instructional alignment, build leadership capacity and stakeholder

engagement, and manage specialized areas such as special education and alternative learning. Beyond these duties, CASs oversee fiscal operations, ensuring budgets are managed with integrity and strategically allocated to support student achievement and operational safety. Because the BOE is removed from these daily realities, it may lack the context of individual school needs within a complex and the larger complex area and is therefore not positioned to provide the specialized, actionable feedback this multifaceted role requires.

Effective management requires the superintendent to maintain clear authority over their team. I respectfully suggest that the committee consider alternative paths to efficiency that honor our existing executive structure and avoid mandates that could hinder the daily operations of our schools.

Thank you for your time and service to public education.

**Date:** Monday, March 2, 2026

**Time:** 10:00 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: COMMENTS with concerns**

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

Mahalo for the opportunity to share the perspective of an active school administrator. I want to begin by expressing my deepest appreciation for your willingness to hear the voices of Hawaii's educational leaders.

By eliminating the School Community Council's (SCC) direct role in principal ratings and moving away from the proposed "district model," you have shown a commitment to fostering true collaboration. These adjustments reiterate our position as administrative leaders and allow us to focus on our primary mission: our students.

While progress has been made, I remain deeply concerned regarding the proposal for the Board of Education to evaluate Complex Area Superintendents (CASs).

- **Operational Alignment:** The line of authority for CASs should remain with the Deputy Superintendent and the Superintendent. Just as CASs support school principals on the front lines, the Superintendent's office oversees the day-to-day operational success of our complexes.
- **Professionalism over Politics:** Evaluations should be conducted by those who work directly with these "architects of success" daily. Moving this authority to the Board risks politicizing a role that must remain grounded in pedagogical and operational excellence.

I also urge you to reconsider any measure that would strip the Superintendent of the managerial right to create leadership positions.

- **Consistency in Leadership:** As a school principal, I have the authority to hire, shift roles, and manage funds to meet the unique needs of my school. This autonomy is what allows me to be an effective leader.
- **Agility in a Large System:** As one of the largest school systems in the nation, the DOE requires a Superintendent who can make timely, expert decisions. Our current Superintendent—a former teacher, administrator, and CAS—possesses the boots-on-the-ground experience to know exactly what our schools need.

Stripping these managerial rights would create a bottleneck of bureaucracy that ultimately slows down our ability to serve students.

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



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

**Date:** February 28, 2026

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

**Department:** Education

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

**Title of Bill:** SB 3334, SD2 Relating to Education

**Position:** Comments with Concerns

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

Thank you for the opportunity to provide testimony on **SB 3334, SD2**.

First, I would like to express my sincere appreciation to the Committee on Ways and Means for your responsiveness to the feedback provided by the educational community. Specifically, I am grateful for the decision to eliminate the School Community Council (SCC) responsibility for principal evaluations and for removing the concept of moving back toward a district model. By listening to these concerns, you have shown a commitment to collaborative governance that respects the professional expertise within our schools. Recognizing this responsiveness helps foster a stronger partnership between the Legislature and the Department as we work together for our students.

While I support the intent to increase fiscal and administrative efficiency, I remain concerned that the current proposal inadvertently risks weakening the Superintendent's executive authority and compromising the operational effectiveness of our public school system.

Specifically, I am concerned that SB 3334, SD2, would hinder the Superintendent's ability to create **Deputy Complex Area Superintendent (CAS)** positions. These roles are not merely administrative, they are essential for the successful transition of leaders into one of the most demanding roles in the Department.

In my own career, the six months I spent as a Deputy CAS were invaluable. That period of transition allowed me to:

- Grasp the full scope of responsibilities before assuming final accountability.
- Establish a clearer understanding of the unique priorities at the school level.
- Integrate with complex area staff and understand the nuances of Hilo-Waiākea.

- Benefit from direct mentorship from my predecessor, which ensured continuity of leadership for our schools.

By imposing statutory caps on leadership positions, this bill limits the Department's ability to use this proven mentorship model, potentially setting up future CASs for a "sink or swim" environment that ultimately impacts our students.

The proposed changes to leadership management create a critical disconnect. Under the Hawaii State Constitution, the Board of Education (BOE) appoints the Superintendent to serve as the Chief Executive Officer. By mandating that the BOE conduct the biennial performance evaluations of CASs and imposing personnel caps, the bill fractures the chain of command.

Leaders cannot be held fully accountable for the performance of their team if they do not maintain the authority to manage, evaluate, and direct their subordinates. Furthermore, because the BOE is removed from the daily, granular realities of complex area operations, it may lack the context necessary to provide the specialized, actionable feedback this multifaceted role requires.

Complex Area Superintendents serve as the vital link between state-level strategy and school-level implementation. Whether we are supervising principal performance, driving K-12 instructional alignment, or managing complex fiscal operations, we require an agile system that supports leadership growth.

I respectfully suggest that the committee consider alternative paths to efficiency that honor our existing executive structure and avoid mandates that could hinder the daily operations and leadership pipeline of our schools.

Mahalo for your time, your consideration of this testimony and your service to public education.

Me ka 'oia'i'o,



Kasie Kaleohano  
Hilo-Waiākea Complex Area Superintendent

JOSH GREEN, MD  
GOVERNOR



KEITH T. HAYASHI  
SUPERINTENDENT

JANETTE F. L. SNELLING  
COMPLEX AREA SUPERINTENDENT

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

February 28, 2026

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

My name is Janette Snelling. I serve as the Complex Area Superintendent for Honoka'a, Kealakehe, Kohala, and Konawaena—the HKKK complex. I want to express my sincere appreciation for the committee's proposed amendments for SB3334 in SD2.

Specifically, I want to thank you for deleting the sections that would have:

- changed the School Community Council's role in principal selection and evaluation;
- and eliminated the position of Complex Area Superintendent from our leadership structure.

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

Regarding the proposal for the Hawai'i Board of Education evaluation every two years, I ask that this be a supplement, not a replacement of our current annual evaluations. My annual review provides a critical opportunity to reflect on my practice with my direct supervisor to ensure I am best serving the 9,000 students and families in my complex area.

Thank-you for your time and consideration. A special acknowledgement to Senator Kanuha and Senator Richards for their open communication with me in support of our schools and families within HKKK.

Mahalo,

Janette Snelling  
Complex Area Superintendent, HKKK

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

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

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

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

## **Testimony in Opposition to SB 3334, SD2**

Submitted by: Sonja Samsonas, Principal

Chair, Vice Chair, and Members of the Committee,

Thank you for the opportunity to provide testimony regarding SB 3334, SD2. I write from the perspective of a school principal who works daily within the leadership structures this bill seeks to modify. While I appreciate the Committee's amendments in SD2—particularly the removal of references to internal Department structures and provisions related to School Community Council involvement in principal evaluation and selection—I must respectfully express continued concerns with the measure as written.

As a principal, I rely heavily on the responsiveness, accessibility, and authority of our Complex Area Superintendent and the broader leadership team within the Department. The proposed cap on superintendent-level positions would significantly limit the Superintendent's ability to design and adjust leadership structures based on real-time operational needs. Schools do not operate in static conditions. Emergencies, leadership transitions, enrollment shifts, compliance demands, and community crises require adaptive and sometimes temporary executive-level support. Artificially restricting the number of leadership positions constrains the Superintendent's capacity to allocate resources where they are most needed to ensure continuity and stability for schools.

From a site-level perspective, leadership continuity is not theoretical—it directly impacts instructional guidance, compliance oversight, staffing decisions, and student services. During times of crisis, such as the devastating wildfires on Maui, additional executive coordination was essential to support affected schools and communities. Limiting structural flexibility in statute undermines the Department's ability to respond swiftly and effectively when schools face extraordinary circumstances.

I also have concerns regarding the provision requiring the volunteer Board of Education to conduct written performance evaluations of each Complex Area Superintendent every two years. The current line authority system—where Complex Area Superintendents report to the Deputy Superintendent—provides a clear supervisory chain with established accountability measures. As a principal, I benefit from this clarity. I know where guidance originates, how decisions are escalated, and how performance oversight is structured. Shifting evaluative responsibility to the Board risks blurring the distinction between governance and management, potentially complicating lines of authority and reducing operational efficiency.

Additionally, the requirement that performance evaluations be provided to legislators upon request raises serious concerns regarding personnel confidentiality and the politicization of supervisory processes. Personnel evaluations are management tools designed to support growth,

accountability, and corrective action within an established chain of command. Mandating disclosure outside of that structure risks undermining trust and disrupting the professional evaluation process.

In closing, while I acknowledge and appreciate the Committee's efforts to address earlier concerns, SB 3334, SD2 continues to include provisions that restrict managerial flexibility, alter effective governance structures, and introduce new oversight mechanisms that do not directly improve student learning or school outcomes.

As a principal, my priority is ensuring that leadership systems remain stable, responsive, and focused on supporting schools. For these reasons, I respectfully urge reconsideration of this measure.

Thank you for the opportunity to testify.

**Date:** Monday, March 2, 2026

**Time:** 10:00 AM

**Location:** Conference Room  
211

**Committee:** WAM

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

**Department:** Education

**Person Testifying:** Richard Fajardo

**Title of Bill:** SB 3334 SD2 Relating to Education

**Position:** Comments and Concerns

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

My name is Richard Fajardo and I am the Complex Area Superintendent for the Pearl City-Waipahu Complex Area. I want to thank each of you and express my appreciation to the Ways and Means Committee for considering the concerns raised in SB3334 SD1. The revisions in SB3334 SD2 demonstrate a willingness to listen to the field and commitment towards collaboration. Thank you again.

In regard to SB3334 SD2, I am respectfully expressing the following concerns:

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

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

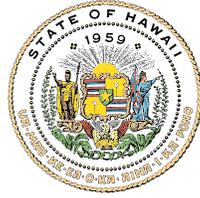
without direct line authority may make it challenging for immediate feedback and directive corrective measures to ensure accountability and results.

2. Cap on the number of Superintendents level positions

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

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

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



**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
**KA 'OIHANA HO'ONA'AUAO**  
**MAUI DISTRICT OFFICE**  
54 S. High Street, 4<sup>th</sup> Fl.  
Wailuku, HI 96793

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

**DATE:** March 1, 2026

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

**FROM:** Lori Yatsushiro, Complex Area Superintendent

**POSITION:** Comments with concerns

First and foremost, mahalo to the Ways and Means members for removing the School Community Council (SCC) evaluating and selecting principals, as well as the replacement of Complex Area Superintendents with District Superintendents noted in SB3334, SD1. I appreciate the time you took to consider the written testimony and impact that would have had on school faculty and staff, school communities, and students.

The first concern with SB3334, SD2, is the Superintendent losing the managerial rights to create necessary leadership positions. If this provision had been in place during the Maui Wildfires, which included the Lahaina, Kula, and Kihei wildfires, the two Maui Complex Area Superintendents would have been significantly hindered in their ability to temporarily hire Deputy Complex Area Superintendents to help and guide the numerous issues with supporting our communities in their time of need. Deputy CASs worked directly with schools to ensure students, teachers, and community members were supported in their transitions to continue their education in other schools. This took many dedicated hands and countless hours to ensure students and families that lost their homes and family members were supported with the love and compassion required. We worked collaboratively with our State Office team to bring students and staff back to some form of normalcy or as normal as possible. Deputy CASs took shifts to ensure constant communication with State Leadership, school leadership, and the Maui Emergency Management Agency. The role of Deputy CASs was critical during this crisis. This was a temporary position and has since sunsetted; however, if there were a cap on "superintendent" positions, this essential extra support would not have been provided. The implementation of such measures would have created barriers to responsive leadership.

These administrative hurdles detract from our core mission, leading to measurable negative consequences for student learning and the delivery of essential support services.

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

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

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

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

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

meaningful accountability; instead, it invites instability, political interference, and a breakdown of professional standards that ultimately harms the stability of the school system and student learning.

In closing, I thank you again for the removal of the School Community Council (SCC) evaluating and selecting principals, as well as the replacement of Complex Area Superintendents with District Superintendents noted in SB3334, SD1. Please consider the profound issues with capping the number of leadership positions, as there are times, particularly during crises or transitions, that additional leadership positions are absolutely necessary and supportive to school staff, students, and the community. In addition, I respectfully urge the Committee to reconsider the proposal for Complex Area Superintendent (CAS) evaluations to be conducted by voluntary Board of Education members. To ensure professional rigor and institutional stability, we recommend that these evaluations remain under the purview of professional Department leadership and be maintained as confidential personnel records.

Thank you for the opportunity to provide testimony on SB3334, SD2.

March 1, 2026

**To:** Senate Ways and Means Committee

**From:** Leila Maeda-Kobayashi, Kapa‘a-Kaua‘i-Waimea Complex Area Superintendent

**Regarding:** SB 3334, SD2 Relating to Education

**Position: Comments with Concerns**

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

Thank you for the opportunity to provide testimony on SB3334, SD2. As the Complex Area Superintendent (CAS) for the Kapa‘a-Kaua‘i-Waimea Complex Area, I value the Committee’s dedication to fiscal responsibility and administrative efficiency.

I am grateful for the Committee’s decision to remove the provisions from SD1 regarding School Community Council evaluations and the district model transition. Eliminating these elements avoids unnecessary administrative disruption and allows our school leaders to remain focused on their core mission of student achievement. However, while I support the intent to increase transparency, I have significant concerns regarding how the new provisions in SD2 will impact the day-to-day operations of our schools on Kaua‘i and across the State.

The proposed bill mandates that the Board of Education (BOE) conduct performance evaluations for each CAS every two years. I oppose this shift in evaluative authority. My daily work involves the hands-on management of our school system, including the supervision of administrative and instructional support as well as the management of personnel, fiscal, and facilities support. I am responsible for monitoring compliance with state and federal laws while directing curriculum development, student assessments, and special education programs.

The Superintendent of Education and the Deputy Superintendent of Academics serve as my direct supervisors and are the only officials properly positioned to evaluate my responsibilities. While the Board of Education provides vital high-level governance and strategic vision, evaluating a CAS requires deep pedagogical expertise and a "working knowledge" of campus operations that a lay board simply does not possess. When evaluations are conducted by those removed from the daily realities of our schools, the metrics for success risk shifting from actual student progress to political or administrative checklists. This disconnect will inevitably hurt student achievement. My work requires constant coordination of personnel and budgets - tasks most effectively assessed by the Superintendent’s team, who actually see this work being done and deal with the results every day. For a leadership structure to be effective, the Superintendent must retain the executive authority to manage and direct their own team. Shifting this to the Board creates

administrative friction and disrupts clear line authority. I strongly urge the Committee to protect the stability of our schools by maintaining the current evaluative structure.

Furthermore, the proposed statutory cap of twenty-seven superintendent-level positions risks undermining the Superintendent's executive authority and the Department's overall operational effectiveness. Codifying such a specific personnel cap into law strips the Superintendent of the managerial rights necessary to remain agile in a large, statewide school system. Education is not static; our needs are constantly evolving. Whether addressing statewide shifts in student enrollment, responding to emerging special education requirements, or implementing new legislative mandates, the Department requires the flexibility to structure leadership positions that respond to the specific, real-time needs of our students. Placing these rigid limits into law makes it much harder for the Department to move or add leadership support when and where it is most needed.

While the Department remains fully committed to fiscal transparency regarding salaries and expenses, we must distinguish between financial accountability and the protection of confidential personnel records. I firmly oppose the requirement to make CAS performance evaluations available to legislators upon request. This provision is a direct threat to the professional integrity of our leadership. Personnel evaluations must remain confidential tools for professional growth, not public-facing documents. Subjecting these private records to legislative review invites the politicization of professional evaluations, which undermines the trust necessary for honest feedback and risks turning a tool for improvement into a mechanism for political leverage.

The current educational structure relies on a direct, unbroken line of accountability that must be preserved to ensure operational stability. I strongly urge the Committee to protect our schools by removing the provision requiring the BOE to evaluate CASs, eliminating the rigid statutory cap on leadership positions, and maintaining the confidentiality of personnel evaluations to prevent the politicization of professional growth. Maintaining these responsibilities to the Department's professional leadership and protecting the Superintendent's executive authority is the only way to ensure a cohesive, responsive system that provides a supportive and inclusive learning environment for every student.

Thank you for your time and your continued service to Hawaii's public education system.



**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\*

March 1, 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.

Thank you very much for removing language in SB3334 SD 1 related to changing our Department's structure and providing the School Community Council a huge voice in a principal's selection and evaluation. I appreciate your thoughtful consideration in continuing to allow complex area superintendents the authority to appoint principals and maintaining the current process for principalship evaluation.

I am writing in opposition to SB3334 SD2, Relating to Education. My concerns are that this bill in its current form removes the Superintendent's decision making authority to hire the necessary number of superintendent level personnel within our Department's needs and budget. A superintendent should have the authority and responsibility to have as many superintendent level positions as he/she seems viable for the success of our Department.

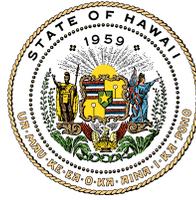
My other concern is that the Superintendent and not the Board of Education should be conducting the evaluation of his/her subordinate superintendent as the Superintendent is much more aware of the responsibilities of our subordinate superintendent than the Board of Education. This action along with limiting the number of superintendent level positions minimizes the Superintendent's managerial rights.

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

Sincerely,

Stanley G. Tamashiro, Jr.  
Principal

JOSH GREEN, M.D.  
GOVERNOR



KEITH T. HAYASHI  
SUPERINTENDENT

STACEY BELLO  
COMPLEX AREA SUPERINTENDENT

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

OFFICE OF THE COMPLEX AREA SUPERINTENDENT

**TESTIMONY TO THE SENATE WAM COMMITTEE**

**DATE:** Monday, March 2, 2026

**TIME:** 10:00 am

**LOCATION:** Room 211

**BILL:** SB 3334 SD2: Relating to Education

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

**POSITION:** Comments with Significant Concerns

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

My name is Stacey Bello and I currently serve as the Complex Area Superintendent (CAS) of the Ka'ū-Kea'au-Pāhoa complex area on Hawai'i Island. First, I would like to show my appreciation to the members of the Ways and Means Committee for taking into consideration the testimonies from the field regarding SB 3334 SD1. Our dedicated school leaders, educational officers, teachers, and community partners overwhelmingly voiced their opposition to the bill as it was written and I'd just like to say thank you for hearing their voices.

Today, I am writing to express significant concerns regarding SB 3334 SD2, which mandates that the Board of Education (Board) conduct biennial written performance evaluations of CAS positions and make CAS evaluations available to all legislators. While I fully support the spirit of transparency intended by this bill, the proposed evaluation structure creates a fundamental conflict in the established line of authority and poses several operational risks.

**1. Blurring the Lines of Authority**

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

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

## **2. Disconnect Between Supervision and Evaluation**

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

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

## **3. Confidentiality of Employee Evaluations**

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

I respectfully urge WAM Committee members to vote no on SB 3334 SD2.

Finally, I would like to extend a warm invitation to the members of the WAM Committee to visit our amazing complex area. Seeing the incredible work of our committed school leaders and rockstar educators firsthand provides the best possible context for the unique successes and challenges within our rural schools.

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



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

**Date:** 03/02/2026

**Time:** 10:00 AM

**Location:** CR 211 & Videoconference

**Committee:** WAM

**Department:** Education

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

**Title of Bill:** SB3334, SD2, PROPOSED, 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 Hawaii State Department of Education (Department) offers comments on this bill. The Department appreciates that the Committee considered the voices of school leaders and other stakeholders who expressed concerns about the original version of the bill, in particular, maintaining the complex area structure and removing provisions pertaining to the role of the School Community Council.

