

**Agenda Item VII.B, Board Action on approval of the record of the September 27, 2016 public hearing on draft administrative rules for multiple charter school authorizers**

General Business Meeting

October 18, 2016

On August 2, 2016, the Board of Education (“Board”) adopted a general timeline to serve as guidance for the promulgation and implementation of proposed administrative rules regarding multiple charter school authorizers: proposed new Hawaii Administrative Rules (“HAR”) Chapter 8-515, entitled “Establishment and Oversight of Charter School Authorizers,” and proposed new HAR Chapter 8-517, entitled “Charter Contract Transfers.” In accordance with this timeline, the Board held a public hearing on September 27, 2016. Board Member Jim Williams served as the presiding officer of the hearing.

Pursuant to law, the Board must approve the record of testimony given at the public hearing.<sup>1</sup> The Board received the verbatim oral testimony in the form of an audio recording, which is also publicly available on the Board’s website at: <http://boe.hawaii.gov/policies/AdminRules/Documents/2016-09-27%20Administrative%20Rules%20Hearing.mp3>. The Board also received the verbatim written testimony, attached as **Exhibit A**.

In accordance with the adopted timeline, the Student Achievement Committee, at its November 1, 2016 meeting, will consider the Board-approved testimony, make any necessary adjustments to the proposed rules, and develop a recommendation to the Board. The Board will then consider the committee’s recommendation at its November 15, 2016 general business meeting.

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<sup>1</sup> HAR §8-3-3(g) states, in pertinent part, “Unless otherwise specifically ordered by the board or the presiding officer, testimony given at the hearing shall be reported verbatim and shall be approved by the board.”

**Exhibit A**

**Written testimony of the Board of Education's September 27, 2016 public hearing on proposed administrative rules regarding multiple charter school authorizers**

September 23, 2016

To Members of the Hawaii Board of Education:

On behalf of the National Association of Charter School Authorizers (NACSA), I submit comments on Hawaii Administrative Rules for Chapter 8-515, entitled “Establishment and Oversight of Charter School Authorizers.” We understand that these proposed Rules will be discussed at public hearing of the Board on September 27, 2016.

NACSA is devoted to improving public education by improving the policies and practices of organizations responsible for authorizing and overseeing charter schools. We advocate that authorizers hold themselves, and the schools they oversee, to high standards based on national best practices, defined in our *Principles & Standards for Quality Charter School Authorizing*.

In a previous letter to the Board dated February 18, 2016, NACSA expressed its support for administrative rules clarifying the role of strong authorizing in supporting quality charter schools. NACSA again applauds the Board for its commitment to high-quality authorizing, as evidenced in the current draft. We are gratified that the application process as described in §8-515-5 will be based on “nationally recognized principles and standards for quality charter authorizing” covering organizational capacity; solicitation and evaluation of charter applications; performance contracting; ongoing charter school oversight and evaluation; and charter renewal and revocation processes.

We continued to be encouraged by the proposed language around evaluation of authorizer performance. When proposals for additional authorizers are taken up in any state, our chief concern is that any new authorizer should not prompt “authorizer shopping” by offering less rigorous application oversight and renewal standards. Hawaii’s current charter law, one of the Nation’s strongest, is quite clear that all authorizers must share a deep commitment to high standards and professional practice in these areas. In creating a process for transfer of charters between one authorizer and another, the proposed Rules make this crystal-clear: “No charter school shall be allowed to transfer its charter contract to another authorizer in an attempt to reduce the level of oversight or accountability to which the charter school is currently subject or to §8-517-4 25 avoid possible revocation or nonrenewal of its charter contract.”

One sequence in the proposed Rules remains troubling, however. At §8-517-6(c), under the heading “Transfers due to termination of authorizer’s chartering authority,” the draft contains the following language: “The board shall solicit from the pool of existing authorizers a new authorizer for each charter school overseen by the entity whose chartering authority is terminated. Each proposed charter transfer shall be with the mutual agreement of the proposed new authorizer and governing board; **provided that if no other authorizer agrees or**



is available to accept the transfer of a charter contract overseen by the entity whose chartering authority is terminated, the commission shall be the new authorizer for that charter school.”

In our February letter we noted that “Transfer should only happen if warranted. If the charter school and another authorizer, including the commission, do not mutually agree to contract terms, the charter school should close. No authorizer should be forced to assume oversight for a failing charter school.”

We stress this point more emphatically now, and note that this provision in the draft Rules explicitly contravenes Hawaii statute: 302D-11(e): “In the event of revocation of any authorizer's chartering authority, the board shall manage the timely and orderly transfer of each charter contract held by that authorizer to another authorizer in the State, with the mutual agreement of each affected public charter school and proposed new authorizer.”

We would call to the attention of the Board the recent experience of another state with multiple authorizers. Ohio passage of 2012 legislation to reduce the size of authorizer portfolios required a number of charter schools to find new authorizers. Part of the law designated the Ohio Department of Education (ODE) as authorizer of last resort for charter schools that could not find other homes. After it became clear that this provision would simply keep faltering schools open, the state legislature restored ODE's discretion in deciding which schools to accept, allowing it to function as a quality-oriented authorizer. We encourage the Board to learn from this episode, stay with the clear direction of statute, and insist that chronically-failing charter schools be closed.

Thank you for your good work, and for your attention to the matter we have raised. We look forward to providing any additional information that may be useful as you consider the proposed Rules.

Sincerely,

John Hedstrom, JD  
Vice-President, Policy and Advocacy  
National Association of Charter School Authorizers

DAVID Y. IGE  
GOVERNOR



CATHERINE PAYNE  
CHAIRPERSON

STATE OF HAWAII  
STATE PUBLIC CHARTER SCHOOL COMMISSION  
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September 26, 2016

VIA EMAIL: [BOE\\_Hawaii@notes.k12.hi.us](mailto:BOE_Hawaii@notes.k12.hi.us)

Lance Mizumoto, Chairperson and Members  
Hawaii Board of Education  
P.O. Box 2360  
Honolulu, Hawaii 96804

RE: Testimony regarding Proposed Rule for New Chapter 8-517-6 (c), Charter Contract Transfers

Dear Chairperson Mizumoto and Members of the Board:

On September 22, 2016, the Hawaii State Public Charter School Commission voted unanimously to provide the following testimony regarding proposed rule for New Chapter 8-517-6(c). The Hawaii State Public Charter School Commission agrees with and supports the position of the National Association of Charter School Authorizers (NACSA) regarding new Hawaii Administrative Rules Chapter 8-517-6(c), Charter Contract Transfers and asks that the Board amend its proposed rule to reflect NACSA's comments. Specifically NACSA's testimony states:

"NACSA also supports the charter transfer rules and the commitment of the state of Hawaii to prevent authorizer shopping. While there are some valid reasons for a transfer of authorizers that these rules still allow for, charter transfer should never be used to avoid authorizer oversight or accountability, or to prevent a poorly performing school from closing, as noted in §8-517-3f. In the case of the termination of an authorizer, schools should have a way to move to another authorizer, but this transfer should not be guaranteed. §8-517-6 guarantees that when an authorizer is terminated, the schools in its portfolio will be transferred to another authorizer or the Commission. Transfer should only happen if warranted. ***If the charter school and another authorizer, including the Commission, do not mutually agree to contract terms, the charter school should close. No authorizer should be forced to assume oversight for a failing charter school.***" (Emphasis added.)

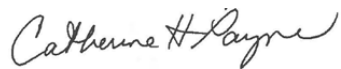
Mr. Lance Mizumoto

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September 26, 2016

Thank you for the opportunity to provide testimony and for your consideration.

Sincerely yours,

A handwritten signature in cursive script that reads "Catherine H. Payne".

Catherine Payne

Chairperson

Hawaii State Public Charter School Commission

A handwritten signature in cursive script that reads "Sione Thompson".

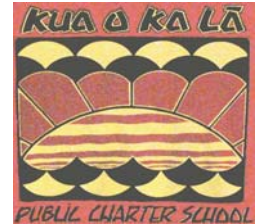
Sione Thompson

Executive Director

Hawaii State Public Charter School Commission



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State of Hawai'i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAII ADMINISTRATIVE  
RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER SCHOOL AUTHORIZERS

September 27, 2016 2:00 p.m. Queen Lili'uokalani Building  
**FULL SUPPORT**

Aloha,

Kua o ka La NCPCS is a Hawaiian focused Charter School located on the coast of Lower Puna. We serve K-12 students and will be adding a Pre-K next school year. We stand in full support of the proposed Administrative rules with consideration requested from the Na Lei Na'auao testimony that has been provided to you.

