

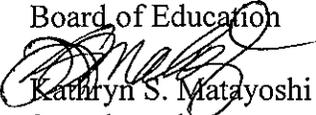


STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

May 15, 2012

TO: The Honorable Donald G. Horner  
Chairperson  
Board of Education

FROM:   
Kathryn S. Matayoshi  
Superintendent

SUBJECT: Post Public Hearing Discussion/Decision-Making Relating to Promulgation of  
New Chapter 8-65, Hawaii Administrative Rules, Relating to Alternative Routes  
to Certification

1. RECOMMENDATION

The public hearing on the aforementioned proposed rules was held by the department on Tuesday, April 24, 2012, at 2:00 p.m. at the Queen Liliuokalani Building, 1390 Miller Street, Room 404, Honolulu, Hawaii 96813. The department has considered all testimony provided at the public hearing and recommends that no changes be made to the proposed rules and that the Board of Education approve the proposed rules for submission to the Governor for final approval.

2. SUMMARY OF COMMENTS AND TESTIMONIES FROM THE PUBLIC HEARING

a. Favorable to the proposed rules

Nine (9) individuals submitted written and oral testimony in support of the proposed rules. Of the nine (9), six (6) supported the proposed rules as is and three (3) had the following comments or suggestions but still overall supported the proposed rules as presented:

- i. Extend the length of commitment for serving the school after graduation from the alternative certification program from three (3) to four (4) years;
- ii. Include detailed qualifications for the pool of practicing principals to participate in the mentoring aspects of the residency component;
- iii. Require candidates to complete a capstone project which would require candidates to apply the methods, approaches, observations, and

- perspectives studied throughout their residency to produce a seminar paper that recognizes an observed issue/area of focus, provides an analysis, and sets forth actionable steps towards a viable solution;
- iv. Include a provision that places graduates of the alterative certification program to serve in high-need areas;
- v. The department may want to consider promoting opportunities for licensed teachers to gain qualitative leadership experience while working in the public school system;
- vi. Include positive family and community engagement.

b. With concerns or in opposition to the proposed rules

An individual presented the following comments, neither supporting nor opposing the proposed rules:

- i. Change the oversight of the administrator certification program by the department to oversight instead by the Hawaii Department of Education (HIDOE) and the Charter School Administrative Office (jointly, or oversight by the Board of Education, to allow charter schools to be included in the administrator certification program;
- ii. The proposed rules may not meet the needs of school administrators for charter schools;
- iii. Provide clarity that multiple alternative certification program providers are allowed;
- iv. Add “non-profit educational support organizations” to §8-65-7(a)(1), as an entity that may qualify as an alternative certification program provider;
- v. Include feedback from the general public and school personnel in the rating of applicants, candidates, and graduates of an alternative certification program;
- vi. Address HIDOE’s Administrator Certification for Excellence (ACE) program;
- vii. Include strict impartiality procedures for applicant interviews and selection into the alternative certification program.

3. DEPARTMENT’S RESPONSE TO THE COMMENTS AND TESTIMONIES RECEIVED

a. With regard to the enumerated items in 2.a. above:

- i. It is acknowledged that remaining at a school for a period of time such as four (4) years is positive for a school. However, the department does not currently require a school administrator to remain at a school for an

extended period of time. We believe the proposed three (3) years service time requirement will ensure that the investment in the alternative certification program candidate is realized by the department. Therefore, the department does not believe changes should be made to the proposed rule.

- ii. Through the procurement process in selecting the alternative certification provider, the department will ensure quality mentoring is present. Therefore, the department does not believe changes should be made to the proposed rule.
- iii. As quality assessments and evaluations will be required of the contracted alternative certification provider, the department will consider capstone projects as an assessment tool in addition to any other assessment tools the provider may require. Therefore, the department does not believe changes should be made to the proposed rule.
- iv. The department's recruitment and placement of graduates from an alternative certification program is not a subject matter of the proposed rules, however the department's continual commitment is to recruit and place graduates of all certification programs to high needs areas and schools. Therefore, the department does not believe changes should be made to the proposed rules.
- v. Providing opportunities within the department to gain qualitative leadership experience is not a subject matter of the proposed rules, however, the department notes that opportunities currently exist for practicing teachers to gain qualitative leadership experiences in the school system. Therefore, the department does not believe changes should be made to the proposed rules.
- vi. The proposed rules address working with parents and community members. Therefore, the department does not believe changes should be made to the proposed rules.

b. With regard to the enumerated items in 2.b. above:

- i. This comment addresses the department's current administrator certification program which is not the subject matter of the proposed rules. While unrelated to the proposed rules, the department does note that the department's jurisdiction over the administrator certification program is dictated by statute (§302A-605 HRS). Therefore, the department does not believe changes should be made to the proposed rules.
- ii. The proposed rules implement §302A-605 HRS, applicable to HIDE public schools and school administrators. The department has no jurisdiction over public charter schools or public charter school

- administrators. Therefore, the department does not believe changes should be made to the proposed rules.
- iii. The proposed rules are intentionally written to allow for one or multiple providers as needed. Therefore, the department does not believe changes should be made to the proposed rule.
  - iv. The proposed rules provide examples of entities that may provide an alternative certification program and does not exclude other forms of qualified program providers. Therefore, the department does not believe changes should be made to the proposed rules.
  - v. The proposed rules outline minimum requirements for rigorous selection and exit processes. Through the procurement process in selecting the alternative certification provider, the department will ensure that rigorous selection and exit/completion requirements are in place by the provider. Therefore, the department does not believe changes should be made to the proposed rule.
  - vi. The current Administrator Certification for Excellence (ACE) program is not the subject matter of the proposed rules. Therefore, the department does not believe changes should be made to the proposed rules.
  - vii. The proposed rules outline minimum requirements for a rigorous selection process. Through the procurement process in selecting the alternative certification provider, the department will ensure rigorous screening mechanisms are in place by the provider. Therefore, the department does not believe changes should be made to the proposed rule.

4. NEW IMPLICATIONS NOT PREVIOUSLY REPORTED

a. Educational

None.

b. Personnel

None.

c. Facilities

None.

d. Financial

None.

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5. OTHER SUPPLEMENTARY INFORMATION

None.