The Department has grave concerns about the following in the Proposed SD2:

- Limiting the authority of the Board and superintendent to establish positions removes the superintendent's flexibility to address situations that arise in the future. For example, when complex area superintendents are planning for retirement, a deputy complex area superintendent position is temporarily created to facilitate a smooth transition. Currently, Board Policy 500-2, requires the Board to approve any changes in adding or abolishing offices led by subordinate superintendents which includes deputy superintendents, assistant superintendents, and complex area superintendents.
- Some of the required annual reports of various information about superintendent and subordinate superintendents are redundant with current reporting requirements.

The Department opposes the following provisions in the Proposed SD2:

- Complex area superintendents are currently evaluated on an annual basis by their direct supervisor, who is most appropriately positioned to assess their performance, as they direct their work and have insight on their performance on a routine basis. The Board does not have direct supervision over complex area superintendents. The Department already requires an evaluation to be conducted annually.

- Requiring legislators to be provided complex area superintendent performance evaluations upon request is of concern - performance evaluations are a personnel matter between the employee and the supervisor. It is the responsibility of the Department, not the Legislature, to manage individual employee performance.

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



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

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

**RE: SB 3334, PROPOSED SD2 - RELATING TO EDUCATION**

**DATE:** March 1, 2026

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

**FROM:** Sam Izumi, Complex Area Superintendent, Castle-Kahuku

**POSITION:** Comments with Concerns

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

I would like to thank and express my appreciation to the Senate Committee on Ways and Means for reviewing all of the testimony that was shared regarding SB3334 SD1. I am grateful that the concerns raised were carefully considered and subsequently addressed in the proposed SB3334 SD2.

While I truly appreciate the time and efforts the committee invested in the drafting of SB3334 SD2, I would like to respectfully provide comments for the committee's consideration. Specifically, I have concerns regarding the requirement of the Board of Education to periodically conduct written performance evaluations of complex area superintendents as the Hawai'i State Department of Education (HIDOE) already has an established process in place.

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

processes. Maintaining this reporting and evaluation relationship and process ensures alignment, accountability, and continuity in advancing HIDOE's goals.

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

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

I respectfully submit these comments for consideration as SB3334 SD2 continues through the legislative process. It is my hope that HIDOE will have the opportunity to work together and jointly collaborate on solutions to any issues around fiscal management and administrative efficiency.

Mahalo for your time and consideration,

Sam Izumi  
Complex Area Superintendent  
Castle-Kahuku Complex Area



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
Leihoku Elementary School  
86-285 Leihoku Street  
Waianae, HI 96792

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

**Monday, March 2, 2026**

**RE: SB 3334, SD2 – RELATING TO EDUCATION**

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

Thank you for the opportunity to provide testimony on **SB 3334, SD2**. My name is Rebecca Gebreyesus, and I serve as the Principal of Leihōkū Elementary in Waiʻanae.

**Appreciation for Recent Revisions**

First, I would like to extend my sincere gratitude to this Committee for listening to the concerns raised by school leaders regarding previous drafts. Specifically, I am grateful for the removal of provisions that would have drastically altered the role of Complex Area Superintendents (CAS) in supporting schools and the challenges associated with untrained School Community Councils (SCC) evaluating principals. Your responsiveness to these concerns ensures that we can maintain our focus on school-level stability.

**Concerns Regarding Line Authority**

While I support the overarching goal of accountability, I am concerned that **SB 3334, SD2** creates a structural conflict in line authority by requiring the Board of Education (BOE) to conduct performance evaluations for the 27 superintendent-level positions.

In any effective organization, the person who directs the work should be the one to evaluate it. As a Principal, I supervise my Vice Principals. If my supervisor were to bypass me to conduct their evaluations, it would undermine my leadership and create confusion regarding accountability.

- **Destabilizing Leadership:** Under the current proposal, it is unclear to whom a CAS is truly responsible—the Superintendent who directs their daily work, or the Board.
- **Professional Nuance:** The Superintendent is an educational professional capable of evaluating the complex nuances of school progress. While the Board provides vital community oversight, they may not have the technical expertise to assess a CAS using limited, specific outcome measures.

## Support for Transparency

I would like to highlight the **positive aspects** of this measure:

- **Administrative Accountability:** I fully support the requirement for an annual report detailing salaries, duties, and travel expenses. Transparency regarding public funds is essential for maintaining community trust.
- **Common Goals:** We all share the goal of student academic progress and community engagement. History shows that the most effective changes in Hawaii’s education system—such as Act 51—are those that are carefully managed and respect the professional structure of the Department.

## Conclusion

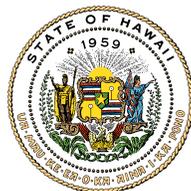
I ask the Committee to consider amendments that return evaluation authority to the Superintendent while maintaining the robust transparency and reporting requirements outlined in the bill. This ensures that our CASs are held to high standards without compromising the chain of command necessary to run our schools effectively.

Mahalo for your leadership and for your dedication to Hawaii’s keiki.

With Aloha,

Rebecca K. Gebreyesus

Principal Leihōkū Elementary



**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
**KA 'OIHANA HO'ONA'AUAO**  
LEEWARD DISTRICT COMPLEX AREA SUPERINTENDENT  
601 KAMOKILA BOULEVARD, ROOM 588  
KAPOLEI, HAWAII 96707

**Date:** Monday, March 2, 2026

**Time:** 10:00 a.m.

**Location:** Room 211

**Committee:** Ways and Means

**Department:** Hawaii'i State Department of Education, Nanakuli-Wai'anae Complex Area

**Bill:** SB 3334 SD2: Relating to Education

**Testifier:** Evangeline G. Casinas, Complex Academic Officer

**Position:** Comments only

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

Thank you for the opportunity to provide testimony on **SB3334 SD2**. I am testifying today to offer comments.

I would first like to thank the WAM committee for the critical changes made in the SD2 Proposed draft. Specifically, I appreciate the removal of the language from SD1 that would have repealed the complex area structure and the position of complex area superintendent. Maintaining the current complex area system is vital for ensuring stability within our school leadership and maintaining the direct support lines between our schools and the Department.

While I support the intent of accountability, I have significant concerns regarding the proposed Section 3(b), which requires the Board of Education to conduct performance evaluations of each complex area superintendent.

- **Capacity Concerns:** It is unclear if the Board of Education has the administrative capacity to manage individual evaluations for up to 15 complex area superintendents while also managing the evaluation of the Superintendent of Education.
- **Organizational Clarity:** In any professional structure, an employee should be evaluated by the person to whom they directly report. Under this bill, the Board (the employer of the Superintendent) would be evaluating the Superintendent's direct reports.
- **The Risk of Conflicting Directives:** This creates a "dual-reporting" conflict. For example, if a Complex Area Superintendent receives a directive from the Superintendent

of Education but feels pressured to prioritize different goals to satisfy a Board evaluation, the chain of command breaks down. This can lead to fragmented leadership and inconsistent implementation of educational policies.

- **Requested Amendment:** To maintain a clear and effective chain of command, I respectfully request that the bill be amended to require the Superintendent of Education to conduct these evaluations. The Board can still maintain oversight by requiring the Superintendent to provide a summary report of those evaluations to the Board, ensuring accountability without disrupting the organizational structure.

Further, I am in strong favor of the fiscal transparency measures included in this bill. The requirement that evaluations include student academic outcomes, fiscal management, and operational efficiency is a step in the right direction. Furthermore, establishing a statutory cap of 27 superintendent-level positions ensures that resources remain focused on the classroom rather than expanding administrative overhead.

While the SD2 Proposed draft is a significant improvement over the SD1 version, the evaluation structure remains a point of concern. I urge the committee to consider the requested amendment to ensure the evaluation process is both practical and aligned with the Department's internal leadership structure.

Thank you for your time and for your dedication to Hawaii's students.



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

**Date:** 03/02/2026

**Time:** 10:00 AM

**Location:** CR 211 & Videoconference

**Committee:** WAM

**Department:** Education

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

**Title of Bill:** SB3334, SD2, PROPOSED, 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 Hawaii State Department of Education (Department) offers comments on this bill. The Department appreciates that the Committee considered the voices of school leaders and other stakeholders who expressed concerns about the original version of the bill, in particular, maintaining the complex area structure and removing provisions pertaining to the role of the School Community Council.

The Department has grave concerns about the following in the Proposed SD2:

- Limiting the authority of the Board and superintendent to establish positions removes the superintendent's flexibility to address situations that arise in the future. For example, when complex area superintendents are planning for retirement, a deputy complex area superintendent position is temporarily created to facilitate a smooth transition. Currently, Board Policy 500-2, requires the Board to approve any changes in adding or abolishing offices led by subordinate superintendents which includes deputy superintendents, assistant superintendents, and complex area superintendents.
- Some of the required annual reports of various information about superintendent and subordinate superintendents are redundant with current reporting requirements.

The Department opposes the following provisions in the Proposed SD2:

- Complex area superintendents are currently evaluated on an annual basis by their direct supervisor, who is most appropriately positioned to assess their performance, as they direct their work and have insight on their performance on a routine basis. The Board does not have direct supervision over complex area superintendents. The Department already requires an evaluation to be conducted annually.

- Requiring legislators to be provided complex area superintendent performance evaluations upon request is of concern - performance evaluations are a personnel matter between the employee and the supervisor. It is the responsibility of the Department, not the Legislature, to manage individual employee performance.

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



1200 Ala Kapuna Street • Honolulu, Hawai'i 96819  
Tel: (808) 833-2711 • Fax: (808) 839-7106 • Web: www.hsta.org

**Osa Tui, Jr.**  
President

**Logan Okita**  
Vice President

**Cheney Kaku**  
Secretary-Treasurer

**Andrea Eshelman**  
Executive Director

## TESTIMONY TO THE HAWAI'I SENATE COMMITTEE ON WAYS AND MEANS

**Item: SB 3334, Proposed SD2 – Relating to Education**

**Position: Support**

**Hearing: Monday, March 2, 2026, 10:00 am, Room 211**

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

Dear Chair Dela Cruz, Vice Chair Moriwaki, and members of the committee,

The Hawai'i State Teachers Association **supports** S.B. 3334, Proposed SD2, which places a cap on administrative positions within the state and complex area offices and ensures our educational leaders are held to consistent evaluation standards. We view these proposed amendments as a positive step forward.

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

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

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

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

Mahalo.



**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

March 2, 2026

S.B. 3334, S.D. 2, PROPOSED — RELATING TO EDUCATION

The Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO wishes to provide comments on S.B. 3334, S.D. 2 (proposed) which establishes a cap on the total number of superintendent-level positions within the Department of Education, defines “superintendent-level” positions, and requires the Board of Education to conduct a written performance evaluation of each complex area superintendent every two years.

We appreciate your careful consideration of this measure and for removing the sections that would have significantly altered the complex area structure and the established processes for principal selection and evaluation. Thank you for your responsiveness to stakeholder concerns, your willingness to preserve the elements foundational to school-level support, and your commitment to reasonable accountability so that leadership at every level continues to align with student success.

Thank you for the opportunity to provide testimony on S.B. 3334, S.D. 2 (proposed).

Respectfully submitted,

Randy Perreira  
Executive Director

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

I respectfully submit testimony as an advocate for improvements within the Hawai'i Department of Education. It seems, in part, that **increased responsiveness to community concerns from DOE leadership could help address the issues that prompted this bill.**

Rather than eliminating the CAS position entirely, practical solutions can improve transparency, accountability, and community trust. I respectfully offer the following amendments for consideration:

- Require a **DOE/CAS representative to regularly attend Neighborhood Board meetings**, joining other elected officials and community leaders 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.
- Place **DOE-nominated CAS candidates on the ballot** for each respective area to allow community input.
- Require the Hawai'i State Board of Education to include a standing "Community Concerns" agenda item at its meetings, ensuring parents and community members have a clear and consistent opportunity to be heard.

While many parents may not have the time or flexibility to testify, community sentiment is clearly reflected in daily conversations, public forums, and social media, as shown in the included screenshots. Families want to be heard, and they want a system that responds.

Our education system has dedicated professionals and strong foundations, yet meaningful improvements are needed to rebuild trust and strengthen communication between families and decision-makers.

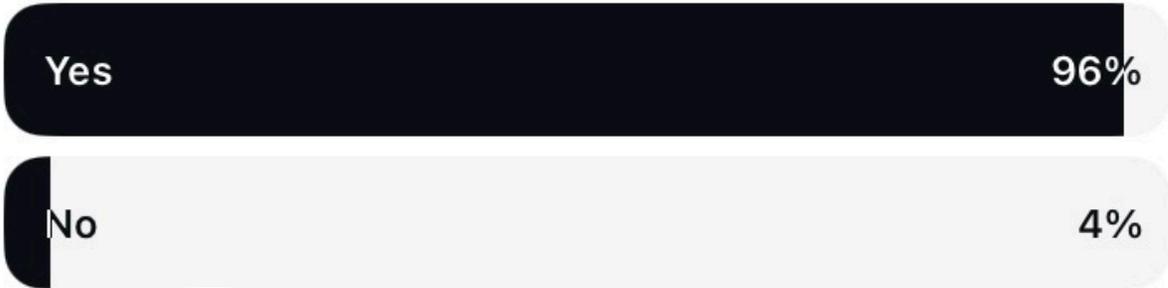
Mahalo for the opportunity to testify and for your consideration of these recommendations.

The following comments are from the public response to Senator DeCorte's recent Instagram post regarding the Department of Education:



samanthadecorte.hi 3w

Is DOE failing?



10.2K responses [See results](#)

Your vote will be visible to the poll creator. Others may be able to see that you voted, but not what you voted for.



lynn.plus.5 3w

Did absolute NOTHING for us here in Lahaina after the fires! Did absolutely NOTHING to help keep our Kumu here after the fires! Keiki are having to sit in the cafeteria because we have no Kumu! That should say enough. Doe had failed us and our Keiki!



17

[Reply](#)



\_r3myy\_ 3w

Failing Waimānalo.

Kailua High School has gone nearly 3 years without lights on their fields. Teachers—who carry one of the most important jobs shaping our future—are still paid far too little.



163

And on top of that, school lunches are terrible and kids are still going home hungry.

If we say education matters, our actions need to prove it. Our keiki deserve better

[Reply](#)



wheredawildthings\_r 3w

Failing here on Kaua'i. Teachers are so tired and the curriculum for high schoolers was bare minimum with the chrome book being the main source of learning curriculum. What happened to hands on education? Oh maybe it's because the teachers have to reach into their own underfunded pockets to provide materials for their students!



1

Reply



talisnoya 3w

High school senior here— as someone that's recently gotten into a top 20 national university, I can firmly say that our state's DOE is failing students. Funds for everything are nonexistent and our state's high school curriculum is setting up students for failure. I've had to fight the system in order to advance my academics (currently holding a 4.5 GPA/ 1470 SAT). Knowing that Republican states that censor important information are still outperforming us is just sad. I'll be seeing Mr. Hayashi at grad in just a few months and I cannot wait to get out of here.



922

Reply



iamlexilum 3w

That's why homeschooling is on the rise... we can't trust our public school system anymore.



903

Reply



fromdaaina2daopu 3w

This has been an issue for years, that's why I homeschool my kids. I won't blame anybody but myself for my kids learning. It ain't easy, but it's what needed to be done, and sacrifices were made.



2

Reply



its\_marisshh 3w

Yet they ? why parents choose to homeschool their kids



7

Reply



**dr.lehuanani.akau** 3w

YES!! This is why we pulled our daughter out of school! We're now homeschooling her! Best decision EVER!

♡  
50

Reply



**leialohaaina** 2w

Former kumu kaiapuni and current Charter School Kumu here, DOE been failing. Home school your kids or find a good charter school.

♡  
3

Reply



**jujuuuu** 3w

And one of the reasons why I had to put my kids in private. Now it ran us broke so now we had to move!! HELP OUR KEIKIS 🙏

♡  
56

Reply



**forman6297** 3w

@jujuuuu so make sure it doesn't happen to your grandkids.

♡

Reply



**shawneeloveskaipman** 3w

Tell me why my High schooler at Lahainaluna sits in the cafeteria most of the day with no teacher

♡  
1

Reply

— View 1 more reply



**malia.edl** 3w

The people who need the money the most aren't getting it. Teachers are completely and utterly burnt out

♡  
4

Reply



**courtneylynnrichards** 3w

I work with families in many different communities and many families are choosing homeschool or hawaiian immersion schools. They are. Or regretting their choice.

♡

Reply



hawaiiiloa\_of\_molokai 3w

My wife is a teacher. She has to purchase supplies out her own pocket. That's sad. We are talking about the future of a nation. Poor teachers ain't getting much support from the DOE.



1,503

Reply



hawaiiiloa\_of\_molokai 3w

[@endhawaiioccupation](#) I took my middle child out of the DOE and enrolled her in Hawaiian setting school. It's not as easy as it seems. When 2 parents work it hard. These other programs usually ask for a lot more out of the parents which I do not argue. I think parents should be more involved but it's just hard when there are bills stacking up and both parents work full time jobs. Also you have to make sure this programs meet state of Hawaii curriculum cause if not no employer or university will recognize the schooling the child had.



8

Reply



nocandefense 3w

DOE here. While Keith got an 80,000\$ raise this year, seniors in high school are being fed the SAME portion size as kindergartners. The system is total failure.



2,168

Reply

February 27, 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 SB 3334 SD2, which proposes to establish a statutory cap on superintendent-level positions and mandate biennial evaluations for Complex Area Superintendents (CAS). While the bill cites "prudent fiscal management" as a primary driver, the proposed changes raise several concerns regarding administrative stability and practical implementation.

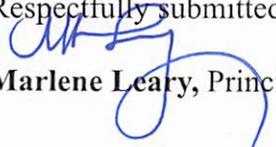
The bill seeks to impose a hard statutory cap of twenty-seven (27) individuals in superintendent-level positions, including the superintendent, deputy and assistant superintendents, and complex area superintendents. This year, the Department of Education (DOE) underwent a leadership restructuring specifically designed to enhance administrative efficiency. Implementing a rigid cap at this time is premature. There is currently no data provided in the measure to demonstrate whether the current administrative structure is effective or ineffective. Changing the structure again without empirical evidence or surveys could undermine the very "administrative efficiency" the legislature hopes to achieve.

Section 3 of the bill requires the Board of Education to conduct written performance evaluations for each CAS every two years and mandates that these evaluations be "made available to any member of the legislature upon request". It is unclear if similar requirements for individual personnel evaluations to be shared with the legislature exist for other state departments. The bill does not clarify why the Complex Area Superintendent position is being specifically targeted for this level of legislative oversight. Such a requirement may infringe upon standard personnel privacy practices and politicize administrative performance reviews.

The measure requires that CAS evaluations include feedback from School Community Councils (SCC). While stakeholder engagement is important, many schools currently face significant challenges in filling SCC memberships with even the bare minimum of participants. This requirement raises a critical implementation question: What occurs if a complex does not have functional or full SCCs? Relying on feedback from under-represented or incomplete councils could lead to skewed evaluations that do not accurately reflect a CAS's performance in leadership effectiveness or personnel management.

I respectfully request that the committee hold SB 3334 SD2. It is essential to wait for further data and comprehensive surveys to determine if a change to the overall leadership structure is truly necessary. Decisions regarding the cap on leadership and the nature of personnel evaluations should be based on evidence of the current system's performance rather than preemptive statutory limits.