Of special concern to us is the timelines and consideration of transfers to a new authorizer. Schools which will receive a two-year renewal of the Performance Contract in the coming renewal process will fall within the time line that does not allow for transfers unless they go through special circumstances hoops and not if they are in Academic monitoring.

We are troubled that with all of the changes on the National and State level occurring that our Performance contract renewal will be based on a system no longer validated by the USDOE. With a drastically changing evaluation system, why is this outdated system being used to determine our contract length of time moving forward?

There are so many gaps in the Charter system that it is hard to fathom the potential school closures based on the current system and as it pertains to the performance contract.

We humbly request that some stay on the proposed timeline of allowing Charters to transfer be considered. There is dialogue on 'authorizer hopping' which has only negative associations and does not consider many other real and valid concerns that our Charters have with our current authorizer and situations our Charter Schools face. Please consider some mechanism for authorizers to be established so that our schools may transfer once a new authorizer has been established. We hope that mission aligned authorizers will be established.

We thank you so very much for your moving forward and approving the Administrative rules to allow for new Charter Authorizers. We fully support this.

Me ka ha'aha'a,

Susie Osborne  
Head of School

Pilimai Traub  
Principal

***NĀ LEI NA‘AUAO***  
***Alliance for Native Hawaiian Education***

State of Hawai‘i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAI‘I  
ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER  
SCHOOL AUTHORIZERS

September 27, 2016    2:00 p.m.    Queen Lili‘uokalani Building

**FULL SUPPORT**

NĀ LEI NA‘AUAO (“NLN”) Alliance for Native Hawaiian Education & Friends is pleased to submit testimony in strong support of proposed Hawaii Administrative Rules (“HAR”) Chapters 8-515 and 8-517 relating to multiple charter school authorizers. The mission of Nā Lei Na‘auao – Alliance for Native Hawaiian Education is to establish, implement, and continuously strengthen models of education throughout the Hawaiian Islands and beyond, which are community-designed and -controlled and reflect, respect and embrace ‘ōlelo Hawai‘i, ‘ike Hawai‘i and Hawaiian cultural values, philosophies and its practices. Our alliance and friends is comprised of 20 charter schools, many of which are the original start up schools following the passing of the first charter school law in Hawai‘i in 1994.

The last 20 years of charter education have been a growing and learning experience for all involved and we sincerely appreciate the Hawai‘i Board of Education (“Board”) and the Board’s staff for their commitment to public charter schools. Your dedication to the communities and families served by our public charter schools is evidenced most recently by your extensive work on the proposed administrative rules. We respectfully make the following requests **so long as the amendments are NOT deemed to be substantial, triggering another public hearing and five-month delay.**

Please note that although we are requesting amendments regarding funding, we collectively believe that funding should not be controlled by the authorizer, as proven by best practice in other states like Minnesota.

A. Authorizer duties to include receipt of all applicable funding for students

Hawaii Revised Statutes (“HRS”) §302D-5 identifies charter school authorizer duties to include being responsible for: (1) the receipt of applicable federal funds from the State Department of Education (“DOE”) and distributing to charter schools it authorizes; and (2) receiving per-pupil funding from the State Department of Budget and Finance and distributing to public charter schools it authorizes. Pursuant to HRS §302D- 28(f), authorizers make per-pupil distributions three times a year, with two major per-pupil distributions occurring by July 20 (based on student enrollment as of May 15) and by December 1 (based on October 15 student enrollment).

To the extent that proposed HAR §8-515-5(b)(7) identifies the duties of an authorizer to include those discussed above, we recommend the amendment of subparagraph “D”:



“Being responsible for the receipt of per-pupil funding based on a school’s student census from the department of budget and finance and distribution of the funding to the authorizer’s charter schools.”

B. Funding following the student in a timely manner is critical to the success of each transferring charter. Funding is an important issue, as charter schools struggle to meet their many expenses with their modest per-pupil funding and no food, transportation or facilities support. Accordingly, NLN requests that HAR §8-517-5(b)(7) be revised to include a [new subparagraph “E”]:

“Any and all outstanding funds to which a school is entitled or due, including without limitation funds related to per-pupil allocations, facilities, administrative reimbursements, federal, and grants-in-aid, shall be transferred to the new authorizer within thirty days of approval of the charter transfer or of receipt by the former authorizer.”

C. We note that fear of retaliation is a legitimate concern for schools that petition to leave their current authorizer, are denied, and are required to return to the first authorizer or face school closure. Therefore, we ask that provisions that may tend to limit or prohibit schools from practically transferring from the purview of the Commission be removed. This would include schools that are currently under any form of “monitoring” by the Commission particularly since the Commission is under Special Review by the Board. Alternatively, please allow an initial period through 2020 for schools to apply for acceptance by a new authorizer notwithstanding the provisions of: HAR §8-517-3(b)(1), (4), §8-517-4(a), §8-517-5(a).

D. Addressing the current Commission’s contract renewal timeline in relation to the transfer timeline. Many charter schools will be in the middle of a contract period when the first opportunity to apply for transfer will take place. Please amend HAR §8-517-5 to allow an exemption for these schools to be able to apply for transfer mid-contract, “The transfer of a charter contract that is not in its final contract year shall only be allowed if it occurs within the first 3 years of the effective date of the first new authorizer or under special circumstances...”

E. Amend HAR §8-515-5(c) to state “The Board shall make publically available...” to ensure accessibility to the application process.

F. Amend HAR §8-515-10(a)(2) to state “Apply local and nationally recognized principles...” to acknowledge and allow for local expertise.

G. Amend HAR §8-517-5(b) to state “The letter shall explain the reason for the request, provide evidence that the transfer is in the best interest of the charter school’s students as well as the school’s mission and vision and identify the proposed new authorizer”.

H. Amend HAR §8-517-3(a)(3) to add “A timely decision by the Board on whether to allow the transfer, not to exceed 60 days from transfer application receipt date” to allow the potential transferring school ample time for planning.

I. Appropriate and adequate legal representation has been an ongoing concern for charter schools. Please insert language to guarantee schools have individual representation for contract negotiation purposes and to ensure the mitigation of future liabilities that could be avoided.

Mahalo for the opportunity to provide testimony in STRONG SUPPORT of the administrative rules. We reiterate that these amendments are only requested **so long as they are NOT deemed to be substantial, triggering another public hearing and five-month delay.** Should you have any questions, please feel free to contact any of the following school leaders below or Taffi Wise, KALO Executive Director on behalf of Nā Lei Na'auao at (808) 887-1117 or by email at [taffi@kalo.org](mailto:taffi@kalo.org).

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*'A'ole pau ka 'ike i ka hualau kio'okali*

## **Connections Public Charter School**

### **Comments on the Administrative Rules for Multiple Charter School Authorizers**

**John Thatcher, Connections Public Charter School**

**September 27, 2016**

Chairperson Mizumoto, Vice Chairperson De Lima and members of the State of Hawaii BOE:

I applaud the Board of Education for creating the administrative rules needed to allow multiple charter school authorizers in Hawaii. These proposed rules are reasonable, responsible and fair. I worked with Nā Lei Na'auao schools on the testimony submitted and wholeheartedly support their testimony. Part of our discussion focused on our state's alignment with the National Association of Charter School Authorizers' (NACSA) initiatives. I encourage policy makers to become familiar with other charter school authorizer organizations (i.e. National Charter Schools Institute). However, NACSA does have some excellent guidance concerning multiple authorizers.

The NACSA Policy Guide, Multiple Charter Authorizing Options, provides guidance for policy makers concerned with the issues surrounding multiple authorizers. Several key considerations are addressed through answering critical questions. In response to, *"How will maintaining a range of authorizer options impact the quality of charter schools and uphold high authorizing standards"* they said, "In states with only one type of authorizer, be it a school district, state education agency or independent chartering board, there is a risk that the one authorizer will accumulate undesirable and unchecked behaviors over time. Its application process may become too cumbersome. A change in leadership may lead to biased decisions. Monitoring systems may become too bureaucratic. The existence of multiple authorizers provides for a check and balance on these types of undesirable behaviors." Unfortunately, this is a description of the history of the Hawaii State Public Charter School Commission.