KSM:la

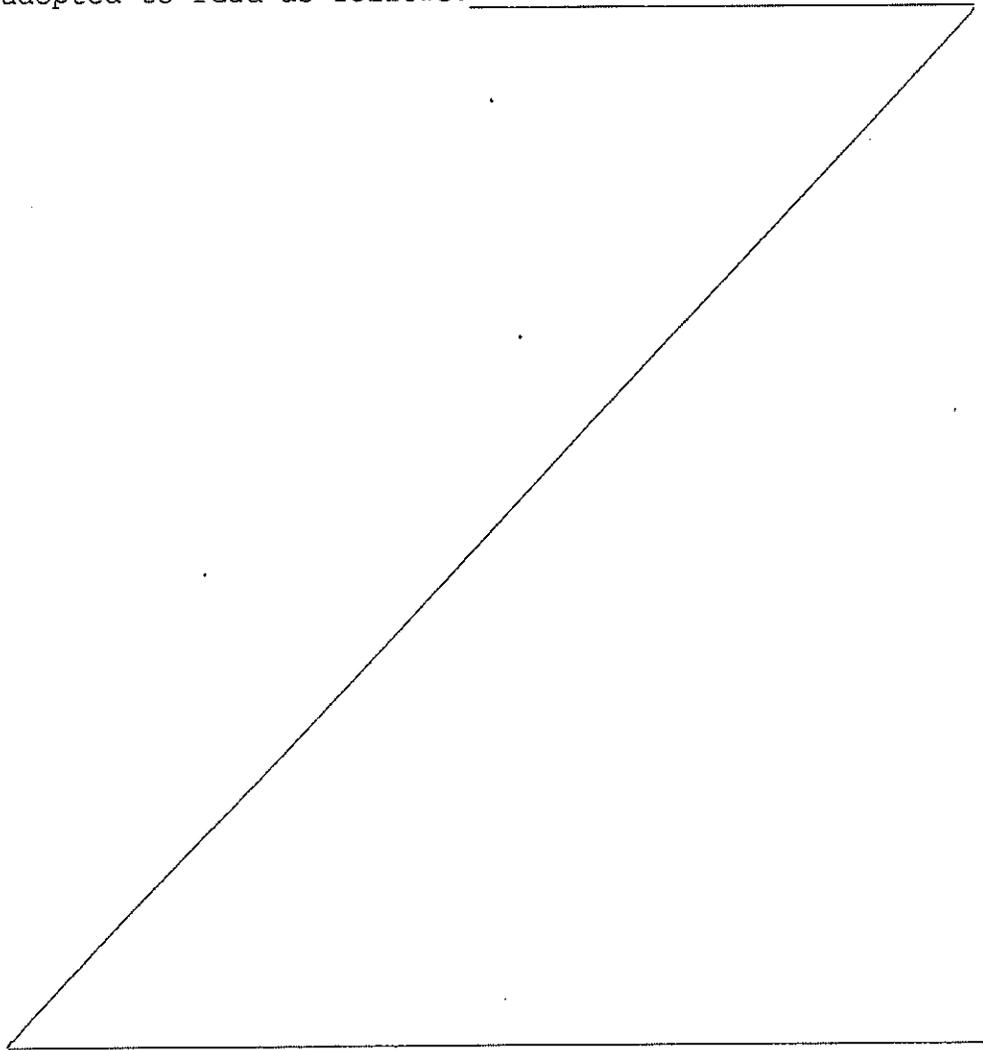
Attachments: Chapter 8-65, Hawaii Administrative Rules  
Department of Education Notes and Applicable Written Testimonies Submitted to  
the Public Hearing (Attachments A - I and L)

c: Office of Human Resources

DEPARTMENT OF EDUCATION

Adoption of Chapter 8-65  
Hawaii Administrative Rules

1. Chapter 8-65, Hawaii Administrative Rules,  
entitled "Alternative Routes to Certification", is  
adopted to read as follows: \_\_\_\_\_



"HAWAII ADMINISTRATIVE RULES

TITLE 8

DEPARTMENT OF EDUCATION

SUBTITLE 2

PART 1

PUBLIC SCHOOLS

• CHAPTER 65

ALTERNATIVE ROUTES TO CERTIFICATION

Subchapter 1 General Provisions

- §8-65-1 Purpose
- §8-65-2 Definitions
- §§8-65-3 to 8-65-6 (Reserved)

Subchapter 2 Alternative Certification

- §8-65-7 Alternative certification program
- §8-65-8 Candidate requirements for enrollment in an alternative certification program
- §8-65-9 Alternative certification program minimum requirements; generally
- §8-65-10 Rigorous screening process
- §8-65-11 Pre-residency
- §8-65-12 Residency
- §8-65-13 Post-residency
- §8-65-14 Periodic program audits
- §8-65-15 Prohibited conduct



pathways to certification that allow the establishment and operation of administrator preparation programs.

"Board" means the board of education.

"Candidate" means a person enrolled in an alternative certification program.

"Department" means the Hawaii department of education.

"Hawaii public schools" shall have the same meaning as "public schools" as defined in section 302A-101, HRS.

"High-need school or area" means a school or area, or both, designated by the superintendent of education as a high-need school or area.

"ISAC-P" means Initial School Administrator Certificate - Provisional as a Vice-Principal.

"PSAC" means Professional School Administrator Certificate as a Principal.

"Qualitative leadership experience" means experience where effective interpersonal and communication skills, the ability to lead and develop teams, strong analytical, problem-solving and/or project management skills, and ethical and data driven decision-making have been demonstrated and documented as described in section 8-65-8(b)(4).

"Residency" means school-based on-the-job training as a school level administrator with school level administrator mentor or mentors.

"School level administrator" means a vice-principal or principal.

"School level administrator experience" means, for purposes of entrance requirements into an alternative certification program, knowledge and performance of duties and responsibilities that are comparable to or higher than the duties and responsibilities of a department of education vice-principal or principal.

"Superintendent" means the Hawaii superintendent of education.

"TSAC" means Temporary School Administrator Certificate that is awarded prior to residency.

§8-65-2

[Eff \_\_\_\_\_ ] (Auth: HRS §§302A-605, 302A-1112) (Imp: HRS §§302A-101, 302A-605)  
§§8-65-3 to 8-65-6

§§8-65-3 to 8-65-6 (Reserved).

## SUBCHAPTER 2

### ALTERNATIVE CERTIFICATION

#### §8-65-7 Alternative certification program.

(a) The minimum standards that an alternative certification program shall meet include, but are not limited to:

- (1) Is an institution of higher education, an alternative certification program operating independently from an institution of higher education, or a combination thereof;
- (2) Is able to select, train, and graduate the number of school level administrator candidates determined by the department to be necessary to address shortages in high-need schools or areas and increase the applicant pool eligible for service in any public school;
- (3) Is selective in accepting candidates;
- (4) Demonstrates subject matter mastery, and high-quality instruction in pedagogy and in addressing the needs of all students in the classroom including English language learners and students with disabilities;
- (5) Provides supervised, school-based experiences and ongoing support such as effective mentoring and coaching;
- (6) Significantly limits the amount of coursework required or has options to test out of courses; and
- (7) Upon completion, will allow candidates completing the program to qualify for and be

awarded the same level of certification that the department's administrator preparation program awards upon completion.

(b) The alternative certification program shall also meet all other requirements of this chapter.

(c) The alternative certification program provider shall enter into a contract or agreement with the department to provide services as an alternative certification program under this subchapter. Said contract or agreement shall set forth the understanding of the duties and responsibilities of the alternative certification program provider and the consequences for failing to comply with this subchapter and all other requirements of the contract or agreement.

(d) Costs for the operation of the alternative certification program may be covered by tuition charged by the provider and approved by the department or by other means as determined by the department.

[Eff \_\_\_\_\_ ] (Auth: HRS §§302A-605, 302A-1112) (Imp: HRS §302A-605, 91-13.5)

§8-65-8 Candidate requirements for enrollment in an alternative certification program.

(a) To be enrolled in an alternative certification program, the provider of the alternative certification program shall ensure the candidate has met one of the following:

- (1) The individual has qualitative leadership experience and holds at least a master's degree;
- (2) The individual is a licensed school level administrator, holds at least a master's degree and has qualitative leadership experience; or
- (3) The individual is a licensed teacher, holds at least a master's degree, and has qualitative leadership experience.

(b) The provider shall obtain evidence that the candidate minimally possesses:

- (1) At least a master's degree from an accredited institution of higher learning;
- (2) If the candidate is being admitted pursuant to subparagraph (a)(2) or subparagraph (a)(3), applicable licensure credentials that are current and active and not encumbered;
- (3) Qualitative leadership experience of three or more years within ten years of application in a leadership, supervisory, or managerial position; and
- (4) Qualitative leadership experience documented through a resume or portfolio by the candidate and verified by the alternative certification program provider through interviews and/or written recommendations from the applicant's supervisors.