Respectfully submitted,

  
**Marlene Leary**, Principal and Citizen of Senate 8, Kauai

**SB-3334-SD-1**

Submitted on: 2/27/2026 5:07:36 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

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

Comments:

March 2, 2026 10:00 CR211

SB3334 SD2 Hearing March 2 @ 10:00

Testimony: Susan Pcola-Davis

**STRONGLY OPPOSED** Please **DEFER**

Mahalo for the amendment to SB 3334 (SD1)

I applaud the time it took to revisit and rewrite the bill. I am still Strongly opposed, and this bill should still be deferred.

In fact, this appears to be a gut and replace but maybe not. Maybe a bait and switch. As a member of the public that is my opinion and your prerogative.

1. Establishing a CAP to 27 varieties of superintendents may appear to be prudent fiscal management. But is it? How do you know? Does this CAP satisfy the goal you want to achieve?
2. Administrative efficiency was proven by SD3334's numerous testimonies at the Education Committee meeting. There was evidence that the structural change would cause chaos. But so does applying an absolute number to a field of expertise that has grown as much as the school system has grown. This is called spreading the pain. It is impossible to retain employees if their duties and responsibilities are increased with the same accountability and no additional resources.

I was under the impression that the Legislature isn't involved in the organizational structure of the DOE. This legislature is involved.

What data is available to show that a cap will prove to be efficient? Instead of setting a limit on all of these superintendents, have you gauged this against school growth, increased expectations, being called **failures**?

This bill is not being part of the solution. It is hand tying. I have attended and testified Board of Education meetings frequently since 2000. The DOE has been asked hard questions of the Board

of Education. Members of the Board have changed several times since then and so have the positions in the Administration of DOE.

The justifications may need to be reviewed. I haven't seen anything that indicates a review is necessary. It would be prudent to do a review before decisions are made that will effect the whole system.

Senator Dela Cruz has been part of the conversation throughout the years.

The main amendment is highlighted. Everything else is the same.

### **AMENDMENT ADDITIONS**

**Every two years, the board shall conduct a written performance evaluation** of each complex area superintendent. Each written performance evaluation shall include: [**Note: 27**]

- (1) Student academic outcomes and progress
- (2) Fiscal management and operational efficiency
- (3) Leadership effectiveness and personnel management
- (4) Stakeholder engagement, including feedback from school community councils, principals, educators, parents, and the community

The written performance evaluations shall be transmitted to the superintendent and made available to any member of the legislature upon request.

**PRIVACY ISSUES:** This should be thoroughly reviewed.

I think there may be privacy issues with this transaction.

Mahalo for reading my testimony.

**SB-3334-SD-1**

Submitted on: 2/27/2026 5:34:55 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Joseph Passantino	Individual	Comments	Written Testimony Only

Comments:

I am writing in strong support of the Ways and Means Committee and would like to sincerely thank the committee members for listening to the voices of principals and school leaders throughout this process.

Your decision to eliminate both the proposed School Community Council (SCC) responsibility for principal evaluation and the concept of transitioning to a district model reflects thoughtful consideration of the practical realities we face in schools each day. These changes demonstrate responsiveness, respect for practitioner expertise, and a genuine commitment to ensuring that policy aligns with the needs of students, staff, and communities.

When educators feel heard, collaboration strengthens. By incorporating principal feedback into your revisions, you have reinforced trust between lawmakers and school leaders and modeled the kind of partnership that leads to sustainable, effective school improvement.

Mahalo for your willingness to engage, reflect, and respond in a way that supports our schools and the students we serve.

February 27, 2026

Testimony: **SB 3334 SD 2 - Comments with Concerns**

Submitted by: Wendy Kau, Principal, King William C. Lunalilo Elementary School

Chair, Vice Chair and Members of the WAM Committee:

First, I would like to express my appreciation to the Ways and Means Committee (WAM) for removing the provisions in SD1 that would have removed Complex Area Superintendents (CASs) and replaced them with an unspecified district model. Additionally, I also appreciate WAM's decision to retain the existing principal selection and evaluation processes rather than adopting changes that would have required School Community Councils' evaluations to carry a fixed weight and shifted final appointment authority. Those changes reflect an understanding of the concerns you received from the various amounts of feedback and testimony submitted.

Currently, SB 3334 SD2 claims its intent is to preserve effective, flexible school leadership structures while ensuring accountability and fiscal responsibility. After reviewing the proposal, I have high concerns and reservations about SB 3334 SD2.

### **Major Concerns**

1. Loss of operational flexibility and responsiveness
  - Capping superintendent-level positions at a fixed number constrains the superintendent's ability to adapt organizational structure to emerging needs (e.g., pandemic response, targeted intervention teams, innovation pilots, compliance specialists). Effective school systems require the ability to create or reassign leadership roles rapidly in response to changing programmatic, legal, or student-need realities.
  - A static numeric cap can become outdated; it does not allow the superintendent to scale leadership capacity up or down according to dynamic needs, new federal/state mandates, or strategic initiatives. This risks hampering timely, evidence-based administrative responses.
2. Undermining managerial authority and clear lines of accountability
  - Restricting the superintendent's discretion to create leadership positions shifts control from the chief executive responsible for day-to-day system management to the legislature. That shift can blur accountability: it is unreasonable to hold the superintendent accountable for system outcomes tied to resources not within their control.
3. Concerns about Board of Education conducting biennial written evaluations of Complex Area Superintendents
  - The BOE is a policy-making and governance body that typically focuses on systemwide policy, strategic direction, and community representation. Directly

assigning the BOE responsibility for biennial written performance evaluations of CASs raises practical and role-expertise issues:

- BOE members may not have sufficient, consistent access to day-to-day operational data or direct supervisory interactions needed to evaluate instructional leadership and school-level impacts fairly and reliably.
  - Evaluations conducted by a primarily governance-focused board risk becoming politicized or overly focused on high-level metrics without the context necessary to interpret school/community conditions.
  - Evaluation quality depends on consistent, informed observation, triangulated evidence (classroom practice, principal feedback, student outcome context), and calibrated raters. Without these components, the process will likely produce uneven or demoralizing results. I have high concerns and reservations regarding how this proposed model would be better and produce long-term results for our Department and our students.
4. Potential unintended consequences for school-level relationships and morale
- Requiring BOE evaluations and adding public availability to the legislature may change the nature of CAS-principal and CAS-school community relationships. CASs may become more risk-averse, prioritizing defensible short-term metrics over collaborative problem-solving with principals and educators.
  - Publicized evaluations—especially if taken out of context—can undermine trust between district leadership and school communities, distract leaders from improvement work, and discourage experienced leaders from accepting CAS roles.

While the aims of fiscal prudence and accountability are worthy, a rigid numeric cap combined with BOE-led evaluations of CASs introduces significant operational, accountability, and equity risks. These provisions could weaken the Superintendent's ability to organize leadership that meets varying, evolving needs across complex areas and could produce evaluation processes that are less informed, more politicized, and potentially harmful to morale and student outcomes.

**SB-3334-SD-1**

Submitted on: 2/27/2026 7:43:04 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

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

Comments:

I, Johnnie-Mae L. Perry, STRONG COMMENT TO ADDRESS AND PROTECT TITLE1 SCHOOLS, OVERCROWDED SCHOOLS, FOOD INSECURITY SCHOOLS, AND HOMELESS SCHOOLS. SCHOOL COMMUNITY COUNCIL TO CASUAL, MODEL BOE. BUDGET CONCERNS. LAWSUIT 8M DOE PAY OUT, DEDUCT FROM DOE BUDGET?

3334 SB RELATING TO EDUCATION.

February 27, 2026

SUBJECT: Testimony in OPPOSITION to SB3334

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

I would first like to Mahalo you for the opportunity to speak and share my thoughts and views regarding Bill SB3334. I appreciate the Ways and Means Committee for listening to all the feedback and eliminating the SCC responsibility of principal evaluation as well as the concept of moving towards a district model that will benefit our keiki and communities.

I have served as an Athletic Administrator for the past 21 years within the KKP Complex. Throughout my career, I have witnessed firsthand the critical role the Complex Area Superintendent plays in supporting principals, athletic programs, academic initiatives, and the overall development of our students. The CAS provides leadership, continuity across schools, ensuring alignment in academic standards, student services, athletics, safety protocols, and operational accountability. In our complex, the CAS has served as a vital bridge between the State DOE, offering guidance, resolving complex issues, and maintaining consistent expectations. This support is especially important in athletics, where compliance, safety standards, Title IX equity, fiscal oversight, and interscholastic coordination require experienced leadership beyond the individual school level.

Athletics is not separate from academics; it is an extension of education. Participation in sports improves attendance, academic engagement, leadership skills, and social-emotional development. It promotes good citizenship in our students. Although Principals play a decisive role in providing athletic programs, hiring qualified coaches, ensuring safe facilities, and maintaining equitable opportunities for all students, it is the CAS that supports them and assists them in making these high-level decisions with consistency and accountability across schools.

I have worked under three separate CAS in the KKP Complex over my tenure. All three have provided me with the support needed during critical times, such as the lava mitigation that brought an entire school to our campus to share facilities. During the hurricanes that trashed our community, but working with the Honolulu Offices to get the proper repairs done to our facilities so our students could compete. Most recently, through COVID-19, by working with our Athletic program and staff to safely bring our student-athletes back to school and participating in sporting activities.

While I appreciate the Legislature's intent to promote fiscal responsibility and accountability within the Hawaii DOE, I respectfully raise concerns regarding the current proposed statutory cap on superintendent-level positions for the following reasons:

1. A fixed cap may undermine flexibility. A fixed number of (27) does not adjust for enrollment growth or decline, school restructuring, new Federal mandates, and Crisis response and needs. Education systems must be responsive and adaptable. A statutory ceiling could unintentionally reduce that responsiveness.
2. CAS are essential operational leaders. They currently oversee personnel, fiscal, and facilities management. Compliance with state and federal laws; curriculum and instructional support; and special education services. All of this directly and significantly impacts school-level operations, including athletics and co-curricular programs. Their role is extremely vital in these times of administrative demands and heightened public scrutiny. Rather than eliminating or restricting these positions, the focus should be on ensuring that highly qualified, community connected leaders fill them.
3. May disproportionately impact the neighbor islands. Complex areas on Hawaii Island, Maui and Kauai already cover large geographic regions. If positions are reduced or frozen, workloads would increase, support to principals and schools would decrease, and rural communities may lose their voice. The cap doesn't take into consideration the needs of the outer islands. Kau-Keaau-Pahoa Complex Area covers the entire district of Puna (Island of Oahu fits within) and the district of Kau, with one CAS as an example.

A more balanced alternative may be requiring justification for new superintendent-level positions instead of a fixed cap; mandating periodic structural review, rather than looking at a specific number; and strengthening evaluation systems without restricting headcount.

Having worked in the DOE for the past 21 years, I live in the day-to-day of the operations, trials and tribulations of a school. The evaluation component makes sense. The cap is not equitable to all.

I appreciate you and thank you for the opportunity to testify and for your continued commitment to improving public education in Hawai'i.

Respectfully submitted,

Iris McGuire, CMAA

Athletic Administrator/District Education Specialist II – KKP

To: Committee on Ways and Means (WAM)

From: Wesley Shinkawa, Principal of Kapolei High School

Date: February 27, 2026

Subject: Testimony on SB3334, SD2 (Proposed) – RELATING TO EDUCATION (Comments Only)

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

Thank you for the opportunity to provide comments on the proposed SD2 for SB3334.

I would like to express my sincere appreciation for the amendments that WAM has made in the proposed SD2. Unlike the previous SD1 version, which sought to repeal complex areas entirely and replace them with a new district structure, SD2 preserves the current complex area organizational structure. Maintaining these established units is vital for schools, as it avoids the massive administrative disruption that would have been caused by redefining every "complex" into a "district". By keeping the complex area model, the legislature ensures that schools can continue to receive support through familiar administrative channels without the uncertainty of a complete system overhaul.

While I support the structural stability in SD2, I must express concern regarding the proposed requirement for the Board of Education (BOE) to conduct written performance evaluations for each Complex Area Superintendent (CAS) every two years. Current practice involves the Deputy Superintendent of Academics evaluating the CASs. Shifting this responsibility to the BOE may remove the evaluation process from those with direct, day-to-day operational knowledge of complex area performance. A professional evaluation by the Deputy Superintendent ensures that instructional leadership is assessed by a direct supervisor intimately familiar with the specific academic and operational needs of the complex.

The proposed SD2 establishes a statutory cap of twenty-seven individuals in "superintendent-level positions". I am concerned that this rigid cap does not account for the rapid expansion of school communities, such as in the Campbell-Kapolei area. In the Ho'opili subdivision alone, three new elementary schools, two middle schools, and a new high school are anticipated.

Without the managerial flexibility to add superintendent-level positions (such as additional CAS or Deputy CAS roles) to meet this growth, the Department of Education would be forced to choose between tasking the existing CAS to take on more responsibilities or take from existing positions that are currently assigned to address other areas of need within the department. This statutory cap could unintendedly and severely compromise progress being made in our schools and these other areas.

Furthermore, the subordinate superintendent position or Deputy CAS position has been a critical leadership tool. Our Superintendent has used this role intermittently to train and onboard

future CASs. This "succession planning" is essential for ensuring that leadership changes occur with minimal disruption to schools and communities. A statutory cap may inadvertently eliminate the flexibility needed to use these developmental roles, potentially leaving complex areas without experienced leadership during transitions.

I respectfully ask the Committee to consider these points to ensure the Department of Education retains the flexibility necessary to support all of Hawaii's school communities.

Mahalo,

Wesley Shinkawa

**TESTIMONY IN OPPOSITION TO SB 3334 Senate Committee on Ways and Means Hearing  
Date: Friday, February 27, 2026**

**Aloha Chair Dela Cruz, Vice Chair Keith-Agaran, and Committee Members,**

My name is **Jarrett Honjiyo**, and I'm a Teacher and Chairperson of the School Community Council at **Moanalua Middle School**. I'm writing today because I am seriously concerned about SB 3334. While I understand the desire to give our communities more of a voice, this bill feels like a recipe for chaos in our schools.

I am asking you to **please vote NO** on this bill for a few very human reasons:

**1. Principals shouldn't have to win a "popularity contest."**

Giving the School Community Council (SCC) 50% of the power to hire or fire a principal sounds democratic, but in reality, it's dangerous. A principal's job is to lead, and sometimes that means making hard choices that parents or community members might not like—whether it's a discipline issue or a change in curriculum.

If a principal knows their mortgage depends on keeping a small group of volunteers happy, they won't be able to lead with integrity. We need our principals to be focused on **students**, not on navigating neighborhood politics or trying to stay "popular" enough to keep their jobs.

**2. SCC members may not be HR experts.**

I love my school's SCC, but we are volunteers—parents, neighbors, and students. We aren't trained in employment law, labor unions, or professional evaluations. Asking us to be responsible for the "firing" process of a professional educator is asking for lawsuits and massive headaches. Hiring and firing should be handled by professional educators who know the legal ropes, not by a rotating group of well-meaning but untrained volunteers.

**3. We are removing the "lifeline" for our schools.**

By getting rid of the Complex Area Superintendents (CAS), this bill leaves our principals completely stranded. Right now, if a principal has a crisis at their school, they call their CAS. Under SB 3334, who do they call? The State Superintendent? There are over 250 schools in Hawaii. It is physically impossible for one office in Honolulu to provide the support and mentorship that our schools currently get from their local complex areas.

**4. This will drive away good leaders.**

Who would want to be a principal under these conditions? If you knew your job security was tied to the shifting moods of a local council rather than your actual performance as an educator,

you'd probably look for work elsewhere. We already have a shortage of great school leaders; let's not make the job so volatile that nobody wants it.

**In short:** This bill feels like it's trying to fix the DOE by tearing out the foundation. Our schools need more support and less politics, not the other way around.

Please, let's keep the "community" in Community Councils, but leave the professional hiring and firing to the professionals. Please **oppose SB 3334**.

Mahalo for your time and for considering my testimony.

**SB-3334-SD-1**

Submitted on: 2/28/2026 8:17:30 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Garret S Zakahi	Individual	Oppose	Written Testimony Only

Comments:

**Senator Donovan Dela Cruz, Chair**

**Senator Sharon Moriwaki, Vice Chair**

**Committee: Ways and Means**

**RE: SB 3334 SD2– RELATING TO EDUCATION – STRONGLY OPPOSE**

**Hearing date:** Monday, March 2, 2026 at 10:00am

---

**POSITION: COMMENTS WITH CONCERNS**

As the principal of Thomas Jefferson Elementary School, I would like to express my sincere appreciation to the Committee on Ways and Means for its responsiveness to previous feedback. Specifically, we thank the Committee for the removal of provisions regarding School Community Council (SCC) involvement in principal evaluations and the elimination of the proposal to shift toward a district-based model. These changes reflect a collaborative approach to preserving effective school-level leadership.

However, despite these improvements, **SB3334 SD2 (Senate Draft 2)** introduces several new provisions that raise significant operational and jurisdictional concerns. I believe these measures will disrupt effective governance and restrict the Department’s ability to manage its leadership structure effectively.

---

**KEY AREAS OF CONCERN**

**1. Infringement on Managerial Authority (Position Caps)**

SD2 establishes a statutory limit of 27 superintendent or subordinate superintendent positions.

- **The Issue:** Codifying staffing limits into law prevents our Superintendent from being agile in response to changing student needs or departmental growth.
- **The Impact:** This restriction blurs line authority and strips our Superintendent of the managerial right to design a leadership structure that best serves the state's complex educational landscape.

## 2. Inappropriate Shift in Evaluation Oversight

The bill requires the Board of Education (BOE) to conduct biennial written performance evaluations of our Complex Area Superintendent (CAS).

- **The Issue:** Our Complex Area Superintendents report directly to our Superintendent, not the Board. Having the Board conduct these evaluations bypasses the established chain of command.
- **The Impact:** This provision creates a "dotted line" of reporting that undermines our Superintendent's role as the chief executive. Direct supervision and evaluation must remain with the immediate supervisor to ensure accountability and professional alignment.

## 3. Privacy and Confidentiality of Personnel Evaluations

SB3334 SD2 mandates that our Superintendent provide copies of CAS performance evaluations to legislators upon request.

- **The Issue:** This raises serious concerns regarding the confidentiality of personnel records.
- **The Impact:** Subjecting individual performance reviews to legislative requests may politicize the evaluation process and could discourage candid, constructive feedback necessary for professional growth.

## 4. Redundant Reporting Requirements

The bill introduces new annual reporting requirements to the Legislature regarding superintendent-level staff.

- **The Issue:** The Department is already committed to transparency; however, additional statutory reporting mandates divert administrative resources away from student-centered initiatives without a clear benefit to educational outcomes.

---

## CONCLUSION

While I appreciate the removal of several problematic sections from previous drafts, the new provisions in SB3334 SD2 create a rigid governance structure that hampers our Superintendent's ability to manage the Department effectively. I respectfully ask the Committee to reconsider

these mandates to ensure that our educational leadership remains focused on operational excellence and student success.

**Thank you for the opportunity to provide these comments.**

## Testimony in Opposition to SB 3334,

Aloha my name is Samarra Lehman. I am not only a resident of Waianae, but a Resource Teacher on the Induction & Mentoring Team of Nanakuli-Wai'anae Complex. I respectfully submit this testimony in **strong opposition** to SB 3334.

Before I speak to the logistics of this bill, I have to voice how disheartening it is to see the public input process for SB 3334 unfold this way. As someone working in the trenches of our schools, I see that only 12 individuals supported this measure, while over 128 testimonies stood in clear opposition. When the DOE, teachers, and the community at large are all raising the same red flag, it feels like those of us doing the work are being unheard. The record is clear: the majority of people within the field are asking to VOTE NO! We as educators have a deep sense of what this bill will do and the extreme harm that it will cause to our system.