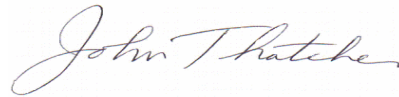
The next question asked, *"What are the drawbacks of allowing only districts to authorize charter schools?"* Part of their response is relevant to the situation in Hawaii. They said, "District-only authorizing environments preclude applicants from choosing an authorizer with a chartering approach and oversight style aligned with their school's needs." In response to *"Who makes a good authorizer"* they wrote, "Good authorizing is about function more than form; there is no one particular authorizing option that works best in all circumstances. The quality of an organization's performance as an authorizer stems largely from its commitment to the work and to the principles of charter schooling. Good authorizing requires a relentless focus on quality – approving only strong applications, providing effective oversight and exercising appropriate interventions. It requires attentiveness and sufficient capacity to handle the volume of work at hand. Essential resources include adequate funding and strong leadership, staffing, and expertise. The success of an authorizer in any state is directly a function of such factors, rather than the type of entity it is. As the range of authorizing options laid out above demonstrates, organizations of many kinds can bring advantages to authorizing. Just as clearly, there

are potential drawbacks to each option, but all of these can be overcome by strong commitment by the authorizer. The charter statute and state policy can raise the quality of all types of authorizers by requiring them to meet professional standards of practice in fulfilling authorizing duties.”

NACSA recommends the following best practices:

- Tap authorizers that will embrace the chartering role;
- Ensure that authorizers have sufficient resources to do their work;
- Offer applicants at least two quality authorizer options in a given jurisdiction;
- Empower and invest in authorizers likely to oversee multiple schools; and
- Hold all authorizers to high standards.

The growth and quality of our charter school sector is largely dependent on policies that define charter school structures, criteria and processes. NACSA’s policy guides are intended to support state policy makers in developing environments that promote quality authorizing and high-quality charter schools. Allowing multiple authorizers in our state will strengthen our charter school sector. A diversity of authorizers will promote professional practices among authorizers and provide checks and balances in charter approval, oversight and renewal decisions.

A handwritten signature in cursive script, reading "John Thatche". The signature is written in dark ink on a light background.



Administrative Testimony  
Testimony of Kamanaʻopono Crabbe, Ph.D.  
Ka Pouhana, Chief Executive Officer

State of Hawaiʻi, Board of Education  
PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAIʻI  
ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER  
SCHOOL AUTHORIZERS

September 27, 2016                      2:00 p.m.                      Queen Liliʻuokalani Building

The Administration of the Office of Hawaiian Affairs (OHA) is in **STRONG SUPPORT** of the proposed Hawaiʻi Administrative Rules ("HAR") Chapters 8-515 and 8-517, relating to charter school authorizers. OHA respectfully urges the Hawaiʻi Board of Education ("Board") and its staff to adopt and implement these rules as expeditiously as possible, and recommends amendments for clarity and only to the extent that do not constitute "substantial" changes further delaying the rulemaking process.

OHA is an interested partner in our Hawaiʻi public charter school system. OHA notes that 17 of the 34 public charter schools are Hawaiian-focused or Hawaiian language immersion charter schools, in which OHA has invested over \$15,000,000 since SY2005-2006. OHA accordingly extends its deep appreciation to members of the Hawaiʻi Board of Education ("Board") and the Board's staff for your commitment to Hawaiʻi's public charter school system, your dedication to the communities and families served by our public charter schools, and the extensive work that has been invested in the proposed administrative rules. It is with this deep appreciation that OHA offers the following comments.

**1. Request the expedited adoption of rules and approval of multiple charter school authorizers, in order to provide much-needed authorizer support for public charter schools.**

OHA respectfully requests that the Board consider expediting its estimated timeline for the adoption and implementation of these rules, including the estimated timeline by which additional authorizers may be recognized. OHA understands that this request may represent an increased burden on the Board and its staff; however, a number of public charter schools have expressed a long-standing and pressing need for additional authorizers, including authorizers who may be more attuned to the particular challenges and opportunities of a Hawaiian-focused or Hawaiian immersion charter school education. A more expeditious implementation of these rules may therefore provide critical and timely relief for our Hawaiian-focused or Hawaiian immersion charter

schools, some of which may not be able to continue operating without the support of an additional authorizer in the very near future.

**2. Request the following amendments to the rules, so long as the amendments do not further delay their adoption and implementation.**

The Board's estimated timeline recognizes that a new public hearing for these rules may be required, if its deputy attorney general deems that "substantial" changes have been made to the rules from their current form; such a public hearing would push the rule adoption and implementation timeline back by approximately five months. Accordingly, OHA makes the following recommendations for amendments *only if another public hearing would not be required*.<sup>1</sup>

**A. Authorizers' duties under HAR §8-515-5(b)(7) should reflect additional statutory requirements relating to the receipt and distribution of per-pupil funding for their charter schools.**

Proposed HAR §8-515-5(b)(7) identifies a charter school authorizer's duties under Hawai'i Revised Statutes ("HRS") §302D-5, which include: (1) receiving applicable federal funds from the State Department of Education, and distributing these funds to charter schools it authorizes; and (2) receiving per-pupil funding from the State Department of Budget and Finance, and distributing these funds to charter schools it authorizes.

OHA notes that an authorizer's duties relating to the receipt and distribution of funding are further prescribed by HRS §302D-28(e) and (f), which require authorizers to annually determine the general fund per-pupil amount their schools should be entitled to receive, and to disburse such funds based on projected and actual student enrollment.<sup>2</sup> These requirements are not reflected in the proposed HAR §8-515-5(b)(7).

Accordingly, insofar as HAR §8-515-5(b)(7) describes the statutory duties of authorizers relating to the receipt and distribution of charter school funds, OHA recommends amending this paragraph to explicitly reflect the related duties described under HRS §302D-28(e) and (f).

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<sup>1</sup> OHA does not believe these requested changes to be "substantial" and thereby require another public hearing, should the Board choose to adopt them. The requested amendment to HAR §8-515-5(b)(7) simply asks that relevant authorizer duties already codified under HRS §302D-28(e) and (f) be included in that section, for clarification purposes; likewise, the requested amendment to HAR §8-517-3 only entails the administrative transfer of a charter school's funds, as part of the charter transfer process described therein.

<sup>2</sup> HRS §302D-28(f) requires authorizers to make per-pupil general fund distributions three times a year, with two major per-pupil distributions occurring no later than July 20 (based on projected student enrollment as of May 15) and December 1 (based on student enrollment as of October 15).

B. HAR §8-517-3 should ensure that a charter school's funds can be accessed in a timely manner notwithstanding a change in authorizer.

In a letter dated March 9, 2016 to the Board's Chair, OHA requested that proposed HAR §8-517-3 be amended, to expressly require that all outstanding funds held on behalf of a charter school be transferred from its current/former authorizer to its new authorizer within 30 days of the charter transfer approval; such a provision would better ensure that the transferring school have timely access to much-needed funds intended for its use. Board discussion indicated that this was an important issue that needed further exploration with the Department of Education, the Department of Budget and Finance, and the State Public Charter School Commission; however, the Board declined to adopt this requested amendment, based on unspecified practical difficulties or unforeseen issues.

OHA continues to stress the importance of "funding following the student," and reiterates its request that a thirty-day transfer deadline be included as part of the proposed rules. Charter schools have a critical need to access their modest allocation of per-pupil funds, grants, and federal dollars in a timely manner, as many schools continue to struggle in meeting their many expenses – including staff and operating costs, facilities, bus transportation, and school lunches, among others. Accordingly, OHA renews its request that HAR §8-517-3 be revised, to include a new subsection (c) to read as follows:

"(c) Any and all outstanding funds to which a school is entitled or due, including without limitation funds related to per-pupil allocations, facilities, administrative reimbursements, federal funds, and grants-in-aid, shall be transferred to the new authorizer within thirty days of approval of the charter transfer or of receipt by the former authorizer."

Mahalo nui for the opportunity to provide testimony in **STRONG SUPPORT** of the proposed administrative rules. Should you have any questions, please feel free to have your staff contact OHA Public Policy Advocate Monica Morris at (808) 594-0285 or by email at [monicam@oha.org](mailto:monicam@oha.org).

‘A‘ohe lua e like ai me ka ho‘ona‘auao ‘ana o ke kamali‘i. Nothing can compare in worth with the education of our children.





**Ke Kula 'o Samuel M. Kamakau**  
Laboratory Public Charter School

46-500 Kūneki St. Kāne'ohe, Hawai'i 96744 \*Kelepona: 808.235.9175 \*Kelepa'i: 808.235.9173  
E mālama 'ia ana ka mauili ola o kākou mai kēlā hanauna a i kēia hanauna.

State of Hawai'i, Board of Education

**PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAII ADMINISTRATIVE  
RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER SCHOOL AUTHORIZERS**

September 27, 2016 2:00 p.m. Queen Lili'uokalani Building

**FULL SUPPORT**

Ke Kula 'o Samuel M. Kamakau **strongly supports** the proposed Hawaii Administrative Rules ("HAR") Chapters 8-515 and 8-517 relating to multiple charter school authorizers. We also commend the Board of Education for its work on these Administrative Rules, showing its commitment to our communities and the students and families we serve.