(c) The provider shall recruit and enroll candidates that are willing to commit to three years of continued employment as a school level administrator with the department after graduation from the alternative certification program and award of their ISAC-P as vice-principal.

(d) The provider shall also ensure candidates have satisfied other requirements of the department including, but not limited to, criminal history record checks in accordance with sections 302A-601.5 and 846-2.7, HRS and chapter 7, title 8, HAR.

(e) Costs related to enrollment in an alternative certification program may be borne by the candidate or by other means as determined by the department. [Eff \_\_\_\_\_] (Auth: HRS §§302A-605, 302A-1112) (Imp: HRS §302A-605)

§8-65-9 Alternative certification program minimum requirements; generally. (a) The alternative certification program shall consist of a clearly articulated curriculum, a rigorous screening process, a pre-residency component, a residency component, and

a post-residency component that minimally meets the requirements of sections 8-65-10 through 8-65-13. The department may consider an alternative certification program that offers the pre-residency and residency components concurrently.

(b) The provider of an alternative certification program shall ensure that all its employees or agents that will be fulfilling duties and responsibilities pursuant to section 8-65-12(a) on any school campus under the department's jurisdiction and working in close proximity to children have passed a criminal history record check in accordance with the provisions of sections 302A-601.5 and 846-2.7, HRS and chapter 7, title 8, HAR.

(c) The provider of an alternative certification program shall be responsible and accountable for ensuring the employment of qualified staff or agents and shall ensure staff and agents are held to the highest professional standard in deliverance of its alternative certification program.

[Eff ] (Auth: HRS §§302A-601.5, 302A-605, 302A-1112, 846-2.7,) (Imp: HRS §302A-605)

§8-65-10 Rigorous screening process. The alternative certification program shall incorporate a rigorous screening process that will result in selectivity in accepting candidates into their program after the applicant has met the requirements of section 8-65-8. The screening process shall minimally include, but not be limited to, interviews, evaluation assessments or other processes that will result in selecting candidates who show the most promise to complete the alternative certification program and immediately address the needs of the department to fill school level administrator positions.

[Eff ] (Auth: HRS §§302A-605, 302A-1112) (Imp: HRS §302A-605)

§8-65-11 Pre-residency. (a) The alternative certification program shall incorporate a pre-residency component to include, but not be limited to, orientation, coursework, effective mentoring and coaching, workshops, ongoing support, and assessments throughout the component and particularly one at the conclusion of the component. Before commencement of the pre-residency component, the program shall evaluate the individual candidates' education and experience to determine the portions of study the candidate will be required to complete.

(b) The pre-residency component shall consist of technical knowledge of content including, but not limited to:

- (1) Educational and instructional leadership including the ability of leaders to be instructionally centered and change oriented;
- (2) Personnel management including supervision and evaluation;
- (3) Curriculum, instruction, and assessment, including but not limited to high-quality instruction that addresses pedagogy and the needs of all students, including English language learners and students with disabilities;
- (4) Governance and organization relating to schools;
- (5) School improvement planning;
- (6) Community and its culture, including public relations; and
- (7) Applicable federal and state laws relating to civil rights, including but not limited to the Individuals with Disabilities Education Improvement Act of 2004 or the currently existing version and section 504 of the Rehabilitation Act of 1973 and its amendments, and federal and state laws relating to employee and student safety.

(c) The pre-residency component shall significantly limit the amount of coursework required

or have options for qualified candidates to test out of courses.

(d) The pre-residency component shall also ensure candidates' proficiency in oral and written communication skills, interpersonal relationships and team building skills, and analyses, decision making, and problem solving skills.

(e) The alternative certification program shall have clearly articulated methodologies and criterion by which it will assess the candidate's required proficiency in the subject matter listed in subsections (b) and (d), at the conclusion of the pre-residency component. [Eff ] (Auth: HRS §§302A-605, 302A-1112) (Imp: HRS §302A-605)

§8-65-12 Residency. (a) The alternative certification program shall incorporate a residency component to include, but not be limited to, effective mentoring and coaching, ongoing support, residency as a vice-principal in a school, and assessments.

(b) The residency component shall provide candidates the opportunity to apply the technical knowledge and skills acquired through the pre-residency component and shall minimally involve:

- (1) Sustained experience at the elementary and secondary school levels, with a minimum aggregate time of one thousand five hundred twenty hours which constitutes one school year, spent in residency;
- (2) Mentoring by a practicing principal;
- (3) Active leadership roles;
- (4) Active participation in activities that promote school improvement and instructional leadership, including but not limited to improving student achievement and teacher development;
- (5) Regular assessments of the candidate's competencies; and
- (6) Appropriate levels of support by the program provider, as determined by the provider.

(c) The alternative certification program shall have clearly articulated methodologies and criterion by which it will assess the candidate's proficiency during and at the conclusion of residency. The school principal mentoring the candidate shall be involved in the assessments.

(d) The provider of an alternative certification program shall be required to execute an agreement, provided by the administrator certification office, and abide by all terms in the agreement and any amendments thereto, for a candidate's residency in a school under the department's jurisdiction.

[Eff \_\_\_\_\_] (Auth: HRS §§302A-605, 302A-1112) (Imp: HRS §302A-605)

§8-65-13 Post-residency. (a) Cumulatively, the alternative certification program's pre-residency and residency components are intended to produce vice-principal candidates achieving acceptable levels of competencies. The required competencies include, but are not limited to, the ability to:

- (1) Develop and implement an educational vision, or build and sustain an existing one, for assisting all students to meet State learning standards;
- (2) Build a culture of learning and supporting systemic performance;
- (3) Communicate and work effectively with parents, staff, students, community leaders, and other community members from diverse backgrounds, and build support for improving student achievement;
- (4) Create the conditions necessary to provide a safe, healthy, and supportive learning environment for all students and staff;
- (5) Lead comprehensive long-range planning, informed by multiple data sources, to determine the present state of the school, identify root causes of problems, propose solutions, and validate improvements with

regard to all aspects of the school, including but not limited to curriculum development, instructional strategies and the integration of technology, student support services including the provision of services to students with disabilities and English language learners, and professional support and development;

- (6) Develop staff capability for addressing student learning needs by effective supervision and evaluation of teachers, by effective staff assignments, support, and mentoring, and by providing staff with opportunities for continuous professional development;
- (7) Set a standard for ethical behavior by example, encouraging initiative, innovation, collaboration, mutual respect, and a strong work ethic;
- (8) Apply statutes and rules and regulations as required by law, and implement school policies in accordance with law; and
- (9) Establish a school budget and manage school finances, resources, and facilities to support achievement of educational goals and objectives.

(b) The alternative certification program shall have clearly articulated methodologies and criterion by which it will assess the candidate to determine that the competencies described in subsection (a) and the knowledge described in section 8-65-11(b) have been met:

(c) The alternative certification program shall only recommend a candidate who has completed all components and passed the post-residency assessment, to the administrator certification office, for consideration of issuance of an ISAC-P.

(d) The candidate employed by the department and issued an ISAC-P shall satisfactorily complete a probationary period as vice-principal pursuant to the

applicable collective bargaining agreement and upon successful completion of probation as determined by the department, be awarded a PSAC.

[Eff \_\_\_\_\_ ] (Auth: HRS §§302A-605, 302A-1112) (Imp: HRS §302A-605)

§8-65-14 Periodic program audits. (a) An alternative certification program shall be subject to periodic program audits by the administrator certification office. The program audits will evaluate the alternative certification program's compliance with all requirements of this subchapter. As part of the audit process, the provider of the alternative certification program may also be required to furnish data and other information deemed necessary by the administrator certification office.