Even the Board of Education has expressed serious reservations. It is difficult for those of us in the field to understand why a proposal with so little community support and so much professional concern continues to move forward. We ask that it stops in the House.

From my daily experience as a Resource Teacher, I can tell you that eliminating the Complex Area Superintendent (CAS) position wouldn't "streamline" things—it would destabilize the very support system schools rely upon to support their individual needs. The CAS isn't a distant "layer of bureaucracy" to us; they are the bridge that ensures our schools are funded and supported. We as a complex work together to ensure schools and in particular for my team, new teachers are able to receive the support that they need. Our CAS supports our team and our efforts by building bridges between our office and the schools.

In our Complex Area, I see the direct impact of our team every day through:

- **Support for New Teachers:** Ensuring our beginning teachers have the mentoring and induction they need and helping to decrease the high turn over rate that is prevalent across the state. We help to ensure teachers develop classroom management skills, understanding of standards and curriculum and develop an understanding of how to analyze student learning in order to ensure students are making progress.
- **Professional Development:** Coordinating the unique and specific needs of our teachers across our 9 schools by creating learning opportunities based on the needs of our beginning teachers. We also provide cultural induction as it is imperative for new teachers who may not be from Hawaii develop an

understanding of the students they are working with and develop a connection to the community and Hawaiian culture. We serve the highest population of Native Hawaiian students in the state.

Forcing our school administrators to adapt to structural changes, will cause an unnecessary weight and the ultimate burden of SB3334 will fall on our students.. When Schools are unable to receive individualized support from the complex team, Principals are unable to run their schools smoothly, teachers are unsupported and often are left with a hard choice as to whether they want to stay in the profession, leaving students with a constant flow of new and inexperienced teachers. Eliminating the CAS position will inevitably weaken the support structure that our community relies on. Our schools and our complex are significant parts of the community and weakening the systems will have a deep negative impact on our community as a whole.

I respectfully urge the Committee to **HOLD SB 3334**. Please don't dismantle a support structure that is vital to the students and teachers we serve. .

February 28, 2026

Testimony: SB 3334 SD 1 and 2 Comments with Concerns

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

My name is Eleanor Gonsalves. I am the Principal of Royal School.

Thank you for taking the time to hear our concerns regarding SB 3334 SD1.

I appreciate the Committee's thoughtful revisions in SD2, in particular the removal of references to the Department's structure—including complex areas and districts—and the ideas related to School Community Councils' input into principal selection and evaluation.

However, I feel the need to provide copies of Complex Area Superintendents evaluations to legislators upon request unnecessary and a bit farfetched. The Department currently has a system in place. The current system already ensures that any areas of concern are addressed within the departments structure.

While I appreciate the Committee's response in amending portions of the bill, SB 3334, D2, I believe that some of the recommendations are really not necessary and may not align to the current structure of the Department. While all may not appear aligned, I do believe that the Department under the current leadership/structure is making progress.

I appreciate the opportunity to submit this testimony and share my comments,

### Testimony for SB334 SD2

Information	Details
Bill Number	SB 3334 SD2
Committee	Senator Dela Cruz, Chair; Senator Moriwaki, Vice Chair; and Members of the Ways and Means Committee
From	Lisa Ann Higa Principal, Bridget Moniz Vice Principal
Submission Date	February 28, 2026
Description	This bill establishes a statutory limit of 27 superintendent-level positions within the Department of Education and mandates a formal written performance evaluation for every Complex Area Superintendent (CAS) every two years. These evaluations, conducted by the Board of Education, must measure specific criteria including student academic progress, fiscal efficiency, and feedback from stakeholders like Principals and School Community Councils. Furthermore, the DOE is required to submit an annual report to the Legislature detailing the salaries, duties, and travel expenses of these 27 positions to ensure high-level transparency and administrative accountability.

Our Position on this Bill is:

**Comments Only**

#### **Detailed summary of our position:**

We would like to sincerely thank the Ways and Means Committee for listening to our concerns around the important role of the Complex Area Superintendent (CAS) in supporting our schools and the challenges with potentially misinformed School Community Council (SCC) members evaluating principals. We appreciate the Ways and Means Committee for recognizing and respecting the duties of the CAS as it is vital to the success of our students, staff and school committee. Further, there is a current, effective process of the SCC in providing input into the evaluation of the school principal.

The hierarchy and accountability becomes muddled and unclear should the Board of Education (BOE) be responsible for the personnel evaluations every two years of the CAS. Currently, the BOE evaluates the Superintendent who in turn supervises and evaluates the CAS. Under the

proposed system, it is not clear to whom the CAS is responsible to report to and this could, in turn, destabilize CAS support to our schools and school administrators.

With regards to building a system of transparency regarding travel, salaries, duties and reporting-we are in agreement of the fiscal accountability and responsibility of our superintendent-level positions and a budget plan brought forth.

### Effects of the Bill

Please list the most significant effects of this bill. Include both positive and negative effects, if applicable, to provide a complete picture.

Effect	Type	Impact Description
Effect 1	Negative	The Superintendent is a direct supervisor of the 27 "superintendent level positions" however, the BOE will conduct bi-annual performance evaluations. This lessens the ability of the Superintendent to supervise, manage and provide the necessary and immediate support to the schools.
Effect 2	Negative	The Superintendent is an educational professional while the Board of Education represents a mixture of educational professionals and community members. Not all may be able to evaluate the nuances of progress if they are limited to using only specific outcome measures.
Effect 3	Negative	Transparency regarding travel, funding, and the like should be reported to both the BOE and the Legislature.

In closing, we would like to echo the sentiments of our former Complex Area Superintendent in Nanakuli/Waianae, Ann Mahi: "Education is not simply a line item in a budget or bill moving through the committee. It is a promise we make to every child, in every classroom across the islands".

Sincerely,

  
Lisa Ann Higa  
Principal

  
Bridget Moniz  
Vice Principal

**TO:** Members of the Committee

**RE:** SB 3334, SD2 – Relating to Education

**POSITION:** Respectful Opposition to Current Provisions

While I would like to express my sincere appreciation for the Committee's thoughtful revisions in **SD2**—specifically the removal of references to internal departmental structures and School Community Council involvement in principal selection—significant operational and governance concerns remain.

Despite the progress made, **SB 3334, SD2** continues to contain provisions that would impede effective leadership, blur the lines of governance, and compromise personnel privacy.

The proposed cap on the number of superintendent-level positions represents a direct infringement on the **managerial rights of the Superintendent**. To lead effectively, the Superintendent must have the autonomy to:

- **Respond to Crises:** As seen during the Maui wildfires, executive-level support is vital when responding to unprecedented operational challenges.
- **Manage Transitions:** Flexibility is required to designate "shadow" support when a Complex Area Superintendent (CAS) departs, ensuring leadership continuity.
- **Evolve with Needs:** Statutory caps create an artificial barrier that prevents the Department from deploying resources where they are most critically needed.

The requirement for the volunteer Board of Education (BOE) to conduct written performance evaluations for every CAS every two years is both **unnecessary and operationally unsound**.

- **Existing Line Authority:** CAS positions currently report to the Deputy Superintendent of Academics. This provides direct accountability and individualized, professional support.
- **Role Confusion:** Shifting this responsibility to the Board risks blurring the distinction between **governance** (the Board's role) and **management** (the Superintendent's role).
- **Undue Burden:** This mandate places an unrealistic workload on volunteer board members while disrupting an already effective accountability structure.

I strongly oppose the provision requiring the Superintendent to provide copies of CAS performance evaluations to legislators upon request.

- **Personnel Privacy:** Mandating the disclosure of confidential evaluations to the legislature is a significant overreach.
- **Politicization:** This requirement risks turning performance management into a political exercise rather than a professional growth and accountability process.
- **Sufficient Oversight:** The current supervisory system already ensures that performance issues are addressed internally and appropriately.

While the amendments in SD2 are a step in the right direction, the bill in its current form remains problematic. It restricts the Superintendent's authority, disrupts established governance, and imposes requirements that do not ultimately benefit student outcomes.

Thank you for the opportunity to provide this testimony and for your continued consideration of these critical issues.

Kyle Morikone  
Vice Principal,  
Royal School

## **COMMENTS 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, Senate Draft 2 (SD2) – Relating to Education**

**POSITION: Comments with Concerns**

**HEARING DATE: March 2, 2026 – 10:00 a.m.**

**Chair and Members of the Senate Ways and Means Committee,**

Aloha and thank you for the opportunity to provide comments on **SB 3334, Senate Draft 2 (SD2)**.

I wish to begin by expressing my sincere appreciation to the Senate Ways and Means Committee for thoughtfully revising the bill in response to concerns raised in prior drafts. In particular, I acknowledge and appreciate the removal of provisions that would have eliminated the Complex Area Superintendent (CAS) structure and those that would have expanded School Community Council involvement in principal selection and evaluation. These revisions demonstrate responsiveness to practitioner feedback and a commitment to maintaining stability within Hawai'i's public education system.

I submit these comments from the perspective of a 44-year public school educator and 27-year school administrator, having served the Hawai'i Department of Education as a classroom teacher, State Educational Specialist (Science), Vice Principal at 'Aiea and Moanalua Intermediate Schools, and as Principal of 'Āina Haina Elementary School, Niu Valley Middle School, and Henry J. Kaiser High School. My comments are grounded in both system-level experience and daily operational realities.

While SD2 addresses significant prior concerns, my intent is to offer practical, field-based perspective as the Committee continues its deliberations.

### **Board of Education Evaluation of Complex Area Superintendents**

I respectfully express concern regarding the provision requiring the Board of Education to conduct written performance evaluations of each Complex Area Superintendent every two years.

In practice, Complex Area Superintendents function as line administrators with direct responsibility for supervising principals, ensuring compliance, and responding to instructional

and operational needs across diverse communities. Performance evaluation of these roles has traditionally—and effectively—been carried out within the administrative supervisory structure.

Maintaining a clear distinction between governance and management helps preserve clarity of accountability and consistency in evaluation practices, while supporting the Superintendent’s ability to manage and support system leaders effectively.

### **Superintendent’s Managerial Authority and Organizational Flexibility**

I also wish to share concern regarding the proposed statutory cap on superintendent-level and subordinate superintendent positions.

Given Hawai‘i’s unique status as a single, statewide school district, flexibility in organizational design has historically allowed the Department to respond to changing enrollment patterns, compliance requirements, and emerging student needs. Preserving the Superintendent’s discretion in structuring leadership roles may better ensure responsiveness and effectiveness over time.

### **Closing**

I again thank the Committee for its careful consideration and for its willingness to revise SB 3334 in response to stakeholder feedback. I respectfully encourage continued attention to preserving clear governance roles, professional evaluation systems, and leadership flexibility as the bill moves forward.

Mahalo for the opportunity to provide these comments and for your continued service to Hawai‘i’s public schools.

Respectfully submitted,

**Justin S. N. Mew**

44-Year Employee, Hawai‘i Department of Education

27-Year School Administrator

Honolulu, Hawai‘i

**Date:** Monday, March 2, 2026  
**Time:** 10:00 am  
**Location:** Conference Room 211 &  
Videoconference  
**Committee:** (WAM) Ways and Means

**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:

My name is Malia Naeole-Takasato. I am a Comprehensive Literacy State Development (CLSD) Resource Teacher at the Ka'u, Kea'au, Pahoia Complex Area on Hawai'i Island.

I am writing to express my sincere appreciation for the Committee's thoughtful consideration of public feedback regarding proposed changes to school leadership and governance structures within the Department of Education.

In particular, I commend the Committee for listening closely to stakeholders and ultimately eliminating the provision that would have assigned School Community Councils (SCCs) a direct responsibility in principal evaluations. I also greatly appreciate the decision to remove the concept of moving toward a broader district-level model that could have altered established accountability and support systems.

These adjustments reflect a strong commitment to balanced, evidence-based decision-making that prioritizes effective school leadership without unintended disruptions. Your responsiveness to community input demonstrates the value of open dialogue and helps build trust in the legislative process. Here are my understandings:

- **Caps the number of superintendent-level positions** — The bill establishes a clear statutory limit, requiring the Department of Education to employ no more than 27 individuals in superintendent-level positions (including the Superintendent, deputy superintendents, assistant superintendents, and complex area superintendents). This reasonable cap promotes fiscal responsibility and efficiency without disrupting essential school support systems.
- **Requires annual reporting to the Legislature** on superintendent and subordinate superintendent positions. This transparency measure ensures ongoing legislative oversight and accountability for administrative staffing levels.

- **Requires the Board of Education to conduct a written performance evaluation** of each complex area superintendent at least every two years. This strengthens accountability for regional leadership while aligning with established evaluation processes.
- **Requires the Superintendent to provide copies of complex area superintendent performance evaluations** to legislators upon request. This provision enhances accessibility to evaluation results, fostering greater transparency and legislative engagement.

These changes reflect thoughtful responsiveness to public and stakeholder input, balancing the need for streamlined administration with the value of localized support for schools and principals. By adopting these balanced reforms, the Committee has advanced meaningful improvements to DOE governance while encouraging continued collaboration.

Respectfully,

M. Malia Naeole-Takasato  
Comprehension Literacy State Development Resource Teacher  
Ka'ū, Kea'au, and Pāhoā Complex Area  
Hawai'i State Department of Education

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

**RE: SB 3334, PROPOSED SD2 - RELATING TO EDUCATION**

**DATE:** February 28, 2026

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

**FROM:** Kori Takaki], Principal

**POSITION: COMMENTS WITH CONCERNS**

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

My name is Kori Takaki, and I serve as a high school principal in the Hawai'i State Department of Education. Mahalo for the opportunity to provide comments with concerns on Proposed SD2 of SB 3334.

First, thank you for listening to the field and removing the provisions in SD1 that would have eliminated the Complex Area Superintendent (CAS) position and imposed a fixed 50% weight for School Community Councils in principal selection. Preserving the CAS role protects the regional leadership that serves as a lifeline to schools. Maintaining a professional, merit-based principal selection process also safeguards leadership stability for our campuses.

While SD2 is a meaningful improvement, I remain concerned about several new provisions.

Placing a statutory cap on leadership positions limits the Superintendent's ability to respond to operational realities. Our islands have unique geographic, staffing, and community needs that require flexibility, not fixed numbers in statute.

Requiring the Board of Education to conduct written evaluations of CASs shifts supervision away from the Superintendent and risks disrupting a clear chain of command. CASs are instructional leaders who should be evaluated within the Department to ensure alignment and coherence.

Finally, allowing CAS performance evaluations to be shared with legislators upon request raises serious confidentiality concerns and risks politicizing professional personnel matters. Expanding access beyond the Department could deter strong leaders from serving in these critical roles.

I share these concerns in the spirit of stability and effective governance. Our schools thrive when oversight is balanced with professional trust and operational flexibility.

Mahalo for your time, your service, and your commitment to Hawai'i's public school students.

With respect and aloha,



Kori Takaki

Principal

Kealakehe High School

**SB-3334-SD-1**

Submitted on: 2/28/2026 5:23:42 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Jon Henry Lee	Testifying for Campbell-Kapolei Complex Area	Comments	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 (CAS) for the Campbell-Kapolei Complex Area. Thank you for the opportunity to share my comments and concerns regarding SB 3334 SD2. I am genuinely grateful for the significant changes this amendment represents; your actions reflect a commitment to supporting our schools and honoring their voice, which remains our shared priority.

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

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

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

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

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

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

**DATE:** March 1, 2026

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

**FROM:** Tiffany Pratt, Principal

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

My name is Tiffany Pratt, and I am a Principal who has committed 30 years to the Hawai'i Department of Education and a lifetime to the greater good of our beloved Hawai'i. I would like to begin by extending a sincere **Mahalo** to the Committee on Ways and Means for your responsiveness to the feedback provided by school leaders and our community.

By choosing to eliminate the previous proposals regarding School Community Council (SCC) involvement in principal evaluations and the move back to a District Superintendent model, you have protected the stability and the positive trajectory of our school leadership. This collaborative approach builds trust between the legislature and the field, allowing us to keep our focus where it belongs: on our **students**. **Mahalo** for also keeping our **students** as the focus and recognizing that the current structure is working and can continue to improve.

While I appreciate the intent behind the revisions in SD2, **I must write in with concerns regarding unnecessary legislative oversight and the duplication of existing processes.**

### **1. Concerns Regarding Personnel Caps**

The proposal to cap superintendent-level positions at 27 creates a rigid framework that may not account for the evolving needs of our students.

- Professional Judgment: As educational professionals, we must have the flexibility to adjust leadership numbers based on student data and regional needs.
- Unnecessary Constraints: We are professionals who always keep student interests at the forefront; we do not require this type of "tight governance" from the legislature to manage our internal staffing effectively.

### **2. Redundancy in Performance Evaluations**

SD2 requires the Board of Education (BOE) to conduct written evaluations of each Complex Area Superintendent (CAS) every two years.

- Existing Effective Processes: We already have a rigorous, established process within the HIDOE for the hiring and evaluation of CASs. The proposal would disrupt the current line of authority.
- Duplication of Effort: Adding a BOE mandate and requiring the delivery of these evaluations to legislators creates an extra layer of bureaucracy. This does not improve student outcomes; it simply adds administrative weight to a system that is already performing these functions.

### **3. Maintaining Professional Integrity**

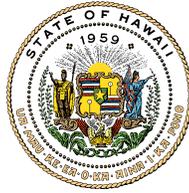
The move toward increased legislative oversight of personnel evaluations risks politicizing educational leadership. Just as every school and complex has unique needs, so does every CAS. It is difficult for an outside board like the BOE to know the minute intricacies a CAS is working on or how to effectively evaluate them. The HIDOE Superintendent and Deputy Superintendents, however, possess an in-depth understanding of what each CAS is managing and are the best fit to evaluate their performance. Our CASs are the backbone of our complex areas; their evaluations should remain a professional matter within the Department's established framework, free from external pressures or legislative requests for individual performance data.

Closing: I am grateful that the Committee heard our concerns regarding the District model and the SCC. However, because the current HIDOE processes for evaluation and staffing are already effective, I believe the additional oversight proposed in SD2 is unnecessary and counterproductive. I urge the Committee to trust the professionals in the field and hold this bill, as the current structure is already working for our keiki while minimizing personal agendas and biases.

Mahalo for the opportunity to submit written testimony and for your continued dialogue with Hawai'i's educators.

Respectfully,

Tiffany Pratt, Principal



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

February 27, 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 and respectfully thank you for the opportunity to submit comments regarding Senate Bill 3334, Senate Draft 2 (SB3334 SD2). I appreciate the Ways and Means Committee's continued engagement with education stakeholders and your commitment to strengthening accountability while supporting the Superintendent and the effective operation of the Hawaii State Department of Education (HIDOE).

I respectfully offer the following comments as possible suggestions for the Committee's consideration to the proposed amendments.

SB3334 SD2 establishes a statutory cap limiting the Department to no more than twenty-seven (27) superintendent or subordinate superintendent positions. While I appreciate the Legislature's intent to promote fiscal responsibility and organizational efficiency, could you possibly consider amending the language that preserves flexibility when systemwide operational needs warrant additional leadership capacity.

With anticipated student population growth and the planned construction of new schools in the Ewa Beach and Kapolei communities, there may be circumstances in which the addition of a Complex Area Superintendent (CAS) or other superintendent-level position is necessary to ensure effective oversight, compliance, and instructional leadership. A fixed statutory cap, without a mechanism for adjustment, may inadvertently constrain the Department's ability to respond to these evolving demands.