We support the letter submitted by Nā Lei Na'auao on behalf of the nineteen charter schools represented. Additionally, we would also like to highlight the following areas-

1. Funding following the student is critical to the success of each transferring charter. Funding is an important issue, as charter schools struggle to meet their many expenses with their modest per-pupil funding and no food, transportation or facilities support. Accordingly, we request that HAR §8-517-3 be revised to include a new subsection to read:  
"Any and all outstanding funds to which a school is entitled or due, including without limitation funds related to facilities, administrative, federal, and grants-in- aid, shall be transferred to the new authorizer within thirty days of approval of the charter transfer or of receipt by the former authorizer."
2. Contract negotiations with individual schools- Individual charter schools vary greatly amongst themselves from operations to academics. Negotiations with individual schools would ensure that the contract is applicable.

In closing, we would like to thank the Board of Education and the staff for this opportunity to share our mana'o.

Me ke aloha,

I Kelling  
Kahu, Director

State of Hawai‘i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAI‘I  
ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER  
SCHOOL AUTHORIZERS

September 27, 2016    2:00 p.m.    Queen Lili‘uokalani Building

**FULL SUPPORT**

Kanuikapono Public Charter School is pleased to submit testimony in strong support of the proposed Hawaii Administrative Rules (“HAR”) Chapters 8-515 and 8-517 relating to multiple charter school authorizers. In 2001, Kanuikapono Public Charter School opened its doors to 55 students and has since grown to a student body of over 200 students on a permanent 12 acre campus located in the heart of the Anahola Hawaiian Homestead community. Kanuikapono Public Charter School envisions a vibrant learning community grounded in native education and community renewal by embracing a pedagogy of ‘Ike Hawai‘i.

The Board of Education’s leadership, responsiveness, and commitment to Hawai‘i’s public charter schools is indicative by the proposed administrative rules. The Governing Board of Kanuikapono Public Charter School acknowledges that multiple authorizers can and will be the impetus to propel Hawai‘i’s charter school movement to become one of the nation’s leading examples. Multiple authorizers will allow for much needed alignment and strengthening of educational, financial, and organizational frameworks between schools and authorizers, as opposed to the current “one size fits all” model. We appreciate the Board of Education’s commitment to engage stakeholders in processes that allow for critical feedback, meaningful and thoughtful problem solving, and responsive action.

Kanuikapono Public Charter School respectfully reiterates our agreement with the requests made by Na Lei Na‘auao on behalf of all Hawaiian focused charter schools **so long as the amendments are NOT deemed to be substantial, triggering another public hearing and five-month delay.** We provide the following recommendations for your consideration and hope for expeditious passing of the rules:

- Create another office and/or mechanism for the disbursement of all funds
- Clarify that the money will follow the child.
- Settle the issue of technical assistance - who and how will it be provided
- Clarify the new authorizers are equal to the current commission under the BOE
- Broaden the lens and network beyond NACSA
- Special review of current commission should call for contract renewal moratorium or special circumstances for transitional phase including ensuring inclusion of the pupil count in the enrollment projections to the state legislature so there will remain funds for the students
- Transfer criteria should be effective 2020

Mahalo for the opportunity to provide testimony in STRONG SUPPORT of the administrative rules. Should you have any questions, please feel free to contact Ipo Torio-Ka`uhane at [ipotorio@kanuikapono.org](mailto:ipotorio@kanuikapono.org) or (808) 645-0987.

Puna Kalama Dawson, Chair

Yvonne Pa, Secretary/Treasurer

Essie Williams, Vice Chair

Nalani Kaneakua, Board of Director

Cyndee Fehring, Board of Director

Kathryn Smith, Board of Director

Ipo Torio-Kauhane, Executive Director, Principal

September 26, 2016

I would like to submit testimony **SUPPORTING** multiple authorizers. As a parent of a Charter School student, I would like our school to have a "choice" of authorizer that fits our vision and mission. We chose to be in a charter school to have freedom to choose the style of learning that fits my child, and I would like my school to be able to provide the same freedom to teach my child in the same manner.

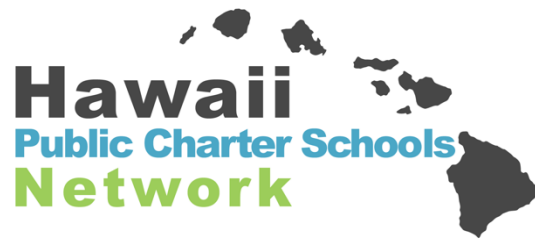
Listening to the SPCSC meeting on September 22, 2016, I was very shocked to hear the disrespectful tone in discussing Big Island Charter School's and disappointed that there is animosity towards any schools especially when I thought that the Commission is supposed to be OUR voice and champion for our students. My hopes were that the Commission was going to help us get what is needed to keep our schools from failing.

I am also a part of the parent group at school that represents about 400 students. We have many ideas for new projects but we are unable to meet with the Principals, as their attention is focused on compliance reporting for the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janlyn Ryusaki-Phillips', with a stylized, flowing script.

Janlyn Ryusaki-Phillips



September 20, 2016

Mr. Lance Mizumoto, Chair  
Hawai'i State Board of Education  
1390 Miller Street  
Honolulu, Hawaii 96813

**Sent Via Electronic Mail: [boe\\_hawaii@noties.k12.hi.us](mailto:boe_hawaii@noties.k12.hi.us)**

**Re: Draft Administrative Rules for Multiple Authorizers**

Aloha Chair Mizumoto and members:

On behalf of the Hawai'i Public Charter School Network (HPCSN), we appreciate the opportunity to testify in support of the Hawai'i Board of Education (BOE) proposal to approve the adoption of administrative rules to recognize multiple authorizers in the state.

The proposed rules establish procedures for the BOE to solicit applications for and approve charter school authorizers pursuant to HRS §302D-4 and for the BOE to approve the transfer of charter contracts from one authorizer to another pursuant to HRS §302D-20, respectively.

Hawaii's sole authorizer, the Hawai'i State Public Charter School Commission ("Commission"), oversees the charter contracts of 34 public charter schools in Hawai'i. While we appreciate the efforts of the Commission and are supportive of policies that promote high academic, financial and organizational standards for Hawai'i public charter schools, we believe there is a need to build in additional capacity for other authorizers in the state.

The establishment of additional authorizers should reflect similar standards for comprehensive academic, operational, governance, and performance charter application and contract requirements, and enhance the diversity and innovation that public charter schools represent for public school education in Hawai'i.

The adoption of the BOE's proposed administrative rules is critical to the success of charter schools in the state. There are beneficial reasons for having multiple authorizers in the state including but not limited to:

- Allowing independent authorizers is one of the most critical components of charter law (National Association of Charter School Authorizers, upon which national principles and standards for charter school authorizing serves as the basis for HRS 302D, encourages states to provide charter school applicants with at least two authorizer options in every jurisdiction);
- Federal law governing the public charter school grant program gives priority to state laws which have multiple authorizers; and
- Additional authorizer(s) may support charter schools in neighbor islands or Hawaiian-culture focused schools and may also elevate standards for best practices among authorizers for the state.

We appreciate the work of the Board, its Student Achievement Committee and BOE staff for its diligence and support of the charter school sector in Hawai'i. HPCSN respectfully offers the following comments for consideration to the Board.

1. Recommended Amendments for Charter Contract Transfers:

- a. Proposed language to §8-517-3 be omitted as this language is too subjective and onerous to administer. The other requirements listed provide adequate rigor for addressing concerns over “authorizer hopping.”
- b. To address a need for transfer of outstanding funds from current/former authorizer to a new authorizer, HPCSN is recommending the addition of the following language to §8-517-3 (b) to a new subsection to read:
  - i. “Any and all outstanding funds due to the school (including state and/or federal grants and funding) managed by the authorizer should be transferred to the new authorizer within thirty days of approval of the charter transfer.”
- c. To address special conditions at the end of the charter contract term, HPCSN is respectfully suggesting an amendment to the following §8-517-4 (e) to allow the Board to grant a temporary extension of a charter contract to for unique and extenuating circumstances. This provision is needed to protect the public interest of students and schools that could be subject to an automatic closure for not securing approval of a charter transfer application within sixty days before the end of a current term year of the current charter contract. This may be amended by adding a subsection to §8-517-4 to read (see underscored authorizing language):
  - i. “If the charter transfer is not approved, the governing board may withdraw its letter of nonrenewal and proceed with its current authorizer’s contract renewal process. If the charter transfer is not approved and the governing board does not withdraw its letter or enter into a new charter contract with its current authorizer, the charter contract shall be considered non-renewed, and the charter school shall close in accordance

with applicable law and the terms of the charter contract,  
unless the Board requires a temporary extension of a charter  
contract as it deems appropriate for unique and extenuating  
circumstances.”