(b) Costs associated with the periodic program audit shall be borne by the alternative certification program.

(c) In the event deficiencies are found with the alternative certification program, the program shall file a corrective action plan with the administrator certification office by the deadline specified by the office. The alternative certification program's corrective action plan shall ensure candidates are not adversely affected.

(d) The administrator certification office may approve the corrective action plan, require modifications to the plan, or reject the plan and require a new corrective action plan. Submission of modifications or a new corrective action plan shall be in accordance with the deadline specified by the administrator certification office.

(e) Failure by the alternative certification program to cooperate and comply with the periodic program audit or to address deficiencies as required by the administrator certification office may be grounds for the department to take appropriate action affecting the continuance of the alternative

certification program. [Eff \_\_\_\_\_ ] (Auth:  
HRS §§302A-605, 302A-1112) (Imp: HRS §302A-605)

§8-65-15 Prohibited conduct. The department may take appropriate action, including but not limited to termination of any contract or agreement for the alternative certification program to continue providing services under this subchapter, against an alternative certification program provider of the alternative certification program for any one or more of the following acts or conditions including, but not limited to:

- (1) Failure to comply with the provisions of section 8-65-15;
- (2) Failure to meet or maintain the conditions and requirements as an alternative certification program;
- (3) Engaging in false, fraudulent, or deceptive practices, or making untruthful or improbable statements;
- (4) Professional misconduct, incompetence, or gross negligence by any employee or agent of the alternative certification program in the administration and implementation of the program;
- (5) Failure to comply, observe, or adhere to any law in a manner such that the department deems the provider of an alternative certification program to be unfit to operate the program;
- (6) Criminal conviction, whether by nolo contendere or otherwise, of any employee or agent of the alternative certification program for a crime directly related to the qualifications, functions, or duties to be performed as an alternative certification program provider on behalf of the department; and
- (7) Violating this chapter, other applicable

S8-65-15

laws, or any rule or order of the  
department." [Eff \_\_\_\_\_ ] (Auth:  
HRS §§302A-605, 302A-1112) (Imp: HRS §302A-  
605)

2. The adoption of chapter 8-65, Hawaii  
Administrative Rules, shall take effect ten days after  
filing with the Office of the Lieutenant Governor.

I certify that the foregoing are copies of the  
rules drafted in the Ramseyer format, pursuant to the  
requirements of section 91-4.1, Hawaii Revised  
Statutes, which were adopted on \_\_\_\_\_,  
and filed with the Office of the Lieutenant Governor.

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Chairperson, Board of  
Education

APPROVED AS TO FORM:

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Deputy Attorney General

STATE OF HAWAII  
Department of Education  
Administrative Rules - Public Hearing  
Board of Education Conference Room  
Tuesday, April 24, 2012

Department of Education Staff:

Galen Onouye, Esq.  
Randy Kawamoto  
Donna Kagawa  
Wilfred Keola

Also Present:

Douglas K. Murata  
Kerry Tom  
Sean Bacon  
Presley Pang, Esq.  
Leiomalama Desha  
Holly Shikada, Esq.  
James Halvorson, Esq.  
Iris Tomita  
Donna Kagawa  
Annette Anderson  
Lisa Asato  
Noe Noe Tom  
Sandra Yeh  
Janet Offner  
Lynn Young  
Sharon Nishihira

**I. Call to Order**

The public hearings meeting for the proposed changes to Hawaii Administrative Rules (HAR) Title 8, Chapters 8-63, 8-65, and 8-66 was called to order by Mr. Galen Onouye at 2:03 p.m.

Mr. Onouye, hearings officer, stated that the location of the hearing is 1390 Miller Street, Hawaii State Board of Education (Board) Conference Room. He further stated that staff from the Department of Education (DOE) are also in attendance and will be introducing themselves during their presentations.

Mr. Onouye stated that the hearing was being conducted and properly noticed in accordance with Hawaii Revised Statutes, Chapter 91, for purposes of receiving testimony relating to the proposed revisions and adoption of the HAR Title 8, Chapters

8-63, 8-65, and 8-66. At the conclusion of the hearing, the record of the hearing and all testimonies received will be forwarded to the Board for review and action on May 15, 2012.

Mr. Onouye called upon Mr. Randy Kawamoto, Office of Human Resources (OHR), to begin the discussion on Title 8, Chapter 8-63.

## **II. Chapter 63**

Mr. Kawamoto spoke to Chapter 63 and its proposal for a new chapter on civil service rules. He stated that the proposed rules apply to all positions and employees of the civil service of the DOE and unless otherwise specified does not apply to positions and employees exempt from civil service. He stated that the proposed rules set forth civil service personnel policy for certain key functions including recruitment, examination, certification appointment, classification, compensation, exemptions from civil service, leaves, medical examinations, internal complaint procedures, and resignation.

Mr. Onouye stated that he would take testimony at this time. He stated that testimony would be limited to five minutes and that a buzzer would sound at four minutes, followed by a second buzzer at five minutes. He asked testifiers to state their name and to speak loudly and clearly. He further stated that all comments should be addressed to him and should not be of a personal nature.

Mr. Onouye asked if anybody would like to testify regarding Chapter 8-63. Hearing none, the meeting moved to Chapter 8-65.

Mr. Onouye called upon Ms. Donna Lum Kagawa, Professional Development and Educational Research Institute (PDERI).

## **III. Chapter 65**

Ms. Kagawa spoke on the proposal to promulgate Chapter 65, Alternative Routes to Certification. She stated that to satisfy the federal Race to the Top (RTTT) grant requirements related to alternate certification, the proposed rules set forth alternative routes to certification to be a school administrator in the DOE. She stated that the proposed rules define the requirements and components of an alternate certification program and define the entry requirements that applicants must meet to be accepted into an alternate certificate program.

Mr. Onouye asked Mr. Zachary DiIonno to please step forward to testify on Chapter 65.

Mr. DiIonno, former middle school special education teacher at Ilima Intermediate School in Ewa Beach, testified in support of the adoption of the proposed Chapter 8-65, HAR, regarding alternative routes to certification for principals and vice principals. He stated that he taught a traditionally high-need community that struggled to fill positions at the teaching and administrative levels. He understood the importance of providing an alternative pathway to certification. He stated that he came to Hawaii in 2007 with

the Teach for America (TFA) program without any prior experience teaching and lacking teaching credentials; however, the DOE, the Board, and the University of Hawaii worked together to ensure that he and his fellow TFA colleagues would be able to achieve their licensure through an alternative certification process while teaching full time.

He stated that the implementation of an alternative certification program for vice principals serves a dual purpose. It fulfills the assurances made in Hawaii's RTTT application; but also seeks to fill vacant administrative positions in high-need schools with high-quality candidates.

Mr. DiIonno stated that under proposed rule 8-65-8(c) "Candidate requirements for enrollment in an alternative certification program," he would like the Board to consider extending the candidates' length of commitment for serving within the DOE after graduation from three years to four years, at minimum. A problem he observed as a teacher was the high attrition rate of teachers and school-level administrators. This "revolving door" effect prevents teachers, administrators, and other school personnel from establishing a sense of community, cohesion, and consistency that benefits not only collaboration amongst faculty, but also stability in students' learning environment and expectations. By requiring candidates for the alternative certification program to remain at the school for at least four years, the Board will ensure that: 1) the certification program attracts candidates who are dedicated to serving a long-term commitment in a school, 2) newly-minted administrators will be able to fully absorb into the cultures of their schools, and 3) teachers have the opportunity to work with their reporting office for a significant amount of time.