To address this concern while maintaining appropriate legislative oversight, the bill could be amended to allow the Superintendent to request authorization for additional superintendent-level

positions through the established budget proposal process. Such requests could include a detailed position description, defined duties, justification aligned to current Department priorities, and anticipated outcomes demonstrating how the position would support operational effectiveness, regulatory compliance, and student success.

This approach would uphold the intent of fiscal accountability while ensuring the Department retains the capacity to responsibly plan for growth and meet emerging systemwide needs.

The bill requires annual reporting to the Legislature regarding superintendent and subordinate superintendent positions. To promote clarity and consistency, would you consider that the legislation specify the information requested or recommended for inclusion in the report. Clear guidance regarding reporting expectations, such as role alignment, major initiatives, performance indicators, or systemwide outcomes, would ensure the report is both meaningful and aligned with legislative intent, while minimizing unnecessary administrative burden.

SB3334 SD2 requires the Board of Education (BOE) to conduct a written performance evaluation of each Complex Area Superintendent every two years. Would you consider amending this provision to reflect an appropriate supervisory structure.

Consideration could be given to having Complex Area Superintendents (CAS) evaluated by an upper-level superintendent, such as a Deputy Superintendent, who has direct supervisory responsibility. These evaluations could then be formally presented annually to the BOE by the Deputy Superintendent, with the CAS present to address questions or provide clarification. This structure maintains Board oversight while ensuring evaluations are conducted by those with direct operational knowledge.

The bill further requires the Superintendent to provide copies of CAS performance evaluations to legislators upon request. Could you consider an amendment to this provision or possibly have it removed.

Although Complex Area Superintendents serve in unclassified executive positions, their performance evaluations remain confidential personnel records under standard human resources practice within the Department. Preserving the confidentiality of these evaluations is essential to ensuring candid feedback, fair assessment, and legally compliant personnel management.

Releasing individual CAS evaluations outside the Superintendent's supervisory authority and established human resources processes risks undermining the integrity of the evaluation system, discouraging honest performance feedback, and creating unintended privacy and due-process concerns. CAS evaluations are designed to support professional growth, leadership accountability, and system improvement, not external review of individual personnel performance.

Any legislative concerns regarding system performance, leadership effectiveness, or organizational outcomes are more appropriately addressed through direct communication with the Superintendent of Education. This approach preserves transparency and oversight while respecting the Superintendent's statutory responsibility for executive supervision and personnel evaluation.

I would also like to express my sincere appreciation to the Ways and Means Committee for thoughtfully considering stakeholder feedback and for removing both the proposed School Community Council responsibility for principal evaluations and the concept of transitioning to a district-based model. Your responsiveness to these concerns demonstrates a commitment to collaboration and balanced policymaking, which is greatly valued by those working within our public education system.

Thank you for your time, consideration, and continued leadership. I respectfully submit these comments for your consideration as SB3334 SD2 continues through the legislative process.

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

**SB-3334-SD-1**

Submitted on: 2/28/2026 7:47:52 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Deborah S Ng	Individual	Comments	Written Testimony Only

Comments:

**TESTIMONY TO THE SENATE COMMITTEE ON WAYS AND MEANS  
RE: SB 3334, PROPOSED SD2 – RELATING TO EDUCATION  
DATE: March 1, 2026**

**TO:** Chair Donovan Dela Cruz, Vice Chair Sharon Moriwaki, and Members of the Committee  
**FROM:** Debby Ng, Complex Academic Officer, Nānākuli–Wai‘anae Complex Area

**POSITION: COMMENTS WITH CONCERNS**

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

I currently serve as a Complex Academic Officer within the Nānākuli–Wai‘anae Complex Area, supporting nine public schools in a high-need community. I appreciate the opportunity to provide comments on Proposed SD2 of SB 3334.

First, I want to sincerely acknowledge this Committee for removing the provisions in SD1 that would have abolished the Complex Area Superintendent (CAS) position and restructured principal selection authority. The overwhelming testimony from educators across the state reflected how essential the CAS structure is to school stability and instructional coherence. Preserving this regional leadership layer protects the direct, responsive support our principals depend on daily.

Our Complex Area operates with a singular focus: to be a system of support for our schools. We provide structured coaching cycles for principals, induction and mentoring support for beginning teachers, ongoing professional development for counselors and academic coaches, and coordinated data analysis across schools. We maintain dashboards that track attendance, academic progress, and special education compliance. All teachers are observed three times per year at the Complex level, and that data — alongside principals’ biweekly observations and common assessment results — is analyzed collaboratively to refine instruction and improve student outcomes. This coherence is possible because of aligned leadership under the CAS.

While SD2 preserves the structure, I must respectfully raise concerns regarding several new provisions.

First, placing statutory limits on the number of superintendent-level positions restricts the Superintendent's managerial authority to determine leadership needs based on operational realities. In high-need communities like Nānākuli and Wai'anāe — where staffing instability, geographic challenges, and concentrated poverty require targeted intervention — leadership capacity must remain flexible. Arbitrary caps may unintentionally limit the Department's ability to respond to evolving needs.

Second, the requirement that the Board of Education conduct written performance evaluations of each CAS every two years disrupts the professional chain of supervision. CASs are instructional leaders who must remain aligned under the Superintendent and deputy leadership to ensure coherence across statewide initiatives. Evaluation and supervision should remain within the Department's professional structure to maintain clarity of accountability and instructional alignment.

Finally, the provision requiring the Superintendent to provide CAS performance evaluations to legislators upon request raises serious concerns about confidentiality and politicization. Personnel evaluations are professional documents intended to support growth, accountability, and performance improvement within the Department. Making these documents subject to external political review may deter highly qualified leaders from pursuing or remaining in these critical roles.

I am grateful that SD2 recognizes the importance of maintaining regional leadership. However, I respectfully urge the Committee to reconsider provisions that centralize oversight in ways that may undermine professional autonomy and leadership stability.

In communities like ours, coherence matters. Stability matters. Leadership continuity matters. Our students depend on it.

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

Respectfully,  
Debby Ng  
Complex Academic Officer  
Nānākuli–Wai'anāe Complex Area

---

**Date:** March 2, 2026

**Time:** 10:55 AM

**Location:** CR 211 & Videoconference

**Committee:** WAM

**Bill No:** SB 3334 SD2, Relating to Education

**Testifier:** Carli Miyashiro

**Position:** Comments with concerns

Aloha e Chair Dela Cruz, Chair, Vice Chair Keith-Agaran, and Members of the Committee:

My name is Dr. Carli Miyashiro. I serve as a Vice Principal with the Hawai'i State Department of Education. I am submitting this testimony in my individual capacity and not as a representative of the Department.

I would like to express my sincere appreciation to the Committee on Ways and Means for listening to the feedback provided by school leaders and stakeholders. By not repealing the CAS and removing the provision regarding the School Community Council (SCC) 's involvement in principal selection and evaluation, you have demonstrated responsiveness to public concerns. This collaboration is vital to success at the school level.

However, regarding the new provisions introduced in Proposed SB 3334 SD2, I offer comments with concerns on how the changes might affect school operations.

The current proposal imposes a rigid cap on the number of individuals who can hold a superintendent-level position. A finite cap would not allow for flexibility in an ever-changing environment and world. For example, if the Department needed to add a CAS for a high-growth area, such as the west side of O'ahu, or to change the organization of the current complex area model, this law would prevent the Department from doing so without legislative intervention. The superintendent must retain the right to create leadership positions in response to the changing needs and demographics of our state.

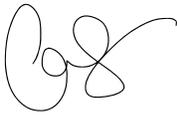
Additionally, under the proposed bill SD2, the CAS evaluation will be completed by the BOE and include feedback from the SCC. Evaluations should remain within the department and be completed by the Superintendent. The SCC does not work directly with the CAS, so they do not have the knowledge or insight to evaluate them. Furthermore, the BOE cannot evaluate the

effectiveness of a CAS without being present in the complex area to see how a CAS manages a crisis or supports a principal.

In conclusion, while I am grateful for the sections that I found problematic in past iterations of SB 3334, I urge the Committee to reconsider the finite cap on leadership roles and shift who provides evaluations.

Mahalo for the opportunity to testify.

Respectfully,

A handwritten signature in black ink, appearing to read 'Carli Miyashiro', with a stylized flourish at the end.

Dr. Carli Miyashiro

**Date:** March 2, 2026

**Time:** 10:00am

**Location:** Conference Room 211 and Videoconference

**Committee:** WAM

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

**BILL:** SB 3334 Relating to Education: SD2

**Testifier:** Malaea Wetzel

**Position:** **COMMENTS AND CONCERNS**

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

Thank you for the opportunity to provide testimony on SB 3334 SD2 (Proposed).

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

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

First, requiring the Board of Education to evaluate Complex Area Superintendents weakens clear lines of leadership and accountability. The Board is responsible for setting policy, while the Superintendent is responsible for managing personnel and executing that policy. Complex Area Superintendents report directly to the Superintendent and serve as the critical link between schools and the Department. Assigning evaluation authority to the Board blurs this distinction and undermines the Superintendent's ability to effectively lead, supervise and hold system leadership accountable.

Second, establishing a statutory cap on superintendent-level positions restricts the Superintendent's ability to effectively manage and organize the Department. Leadership structures must remain flexible to respond to evolving student needs, operational priorities and statewide initiatives. This flexibility is essential to ensuring that schools receive the support they need. Leadership structure decisions are a

core executive responsibility and should remain within the Superintendent's authority - not fixed in statute.

Hawaii's public education system depends on clear governance roles, strong leadership coherence and appropriate managerial authority. This bill, as written, undermines those essential foundations.

For these reasons, I respectfully urge the Committee to defer SB 3334 SD2 (Proposed).

Thank you for the opportunity to provide testimony.

Respectfully submitted,

*Malaea Wetzel*

[Malaea Wetzel \(Feb 28, 2026 20:53:37 HST\)](#)

Malaea Wetzel

Principal, Hale'iwa Elementary School

**Date:** Monday March 2, 2026  
**Time:** 10:00am  
**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, Proposed SD2. While I appreciate the transition away from the total elimination of Complex Area Superintendent (CAS) positions, the revised measures in SD2—specifically the statutory capping of leadership positions and the publicizing of confidential evaluations—create significant risks for the stability of literacy instruction in our most vulnerable communities.

As a District Educational Specialist focusing on literacy within the Ka'ū-Kea'au-Pāhoa Complex Area, I am gravely concerned by the following provisions:

**1. Arbitrary Caps Threaten Specialized Literacy Support:** The mandate to employ no more than 27 individuals in superintendent-level positions ignores the growing complexity of literacy needs in the "schoolhouse." For a rural and sprawling complex area like ours, these caps often lead to the consolidation of roles. When leadership is spread too thin, specialized literacy oversight is the first to suffer. My role as a literacy specialist relies on a CAS who has the bandwidth to advocate for regional resources; an arbitrary cap risks a "return to the center," leaving our rural students without a direct voice in the department's top tier.

**2. Politicization of Instructional Leadership:** The requirement to provide copies of CAS performance evaluations to legislators upon request is highly concerning. Evaluations of instructional leaders should be based on academic metrics, HMTSS-R fidelity, and student growth—not political favor. By making these evaluations available for legislative review, we risk shifting a CAS's focus away from long-term, research-based literacy strategies (which often take years to show results) toward short-term "performative" metrics that satisfy political inquiry but do not serve student learning.

**3. Impact on Localized Instructional Integrity:** The proposed biennial evaluations by the Board of Education, coupled with the reporting requirements, move governance further away from the local complex. In my daily work, I see that effective literacy instruction is not

"one-size-fits-all." We need a CAS who is evaluated on their ability to lead complex academic transformations specific to our geographic and socio-economic context—not one who is managed by a centralized board that may not understand the nuances of the Ka'ū-Kea'au-Pāhoa community.

**4. Instability in Long-Term Literacy Planning:** Literacy initiatives, such as our current CLSD grant work, require years of consistent, stable leadership to take root. The administrative "tightening" proposed in this bill creates an environment of professional instability. When leadership positions are capped and evaluations are politicized, it becomes difficult to maintain the long-term coaching cycles and "Job-Embedded Support" that our teachers currently rely on to improve student discourse and reading proficiency.

At its heart, literacy is about equity. Our students in Ka'ū-Kea'au-Pāhoa deserve a leadership structure that is designed for instructional impact, not one defined by administrative ceilings and political oversight. I urge the Committee to protect the integrity of our regional leadership and hold SB 3334.

Mahalo for the opportunity to testify.

Respectfully,

Elaine Higa

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

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

**DATE:** Monday, March 2, 2026

**TIME:** 10:00 AM

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

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

**BILL: SB 3334 SD2, Relating to Education** Establishing a cap on Superintendent-level positions and requires the Board of Education to conduct an evaluation of the Complex Area Superintendents every two years

**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 comments with concerns in opposition to SB3334 SD2.

First, I would like to express appreciation to the Committee for addressing significant concerns raised in the prior draft. The removal of provisions eliminating Complex Area Superintendents and shifting principal evaluation authority to School Community Councils reflects thoughtful consideration of stakeholder feedback. Those changes were important and appreciated.

However, I remain strongly opposed to the provision requiring the Board of Education to conduct written performance evaluations of Complex Area Superintendents every two years and making those evaluations available to members of the Legislature upon request

As a rural, neighbor island principal, my Complex Area Superintendent is my direct supervisor and primary regional advocate. The supervisory relationship between principals and CAS leaders depends on clear managerial authority and professional accountability structures within the Department. Performance evaluations of CAS leaders are a managerial function that should remain under the authority of the Superintendent of Education, who is charged with overseeing operations. Requiring the Board of Education to conduct individual CAS evaluations blurs the line between governance and management and alters the existing supervisory chain of command.

I am also concerned about establishing a statutory cap on superintendent-level positions. While I understand and support the goal of fiscal accountability, establishing a statutory cap limits the Superintendent of Education’s ability to strategically allocate leadership resources as conditions evolve. Hawai‘i’s public school system serves multiple islands with distinct geographic, demographic, and community realities. Leadership demands are not static. Enrollment shifts, emergent compliance

requirements, evolving academic priorities, and unforeseen regional crises require the flexibility to adjust leadership structures accordingly. Embedding rigid numerical limits in statute constrains adaptability and may unintentionally reduce responsiveness at the regional level - particularly for rural and neighbor island communities where distance and access already present operational challenges.

Our complex area spans a geographic footprint roughly the size of O‘ahu. In regions of this scale, leadership allocation and responsiveness matter deeply. Policies affecting supervisory structures and leadership flexibility have direct operational consequences on campuses like mine.

For these reasons, while I appreciate the improvements reflected in SD2, I respectfully urge the Committee to reconsider the provisions related to Board-level evaluation of Complex Area Superintendents and statutory limits that may constrain the Superintendent’s managerial authority.

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



Adria Medeiros

Principal, Mountain View Elementary School

Date: March 2, 2026

Time: 10:00 AM

Committee: WAM

Department: Education

Testifier: Bruce Naguwa

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

My name is Bruce Naguwa. I would like to thank the members of the Ways and Means Committee for supporting principals, teachers and students. Moving away from the current Complex Area Superintendent model, back to the District Superintendent model, does not take into consideration the unique needs of schools within a complex area. As a former District Deputy Superintendent for the Leeward District, we were responsible for six complex areas and over fifty schools. Providing individualized and on-time services to every school was difficult. Each complex area should be afforded the individualized attention that they deserve. The committee's decision will have a positive effect on the students that we serve.

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 backwards for equity, access and efficiency.

I would also like to thank the committee for not supporting the position to allow the School Community Council to have a weight of 50% for principal selections. While community input is a vital component to 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.

Thank you for supporting the students of Hawaii.

Mahalo for the opportunity to testify,

Respectfully,

Bruce Naguwa

Retired Principal and Former Deputy District Superintendent Leeward District

**Date:** Monday March 2, 2026

**Time:** 10:00am

**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 parent with children currently enrolled in the Hawaii Department of Education (DOE) public school system, I am writing to express my strong opposition to SB 3334, Proposed SD2.

While I understand the Legislature's desire for accountability, the specific measures introduced in this draft create a dangerous precedent that prioritizes arbitrary numbers over student needs and political oversight over academic success. I am particularly concerned by the following points:

**1. Arbitrary Caps Hurt Local Schools:** The statutory limit of 27 superintendent-level positions is a "one-size-fits-all" solution to a complex problem. As a parent, I want to know that my child's school has a direct line to leadership that understands our specific community's challenges—whether that is literacy gaps, rural transportation issues, or campus safety. When you cap these positions, you force the consolidation of Complex Areas. This means my school's leadership will be spread thinner, making them less responsive to the needs of my child and their teachers.

**2. Politicizing Education Leadership:** The requirement for the Superintendent to provide copies of Complex Area Superintendent (CAS) performance evaluations to legislators upon request is an extreme overreach. Evaluations for educational leaders should be confidential professional documents focused on student achievement and school health. Opening these up to legislative request invites political pressure into our schools. We need our educational leaders focused on our children's literacy and growth, not on whether their evaluation will be used for political leverage in the State Capitol.

**3. Centralizing Power Away from Communities:** Requiring the Board of Education—a centralized body—to conduct biennial written evaluations of every CAS moves power further away from our local "Complex" communities. Our local leaders should be accountable to the students, parents, and teachers they serve daily. This bill shifts that accountability toward a centralized political structure, making it harder for parents to have a meaningful voice in how their local school areas are led.

**4. Instability for Students and Teachers:** Our schools are finally finding their footing with critical literacy and support programs. This bill creates an atmosphere of instability. When leadership roles are capped by law and subject to political review, we risk losing high-quality educators who do not want to work in a politicized environment. Constant turnover at the top leads to inconsistent programs at the bottom, and it is our children who pay the price for that lack of continuity.

Our children deserve an education system that is stable, locally responsive, and led by professionals who are evaluated on student outcomes—not a system governed by arbitrary caps and political scrutiny.

I respectfully urge the Committee to **hold SB 3334, SD2** and focus instead on initiatives that put resources directly into our classrooms and support our local school communities.

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

Sincerely,

Darren Higa

Parent, Hilo-Waiakea Complex Area

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

My name is Keith Sakanashi, and I am a first-grade teacher at a Title I elementary school serving a high population of English Learners. I respectfully submit testimony in opposition to SB3334, SD2.

First, I sincerely thank the Senate Committee on Ways and Means for listening to educator and community feedback. Removing the requirement that School Community Councils conduct principal evaluations and eliminating the proposed move toward a district model demonstrated responsiveness and a willingness to collaborate. That decision strengthened trust among educators like myself.

However, from the lens of a classroom teacher, I remain concerned about the revised proposal.

### **Statutory Cap on Superintendent-Level Positions**

As a first-grade teacher in a high-need Title I school, I rely heavily on system-level support to meet the academic, linguistic, and social-emotional needs of my students—many of whom are English Learners acquiring foundational literacy skills while also learning a new language. The Hawaii State Department of Education operates as a single statewide district with diverse and complex needs. Placing a rigid statutory cap of 27 superintendent or subordinate superintendent positions may unintentionally limit the department’s flexibility to allocate leadership where it is most needed.

In my classroom, policy decisions are not abstract. Leadership capacity directly impacts professional development in early literacy, coaching support for differentiated instruction, EL strategies, and compliance with federal programs that fund Title I and language acquisition services. A fixed cap does not account for enrollment shifts, federal requirements, or emerging student needs.

### **Annual Reporting Requirements**

Transparency is important. However, additional reporting focused on superintendent staffing may increase administrative workload without directly improving outcomes for students. At the classroom level, what matters most is sustained instructional support, curriculum alignment, and timely intervention systems—not additional layers of reporting.