HPCSN works to support its member public charter schools in Hawaii and to be a voice for children and families that seek choice in an independent public school setting. We appreciate the opportunity to provide testimony on behalf of HPCSN.

Sincerely,

Jeannine Souki  
Executive Director  
Hawaii Public Charter Schools Network



## Native Hawaiian Education Council

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September 26, 2016

Mr. Lance A. Mizumoto, Chairperson  
Mr. Brian De Lima, Vice Chairperson  
State of Hawai'i, Board of Education  
P. O. Box 2360  
Honolulu, Hawai'i 96813

Via: [testimony\\_boe@notes.k12.hi.us](mailto:testimony_boe@notes.k12.hi.us)

Subject: September 27, 2016 Public Hearing re:  
-Proposal to Promulgate a New Chapter 8-515, Establishment and Oversight  
of Charter School Authorizers  
-Proposal to Promulgate a New Chapter 8-517, Charter Contract Transfers

Dear Mr. Mizumoto and Mr. De Lima,

The Native Hawaiian Education Council (NHEC or the Council) provides the following written testimony **in general support** of the proposed new chapters, with comments and concerns articulated below to enhance clarity and understanding of the implementation.

The Council's comments are made intentionally considering Hawai'i's: Unique context of having a single State Educational Agency (SEA) and Local Educational Agency (LEA); Ongoing Every Student Succeeds Act (ESSA) implementation efforts; Two official languages—English and Hawaiian—that are mediums of instruction in the State's public education system; Unique charter school environment and governance parameters; Native Hawaiian students comprising 25% of the Department of Education's enrollment; 17 of 34 public charter schools are Hawaiian focused with 6 of the 17 being Hawaiian language immersion schools.

The Native Hawaiian Education Council was established in 1994 under the federal Native Hawaiian Education Act. The Council is charged with coordinating, assessing and reporting and making recommendations on the effectiveness of existing education programs for Native Hawaiians, the state of present Native Hawaiian education efforts, and improvements that may be made to existing programs, policies, and procedures to improve the educational attainment of Native Hawaiians.





## **I. General Testimony Support Comments**

We support both of the proposed new chapters 8-515 and 8-517 in concept and ask the Board to give careful consideration to the implementation impacts re:

- A. **Keep what is best for students, families and communities at the forefront of any action;**
- B. Focus not only on short term, cyclical authorization activities, but also the **long term support and maintenance of quality charter schools** by balancing authorizer responsibilities with support activities without “crossing the line” to management of schools;
- C. Avoid when possible **unintended implementation consequences;**
- D. **Broaden consultation of national and local subject matter expertise,** for example, in addition to the National Association of Charter School Authorizers (NACSA), include National Institute of Charter School Authorizers, National Alliance of Public Charter Schools, Charter School Friends Network, Hawai’i Association of Independent Schools, National Association of Independent Schools and other school and community organizations;
- E. **Establish and maintain fiscal transparency, accountability and understanding** with schools in its portfolio, the Board and the general public.

## **II. Proposal to Promulgate a New Chapter 8-515, Establishment and Oversight of Charter School Authorizers**

### **A. Section 8-515-6 Application and approval procedure.**

- (a) We recommend a chartering authority process no longer than 18 months (vs. 12 months), primarily to provide the Board of Education with the time needed to thoughtfully and carefully assess applicants for this important initial task; the language of “no longer than 18 months” still allows a process to be completed within the 12 months proposed.
- (b) (10) The term “rebuttal” invokes a debate rather than a process that seeks clarity and understanding; we recommend “response” vs. “rebuttal”.
- (d) We recommend the Board utilize the immediacy of e-mail to a point of contact on record instead of the outdated practice of registered or certified mail with return receipt requested.
- (d) We also recommend that an appeal process, if any, be articulated to make it clear on the front end what options are available to the entity post Board decision.
- (d) Consideration of applicants applying to multiple authorizers simultaneously.



**B. Section 8-515-11 Performance evaluations.**

(b) Authorizers should be allowed to complete the operating year before the performance evaluation is provided by the Board; a 90 day period (post operational year) is reasonable to complete the evaluation;

(c) Similar to new charter schools, we recommend the Board create a mid-year interim evaluation for the newly approved authorizer to ensure support in being successful as a new authorizer; and

(c) Support the 360 degree element, including feedback from the authorizer's portfolio of charter schools.

**III. Proposal to Promulgate a New Chapter 8-517, Charter Contract Transfers**

The Council asks the Board to consider the following in implementation:

- A. For nonrenewal of authorizer status, consider the implications of the schools in the authorizer's school portfolio and the process to transfer such schools to other authorizers, including timely notification and thought and careful transition to minimize impact to students, families and communities.

**IV. General Clarification Needed**

In the course of considering public testimony and next steps in the process, please clarify:

- A. How the proposed new Chapters 8-515 and 8-517 will impact the State Public Charter School Commission (Commission) and its responsibilities and current 34 school portfolio?
- B. If the performance evaluation system, performance evaluations, special reviews, etc. outlined in both draft chapters, will also apply to the Commission?
- C. What governance relationship will new authorizer(s) have with the Commission?

In full disclosure, the Council's Executive Director, Dr. Sylvia Hussey, is currently a State Public Charter School Commissioner, appointed by the Board of Education in June 2016. The written testimony provided herein is the Council's testimony and not Dr. Hussey's. However, you are free to contact her directly via e-mail ([sylvia@nhec.org](mailto:sylvia@nhec.org)), office (808.523.6432) or mobile (808.221.5477) telephone with any questions or comments regarding the Council's written testimony.

Sincerely,



Dr. Lisa M. Watkins-Victorino, Chair

cc: Native Hawaiian Education Council and staff



State of Hawai'i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAII  
ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO  
CHARTER SCHOOL AUTHORIZERS

September 27, 2016 at 2:00 p.m. in the Queen Lili'uokalani Building

**STRONG SUPPORT**

Kanu o ka 'Āina New Century Public Charter School (KANU) respectfully submits testimony in **strong support** of proposed Hawaii Administrative Rules ("HAR") Chapters 8-515 and 8-517 relating to multiple charter school authorizers. KANU's Board and administrative staff urges the Hawaii Board of Education to adopt and implement these rules as speedily as possible to ensure quality choices are available to current and future charter schools.

KANU's mission is *Kūlia i ka nu'u*, or strive for the highest. A philosophy of excellence guides KANU as we collectively design, implement and continuously evaluate a quality, culturally-driven, intergenerational Hawaiian model of education with Aloha. As a community-based learning 'ohana, KANU is steadfast in cultivating compassionate, empowered, highly competent learners of all ages, grounded in Native Hawaiian culture and language. We feel it is imperative that KANU as well as all Hawaii Charter Schools have a choice in quality authorizers that will honor individual school missions.

We respectfully make the following suggestions so long as the amendments **DO NOT** delay the adoption and implementation of the rules:

**A.** Authorizer duties to include receipt of all applicable funding for students

Hawaii Revised Statutes ("HRS") §302D-5 identifies charter school authorizer duties to include being responsible for: (1) the receipt of applicable federal funds from the State Department of Education ("DOE") and distributing to charter schools it authorizes; and (2) receiving per-pupil funding from the State Department of Budget and Finance and distributing to public charter schools it authorizes. Pursuant to HRS §302D-28(f), authorizers make per-pupil distributions three times a year, with two major per-pupil distributions occurring by July 20 (based on student enrollment as of May 15) and by December 1 (based on October 15 student enrollment).

To the extent that proposed HAR §8-515-5(b)(7) identifies the duties of an authorizer to include those discussed above, we recommend the amendment of subparagraph "D":

"Being responsible for the receipt of per-pupil funding based on a school's student census from the department of budget and finance and distribution of the funding to the authorizer's charter schools."

B. Funding following the student in a timely manner is critical to the success of each transferring charter. Funding is an important issue, as charter schools struggle to meet their many expenses with their modest per-pupil funding and no food, transportation or facilities support. Accordingly, we request that HAR §8-517-5(b)(7) be revised to include a [new subparagraph "E"]:

"Any and all outstanding funds to which a school is entitled or due, including without limitation funds related to per-pupil allocations, facilities, administrative reimbursements, federal, and grants-in-aid, shall be transferred to the new authorizer within thirty days of approval of the charter transfer or of receipt by the former authorizer."

C. We note that fear of retaliation is a legitimate concern for schools that petition to leave their current authorizer, are denied, and are required to return to the first authorizer or face school closure. Therefore, we ask that provisions that may tend to limit or prohibit schools from practically transferring from the purview of the Commission be removed. This would include schools that are currently under any form of "monitoring" by the Commission particularly since the Commission is under Special Review by the Board. Alternatively, please allow an initial period through 2020 for schools to apply for acceptance by a new authorizer notwithstanding the provisions of: HAR §8-517-3(b)(1), (4), §8-517-4(a), §8-517-5(a).