Regarding the residency aspect under HAR 8-65-12; he would like the Board to consider requiring candidates to complete a capstone project upon the completion of their residency. This project would require the candidates to apply the methods, approaches, observations, and perspectives studied throughout their residency to produce a seminar paper that recognizes an observed issue/area of focus, provides an analysis of that focus, and sets forth actionable steps towards a viable solution. This may help candidates think critically about issues that they are likely to face as administrators. Candidates could use these seminar papers directly toward their practices. He included other suggestions in his submitted testimony. (Attachment A)

Mr. Onouye noted for the record that written testimony in support of Chapter 8-65 was received from Ms. Sasha Hamada (Attachment B), Ms. Lianne Lee (Attachment C), Mr. Daniel Ellis (Attachment D), Ms. Serena Podish (Attachment E), Mr. Christopher St. Sure (Attachment F), Ms. Connie Yonashiro (Attachment G), and Mr. Brian Tongg (Attachment H). Mr. Onouye stated that Mr. Alex Cyran's email (Attachment I) does not indicate support or against but reflects several concerns which will be made part of the record.

Hearing no further request for testimony, Mr. Onouye moved to Chapter 8-66.

#### IV. Chapter 66

Mr. Wilfred Keola, Jr., OHR, presented the proposal to promulgate a new Chapter 66, Part-time Temporary Employees. He stated that the purpose of the proposed rule is to set forth the compensation for part-time temporary teachers and certain other part-time temporary and casual employees of the DOE.

Ms. Mei Fei Kuo, Esq. from the law firm of Alston, Hunt, Floyd and Ing, testified on behalf of part-time teachers (PTTs) they represent in a lawsuit of Dianne Kawashima vs. State of Hawaii. She testified on behalf of the part-time employees (PTEs) opposing proposed HAR Chapter 8-66 which unlawfully seeks to reclassify PTEs and reduce their compensation to hourly rates that are lower than what they are entitled to under the law.

Ms. Kuo stated that in the Kawashima class action, the Court granted summary judgment motion on behalf of the PTEs which held that the prior efforts of the DOE, its Superintendent, and the Board to try to amend and reduce the hours for PTEs were unlawful and ineffective. Therefore, from 1976 to the present date, the PTEs' hourly rates are governed by Regulation 5203 which provided that their compensation "shall be based on the most current per diem rates established for substitute teachers." (Attachment J with exhibits)

She stated that for decades, the PTEs' pay has been linked to the pay for substitute teachers to ensure they were receiving equal pay for equal work and that concept is recognized in the DOE School Code and in Chapters 76 and 89 (HAR). They object to the proposed Chapter 8-66. Ms. Kuo highlighted two of the reasons. Part-time teachers and part-time employees are entitled to equal pay for equal work and their classification and compensation system should continue to be tied to the rates paid substitute teachers. At a minimum, their hourly rates should not be reduced. Currently, under Regulation 5203, the PTTs are entitled to the hourly rates that range between \$22.56 an hour to \$26.50 an hour. With the proposed Chapter 8-66, the classification of the part-time teachers and part-time employees are being reduced to \$20.67 and \$22.43 an hour which will result in a significant pay cut for the part-time employees which will range between 9 percent and 19 percent depending on the classification of the part-time teachers and part-time employees. Additionally, they object to the proposed changes to Chapter 8-66 because the DOE is attempting to set PTEs pay at the illegal rate that it was in 2005 even though the pay that has been given to other teachers and substitute teachers under the same compensation scheme has increased. The 2005 levels violate Chapter HRS 89(c)(2) which requires the DOE to make adjustments for excluded employees that are not less than those provided under collective bargaining agreements to employees hired on a comparable basis. After decades of having the part-time teachers and part-time employees pay linked to the pay of the teachers in Bargaining Unit 5, it is wrong at this point to deny the part-time teachers and part-time employees fair wages that are increased in the manner of how the law had contemplated it to be.

Mr. Onouye stated that Ms. Kuo's testimony would be noted as part of the record and submitted to the Board.

Mr. Onouye noted that testimony was received from Mr. Neil Okuna in opposition which will be made part of the record. (Attachment K)

The meeting was recessed at 2:18 p.m. and reconvened at 2:45 p.m.

Mr. Onouye stated that the recess was taken for purposes of providing additional time for late-comers.

Mr. Onouye stated that testimony was received from Mr. Jarrett Keohokalole in support of Chapter 65 and will be part of the record. (Attachment L)

Mr. Onouye asked if there were any other testimonies. Hearing none he stated that all materials will be forwarded to the Board and will be acted upon at the Board meeting on Tuesday, May 15, 2012.

V. **Adjournment**

The public hearing meeting adjourned at 2:47 p.m.

## ATTACHMENTS

Attachment A	Written Testimony of Mr. DiIonna
Attachment B	Written Testimony of Ms. Sasha Hamada
Attachment C	Written Testimony of Ms. Lianne Lee
Attachment D	Written Testimony of Mr. Daniel Ellis
Attachment E	Written Testimony of Ms. Serena Podish
Attachment F	Written Testimony of Mr. Christopher St. Sure
Attachment G	Written Testimony of Ms. Connie Yonashiro
Attachment H	Written Testimony of Mr. Brian Tongg
Attachment I	Written Testimony of Mr. Alex Cyran
Attachment J	Written Testimony of Alston, Hunt, Floyd & Ing Lawyers
Attachment K	Written Testimony of Mr. Neil Okuna
Attachment L	Written Testimony of Mr. Jarrett Keohokalole

**TESTIMONY**

TO: Hawai'i Board of Education  
FROM: Zachary DiIonno  
DATE: April 15, 2012  
RE: Proposed HAR Chapter 8-65 "Alternative Routes to Certification"

Honorable Chair Horner and Board Members:

My name is Zach DiIonno, and I would like to offer testimony in support of the adoption of the proposed administrative rules in Chapter 8-65, regarding alternative routes to certification for vice principals.

I am a former middle school special education teacher and taught for three years at Ilima Intermediate School in Ewa Beach, a traditionally high-need community that struggles to fill positions at the teaching and administrative level. I understand the importance of providing alternative pathways to certification. In fact, I am a testament to the benefits of the alternative route to certification process. I came to Hawaii in 2007 as a Teach For America ("TFA") corps member. I did not have any prior experience teaching and therefore lacked any teaching credentials. However, as your Honor knows through your involvement with the TFA program, the Hawaii Department of Education, this Board, and the University of Hawaii worked together to ensure that my fellow TFA colleagues and I would be able to achieve our licensure through an alternative certification process while teaching full-time, particularly during times when shortages plague our states' high-need schools. I can attest to the value of offering alternative certification processes, particularly at a time when states are looking to attract high-performing, quality teaching candidates from other professional backgrounds.

The implementation of an alternative certification program for vice principals serves a dual purpose. Not only does it fulfill the assurances made in Hawaii's Race To The Top application, but it also seeks to fill vacant administrative positions in high-need schools with high-quality candidates. I commend the Board's efforts for addressing this need in our state's public education system.

I would like to comment on several of the rules in the proposed Chapter 8-65. Under proposed rule § 8-65-8(c) "Candidate requirements for enrollment in an alternative certification program," I ask the Board to consider extending the candidates' length of commitment for serving within the department after graduation from three years to four years, at minimum. A major problem I observed as a teacher was the high attrition rate of teachers and school-level administrators. This "revolving door" effect prevents teachers, administrators, and other school personnel from establishing a sense of community, cohesion, and consistency that benefits not only collaboration amongst faculty, but also stability in students' learning environment and expectations. By requiring candidates for the alternative certification program to remain at the school for at

least four years, this Board will ensure that: 1) the alternative certification program attracts candidates who are seriously dedicated to serving a long-term commitment in a school, 2) newly-minted administrators will be able to fully absorb into the cultures of their schools, and 3) teachers have the opportunity to work with their reporting office for a significant amount of time. Research shows that teachers do not hit their "stride" in teacher efficacy until about Year 4 or 5—principals and vice-principals are no different.