### **Complex Area Superintendent Evaluations**

Requiring the Hawaii State Board of Education to conduct written evaluations of each complex area superintendent every two years and mandating that evaluations be shared with legislators upon request raises concerns about governance balance. Evaluation systems should remain structured, fair, and focused on instructional leadership—not subject to potential politicization. Stability in leadership matters in high-poverty schools, where consistent direction supports long-term improvement efforts.

As a first-grade teacher, my daily focus is ensuring that every child learns to read, feels safe, and develops confidence as a learner. Structural changes at the top should clearly demonstrate how they will strengthen classroom instruction and student outcomes. At this time, SB3334, SD2 does not provide sufficient evidence that these changes will translate into measurable improvements for students in high-need Title I schools.

For these reasons, I respectfully urge you to reconsider the remaining provisions of SB3334, SD2.

Mahalo for the opportunity to share my perspective.

Sincerely,  
Keith K. Sakanashi  
First Grade Teacher

February 28, 2026

To: Senate Committee on Ways and Means

Re: SB 3334 SD2

Position: Comments with Concerns

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

First and foremost, mahalo nui for taking into consideration all the concerns brought before you regarding SB 3334 SD1. The thoughtful revisions in SD2 clearly show that you heard and understood the worries expressed by educators and leaders across the state, especially by removing references to our internal structure and the provisions about School Community Councils' input on principal selection and evaluation.

However, even with these important amendments, I must respectfully raise continued concerns about SB 3334, SD2.

### **1. Limiting Superintendent Positions**

Putting a limit on the number of top-level superintendent positions heavily restricts the Superintendent's managerial authority. The Superintendent must keep the flexibility to quickly adjust leadership to meet changing needs, handle emergencies (like the Maui wildfires), or manage staff transitions. Artificially limiting these roles stops the Superintendent from deploying the necessary support where and when it is needed most, which prevents our Department from acting fast and responsibly in critical situations.

### **2. Board of Education Performance Evaluations**

I strongly oppose requiring the volunteer Board of Education (BOE) to conduct written performance evaluations of Complex Area Superintendents every two years. This is unnecessary because the current chain of command - where Complex Area Superintendents report directly to the Deputy Superintendent of Academics - provides the proper supervision, accountability, and individualized support. Giving the evaluation duty to the BOE confuses the separate roles of governance (setting policy) and management (running the department). It also places a heavy, unnecessary burden on volunteer Board members and disrupts the clarity of the current accountability system.

### **3. Providing Evaluations to Legislators**

I strongly disagree with the provision that requires the Superintendent to provide copies of Complex Area Superintendent performance evaluations to legislators upon request. This requirement is unreasonable. Our current system already ensures that all concerns are handled appropriately within the Department. Forcing the release of personnel reviews to legislators compromises established supervisory trust and risks making performance management a political issue.

In summation, while the amendments reflected in SD2 of SB3334 are greatly appreciated, it continues to include rules that unnecessarily restrict the Superintendent's management power, disrupts the effective governing structure, and imposes new requirements that are neither operationally necessary nor beneficial to student outcomes.

Mahalo for the opportunity to provide this testimony.

'O au nō me ka 'oia'i'o,



Lehua Brown

Complex Academic Officer

Kaimukī-McKinley-Roosevelt Complex

**SB-3334-SD-1**

Submitted on: 3/1/2026 12:03:05 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lynette Kumalae	Individual	Support	Written Testimony Only

Comments:

**SB-3334-SD-1**

Submitted on: 3/1/2026 12:49:11 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Alan Kumalae	Individual	Support	Written Testimony Only

Comments:

Aloha Senate Education Committee,

My name is Alan Kumalae and I am in support of SB 3334 (SD2).

I am a community member on the Ka'ewai School Community Council and feel this bill will allow for more valuable input from the SCC which will in turn benefit the students and teachers in public schools in the future.

Mahalo for allowing me to submit my testimony.

## Testimony on Proposed SD2 of SB 3334

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

My name is Tim Hosoda. I serve as the Principal of Pauoa Elementary School. I am submitting this testimony in my individual capacity and not as a representative of the Department.

Thank you for the opportunity to weigh in on Proposed SD2. To be honest with you, I've never submitted testimony prior to SB3334. This bill is the first one that motivated me enough to write to be heard. Seeing the changes from the original proposal through SD2 makes me realize that the Senate is listening, and that our collective voices are making a difference.

While the changes to the bill are a great first step, there are a two things that I still have concerns about:

1) Limiting the amount of superintendent level positions to 27: I'm not sure what the purpose of this is other than to limit the Superintendent's authority. The Legislature provides the DOE with a specific amount of funds to operate all the public schools. The superintendent should be able to use his discretion to determine how to best use these funds. He knows what is working, what is not working, and what areas need to be addressed. If he doesn't use these funds in the best way to support the schools, he will hear it from the Board of Education as well as from the schools. The amount of superintendent-level positions in the DOE should be up to the Superintendent to decide.

2) The Complex Area Superintendent (CAS) evaluations: The Board of Education doesn't directly oversee the CASs. The Deputy Superintendent oversees all the CASs, which is why this Deputy is the one doing their evaluations. The person(s) who does the evaluations of any individual should be the one most familiar with what that person(s) is responsible for doing and if they are being effective or not. The Board of Education isn't familiar enough with what each CAS does to be responsible for their evaluations. Keep in mind that each Complex Area has their own issues, concerns, strengths, needs, as well as initiatives.

The second part of the CAS evaluations that concerns me is making their evaluations available to legislatures upon request. This information is personal and should be between the CAS and the Deputy that evaluates them. If this version of the bill were to pass, it would make it harder to attract qualified candidates because nobody wants their evaluation to be obtained by the legislature. The DOE is already having a hard time filling teaching positions, which is working its way upward because there is also a shortage of Vice Principals. We have many challenges in the DOE, don't make this another one. Please keep the CAS evaluations with the Deputy.

In conclusion, please look at all the great things Superintendent Hayashi is doing. While the DOE isn't perfect, he is making changes for the better. Please allow him to use his discretion

with the amount of superintendent-level positions in the DOE and how the CAS evaluations are handled. With your support, he will be able to accomplish even more.

Thank you for your time,

Tim Hosoda

**SB-3334-SD-1**

Submitted on: 3/1/2026 7:36:47 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Linda Voong	Individual	Oppose	Written Testimony Only

Comments:

Date: Monday March 2, 2026

Time: 10:00am

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:

My name is Linda Voong, and I am writing to you as a concerned parent whose child is scheduled to begin their journey in the Hawaii Department of Education (DOE) public school system in 2 years. While my child has not yet stepped into their first classroom, I am deeply invested in the stability and quality of the system they are about to enter. I am writing to express my strong opposition to SB 3334.

As I prepare my child for this major milestone, I am alarmed by measures in this bill that appear to prioritize political oversight and arbitrary caps over the actual needs of our students. My concerns include:

**Diluted Support for New Students:** The proposed statutory limit of 27 superintendent-level positions is a "one-size-fits-all" approach that ignores the unique needs of different communities. As a new parent, I want to know my child's school has a direct line to leadership that understands local challenges like literacy gaps or campus safety. Capping these positions forces consolidation, meaning leadership will be spread thinner and be less responsive to my child's teachers.

Unnecessary Politicization of Schools: Requiring that performance evaluations of Complex Area Superintendents (CAS) be provided to legislators upon request is an extreme overreach. I want our educational leaders focused on my child's academic growth and literacy, not on whether their professional evaluations will be used for political leverage at the State Capitol.

Centralization Away from Families: This bill shifts accountability toward a centralized political structure by requiring the Board of Education to conduct biennial evaluations of every CAS. This moves power away from our local "Complex" communities, making it harder for parents like me to have a meaningful voice in how our local schools are led.

Risking Instability for the Future: Our schools need stability to succeed. By creating a politicized environment with arbitrary leadership caps, we risk losing high-quality educators. Constant turnover at the top leads to inconsistent programs at the bottom, and I do not want my child to pay the price for a lack of continuity during their first years of school.

My child deserves an education system that is stable, locally responsive, and led by professionals focused on student outcomes rather than political scrutiny. I respectfully urge the Committee to hold SB 3334 and instead focus on initiatives that put resources directly into our classrooms to support our newest students.

Mahalo for considering the perspective of a future DOE parent.

Sincerely,

Linda Voong

Future Parent

To: Senate Committee on Ways and Means

Re: SB 3334, SD2 – RELATING TO EDUCATION

Hearing Date: Monday, March 2, 2026

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

Thank you for the opportunity to provide testimony on SB 3334, SD2. My name is Dr. Corey Barton. I am writing as an individual; however, I currently serve as the Principal of Ewa Makai Middle School.

I would like to express my overall appreciation to the Committee on Ways and Means for listening to stakeholder feedback and eliminating both the SCC responsibility of principal evaluation as well as the concept of moving toward a district model. Recognizing your responsiveness helps foster collaboration and reinforces the importance of maintaining the current complex area structure.

Regarding the proposed revisions in SD2, I would like to offer the following comments:

- **Strong Opposition to Board Evaluation of CASs:** I strongly oppose the requirement for the Board of Education to conduct biennial written performance evaluations of each complex area superintendent. These evaluations are a fundamental managerial right of the Superintendent of Education. Shifting this oversight to the Board undermines the Superintendent's authority to manage their own leadership team.
- **Concerns Regarding Legislative Overreach:** While oversight is vital for prudent fiscal management, the Department of Education is already subject to oversight by the Board of Education. It is concerning that the legislature appears to be attempting to act as the Board of Education itself. Accountability efforts should focus on the Board's oversight capabilities rather than the legislature exerting direct control over Department personnel and operations.
- **Concerns on Leadership Caps:** I am concerned that the Superintendent is losing the managerial right to create necessary leadership positions due to the statutory cap of twenty-seven individuals for "superintendent-level positions".
- **Transparency and Reporting:** While I have concerns about the evaluation process, I recognize the value of fiscal transparency. The requirement for an annual budget report detailing the duties, salaries, and travel expenses of all superintendent-level positions is a notable step toward public accountability.

Thank you for your consideration of this testimony and for your continued dedication to Hawaii's public education system.

Sincerely,

A handwritten signature in black ink, appearing to read "Corey Barton". The signature is fluid and cursive, with the first name "Corey" and last name "Barton" clearly distinguishable.

Dr. Corey Barton

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

My name is Leonard Padayhag, and I am a School Renewal Specialist (SRS) in the Kaimuki-McKinley-Roosevelt (KMR) complex area. I am writing to provide comments with serious concerns regarding the proposed Senate Draft 2 of SB 3334.

First, I would like to express my sincere appreciation to the Ways and Means for listening to our feedback on the previous draft. By removing the provisions that would have eliminated the Complex Area Superintendent (CAS) position and the proposed changes to the School Community Council's (SCC) role in principal selection, you have shown a responsiveness that fosters collaboration and maintains regional stability for our schools.

However, I strongly oppose the new provision requiring the Board of Education to evaluate CASs. This requirement blurs current line authority and disrupts effective governance structures. As a member of the district team, I know that CASs deal with an enormous volume of coordination, from executing the State Strategic Plan to handling local complaints. They should remain directly accountable to the Superintendent's chain of command, rather than being subject to biennial written evaluations by the Board.

Furthermore, I am deeply concerned with the Superintendent losing the managerial rights to create leadership positions due to the proposed cap of 27 superintendent-level positions. Restricting this authority ignores the tremendous and evolving role of subordinate superintendents in providing the necessary support to our students and families. This statutory limit is not operationally beneficial and hinders the Superintendent's ability to attract and retain the best talent to lead our department.

For these reasons, I urge the committee to reconsider these new revisions.

Mahalo for the opportunity to provide written testimony.

Respectfully,

Leonard Padayhag  
School Renewal Specialist, Educational Officer  
Kaimuki-McKinley-Roosevelt Complex Area  
4967 Kilauea Avenue  
Honolulu, HI 96817

**SB-3334-SD-1**

Submitted on: 3/1/2026 8:09:32 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Richard Billingsley	Individual	Oppose	Written Testimony Only

Comments:

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

Thank you for your thoughtful revisions in SD2, specifically the removal of references to internal department structures and School Community Council input. These changes directly address several of our previous governance concerns. However, I maintain serious concerns regarding the following provisions in SB 3334, SD2:

First, capping superintendent-level positions severely restricts the Superintendent’s managerial rights. Operational flexibility is vital during transitions and crises to deploy leadership support where it is most needed.

Furthermore, requiring the volunteer Board of Education to evaluate Complex Area Superintendents (CASs) is unnecessary and blurs the line between governance and management. The current structure, where CASs report to the Deputy Superintendent, ensures clear accountability and individualized operational support.

Additionally, mandating that personnel evaluations be shared with legislators is a significant overreach. This requirement risks politicizing performance management and undermines established internal supervisory processes.

While I appreciate the Committee’s responsiveness to date, SB 3334, SD2 still contains provisions that disrupt effective governance and restrict the Superintendent’s ability to manage the Department efficiently.

Thank you for the opportunity to provide this testimony.

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

### **RE: SB 3334, PROPOSED SD2 - RELATING TO EDUCATION**

**DATE:** February 28, 2026

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

**FROM:** Richard Carosso, Principal, Lahainaluna High School

### **POSITION: COMMENTS WITH CONCERNS**

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

As a principal currently leading within the Hawaii State Department of Education on Maui, I appreciate the opportunity to offer my perspective on the proposed changes in SB 3334, SD2.

I want to start by extending my gratitude to this Committee for its responsiveness to the concerns raised by school leaders. By preserving the Complex Area Superintendent (CAS) role and protecting the merit-based integrity of the principal selection process, you have prioritized the stability our schools desperately need. The CAS is more than a title; they are the essential support system that allows our regional schools to navigate daily complexities with a direct line to localized expertise.

However, as we look at the new language in Proposed SD2, I must highlight several operational risks that threaten our ability to manage the ongoing recovery in Lahaina effectively:

**1. Rigid Boundaries in a Fluid Recovery** The current situation in West Maui is anything but static. Imposing a fixed statutory cap on leadership roles is a "one-size-fits-all" solution for a problem that requires extreme flexibility. To properly address the enrollment surges and geographic hurdles we face, the Superintendent needs the authority to organize leadership based on actual site needs rather than arbitrary legislative ceilings.

**2. Preserving the Chain of Command** The proposal to have the Board of Education evaluate field-level CASs creates a significant disconnect in accountability. A CAS is an instructional leader who must remain answerable to the Superintendent and the Department's operational goals. Shifting this oversight to a centralized board—which is naturally removed from the day-to-day realities of our campuses—undermines the direct supervision necessary for a high-functioning school system.

**3. Maintaining Professional Privacy** The requirement to turn over individual performance evaluations to legislative bodies is deeply concerning. These documents are designed to be confidential tools for professional growth and departmental accountability. Subjecting these reviews to political scrutiny transforms them from a leadership development tool into a political target. This will undeniably discourage our strongest candidates from stepping into these high-pressure roles at a time when we need them most.

Our mission is to keep our focus on the classroom and the success of our students. I urge the Committee to reconsider these centralized oversight measures and allow the Department the professional autonomy it needs to lead through this recovery.

Thank you for your time and your continued commitment to our public schools.

Respectfully,

A handwritten signature in black ink, appearing to read "Richard Carosso" with a horizontal line extending from the end.

Richard Carosso  
Principal  
Lahainaluna High School

**SB-3334-SD-1**

Submitted on: 3/1/2026 8:47:12 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Alice Luck	Testifying for He'e Coalition	Oppose	Written Testimony Only

Comments:

The He'e Coalition stands in opposition to this bill. The Coalition recognizes that this Committee is concerned with the lack of progress in certain areas of the Department of Education; however, this proposed policy does not address systemic issues of concern effectively. It instead mandates arbitrary caps on Superintendent positions and requires the BOE to conduct performance evaluations of Complex Area Superintendents, something that they do not have sufficient information to do effectively or fairly, and which would conflict with the authority of the Superintendent to evaluate his or her own staff. If the Committee desires additional oversight of the Complex Area Superintendents, it should consider establishing complex area boards consisting of informed community members, which could be tasked with providing an additional layer of oversight and accountability at the Complex Area level.

**SB-3334-SD-1**

Submitted on: 3/1/2026 8:49:28 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Disa Hauge	Testifying for DOE, Nanakuli-Waianae Complex Superintendent	Comments	In Person

Comments:

Chair Dela Cruz, Vice Chair Moriwaki, and members of Ways and Means, I am Disa Hauge, Complex Area Superintendent for Nānākuli-Wai‘anae.

Thank you for the opportunity to testify on SB 3334 SD2. I would like to begin by sincerely thanking this Committee for listening to our previous concerns. My position on SD2 is neutral, and I would like to provide a rationale for your serious reconsideration of one specific element within the bill.

While I support the bill’s goals of transparency and accountability, I wish to describe the significant difficulty created by the new evaluation structure for the 15 Complex Area Superintendent (CAS) positions.

As currently drafted, the Board of Education (BOE) would be responsible for the biennial performance evaluations of the 15 Complex Area Superintendents. This creates a significant "line authority" conflict. In a large and complex organization, an employee should be evaluated by their direct supervisor, who possesses full knowledge of both the employee’s performance and the underlying work conditions that drive their decisions.

To illustrate the structural risk: As a CAS, I supervise Principals, who in turn supervise Vice Principals. If I were to bypass the Principal to evaluate the Vice Principal directly, it would undermine the Principal's authority and destabilize the school's management. It would directly affect teachers if the vice principals who support them were beholden to two supervisors-- me and their principal.

Under SD2, the Superintendent is the direct supervisor of the CASs, yet the BOE would conduct their evaluations. This creates a "dual-boss" scenario where a CAS may receive conflicting directives: prioritizing the operational goals of the Superintendent while being evaluated on different criteria by the Board. This leads to administrative instability and a lack of clarity in reporting and accountability. Principals and schools are, in turn, destabilized by this break in line authority and accountability.

We all share the common goal of student academic progress and community engagement. Lasting, effective change is best achieved through carefully managed processes, much like the Legislature’s thoughtful leadership that produced Act 51.

I respectfully ask the Committee to amend the bill to ensure that the Superintendent retains the responsibility for evaluating the CASs, with the BOE providing oversight of that process, rather than conducting the evaluations themselves. This preserves the professional chain of command while maintaining the public accountability you seek.

Thank you for your time and for your unwavering dedication to Hawai'i's students.

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

### **RE: SB 3334, PROPOSED SD2 - RELATING TO EDUCATION**

**DATE:** March 1, 2026

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

**FROM:** Debra Heyler, Vice Principal

### **POSITION: COMMENTS WITH CONCERNS**

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

First of all, I would like to thank the Senate committee for considering these two critical areas in your revised bill: Keeping the Complex Area Superintendent (CAS), as they provide indispensable localized oversight and expert mentorship that a centralized district simply cannot replicate; and the exclusion of School Community Councils (SCC) from principal evaluations, as they lack the technical benchmarks required for professional oversight and risk introducing personal bias into a process that must remain objective and data-driven.

However, while Proposed SD2 is a significant improvement over the previous draft, I must share the following concerns regarding the new provisions.

**Capping the number of superintendent-level positions:** As stated in my [testimony in opposition to SB 3334](#), CASes are essential to ensuring timeliness in critical responses, uniformity and consistency, and expert mentorship. Each school is on a trajectory of academic improvement with the guidance and support of our CAS. Being limited by a statutory cap that will impact the current systems and structure may have a consequential impact on student achievement and staff morale.