D. Addressing the current Commission's contract renewal timeline in relation to the transfer timeline. Many charter schools will be in the middle of a contract period when the first opportunity to apply for transfer will take place. Please amend HAR §8-517-5 to allow an exemption for these schools to be able to apply for transfer mid-contract, "The transfer of a charter contract that is not in its final contract year shall ~~only~~ be allowed if it occurs within the first 2 years of the effective date of these rules or under special circumstances..."

E. Amend HAR §8-515-5(c) to state "The Board shall make publically available..." to ensure accessibility to the application process.

F. Amend HAR §8-515-10(a)(2) to state "Apply local and nationally recognized principles..." to acknowledge and allow for local expertise.

G. Amend HAR §8-517-5(b) to state "The letter shall explain the reason for the request, provide evidence that the transfer is in the best interest of the charter school's students as well as the school's mission and vision and identify the proposed new authorizer".

H. Amend HAR §8-517-3(a)(3) to add "A timely decision by the Board on whether to allow the transfer, not to exceed 60 days from transfer application receipt date" to allow the potential transferring school ample time for planning.

I. Appropriate and adequate legal representation has been an ongoing concern for charter schools. Please insert language to guarantee schools have individual representation for contract negotiation purposes and to ensure the mitigation of future liabilities that could be avoided.

Mahalo for the opportunity to submit testimony in STRONG SUPPORT of the proposed administrative rules. Should you have any questions, please contact Joe Fraser, Board Secretary/Treasurer at (808) 594-8617.



## KAMEHAMEHA SCHOOLS®

Time: 2:00 p.m.  
Date: September 27, 2016  
Meeting: Hawai'i State Board of Education  
Location: Queen Lili'uokalani Building  
Re: Comments regarding Proposed HAR 8-515 and 8-517

Aloha! My name is Wai'ale'ale Sarsona and I serve as the Managing Director of the Kūamahi Community Education Group of Kamehameha Schools. As part of the second goal of Kamehameha Schools' strategic plan, which guides us to contribute to the communities' collective efforts to improve Hawai'i's education systems for Native Hawaiian learners, Kamehameha Schools is committed to support Hawaiian-focused charter schools. Therefore, we are writing to express our support of the Board of Education's efforts to establish and implement an authorizer in addition to the existing Hawai'i Public Charter School Commission.

Our comments are intended to support clarification and refinement to the proposed rules and we are hopeful that modifications can be made without delay to the rules implementation process.

We support the intention to establish alternative authorizers, as we recognize that the Hawai'i State Public Charter School Commission is operating at capacity with the current number of charter schools. We support policies that promote high academic, financial and organizational standards for Hawai'i's charter schools, and the establishment of an alternative authorizer would promote such standards.

First, we note that fear of retaliation is a legitimate concern for schools that petition to leave their current authorizer, are denied, and are required to return to the first authorizer or face school closure. Therefore, we recommend that provisions that may limit or prohibit schools from practically transferring from the purview of the Commission be removed. Alternatively, please allow an initial period through 2020 for schools to apply for acceptance by a new authorizer notwithstanding the provisions of: HAR Section 8-517-3(b)(1), (4), Section 8-517-4(a), 8-517-5(a).

Second, we stress the importance of funding following the student. To this end, we request the addition of the following language to proposed HAR Section 8-515-5(b)(7) [new subparagraph "E"]:

(E) Being responsible for the receipt of any and all outstanding funds to which a school is entitled or due, including without limitation funds related to facilities, administrative, federal, and grants-in-aid, which shall be transferred to the new authorizer within thirty days of approval of the charter transfer or of receipt by the former authorizer.

Page Two

Kamehameha Schools advocates for and supports the achievement of Hawai'i's Native Hawaiian public school students. As such, we have been a collaborator with the Hawai'i public charter schools for over a decade. Through our work with Hawaiian-focused public charter schools, we hope to significantly impact more children and their families through education. We believe that Hawaiian-focused charter schools provide quality educational choices for our families and ultimately enhance both academic achievement and engagement for students. We encourage you, the leaders of our government to stand with us in supporting a move to improve the educational system in Hawai'i in this way.

Founded in 1887, Kamehameha Schools is a statewide educational system supported by a trust endowed by Princess Bernice Pauahi Bishop, whose mission is to improve the capability and well-being of Native Hawaiian learners. We believe that by continuing to engage in dialog around these charter school policies and proposals, we can contribute in a positive and meaningful way.

We commend the BOE for working hard to increase the effectiveness of our public education system. E kūlia mau kākou i ka nu'u! Let's constantly strive for the summit. Mahalo a nui.

State of Hawai'i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAI'I ADMINISTRATIVE RULES  
CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER SCHOOL AUTHORIZERS

September 27, 2016 2:00 p.m. Queen Lili'uokalani Building

**FULL SUPPORT**

I would like to extend my gratitude for the board's interaction with the charter school movement in Hawaii in the past year. The listening tour led to the formation of the Permitted Interaction Group, which led to the promulgation of administrative rules to allow multiple authorizers in our State. This is the first step in raising the bar to excellence in chartering. But, this will not be a panacea for charter education. We must insist that authorizers negotiate the charter contracts as prescribed by law. This will allow us to reach agreement on the best, unique, and appropriate performance measures to ensure that the measurement fits the school community.

There is another piece to make this work. Funding. To enable authorizers to conduct their oversight of charters, they too, must be equally funded. Perhaps to go to the National model and what was once imbedded in the statutes in 302-B (predecessor to 302-D) that the charters pay up to 2% of its per pupil funding to the authorizer. Having a clearly defined path for the authorizer's funding will eliminate contentious claims of "authorizer jumping" and will in fact, stimulate authorizers to be transparent and responsible to their charters.

Support is absolutely a duty of authorizers. Too often, the word "advocacy" has been confused with support. And what is wrong with advocacy as an authorizer? Why shouldn't authorizers go to the Legislature and the Governor to advocate for the public school children they serve? Why wouldn't they advocate for equality of funding and funding for facilities, food service and transportation? Of course, these are rhetorical questions and won't be in the administrative rules, but we have to start to combat the negativity with some positive behavior. Having authorizers work closely with their schools to ensure accountability and enhance performance is a step in the right direction.

Thank you for this giant step in public charter school education. We will help to make this work in our capacity as charter school leaders.

Sincerely,



Steve Hirakami

State of Hawai'i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAII'  
ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO  
CHARTER SCHOOL AUTHORIZERS

September 27, 2016 at 2:00 p.m. in the Queen Lili'uokalani Building

**STRONG SUPPORT**

As parents of two Hawaii Public Charter School Alumni we respectfully submit testimony in **strong support** of proposed Hawaii Administrative Rules ("HAR") Chapters 8-515 and 8-517 relating to multiple charter school authorizers, and urge the Hawaii Board of Education to adopt and implement these rules.

Charter Schools offered a viable option for place-based, Hawaiian-Focused education for our children. We have been actively involved with Hawaii Charter Schools since 2000. Unfortunately, the climate for charter schools in Hawaii has often times been what we consider hostile. Therefore, we believe it is vital and in the best interest of all Hawaii Charter School students that schools have a choice in quality authorizers that can provide a supportive, positive environment where schools can flourish as they implement their vision and mission.

Mahalo for the opportunity to submit testimony in STRONG SUPPORT of these administrative rules.

If you have any questions, feel free to contact Lawrence Levenson (808) or Nancy Levenson (808) 890-2513.





# *Kanu o ka ʻĀina Learning ʻŌhana*

Serving and perpetuating sustainable Hawaiian communities through  
Education with Aloha

State of Hawaiʻi, Board of Education

## PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAII ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER SCHOOL AUTHORIZERS

September 27, 2016, at 2:00 p.m. in the Queen Liliʻuokalani Building

### **STRONG SUPPORT**

Kanu o ka ʻĀina Learning ʻŌhana (KALO) respectfully submits testimony in **STRONG SUPPORT** of proposed Hawaii Administrative Rules (“HAR”) Chapters 8-515 and 8-517 relating to multiple charter school authorizers. KALO urges the Hawaii Board of Education to adopt and implement these rules as promptly as possible to ensure quality choices are available to current and future charter schools.

KALO supports legislative activity protecting the Charter Schools and speaks for the indigenous right of self-determination and community control over education. Specific concerns are basic social justice issues; regulatory climate, assessment, equitable funding & services (food/transportation) and appropriate facilities. KALO has successfully provided support to 17 Hawaiian Focused Charter Schools through on-going public/private partnerships. The critical nature of these partnerships cannot be underestimated, given the limited per pupil allocation received from the State, schools heavily depend on the generosity of philanthropic organizations for their survival. KALO has been instrumental in securing and managing private funding opportunities for Hawaiian Focused Charter Schools.