I would like to emphasize the importance of HAR § 8-65 "Rigorous screening process." Selectivity is critically important when recruiting school administrators. School administrators like vice principals can really "make or break" the success of a school. Only the most qualified candidates should be admitted to the program, and not simply individuals that are needed to fill slots.

Regarding proposed HAR § 8-65-12 (b)(2) "Residency," I ask that the Board consider and detail the qualifications for the pool of practicing principals to participate in the mentoring aspect of the residency component. Candidates need the best models and would find working with an ineffective principal to be a waste of time and money. As someone who is interested in becoming a school administrator one day, I would want to be sure that I mentor under a competent, dynamic principal in good standing with the DOE. Also, would these mentoring principals receive any type of compensation? Compensation may incentivize the high-performing practicing principals to participate in this program.

Lastly, under proposed HAR §§ 8-65-12 "Residency" and 8-65-13 "Post Residency," I would like the Board to consider requiring candidates to complete a capstone project. This project could require candidates to apply the methods, approaches, observations, and perspectives studied throughout their residency to produce a seminar paper that recognizes an observed issue/area of focus, provides an analysis, and sets forth actionable steps towards a viable solution. This may help candidates think critically about issues they are likely to face as administrators. Candidates could use these seminar paper directly towards their practices.

I appreciate you taking the time to consider my suggestions. I hope the Board finds these suggestions helpful or that they at least foster further discussion about the proposed rules mentioned above.

SASHA HAMADA  
99-576 Paihi Street, Aiea, HI 96701  
shamada8@hawaii.edu

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April 16, 2012

Department of Education  
Attention: Office of Human Resources  
P.O. Box 2360  
Honolulu, Hawaii 96804

To whom it may concern,

I am testifying today in support of the Department of Education's ("Department") proposed adoption of Chapter 8-65 – Alternative Routes to Certification, specifically § 8-65-8, Candidate requirements for enrollment in alternative certification program. Pursuant to the Department's proposed adoption, a candidate of the alternative certification program must hold at least a master's degree and have three or more years of "qualitative leadership experience" as defined by § 8-65-2.

I commend the Department for taking to task the shortage in school administrators by providing alternative routes to certification for vice-principals. From my reading and understanding of the issue, today's proposed adoption aligns the Department's policies towards the recruitment of high-level school administrators with the goals of Race to the Top education reforms. This adoption provides for the development of school administrators that demonstrate high leadership potential to address operational needs as well as improve student learning. Particularly, given the emphasis on training and school-based experiences, this adoption has the possibility of increasing the proficiency of administrators in managing their departments efficiently, while remaining grounded in educational philosophy. I believe this adoption supports the cultivation of effective leadership teams to oversee important educational reform that fosters the development college- and career-ready individuals.

The Department may want to consider promoting opportunities for licensed teachers to gain qualitative leadership experience while working in the public school system. Providing applicable leadership experience to teachers considering school administration will increase the number of individuals that qualify for the alternative certification program and broaden the applicant pool. Moreover, I believe that the shortage of administrators may result from the differing nature of the work. School administration may be less appealing to teachers because administrators spend less time in a classroom due to their focus on operational management. According to my parents, both of whom are teachers, most teachers prefer being in the classroom because they want to educate students, making recruitment for vice-principals difficult. Nonetheless, the Department proposes the adoption of an administrator preparation program that addresses this inherent issue by setting broad requirements for enrollment that will allow the Department to outsource leadership talent as well as groom leaders from within.

Again, I support the proposed adoption of Chapter 8-65 and I believe this adoption is a step in the right direction. Thank you for allowing me this opportunity to testify on this proposed adoption.

Sincerely,

/s/ Sasha Hamada

Sasha Hamada

April 15, 2012

Department of Education  
Office of Human Resources  
P.O. Box 2360  
Honolulu, HI 96904

**Re: Support for Adoption of Chapter 8-65 Hawai'i Administrative Rules**

Members of the Board,

Thank you for this opportunity to testify in support of Chapter 8-65 Hawai'i Administrative Rules.

I am in support of the adoption of Chapter 8-65 of the Hawai'i Administrative Rules ("HAR"). Our public schools need regulated standards for the establishment of alternative routes to certification for vice-principal school administrators. The proposed standards in Chapter 8-65 requires that candidates meet certain standards and minimum requirements such as leadership experience, attainment of a master's degree, and a teaching license. HAR §8-65-8. The section also outlines a rigorous screening process after requirements are met which includes interviews, evaluation assessments, or other processes. HAR §8-65-10. Section §8-65-15 lists the prohibited conduct and is also a very important addition to the administrative rules. The requirement of completion of the program and receipt of the Initial School Administrator Certificate - Provisional ("ISAC-P") will help to improve the quality of leadership in our public schools.

I am a 2012 Juris Doctorate at the William S. Richardson School of Law. I attended public school until the 9<sup>th</sup> Grade at Pearl Ridge Elementary School and Highlands Intermediate School. I later graduated from Punahou School in 2005. I was in the Gifted and Talented program from grades 2-6 and in the honors track at Highlands Intermediate School. I had a very positive experience in the public school system. My principal at Pearl Ridge Elementary got a grant for us to put on a school play in 6<sup>th</sup> Grade. I was the author of the play and it was an amazing experience for me, which led me to pursue writing and eventually towards a career in law. Not all public school students have the memorable and fulfilling educational experience that I had. I believe that administering regulations and standards at the vice-principal level will benefit our public schools in many ways – leading to higher attendance rates, graduation rates, and employment rates in Hawai'i. I would like to send my children to public school at the elementary and intermediate school levels. Implementing these certification rules would give me greater peace of mind that my children will receive a quality public education.

I express my gratitude to members of the BOE for your attention and kind consideration of my testimony. For any concerns, you may get in touch with me through (808) 779-5236, or through e-mail at liannel@hawaii.edu. Mahalo for your hard work and consideration!

Respectfully Yours,

Lianne Lee  
2860 Waialae Ave. #115  
Honolulu, HI 96826

DANIEL J. ELLIS  
214 Aikapa Street,  
Kailua, HI 96734  
Daniel.joseph.ellis@gmail.com

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April 17, 2012

Department of Education  
Queen Liliuokalani Building,  
1390 Miller Street, Room 300  
Honolulu, HI 96804  
testimony\_proposed\_rules\_ohr@notes.k12.hi.us

To whom it may concern,

I am testifying today in strong support of the Department of Education proposed adoption of Hawaii Administrative Rules Chapter 8-65, "Alternative Routes to Certification."

This measure will help to provide an alternative means of attracting and maintaining leadership in the Hawaii school system. As both a recipient of the benefits of a Hawaii public school education and as a former teacher this step will provide a means of attaining the best-qualified leaders the state has to offer. Of particular merit is the focus on candidates with a demonstrated focus on English language learners and students with disabilities. As a state with some of the highest levels of English as a second language students (ESL), promoting highly skilled administrators with language skills and ESL experience will ensure that underserved and under performing communities are not left behind.