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

**CAS Evaluations to the Legislature:** Finally, the requirement that the Superintendent must provide copies of CAS performance evaluations to legislators upon request is also concerning. Personnel evaluations should remain confidential professional documents used for growth and accountability within the Department. Making these evaluations

available to political bodies risks politicizing leadership roles and may deter high-quality candidates from seeking or remaining in CAS positions.

Though I value the support for regional leadership in this draft, I urge you to reconsider these extra oversight measures. The Department should maintain the independence to evaluate and manage its own leadership team.

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

Respectfully,  
Debra Heyler  
Vice Principal

**Date:** Monday, March 2, 2026

**Time:** 10:00am

**Location:** Conference Room 211 & Videoconference

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

**BILL:** SB 3334, Proposed SD2, Relating to Education (Administrative Caps and Evaluations)

**TESTIFIER:** Samantha Tomori, Resource Teacher

**POSITION:** OPPOSITION

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

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 to express my **strong opposition to SB 3334, Proposed SD2**.

While I appreciate the Legislature's intent to improve accountability, the specific measures in SD2—particularly the statutory capping of leadership positions and the publicizing of confidential evaluations—threaten the stability of the very schools that need consistency the most.

As a Resource Teacher who works directly with classroom educators, I am concerned by the following provisions:

**1. Arbitrary Caps Compromise Localized Support:** The mandate to cap superintendent-level positions at 27 individuals is a "one-size-fits-all" approach that ignores the geographic reality of the Big Island. Our current structure allows for localized leadership that understands our unique challenges, such as limited internet access, transportation hurdles, and the high cost of living in remote areas. Capping these positions risks a consolidation of power that will spread leadership too thin, detaching administrative oversight from the actual needs of our rural students.

**2. Politicization of Performance Evaluations:** The requirement for the Superintendent to provide copies of Complex Area Superintendent (CAS) performance evaluations to legislators upon request is an unprecedented overreach. Evaluations of educational leaders must remain professional and confidential, focused on academic growth and instructional fidelity. Opening these documents to legislative scrutiny invites political influence into the management of our schools. Our CAS should be focused on student literacy and teacher support, not on how their professional evaluation might be used in a political arena.

**3. Centralized Oversight vs. Regional Knowledge:** Requiring the Board of Education to conduct biennial evaluations of every CAS moves accountability further away from the community. In a rural, disadvantaged complex, we need a leader who is empowered to make

decisions based on local data and community feedback. Shifting this evaluation to a centralized board—and then to the Legislature—strips away the local voices that advocate for our students.

**4. Instability and Teacher Support:** Our schools require stability, not constant restructuring or administrative "tightening." As a Resource Teacher, I see that our teachers thrive when they have a stable, supportive leadership chain that allows for long-term instructional planning. This bill creates an environment of professional uncertainty that hinders our ability to sustain the coaching and literacy cycles we have worked so hard to implement.

Our students in disadvantaged rural areas are already fighting an uphill battle. They do not need a reorganization that adds political layers to management while potentially thinning out the local advocates who understand their lives. I respectfully urge the Committee to **hold SB 3334, SD2** and instead focus on legislation that addresses teacher retention and direct school funding.

Mahalo for the opportunity to testify.

Respectfully,

Samantha Tomori

Resource Teacher

Ka'ū Kea'au Pāhoā Complex Area

**SB-3334-SD-1**

Submitted on: 3/1/2026 9:16:05 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Danielle Dixon	Individual	Oppose	Written Testimony Only

Comments:

To Whom It May Concern,

I submit this testimony in strong support of maintaining the existing leadership and organizational systems of the Ka‘ū–Kea‘au–Pāhoa (KKP) Complex Area within the Hawai‘i State Department of Education. I write from the perspective of a district resource teacher serving schools across Ka‘ū, Kea‘au, and Pāhoa on Hawai‘i Island.

The KKP Complex Area exists because our communities have distinct needs. Our rural and under-resourced schools face challenges that differ significantly from those of schools in more urbanized or resourced parts of Hawai‘i Island. Geographic isolation, limited access to services, staffing shortages, housing instability, transportation barriers, and varied family demographics shape the daily realities of our students, families, and educators. A one-size-fits-all structure does not serve us equitably. The existence of our own complex area systems is not a matter of convenience—it is a matter of educational justice.

Our current complex leadership structure allows us to be responsive to the specific needs of our schools. Decision-making is informed by deep, local knowledge of our communities. Supports are tailored to the realities of distance, infrastructure limitations, and workforce challenges. Our systems were built intentionally to address longstanding inequities, and they are working. To dismantle or collapse this structure—particularly through merging the three complex areas on Hawai‘i Island—would undo years of careful, responsive system-building that is finally producing stability and progress for our schools.

We are fortunate to have stable leadership from our current Complex Area Superintendent, who is deeply committed to advocating for the unique needs of Ka‘ū, Kea‘au, and Pāhoa. This leadership has fostered trust, consistency, and forward momentum. The relationships built between schools, district resource teachers, school leaders, and complex leadership are not incidental; they are foundational to how we support educators and students in rural contexts. Restructuring would fracture these relationships and erode the institutional knowledge that allows us to respond quickly and effectively when schools face crises, staffing challenges, or urgent student needs.

Among district resource teachers, we have developed a coherent and collaborative system of support aligned to the specific contexts of our complex. We share programming, schedules, professional learning structures, and coordinated service models that schools depend upon.

Students, families, teachers, and school leaders have come to trust these systems. Our programming is not generic—it is built with and for our communities. Disrupting this structure would not be a neutral administrative change; it would dismantle systems that schools rely on and are proud of.

Kalo teaches us an important lesson. When a kalo patch is finally established, its roots strong and its water flowing in balance, we do not rip it up and replant it in unfamiliar soil simply for the sake of reorganization. We tend the garden carefully. We protect what is growing. Our KKP complex systems are that kalo patch. They are rooted in relationships, nurtured through years of responsive leadership, and sustained by trust within our communities. To disturb this garden now would jeopardize growth that has taken significant time and care to cultivate.

Equity does not mean sameness. Equity means honoring difference and designing systems that meet communities where they are. The Ka‘ū–Kea‘au–Pāhoa Complex Area leadership structure does exactly that. I strongly urge decision-makers to preserve our current complex area systems and to recognize that restructuring—especially collapsing complex areas—would undermine the very progress that our rural schools have worked so hard to achieve.

Respectfully submitted,  
*Danielle Dixon*

District Resource Teacher  
Ka‘ū–Kea‘au–Pāhoa Complex Area  
Hawai‘i Island, State of Hawai‘i

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

**RE: SB 3334, PROPOSED SD2 - RELATING TO EDUCATION**

**DATE:** March 1, 2026

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

**FROM:** Wilma Roddy, Complex Academic Officer

**POSITION: COMMENTS WITH CONCERNS**

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

As a Complex Academic Officer on Hawaii Island, I appreciate the opportunity to weigh in on Proposed SD2 of SB 3334.

I want to start by acknowledging the Committee's decision to pull back on the plans to abolish the CAS position and the 50% SCC weight. These changes are a huge relief for those of us in the field. The CAS is a lifeline for our schools, and maintaining a merit-based system for principal selection is critical for the stability of our leadership pipeline.

However, I believe the new provisions in SD2 still pose significant risks to how we operate:

**Flexibility is Key:** Hawaii Island's educational landscape is unique. A "one-size-fits-all" statutory cap on leadership roles limits the Superintendent's ability to respond to our island's specific geographic and staffing challenges.

**Chain of Command:** The CAS must remain accountable to the Superintendent and deputy leadership. Moving their evaluations to the Board every two years creates a disconnect between those setting the strategy and those executing it on the ground.

**Privacy and Professionalism:** Opening up performance evaluations to legislative requests is a dangerous precedent. It risks politicizing roles that should be purely about educational excellence and may drive away the very talent we are trying to attract.

I respectfully ask that the Committee continue to collaborate with the Superintendent and school-level leaders to refine this measure. Mahalo for your time and for your commitment to Hawaii's public schools.

Respectfully,

Wilma Roddy, CAO

**SB-3334-SD-1**

Submitted on: 3/1/2026 9:31:15 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Neil Battad	Testifying for Mauka Lani Elementary School	Comments	Written Testimony Only

Comments:

Testimony as Comments on SB 3334 SD2

Chair, Vice Chair, and Members of the Committee:

Thank you for the opportunity to provide comments on SB 3334 SD2.

I want to sincerely thank you for listening to the voices of principals across the state and for making meaningful revisions to this bill. The decision to remove the provisions related to School Community Council (SCC) weighting and the elimination of Complex Area Superintendent (CAS) positions reflects thoughtful consideration and a willingness to engage with your constituents in the field. Our CAS is more than a Complex Area Superintendent. To me and my complex area principals, our CAS is Critical Administrative Support.

As principals, we are entrusted with leading diverse school communities. A critical part of that responsibility is listening carefully to the concerns of our faculty, families, and students — even when perspectives differ. Strong leadership requires dialogue, reflection, and adjustment when needed. In many ways, the Committee demonstrated that same principle in its review of SB 3334. By responding to feedback and modifying the bill, you modeled the kind of responsive governance we strive to practice in our own schools.

I also want to affirm that our School Community Councils (SCC) remain a vital and valued part of our campuses. SCC members give generously of their time and bring important perspectives to school decision-making. Their concerns are not dismissed; they are part of an ongoing partnership. As principals, we remain committed to working collaboratively with our SCCs to address challenges, strengthen transparency, and improve outcomes for students.

Mahalo for your willingness to listen and for your continued support of public school leadership. We appreciate the opportunity to engage in this process and look forward to continued collaboration.

Respectfully submitted,

Neil Battad

Principal, Mauka Lani Elementary

## Written Testimony

March 1, 2026

TO: Senate Ways & Means Committee  
Person Testifying: Jeffrey Shitaoka  
RE: SB3334 SD 2 Relating to Education  
Position: Opposition  
Hearing Date: 03/02/2026

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

My name is Jeffrey Shitaoka. I serve as a Principal at Niu Valley Middle School with the Hawai'i State Department of Education (HIDOE). I am submitting this testimony in my individual capacity and not as a representative of the Department.

I would like to first express my appreciation for your committee's responsiveness to consider the feedback from school level principals and other educators in the field. Thank you for eliminating the previous bill's language related to removing Complex Area Superintendents in favor of District Superintendents and Deputy District Superintendents. In addition, mahalo for eliminating the School Community Council's responsibility of principal evaluation.

I am in opposition to the bill and would like to share comments with respect to revised SD2.

I have reservations about requiring the Superintendent to provide copies of Complex Area Superintendent performance evaluations to legislators upon their request. I also have reservations that would require the Board of Education to conduct written performance evaluations of each Complex Area Superintendent every two years. Third, I have reservations about limiting the number of Superintendent or Superintendent subordinate positions. These actions would be detrimental to the morale within the HIDOE and undermine the authority of the Superintendent.

Principals and vice principals around the state are diligently encouraging teachers to consider the career path of school administration. If enacted, revised SD2 will create a direct if not downstream consequence of negatively impacting the ability to recruit and to retain educational officers at a time where building capacity is so critical.

Thank you for providing a venue for me to share my comments. Thank you for facilitating an open discourse to improve public education and for inviting collaboration.

Kind regards,



Jeffrey Shitaoka

## TESTIMONY TO THE SENATE COMMITTEE ON WAYS AND MEANS

Chair Dela Cruz, and Members of the Committee:

My name is Danielle Himalaya, and I serve as a principal within the Hawai'i State Department of Education. I am submitting this testimony in my individual capacity and not as a formal representative of the Department.

I would like to extend my sincere gratitude to the Committee on Ways and Means for its diligent consideration of the feedback provided by school-level administrators. Your willingness to refine SB3334 reflects a commitment to the stability of our educational system. Specifically, I wish to highlight the following points of appreciation:

### **School Community Council (SCC) Provisions**

I am appreciative of the committee's decision to remove the provisions that would have shifted principal evaluation and selection responsibilities to the School Community Councils.

- **Continued Collaboration:** It is important to emphasize that this is not a dismissal of the SCC's value. On the contrary, I deeply appreciate the continuous feedback and collaboration we share with our SCC members. They remain vital partners in shaping school culture and academic goals.
- **Professional Consistency:** By maintaining the current administrative structure for both the evaluation and selection of principals, the committee ensures that leadership remains grounded in professional standards and long-term institutional stability. This allows SCCs to continue to be a part of the process and to focus on collaboration without the burden of complex personnel management.

### **Preservation of the Complex Area Superintendent (CAS) Structure**

I further appreciate the committee for electing to maintain the existing Complex Area Superintendent (CAS) framework rather than transitioning to a district-based model. This continuity is essential for preserving the progress made within our current complexes and prevents the administrative disruption that often accompanies large-scale organizational shifts.

### **Conclusion**

The committee's responsiveness to those on the front lines of education fosters a genuine spirit of collaboration. Your actions demonstrate a profound respect for the professional expertise of Hawai'i's educators and a shared desire to maintain a functional, supportive system for our students. Thank you for the opportunity to provide this testimony and for your continued service.

Respectfully,

Danielle Himalaya

**Date:** Monday, March 2, 2026

**Time:** 10:00 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 SD2, Relating to Education

**TESTIFIER(S):** Joy Hohnstine

**POSITION: OPPOSITION AND COMMENTS**

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

Thank you for your time and careful consideration of all previously submitted testimony related to earlier iterations of this bill. Your continued support and earnest efforts to ensure all voices, concerns, and insights are not only heard but valued is truly appreciated and offers the opportunity for continued partnership as we all work together to find ways to support our students, staff, schools, and community.

Thank you.

I am submitting testimony today in opposition to SB3334 SD2. My opposition is not meant to undermine my gratitude for the revisions which have been made which reflect a true step forward but rather to ask for further consideration by the committee.

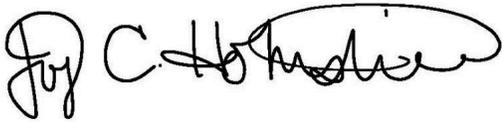
My opposition is based on the following concerns which I believe represent a significant risk of exacerbating an inequity of access, representation, and decision making for rural communities such as the one I have served for the last twenty years as an employee of the Hawai'i State Department of Education in the Ka'ū-Kea'au-Pāhoa Complex Area.

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

- I believe that performance evaluations help us improve and ensure alignment to our mission, vision, and intention to serve students. However, Complex Area Superintendents already participate in a highly regulated review process as part of our internal department practices. This review process would appear to meet the same need the proposed BOE review is hoping to achieve.

For these reasons, I oppose SB 3334SD2. Mahalo for the opportunity to testify.

Respectfully,

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

**SB-3334-SD-1**

Submitted on: 3/1/2026 9:48:20 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Anela Pia	Individual	Comments	Written Testimony Only

Comments:

March 1, 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:

Mahalo for your thoughtful consideration of the testimony submitted on SB3334 and for your responsiveness in amending the bill. I sincerely appreciate the Committee's decision to remove the provisions in SD1 related to assigning School Community Council responsibility for principal evaluation and selection, as well as the movement toward a district model and elimination of Complex Area Superintendents. Your willingness to listen to feedback from educators and stakeholders strengthens trust and reinforces a shared commitment to our public schools.

By addressing concerns regarding the restructuring of the Hawaii Department of Education and its potential impact on leadership coherence and school stability, the Committee has demonstrated a balanced and thoughtful approach to governance.

I do, however, wish to respectfully express continued concern regarding language that would limit the Superintendent's managerial authority to create and structure leadership positions as needed to effectively operate the system. The ability of the Superintendent to organize leadership roles in response to evolving student needs, enrollment shifts, operational demands, and strategic priorities is essential to maintaining an adaptive and effective statewide system.

I am also concerned about proposals that would assign the Hawaii State Board of Education direct evaluative authority over Complex Area Superintendents. The Board plays a critical policy-setting and oversight role, and maintaining a clear distinction between governance and management responsibilities is important for system stability. Blurring that line risks politicizing operational leadership roles and undermining the coherence of the superintendent's leadership team.

Strong systems depend on clarity of roles: the Board sets policy and direction; the Superintendent manages and implements through a cohesive leadership structure. Preserving that balance protects both accountability and operational effectiveness.

Thank you again for your responsiveness and for your continued commitment to thoughtful deliberation on matters that deeply impact Hawai'i's students, schools, and communities.

Respectfully,

Anela Pia

Ka'imiloa Elementary School Principal

**TO:** The Chair, Vice Chair, and Members of the WAM Committee

**FROM:** Stuart Kim

**DATE:** March 1, 2026

**RE: TESTIMONY IN OPPOSITION TO SB3334**

### **Relating to Superintendent-Level Positions and Evaluations**

I am thankful for the committee's revision of SB3334 and while the intent of this measure is to ensure fiscal responsibility and accountability, I respectfully **oppose** this bill. I believe that establishing a statutory cap on leadership positions and mandating specific evaluation protocols through legislation restricts the Department of Education's (DOE) ability to remain agile and responsive to the needs of our students and schools.

### **Concerns Regarding a Statutory Cap (Section 2)**

- **Limits on Administrative Needs:** Establishing a hard cap of twenty-seven (27) superintendent positions seems like an arbitrary limitation that does not account for future growth, federal mandates, or the evolving flexibility of school administration. As Hawaii's schools' educational needs change, the DOE must have the discretion to restructure its leadership to meet new challenges without requiring a legislative amendment every time a change is needed.
- **Excessive Oversight on Executive Authority:** The Board of Education and the Superintendent are constitutionally and statutorily tasked with the management of the public school system. Dictating the specific number of "superintendent-level" positions is a form of legislative micro-management that interferes with the BOE and DOE's ability to manage its workforce effectively.

### **Concerns Regarding Mandated Evaluations (Section 3)**

- **Redundancy and Administrative Burden:** Complex Area Superintendents (CASs) are already subject to performance reviews and oversight by the Superintendent. Codifying a specific two-year written cycle in statute creates a rigid framework that may conflict with existing collective bargaining agreements or internal performance management systems.
- **Politicization of Personnel Records:** Section 3(b)(4) requires that these evaluations be made available to any member of the Legislature upon request. This raises significant concerns regarding the privacy of personnel records and the potential for professional evaluations to be used as political tools. Leadership performance should be measured by educational outcomes and operational efficiency, not subject to legislative scrutiny that could discourage honest, constructive feedback within the Department.
- **Impact on Recruitment and Retention:** Subjecting high-level administrators to public or legislative review of their performance evaluations may deter highly qualified candidates from seeking these critical leadership roles.

## **Conclusion**

I appreciate the Committee's responsiveness in amending portions of the bill, SB 3334, however it still contains provisions that unnecessarily restrict the Superintendent's managerial authority, disrupt effective governance structures, and impose new requirements. True accountability is best achieved through the existing governance structure of the Board of Education, which is empowered to hold the Superintendent and their leadership team accountable for results. Locking administrative numbers and evaluation procedures into statute limits the system's ability to evolve and places an undue burden on the very people tasked with supporting our schools.

Thank you for the opportunity to provide testimony.

**Date:** Monday, March 2, 2026

**Time:** 10:00 a.m.

**Location:** Conference Room 211 & Videoconference

**Committee:** Ways and Means

**Department:** Ho'okele School Community Council

**BILL: SB 3334 SD2, Relating to Education** Elimination of Complex Area Superintendent Positions & SCC Authority Expansion

**TESTIFIER(S):** Ho'okele School Community Council

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

Thank you for the opportunity to submit this testimony. I am writing on behalf of Ho'okele Elementary School Community Council to express our sincere appreciation to the Ways and Means Committee for actively listening to stakeholder feedback and reflecting those concerns in the current draft of this measure.