KALO feels that the current commission has undermined the public/private partnership through decisions regarding inclusion of component units in determining financial viability, causing unnecessary financial monitoring encouraging a negative public perception of charters. It is our opinion that the adoption of these administrative rules and the establishment of multiple authorizers will allow the intended integrity of the process to be honored resulting in schools held to high standards of accountability.

KALO joins with NLN as we respectfully make the following suggestions so long as the amendments **DO NOT** delay the adoption and implementation of the rules:

Please note that although we are requesting amendments regarding funding, we collectively believe that funding should not be controlled by the authorizer, as proven by best practice in other states like Minnesota.

A. Authorizer duties to include receipt of all applicable funding for students

Hawaii Revised Statutes (“HRS”) §302D-5 identifies charter school authorizer duties to include being responsible for: (1) the receipt of applicable federal funds from the State Department of Education (“DOE”) and distributing to charter schools it authorizes; and (2) receiving per-pupil funding from the State Department of Budget and Finance and distributing to public charter schools it authorizes. Pursuant to HRS §302D- 28(f), authorizers make per-pupil distributions three times a year, with two major per-pupil distributions occurring by July 20 (based on student enrollment as of May 15) and by December 1 (based on October 15 student enrollment).

To the extent that proposed HAR §8-515-5(b)(7) identifies the duties of an authorizer to include those discussed above, we recommend the amendment of subparagraph “D”:

“Being responsible for the receipt of per-pupil funding based on a school’s student census from the department of budget and finance and distribution of the funding to the authorizer’s charter schools.”

B. Funding following the student in a timely manner is critical to the success of each transferring charter. Funding is an important issue, as charter schools struggle to meet their many expenses with their modest per-pupil funding and no food, transportation or facilities support. Accordingly, NLN requests that HAR §8-517-5(b)(7) be revised to include a [new subparagraph “E”]:

“Any and all outstanding funds to which a school is entitled or due, including without limitation funds related to per-pupil allocations, facilities, administrative reimbursements, federal, and grants-in-aid, shall be transferred to the new authorizer within thirty days of approval of the charter transfer or of receipt by the former authorizer.”

C. We note that fear of retaliation is a legitimate concern for schools that petition to leave their current authorizer, are denied, and are required to return to the first authorizer or face school closure. Therefore, we ask that provisions that may tend to limit or prohibit schools from practically transferring from the purview of the Commission be removed. This would include schools that are currently under any form of “monitoring” by the Commission particularly since the Commission is under Special Review by the Board. Alternatively, please allow an initial period through 2020 for schools to apply for acceptance by a new authorizer notwithstanding the provisions of: HAR §8-517-3(b)(1), (4), §8-517-4(a), §8-517-5(a).

D. Addressing the current Commission’s contract renewal timeline in relation to the transfer timeline. Many charter schools will be in the middle of a contract period when the first opportunity to apply for transfer will take place. Please amend HAR §8-517-5 to allow an exemption for these schools to be able to apply for transfer mid-contract, “The transfer of a charter contract that is not in its final contract year shall only be allowed if it occurs within the first 2 years of the effective date of these rules or under special circumstances...”

E. Amend HAR §8-515-5(c) to state “The Board shall make publically available...” to ensure accessibility to the application process.

F. Amend HAR §8-515-10(a)(2) to state “Apply local and nationally recognized principles...” to acknowledge and allow for local expertise.

G. Amend HAR §8-517-5(b) to state “The letter shall explain the reason for the request, provide evidence that the transfer is in the best interest of the charter school’s students as well as the school’s mission and vision and identify the proposed new authorizer”.

H. Amend HAR §8-517-3(a)(3) to add “A timely decision by the Board on whether to allow the transfer, not to exceed 60 days from transfer application receipt date” to allow the potential transferring school ample time for planning.

I. Appropriate and adequate legal representation has been an ongoing concern for charter schools. Please insert language to guarantee schools have individual representation for contract negotiation purposes and to ensure the mitigation of future liabilities that could be avoided.

Mahalo for the opportunity to provide testimony in STRONG SUPPORT of the administrative rules. We reiterate that these amendments are only requested **so long as they are NOT deemed to be substantial, triggering another public hearing and five-month delay.**

Respectfully Yours,  
Dwight Takamine  
Vice-President Kanu o ka Aina Learning Ohana  
(808) 689-2900



## Multiple Authorizers Testimony

Kanoë Naone

to:

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

09/27/2016 06:33 AM

Hide Details

From: Kanoë Naone &lt;kanoen@inpeace.org&gt;

To: "testimony\_proposed\_rules\_BOE@notes.k12.hi.us"

&lt;testimony\_proposed\_rules\_BOE@notes.k12.hi.us&gt;

Aloha, Please find my testimony for today's hearing.

## State of Hawai'i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAII ADMINISTRATIVE  
RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER SCHOOL AUTHORIZERS

September 27, 2016, 2:00 p.m.

Board of Education Queen Lili'uokalani Building

**FULL SUPPORT OF MULTIPLE AUTHORIZERS**

The Institute for Native Pacific Education and Culture (INPEACE) is pleased to submit testimony in full support of proposed Hawaii Administrative Rules Chapters 8-515 and 8-517 relating to multiple charter school authorizers.

My name is Dr. Kanoë Nāone, the current Chief Executive Officer of INPEACE, a statewide P-20 Native Hawaiian educational 501c3 serving more than 6,200 annually. INPEACE is able to effectively serve high-need Native Hawaiian communities through early childhood education, workforce development, and Hawaiian language and cultural programs.

I am passionate about grassroots common sense solutions to complex issues by determining root causes and relying upon indigenous knowledge. I consistently promote these homegrown solutions to community issues through publications and local, national, and international advocacy. I am excited to use data to overcome mainstream marginalizing practices that undermine success in Native Hawaiian communities.

INPEACE supports multiple authorizers that cultivate community partners and align with native practices. I also support the Na Lei Na'auao request for changes to include; 1) funding that follows the child, 2) the timeline be accelerated if a viable authorizer is approved such as the University of Hawai'i West Oahu 3) schools with like visions to a new authorizer be allowed to transfer seamlessly and quickly to end the current hostile environment.

Thank you for this opportunity to testify.

C. Kanoelani Nāone, Ph.D. | Chief Executive Officer | INPEACE



Serving Native Hawaiian Communities for 21 years

1001 Kamokila Boulevard, Suite 226, Kapolei, Hawai'i

Phone: (808) 693-7222 Fax: (808) 693-7221 Web: [www.inpeace.org](http://www.inpeace.org)

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## COUNCIL FOR NATIVE HAWAIIAN ADVANCEMENT

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State of Hawai'i, Board of Education

### PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAI'I ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER SCHOOL AUTHORIZERS

September 27, 2016, 2:00 p.m.  
Board of Education Queen Lili'uokalani Building

#### **FULL SUPPORT WITH REQUEST TO ACCELERATE THE TIMELINE**

The COUNCIL FOR NATIVE HAWAIIAN ADVANCEMENT (CNHA) is pleased to submit testimony in full support of proposed Hawaii Administrative Rules Chapters 8-515 and 8-517 relating to multiple charter school authorizers.

CNHA was founded in 2001, with the mission to enhance the cultural, economic, political and community development of Native Hawaiians with the vision and dream of a socially and economically sustainable Hawaiian community empowered through self-governance. We believe education is the equalizer that will benefit all of Hawaii.

Educational choice is imperative to reignite a positive attitude about public education in Hawaii grounded in the traditions that have made Hawaii what it is today. CNHA believes by providing educational experiences with relevance to the community where children live and aligned with the cultural practices they value; it makes the education meaningful resulting in better success. As the BOE has validated with passage of Na Hopena A'o which we applaud.

It is our strong opinion that Hawaii should follow the nation best practices that empower community and the current charter school system has varied far away from its original intent of community designed and controlled schools. We feel it is critical that the Board of Education establishes multiple authorizers that will provide a positive, supportive environment for charter schools, which support the vision and missions of each school and assess them appropriately.

We feel the proposed rules that created processes should:

- denounce and remedy the current hostile retaliatory practices,
- clarify timely funding streams that follow the child,
- assess children appropriately and from a strength based perspective,
- collect data that is useful in real time to impact students' academic growth. and
- be aligned with the vision and mission of the schools chartered for the reflective demographic population the school is serving.

Thank you for the opportunity to submit this testimony. Please contact [info@hawaiiancouncil.org](mailto:info@hawaiiancouncil.org) with any questions.