By allowing non-traditional leaders into the system will support the development of personnel, enhance the effectiveness of educators, further help identify highly effective individuals for leadership roles, and ensure equitable distribution of effective leaders into underserved communities. It is the right thing to do for children. It is also the national and federal direction for educational improvement. Further current congressional proposals to reauthorize No Child Left Behind, and federal criteria for state waivers for No Child Left Behind include requirements from the Race to the Top framework.

Noticeably absent from the alternative route to certification is one criteria for administrator certification that might need to be expanded, which is the need for positive family and community engagement. As highlighted in national race to the top standards is the need to attain candidates that can successfully engage with and promote community involvement in the school. At looking at the most successful and desired schools around the state by any criteria, positive family and community engagement are the two most common factors in the schools effectiveness and student success. By including a community outreach and parental mediation and counseling component to alternative administrator certification this will further the goals of performance and growth of our schools as community centers. Further the implementation of the program to include the determination and monitoring of qualified personnel to administer and insure that appropriate candidates are being accepted and supported throughout the process is of concern.

Again, I support the proposed amendment and appreciate the opportunity to testify.

Sincerely,  
Daniel J. Ellis  
2013 J.D. Candidate, Richardson School of Law

SERENA L. PODISH  
WILLIAM S. RICHARDSON SCHOOL OF LAW, CLASS 2013  
2515 Dole Street, Honolulu, HI 96822  
[serena9@hawaii.edu](mailto:serena9@hawaii.edu)

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April 17, 2012

Department of Education  
Office of Human Resources  
P.O. Box 2360  
Honolulu, Hawaii 96804

To Whom It May Concern:

I am writing today in support of the proposal of the Department of Education ("DOE"), on behalf of the Board of Education ("BOE" or the "Board"), to promulgate a new chapter 65, Alternative Routes to Certification for which the purpose is to set forth alternative routes to certification to be a school administrator in DOE.

As a second year law student, my interest in this proposal is purely academic. In familiarizing myself with the proposed new chapter, §8-65, of the Hawaii Administrative Rules, entitled "Alternative Routes to Certification" as well as becoming familiar with Race to the Top objectives, I am confident chapter 65 supports the Board's strategic objective to "cultivate, reward, and leverage effective teaching and leading" as described in the third focus area of Hawaii's five-point plan for education reform. (<http://www.hawaii.boe.net/Pages/Racetothetop.aspx>).

I commend the Board for creating alternative means by which to attract, train, and retain highly qualified school level administration. Chapter 65 is neatly aligned with the Race to the Top ultimate goal of student achievement. The minimum standards set forth in Subchapter 2 §8-65-7 demonstrate a clear commitment to selectivity and subject mastery, as well as flexibility to allow candidates accessibility to obtain the same level of certification that DOE's administrator preparation program awards upon completion. (HAR §8-65-7(a) (1)-(7)). Providing alternative means to certification is a very practical way to attract qualified individuals and ensure they possess the requisite knowledge, skills, and ability to perform proficiently and meet student achievement needs.

Again, I support the proposal to promulgate a new chapter 65 and I believe, through providing school level administration with the tools and training necessary to be successful, chapter 65 supports the ultimate objective to improve student achievement. Thank you for allowing me this opportunity to submit written testimony on this proposed rule.

Respectfully,

*1st Serena L. Podish*

Serena L. Podish

Christopher St. Sure  
94-702 Lumiauu St. # 3, Waipahu, HI 96797  
stsure@hawaii.edu

April 16, 2012

Department of Education  
Office of Human Resources  
P.O. Box 2360  
Honolulu, HI 96804

To whom it may concern,

I am testifying in support of the Department of Education's proposed new chapter 65, Alternative Routes to Certification. As someone raised in the local community, education is a very big deal to ensure a positive future for the people of Hawai'i. In order to better ourselves as a state, we need to make sure that our youth are getting the education that they need to succeed. Hawai'i needs qualified local candidates in administrator positions and, almost as important, desperately needs the funding that Race to the Top can potentially provide.

The proposed new chapter will ensure that candidates for vice-principal administrator not only are given multiple options in order to become administrators in schools, but also that these candidates are also properly trained in the newly set up program. Specifically § 8-65-8 provides three reasonable means to enter into the program that I fully support. I would further like to stress the importance of § 8-65-11(b)(6), which provides that the Pre-Residency portion of the program will educate candidates on the community and culture. Hawai'i is a mixture of all sorts of cultures that needs to be respected and understood in order to reach certain students, especially in high need areas. Furthermore, I fully support the implementation of a Residency portion of the curriculum, because of its inherent benefits for candidates but I would like more clarification on who will act as mentors. Is there an incentive for current principals to mentor? How do we make sure that the mentors are of the quality that will further the purpose of the alternative routes to certification program?

One of other primary concerns is the recruitment of candidates for high-need areas such as on the west side of Oahu. How do we attract candidates to work in these areas once they complete the program? Currently, a candidate has to commit to three years of continued employment as a school administrator upon completion of the program, but is anything in place to position these now qualified individuals in the areas that need them the most? I know that addressing these areas are one of the purposes of the new chapter, but how can we make sure that people stay in these high-need areas.

Again, I support this proposed new rule and I believe this new chapter is a much needed step in the right direction. Thank you for allowing me to submit my opinion.

Sincerely,

[/s] Christopher St. Sure

April 16, 2012

TO: Department of Education, Board of Education  
FROM: Connie Yonashiro, student at William S. Richardson School of Law  
RE: Proposed Changes to Administrative Rules, Alternative Routes to Certification

Dear Members of the Department and Board of Education,

I am testifying in **support** of the Department of Education's proposed amendments, specifically the adoption of Chapter 8-65 to Hawai'i Administrative Rules (HAR) regarding standards for an alternative certification program.

I believe these amendments are necessary and the Department of Education needs to set "standards that an alternative certification program shall meet for alternative routes to certification for vice-principal school administrators." (§8-65-1 of the proposed amendments). The standards set forth under this proposed chapter, along with the alternative certification program that will meet those standards, will ensure that qualified candidates will have the opportunity to serve in the public school system.

It is necessary to attract and retain proficient and enthusiastic school administrators with desirable qualities such as leadership skills, and these amendments aim at creating standards to sufficiently prepare candidates to fulfill the needs of children in Hawai'i. By expanding certification requirements to include alternative routes to certification, along with applicable standards set forth in these proposed rules, the amount of potentially qualified applicants will increase and ultimately fill the needs in areas of shortages.

Additionally, defining the term "Alternative routes to certification" under §8-65-2 aligns the term with the United States Department of Education regulations, to reduce confusion, and add clarity to the purpose of the "pathways to certification that allow the establishment and operation of administrator preparation programs," which will also help satisfy federal Race to the Top grant requirements.

The proposed chapter 8-65 outlines rigorous standards for an alternative certification program, to guarantee the qualifications of the potential candidates, and will "only recommend a candidate who has completed all components and passed the post-residency assessment." (§8-65-13 of the proposed amendments). Furthermore, the proposed rule establishes periodic program audits under §8-65-14 to "evaluate the alternative certification program's compliance with all the requirements" of the proposed rule. This anticipates that if any deficiencies are found, they have a method of correction is available, and non-compliance will not be tolerated.

Again, I support the proposed amendments to create standards for alternative routes to certification and believe it will help address the need to attract and prepare potential candidates for administrative positions.

Thank you for receiving this testimony and for all your hard work and consideration.

April 16, 2012

**Donald G. Horner**

Chairperson, Board of Education, Department of Education

Re: Support for the proposal to promulgate the new Chapter 65, Alternative Routes to Cert.