Specifically, we wish to commend the Committee for eliminating the provision that would have tasked School Community Councils (SCC) with the responsibility of principal evaluations. Furthermore, we strongly support the decision to remove the proposed transition toward a district model.

The Committee's responsiveness to the concerns raised by the community is deeply valued. By recognizing our feedback and amending the legislation accordingly, you have not only validated our position on these vital educational structures but also fostered a spirit of meaningful collaboration. We believe this collaborative approach yields the best outcomes for our schools and communities.

Thank you again for your time, your consideration, and your leadership on this issue.

Thank you for the opportunity to testify.

Respectfully submitted,

Ho'okele School Community Council

Candice Yamamoto (Teacher and School Community Council Chairperson)

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

**DEPARTMENT:** Education  
**BILL:** SB2877, Relating to  
**TESTIFIER:** Daniel Larkin

**POSITION:** OPPOSITION AND COMMENTS

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

I am writing this testimony as an individual who is currently 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. Aside from the desire for a performance evaluation component, which is understandable and I believe we all would agree to, the new wording of this bill lacks a clearly articulated objective that would demonstrably improve student outcomes or system efficiency.

Why would we remove the connection between the schools and the Department or Superintendent's offices with even deeper degradation of capability? Yes there are problems within the department that need to be addressed and our students' performance is not at our desired levels, but if you examine the data from the previous three years of post COVID recovery, we are on the right track. Scores are up, attendance is up (but not enough), graduation rates are up. We are lauded nationally as one of the better states as to recovery. The biggest hurdle is time. Changing the direction of the ship is never instantaneous and does take time, but it is happening under the current structure, albeit at a slower pace than we as a state wish.

To be clear, according to the National Assessment of Educational Progress (NAEP), which is the gold standard for measuring state-level student achievement, Hawaii ranked 2nd in English and 4th in Math for post-COVID recovery as of 2025. Since 2003, where we were ranked near the bottom nationally, we have consistently improved and are now routinely in the middle of the ranking and working upwards. How could anyone be upset about that?

A simple internet search notes our overall biggest challenge is chronic attendance, in which the largest challenge is the lack of ability to enforce childhood attendance prior to the age of 12. Only after the age of 12 can they be taken to truancy court, however, by then the habits are formed, so it is nearly too late. Therefore, I urge the Committee to focus legislative efforts on addressing chronic elementary school attendance, a root cause of underperformance, rather than dismantling the current leadership structure.

I would like to add in my appreciation to Ways and Means for listening to the feedback and eliminating both the SCC responsibility of principal evaluation as well as moving towards a district model. Mahalo.

I still fully believe this proposed change still does not streamline the system, it still 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 leadership structure essential to school stability and student achievement. I fully believe that we should be sitting down as a collaborative group to co-write bills to help education, but ensuring these bills are written with the right purpose will take time, effort and open positive communication.

Respectfully,

Daniel Larkin, Principal

Date: Monday, March 2, 2026

Time: 10:00 am

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

Committee: WAM (Ways and Means)

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

BILL: SB 3334 SD2, Relating to Education

TESTIFIER: 'Iwalani Harris, Complex Area District Educational Specialist, 9 years, educator for 34 years

POSITION: Comments with concern to SB3334 SD2

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

First, mahalo piha to this Ways and Means committee for hearing my thoughts on this bill that directly impacts how we support and serve our schools within our Complex Area. I also mahalo you for eliminating both the SCC responsibility of principal evaluation and eliminating the district model that we had many years ago that did not serve schools, students, and communities effectively.

My name is 'Iwalani Harris, and I am writing to express my strongest opposition to SB 3334 and provide additional comments for SD2. I speak today not just as a concerned educator of over 30 years, 20 of those years at the school level, but also as someone who has dedicated the last decade to 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. It's not just principals that are supported by the CAS. Teachers, Educational Assistants, Parent Involvers, community organizations, and especially students have the ability to reach out to the CAS. The CAS helps us navigate and provides us guidance like a captain (kapena) of the canoe (wa'a).
- Integrity of Professional Evaluation: My decade of experience has shown that the merit-based, professional evaluation currently facilitated by the CAS is essential for maintaining school integrity. The CAS meets with parents, community members, educators, and students.

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. Each community is unique! 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 KKPCA summit where everyone gathers from each school to re-commit to serving our students and families in Ka'ū-Kea'au-Pāhoa 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. Will this revision support schools, students, and educators in each diverse community?!

I urge this Committee to 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

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. I urge this Committee to hold SB 3334 and maintain the regional 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

**SB-3334-SD-1**

Submitted on: 3/1/2026 9:59:52 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Geri Fernandez	Individual	Support	Written Testimony Only

Comments:

Subject: Testimony in Opposition to the Restructuring of the Ka‘ū–Kea‘au–Pāhoa Complex Area  
To the Members of the Decision-Making Body,

I am writing to you today as a District Resource Teacher dedicated to the schools of Ka‘ū, Kea‘au, and Pāhoa. I am submitting this testimony to voice my resolute support for maintaining our current leadership and organizational framework within the Hawai‘i State Department of Education.

**The Necessity of a Specialized System**

The KKP Complex Area is not merely an administrative boundary; it is a vital response to the unique socio-economic and geographic realities of our region. Our schools navigate a landscape defined by rural isolation, staffing hurdles, and significant infrastructure gaps.

Applying a centralized, "standardized" model to our district ignores the principle of educational equity. Our current independent structure ensures that we are not overlooked in favor of more urbanized areas, but rather empowered to address the specific needs of our students and families.

**Localized Leadership and Proven Progress**

Our current leadership, led by our Complex Area Superintendent, operates with a deep, localized understanding of our community’s pulse. This stability has allowed us to:

- **Foster Deep Relationships:** The trust between district resource teachers, school administrators, and the complex leadership is the backbone of our success.
- **Respond with Agility:** Because our leadership is local, we can pivot quickly to address crises or staffing shortages without the delays of a broader, more detached bureaucracy.
- **Preserve Institutional Knowledge:** Merging or collapsing our complex area would erase years of strategic progress and fracture the professional bonds that keep our schools running effectively.

**A Cohesive Network of Support**

As District Resource Teachers, we have meticulously built a support system tailored specifically to KKP. Our professional development, student programming, and scheduling are not "off-the-shelf" solutions—they are bespoke models designed for our rural context. These systems are finally providing the stability our educators and students deserve. To dismantle them now would be a step backward for the entire Hawai'i Island educational landscape.

### The Wisdom of the Kalo Patch

In Hawai'i, we understand that when a lo'i kalo is thriving—with strong roots and a steady flow of water—you do not uproot it for the sake of "reorganization." You protect the environment that allowed it to grow. The KKP complex is that thriving garden. Our systems are rooted in the trust of our community and nurtured by consistent leadership. To disrupt this growth now would jeopardize the future of every student we serve.

### Conclusion

True equity requires us to honor the differences between communities rather than forcing them into a mold of sameness. I strongly urge you to preserve the Ka'ū-Kea'au-Pāhoa Complex Area as it currently stands. Let us continue to build on the progress we have made rather than undermining the very systems that have finally brought stability to our rural schools.

Respectfully submitted,

Geri Fernandez

A District Resource Teacher

Ka'ū-Kea'au-Pāhoa Complex Area

Hawai'i Island

**Department:** Education

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

**Title of Bill:** SB 3334 SD2 – Relating to Education

**Hearing Date:** March 2, 2026

**Position:** OPPOSE / COMMENTS WITH CONCERNS

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

My name is Derek Santos, and I am the Principal of Kalihi Uka Elementary School. I would like to thank the Committee for removing the previous provisions in SD1 that sought to dismantle the Complex Area structure. Preserving the relationship between schools and their Complex Area Superintendents (CAS) is vital for the stability of our learning communities.

However, I am writing to express **strong concerns regarding the provisions in SB 3334 SD2**. While the intent may be fiscal oversight, the practical application of this bill creates a rigid, top-down environment which undermines the Department's ability to lead effectively.

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

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

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

## **2. Loss of Managerial Flexibility (Personnel Caps)**

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

- **Arbitrary Limits:** Education is not static. Whether dealing with a pandemic, a natural disaster, or a shift in federal mandates, the Superintendent must have the managerial right to create leadership positions that address the specific needs of our students.

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

### **3. Privacy and Professionalism**

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

### **Conclusion**

While I appreciate the removal of the "District" structure from the previous draft, SD2 replaces those concerns with new threats to the professional autonomy of the Department. I urge the Committee to **reconsider these provisions** and allow the Superintendent the authority to manage personnel and evaluations internally.

Thank you for the opportunity to testify.

Date: 3/2/26

Time: 10:00am

Location: 211

Committee: WAM

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

**FROM:** Barbara Oura Tavares

**MEASURE:** SB3334 SD2 – RELATING TO EDUCATION

**POSITION: SUPPORT IN PART AND PROVIDE COMMENTS/CONCERNS IN PART**

Thank you for the opportunity to submit testimony regarding SB3334 SD2. I am writing to express my deep appreciation for several of the recent revisions made to this measure, as well as to respectfully voice strong concerns regarding the proposed administrative caps and evaluation procedures for Department of Education (DOE) leadership.

**Points of Appreciation:**

- **Preservation of Complex Area Superintendents:** I want to express my sincere gratitude to the Committee for listening to community feedback and eliminating the proposal to change Hawaii's DOE leadership structure from Complex Area Superintendents to District Superintendents. Maintaining the current structure ensures we can continue an effective tri-level system that provides highly personalized, localized support to our school leadership and their unique communities.
- **Removal of School Community Council (SCC) Voting Authority on Principals:** I also greatly appreciate the elimination of the proposal that would have given SCCs responsibility and voting authority regarding principal evaluations and the selection of principal positions. Removing this provision helps maintain clear lines of authority among stakeholders, prevents potential bias, and avoids arbitrary decision-making practices in school leadership selection.

**Points of Concern:**

While the SD2 draft includes positive changes, I am highly concerned with the remaining proposals regarding superintendent-level positions and evaluations:

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

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

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

Sincerely,

*Barbara Oura Tavares*

Barbara Oura Tavares

Principal - Lihikai Elementary School

Barbara.Oura\_Tavares@k12.hi.us

**SB-3334-SD-1**

Submitted on: 3/1/2026 10:06:39 AM

Testimony for WAM on 3/2/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Kristi N Clay	Individual	Oppose	Written Testimony Only

Comments:

To whom it may concern,

I am writing as a District Resource Teacher to strongly support maintaining the existing leadership and organizational systems of the **Ka‘ū–Kea‘au–Pāhoa (KKP) Complex Area**. I want to be CLEAR; I have not been pressured by anyone in any way to submit this testimony. I do it on my own accord and am happy to answer any futher questions.

Our rural schools face unique challenges—geographic isolation, staffing shortages, and housing instability—that require a tailored approach. A "one-size-fits-all" model is not equitable for our students; the KKP structure is a matter of **educational justice**.

**Why the current system must remain:**

- **Localized Expertise:** Our leadership uses deep local knowledge to make responsive decisions. Merging complex areas would dismantle years of intentional, effective system-building.
- **Stable Leadership:** Our current Complex Area Superintendent has fostered the trust and consistency necessary for forward momentum. Restructuring would fracture these foundational relationships.
- **Cohesive Support:** As resource teachers, we have built a collaborative system of professional learning and service models that our schools rely on. These are not generic programs; they are built specifically for our communities.

In our culture, we know that when a *kalo* patch is established and the roots are strong, we do not uproot it for the sake of reorganization. We tend to it. Our KKP systems are that *kalo* patch—rooted in relationships and nurtured through years of care.

Equity means designing systems that meet communities where they are. I urge you to preserve our current structure and protect the progress our rural schools have fought so hard to achieve.

**Respectfully submitted,**

**Kristi Clay**

*District Resource Teacher Ka‘ū–Kea‘au–Pāhoa Complex Area*



## **Testimony in Opposition to S.B. NO. 3334, SD2 Relating to Education**

**Hearing Date:** Monday, March 2, 2026

**Time:** 10:00 AM

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

Dear Chairperson and Members of the Committee,

I am writing to express my gratitude for the opportunity to provide further testimony and to share my position on the proposed Senate Draft 2 of S.B. NO. 3334.

First, I would like to express my sincere appreciation to the Committee on Ways and Means for listening to the feedback provided by the community. Specifically, I am grateful for the decision to eliminate the School Community Council (SCC) responsibility for principal evaluations and for removing the concept of moving toward a district model. This responsiveness fosters a true sense of collaboration between the legislature and education professionals, and it reinforces the importance of maintaining a system that supports our school leaders.

Regarding the revised SD 2, I would like to offer the following comments on the new provisions:

### **1. On the Capping of Superintendent-Level Positions:**

While I understand the desire for fiscal and administrative efficiency, I remain concerned about the statutory limit of 27 positions. My primary concern throughout this process has been the preservation of the Complex Area Superintendent (CAS) role. Having worked with CASs since 2003, I have seen firsthand that they are vital to the HIDOE system. They take personal responsibility for the progress of their schools and know their principals and their needs intimately.

CASs play a vital role in bridging the gap between the State Department's vision and the unique needs of local communities. Their proximity to schools allows for local insight that is essential for tailoring state policies to meet the specific needs of students and families. Any cap on leadership must ensure that this specific, critical layer of oversight and support is not diluted or overburdened.

### **2. On Performance Evaluations and Reporting:**

The revised draft requires the Board of Education to conduct written performance evaluations of each CAS every two years and share these with legislators upon request.

While transparency is important, it is vital that these evaluations remain focused on professional growth and the complex, qualitative nature of school leadership.

CASs live their jobs—they are available at all hours and their weekends are filled with school activities. They address issues promptly, whether they involve student safety or academic performance. Any evaluation system must accurately reflect this high level of engagement and the diverse challenges faced across different islands and complexes.

In conclusion, while I appreciate the significant improvements made in SD 2, I urge the committee to ensure that the final version of this bill continues to protect the integrity of the Complex Area Superintendent position. Their role ensures that high standards are upheld and that issues are addressed effectively at the local level.

Thank you for your time, your responsiveness to our initial concerns, and the opportunity to provide testimony on this important matter.

Sincerely,

*Babette Moreno*

Babette Moreno

Straight A Solutions, LLC

281.384.4568

[babette@straightasolutions.com](mailto:babette@straightasolutions.com)

**SB-3334-SD-1**

Submitted on: 3/1/2026 12:57:30 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Dr. Sandy Cameli, EdD	Individual	Oppose	Written Testimony Only

Comments:

To: Senate Ways and Means Committee

Aloha Chair and Members of the WAM Committee,

I implore you to **OPPOSE SB 3334** and preserve the Superintendent structure within the Hawai‘i State Department of Education (HIDOE). The current system is an equity-focused mechanism that ensures consistent support, oversight, and open communication across all 258 public schools on our six islands.

Fair representation analogy

- Just as our Legislature relies on representatives from each island and district to ensure every community’s voice is heard, the current Superintendent structure ensures fair representation and tailored support for each island and Complex Area in educational decisions and implementation. Eliminating leadership positions from our current superintendent structure would be like removing local legislators and expecting a down-sized centralized body to equitably understand and address the needs of Kaua‘i, Maui, Hawai‘i Island, Moloka‘i, Lāna‘i, and O‘ahu - an approach that would silence local priorities and widen inequities.

Communication and responsiveness

- Various Superintendent positions, across our tri-level system, are the essential bridge between school-level educators, district and state leadership. They translate policy into meaningful practice for principals, teachers, and school communities, and they elevate local needs, challenges, and promising practices back to the State. Restructuring this layer - by downsizing - will weaken feedback loops, delay problem-solving, and disconnect principals and teachers from decisionmakers who understand local constraints.

Personal experience:

- As a classroom teacher, who moved to the District level, and eventually into an Educational Specialist role at the State level, I experienced - first hand - the effectiveness of the tri-level structure within our HIDOE. I firmly believe my professional journey, and my enhanced ability to serve students, resulted from the guidance and support of a

neighbor-island Complex Area Superintendent, various Assistant Superintendents and Executive Leadership (Superintendent and Deputy Superintendents) - experiences and opportunities I fear would not be available through a restructured system.

Should you require additional examples or rationale for this recommendation, feel free to reach out to me directly.

Mahalo for your open-minded consideration. For the sake of equity for all islands and schools, I strongly urge you to **REJECT SB 3334**.

Dr. Sandy Cameli EdD

Educator/Author

Honolulu, Hawai'i

**SB-3334-SD-1**

Submitted on: 3/1/2026 6:00:07 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Palakiko	Individual	Comments	Written Testimony Only

Comments:

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

I am submitting testimony today as a parent in **strong support** of DOE reform, particularly reforms related to the Complex Area Superintendent (CAS) position.

While I recognize that some principals feel supported by their CAS and that some districts may have positive experiences, that has not been the experience of our community.

As a parent from a Kaiapuni school, I can tell you that the level of support provided to our schools has been **significantly lacking**. Our CAS provides very **limited responses** — if any — to parents. When our community attempts to advocate for progress or growth, we are often met with dismissiveness. Over time, this has created a deep sense of frustration and disenfranchisement among families.

If you review the testimony submitted for HB1496, you will find that many others connected to Kaiapuni schools share similar concerns about CAS leadership and accountability.

In our efforts to seek assistance beyond the CAS, we have received only two responses before **communication from leadership ceased entirely**. We have called and emailed Superintendent Keith Hayashi, Deputy Superintendent Heidi Armstrong, Deputy Superintendent Tammi Oyadomari-Chun, and Office of Hawaiian Education Director Kau‘i Sang. We have testified at Board of Education meetings and Neighborhood Boards. Yet, our community has received no meaningful response.

Some argue that this bill creates “excessive” oversight. From a parent’s perspective, I believe it does not do enough. Without stronger oversight and accountability, the DOE has been allowed to operate with **little transparency and few consequences**.

As a parent, I respectfully ask that serious consideration be given to solutions that **ensure the DOE is more accountable and more responsive to the communities it serves**.

As a parent in a Kaiapuni school, I urge you to recognize the unique needs of Kaiapuni and the **importance of having a dedicated Kaiapuni CAS** who understands and advocates for our schools.

Mahalo.

**SB-3334-SD-1**

Submitted on: 3/1/2026 8:19:50 PM

Testimony for WAM on 3/2/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Michelle Nakamura	Individual	Comments	Written Testimony Only

Comments:

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

Mahalo for the opportunity to provide comments with concerns regarding SB3334.

My name is Michelle Nakamura and I currently serve in a temporary assigned Vice Principal role with the Hawai'i Department of Education. I am also preparing to enter my internship year through the HICISL Vice Principal preparation program. In my role, I work closely with teachers, educational assistants, students, and families, and I see firsthand how important strong leadership support is for our schools.

Complex Area leadership plays an important role in helping principals and school leadership teams navigate challenges, think through decisions, and stay focused on student learning. The connection between schools and complex area leadership provides alignment, guidance, and support that helps schools move forward when complex issues arise.

As someone currently developing as an administrator, I have also experienced how valuable mentorship from experienced Complex Area leaders can be. Their institutional knowledge and guidance help those of us in the leadership pipeline grow into stronger school leaders who will continue serving our students, staff, and communities.

While I understand the intent behind this measure, I respectfully submit comments with concerns. From a school-level perspective, clear lines of leadership help principals and leadership teams know where to turn when complex issues arise. The current structure allows the Department to respond to school needs and provide guidance in a timely way. Limiting how leadership can be organized or adding statutory requirements may reduce that flexibility and could unintentionally affect how effectively support reaches schools and ultimately impacts students.

Mahalo for the opportunity to share these comments and for your continued commitment to Hawai'i's public school students.

Michelle Nakamura