Dear Mr. Horner and members of the Board,

Thank you for receiving and considering public testimony on this important issue. My name is Brian Tongg. I am currently a second year student at the William S. Richardson School of Law. I have been educated by the public school system and have several family members employed by the state as teachers and counselors, so this issue is a personal one. I **support** the promulgation of the new Chapter 65 as a means of compliance with federal Race to the Top requirements.

Being mindful of the Board's stated purpose of producing suitable, administrative-minded candidates, I believe chapter 65 is well-rounded and addresses the most obvious areas of contention against the promulgation of such legislation. Subsections clearly outline the minimum standards for candidates, and make note of procedures for training and development.

There will inevitably be concerns that candidates are insufficiently qualified as a result of these alternative methods of certification. I believe that the chapter effectively weighs the need for able administrators against the potential for unqualified candidates "slipping through the cracks."

- Section 8-65-8(a) and (b) on the minimum requirements for candidates enrolling in alternative certification programs: while experience and higher-education attainment do not automatically ensure a candidate will make a good administrator, they are indicators of a capacity and potential to perform.
- Section 8-65-11 on the pre-residency requirement: I believe that allowing candidates time to acclimate to the system is beneficial for their long-term success. Moreover, I was pleased to see that § 8-65-11(a) notes that the program will evaluate and tailor the course of study to address each candidate's potential shortcomings.
- Section 8-65-14 on the periodic program audits: with all of the budget cuts and furloughs of recent years, audits are an important means of ensuring the programs remain under budget. I think this transparency grants peace of mind for the public to know that funds are not being misappropriated.

I support the Board's effort to advance reform in a stagnant system. Federal Race to the Top money will be important to the health and longevity of our education system, and I applaud the state's balanced and measured response. For questions and concerns, I may be reached at (808) 721-6817, or by email at [btongg@hawaii.edu](mailto:btongg@hawaii.edu).

Respectfully yours,

Brian Tongg  
45-739 Hilinai St. Kaneohe, HI 96744



Testimony on Hawaii Administrative Rules Proposed New Chapter 65, Alternative Routes to Certification

hawaii charter

to:

testimony\_proposed\_rules\_ohr@notes.k12.hi.us

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Please respond to hawaii charter <hawaii charter@yahoo.com>

History: This message has been forwarded.

To: Office of Human Resources, Hawaii Department of Education

From: Alex Cyran, e-mail: hawaii charter@yahoo.com

Date: April 16, 2012

Re: Testimony on Proposed New Chapter 65 Under Title 8, Hawaii Administrative Rules

I would like to comment on the proposed new Chapter 65 of the Hawaii Administrative Rules, and I am writing in the capacity of a private citizen in the State of Hawaii.

Designating the responsibility of administrators' certification to the Hawaii Department of Education (HIDOE), or a designee under the HIDOE, unfairly biases the process in favor of the HIDOE. There are public schools in Hawaii that are not part of the HIDOE. The way the proposed chapter is written, the charter schools are unfairly excluded from involvement in the process of selecting, training, and monitoring administrators' certification, while the HIDOE will unfairly benefit.

Rather than placing administrators' certification under the oversight of the HIDOE, it should be totally independent, with monitoring provided jointly by the HIDOE and the Charter School Administrative Office. Alternatively, it could be placed directly under the control of the Hawaii Board of Education.

The proposed chapter assumes that administrators trained and certified to meet the needs of the HIDOE would then be effective leaders of charter schools also. This is a false assumption as the needs of school leaders, those working outside of the HIDOE, are substantially different. Much more creativity in leadership is required of these administrators, and the proposed chapter 65 will not provide the leadership needed for many schools outside of the HIDOE.

To provide true alternative routes to administrators' certification, there needs to be multiple providers. The

proposed Chapter 65 is unclear on whether there would be one provider, or multiple providers. Specifically lacking is the process for encouraging and granting multiple providership to qualified entities. You may note that there is a bill in the Hawaii State Legislature, SB2115 2D2 HD2, that clearly establishes a process for multiple authorizers for charter schools. Similarly, the proposed Chapter 65 needs to be changed to clearly articulate language for multiple providers.

Nonprofit educational support organizations should be added to the designation of entities that may apply to be providers.

Although very specific language is provided for the candidate selection process, the proposed Chapter 65 lacks language for regularly soliciting and using feedback from the general public and school personnel regarding the quality of school leaders being selected, trained, and granted administrators' certification. The present administrative certification program is lacking of feedback from the public, and the proposed Chapter 65 sustains this deficiency.

The proposed Chapter 65 must address the concerns of the Board of Education regarding the ACE Program that are recorded in the meeting minutes of the past years.

Lastly, professional licensing in other Hawaii State departments outside the HODOE follows strict impartiality procedures. For example for one type of license administered by the Department of Health, applicants are assigned numbers instead of names throughout the process. Interviews need to be conducted by qualified individuals outside of group that makes the final selection. This impartiality, and its addition to the proposed Chapter 65, is more important than the specificity included in the language for the rigorous screening process. It is essential that language ensuring the highest standard of impartiality is included, and not assumed to be self-imposed by the provider.

Thank you for considering my testimony.

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JARRETT KEOHOKALOLE  
45-447 Kaneohe Bay Dr., Kaneohe, HI 96744  
jkeoho@gmail.com

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April 24, 2012

Board of Education  
Department of Education  
P.O. Box 2360  
Honolulu, Hawaii 96813

To whom it may concern,

Aloha, my name is Jarrett Keohokalole. I live, and vote, in Kāneʻohe. I am testifying today in support of the Department of Education's ("Department") proposal to promulgate new rules under Chapter 8-65, entitled Alternative Routes to Certification.

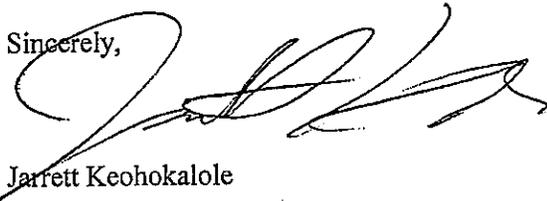
I commend the Administration, the Department, and the Board of Education for taking the initiative to move forward on this important issue. The education of our keiki is of vital importance to our future and I firmly believe that reform at all levels of our educational system is a healthy and necessary way to facilitate the ongoing success of our children. Reform must begin at the top. We must take steps to ensure that the most qualified and effective individuals are not only being placed in the classrooms to teach our children, but are also staffing the offices of our schools so that those teachers are being supported in a way that will allow them to educate our children effectively.

I support this initiative because it provides the Department with a larger pool from which to select the best people to lead these schools. The best administrators are individuals who can listen, lead, delegate, and manage people. Each school is its own organization and each organization needs an effective facilitator who keeps things moving and holds people, and themselves, accountable. I understand that in an educational setting, experience matters. However, the importance of having effective leadership in an organization cannot be overstated.

This proposal will allow the Department to find individuals who have the capabilities to excel in these positions. Sometimes the best people for the job take a non-traditional route. As a second-year law student at the William S. Richardson School of Law, I can tell you from personal experience that some of the highest performing students at our school are non-traditional students. With the state of our educational system the way it is, we simply cannot afford to fence off key positions within that system to individuals who may be the best people for the job, but don't fit the "mold."

In any organization, the administrators are the individuals who are held accountable for its successes and failures. Somehow, that concept has been lost in our educational system, where so much of the blame is placed at the feet of teachers. I support the proposal to promulgate rules under Chapter 8-65 because I believe that our children deserve to be educated, and supported, by the best people possible. Thank you for allowing me this opportunity to testify on this proposed amendment.

Sincerely,



Jarrett Keohokalole