Mahalo,

Michelle Kauhane  
President & CEO

9/26/2016

We would like to submit testimony SUPPORTING multiple authorizers. As parents of Charter school students, we would like our school to have a choice of authorizer that fits our vision and mission.

We are parents of 6 keiki here at Kanu o ka Aina. Kanu has saved our family and keiki by allowing them to learn through place and project based learning. Our oldest son was labeled with ADHD in kindergarten because he could not sit still at a desk all day. Once he entered Kanu at 3rd grade it has been a struggle, but through the vision and mission of place and project based learning here at Kanu, he is now in 10th grade and getting A's and B's. He loves coming to school now. Although all of our keiki are different in learning styles the outcome is the same for all of them.

We humbly ask you to support multiple authorizers and support charter schools. Help us grow strong and confident community contributors, however that may look like in your community.

Mahalo nui loa for your time,

Owen and Heather Sarsona

# WAIMEA HAWAIIAN CIVIC CLUB

State of Hawai'i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAI'I  
ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO  
CHARTER SCHOOL AUTHORIZERS

September 27, 2016, 2:00 p.m.

Board of Education - Queen Lili'uokalani Building

## FULL SUPPORT

The Waimea Hawaiian Civic Club is pleased to submit testimony in full support of proposed Hawaii Administrative Rules ("HAR") Chapters 8-515 and 8-517 relating to multiple charter school authorizers. Resolution 15-L29 submitted by the Association of Hawaiian Civic Clubs (see full text below) confirms our commitment to the Education of Hawaii's children and the valuable contribution made by Hawaiian Focused Charter Schools.

It is our strong opinion that Hawaii should follow the best practices outlined by the National Association of Charter School Authorizers as a result of the 2011 charter system audit and establish a pathway for multiple charter school authorizers in the State of Hawaii. We feel it is critical that the Board of Education establishes multiple authorizers that will provide a positive, supportive environment for charter schools, which support the vision and missions of each school. These administrative rules provide the first step in achieving this goal.

ASSOCIATION OF HAWAIIAN CIVIC CLUBS

A RESOLUTION

15-L29

URGING THE HAWAI'I STATE LEGISLATURE TO AUTHORIZE THE BOARD OF  
EDUCATION TO ESTABLISH "THE PATHWAY II HAWAIIAN AUTHORIZER" WITH  
CHARTERING JURISDICTION AUTHORITY

WHEREAS, the needs of Hawaii's youth are long standing; and

WHEREAS, the Board of Education requires support in its quest to  
provide the framework for Hawaiian Cultural Education and Language  
medium instruction pursuant to Board of Education Policy 2104 and  
2105; and

WHEREAS, the Board of Education recently adopted Policy E-3 Na Hopena A'o to provide a comprehensive framework of outcomes that reflects the core values and beliefs in Hawaiian values, language, culture and history as a foundation to prepare students for success in college, career and communities, locally and globally; and

WHEREAS, Hawaiian language, culture and history should be an integral part of Hawaii's education standards for all students; and

WHEREAS, veterans of the Hawaiian education community have come together representing public and private P-20 education with the support of the Office of Hawaiian Affairs to establish a second pathway to public education that will bridge charter schools and Department of Education schools creating professional learning communities that will enhance Hawaii's commitment to education; and

WHEREAS, the United States of America Presidential Executive Order of October 14, 2009, established Asian Americans and Pacific Islanders (AAPI) under the United States Department of Education addressed lower college-enrollment rates and high poverty rates amongst Pacific Islanders in relation to other ethnic groups; and

WHEREAS, the Hawai'i State Constitution Article X, Section 4 requires that the study of the Hawaiian language be promoted in the public schools; Article XII, Section 7 reaffirms and protects traditional and customary Hawaiian rights exercised for various purposes; and Article XV, Section 4 recognizes Hawaiian as an official language of the State; and

WHEREAS, the Hawai'i State Legislature enacted a number of specific Hawaiian language provisions relating to P-12 education that impact charter schools including programs for preschool-aged children through Hawaiian, mandating a Hawaiian language college with a laboratory school program, establishing Hawaiian language medium education, requiring a Hawaiian language medium early education representative to the early learning advisory board and relating to the use of Hawaiian as a medium of education for preschool; and

WHEREAS, the State of Hawai'i and its Department of Education are subject to federal laws that relate to the Hawaiian language in education and to speakers of the Hawaiian language as in the Native American Language Act of 1990 and Native American Language and Limited English Proficient provisions of the English Secondary Education Act; and

WHEREAS, following the advent of the New Century Public Charter School Section in 1998, Na Lei Na'auao Alliance for Native Hawaiian Education



(NLN), an alliance of culturally-based, Hawaiian-focused public charter schools located on Kaua'i, O'ahu, Moloka'i and Hawai'i whose mission is to establish models of education that are community designed and controlled and which reflect, respect and embrace Hawaiian cultural values and which have come together to provide viable choices in education for students in grades PK through 12; and

WHEREAS, over 15 years, charter schools have become the primary vehicle to create a new community-driven educational sector; and

WHEREAS, as of 2015, there are over 4,100 students enrolled in seventeen culturally-based, Hawaiian-focused charter schools; a majority of the students are of Hawaiian ancestry and who share the commonality of being economically disadvantaged; and

WHEREAS, one in five native Hawaiians live in poverty today according to the White House initiative on Asian Americans and Pacific Islanders and, according to Kamehameha Schools, native Hawaiian children have the lowest on-time high school graduation rates and only 14.3% complete a college degree; and

WHEREAS, researchers have found that Hawaiian students exposed to culturally-driven educational strategies have a stronger sense of socio-emotional well-being, deeper engagement with their school, stronger commitment to civic activities in their communities and that these factors are directly tied to academic achievement; and

WHEREAS, with the majority of Native Hawaiian children now attending public schools, the charter school movement is one of the most important vehicles for linking generations of Native Hawaiians to culture-based education as well as a unique opportunity to design and control an educational system that honors the language, customs, and traditions of an indigenous population; and

WHEREAS, charter school students and their schools were excluded from receiving over 50% of the combined federal and state public school educational supports provided to traditional schools in 2010; and

WHEREAS, the bottom-line issues that continue to challenge charter schools are:

- No facilities, no capital improvement funds, no debt service, no repair and maintenance, no credit enhancement, prohibited leverage yet mandated compliant facilities
- No food, prohibited from PURCHASING food services from the Department of Education even for schools with majority "free and

reduced" qualified students who should receive assistance from the federal government

- No transportation services
- Inconsistent IDEA/SPED support
- No formula-driven federal funding disbursement that follows the child
- Forced English language testing for Hawaiian immersion students
- No after-school services
- Unconscionable contract manipulation
- Inadequate resources and over burdensome hostile regulatory compliance; and

WHEREAS, Hawai'i Revised Statutes §302D-1 provides that an authorizer is an "entity established ... to review charter applications, decide whether to approve or deny charter applications, enter into charter contracts with applicants, oversee public charter schools, and decide whether to authorize, renew, deny renewal of, or revoke charter contracts"; and

WHEREAS, the National Association of Charter School Authorizers audited Hawaii's charter system in 2011 and highly recommends another Authorizer be established in Hawaii, targeting Fall 2014 as best practice.

NOW, THEREFORE, BE IT RESOLVED, by the Association of Hawaiian Civic Clubs at its 56TH annual convention at Lahaina, Maui this 14th day of November 2015, that it urges the Hawai'i State Legislature to authorize the Board of Education to establish "the Pathway II Hawaiian Authorizer" with chartering jurisdiction authority; and

BE IT FURTHER RESOLVED, that the State Legislature authorize the Board of Education to seek an exemption for specialized legal support, when necessary; and

BE IT FURTHER RESOLVED, that the State Legislature authorize the Board of Education to allocate a just portion of the existing authorizer budget to the "Pathway II Hawaiian Authorizer"; and

BE IT FURTHER RESOLVED, that the State Legislature authorize the Board of Education to provide equal services, programs, funding, and regulatory compliance as is required and provided for all public schools; and

BE IT FURTHER RESOLVED, that the State Legislature authorize the Board of Education to assist the "Pathway II Hawaiian Authorizer" in establishing appropriate cultural and language- based measurement tools; and

BE IT FURTHER RESOLVED, that a certified copy of this resolution be transmitted to the Governor of Hawai'i, State Senate President, State Speaker of the House, State Senate Committee on Hawaiian Affairs, State House Committee on Ocean, Marine Resources, & Hawaiian Affairs, Office of Hawaiian Affairs Chair of the Board of Trustees, All County Mayors, Hawaii State Board of Education, Senate Committee on Education and House Committee on Education, the Senate Ways & Means Committee and the House Finance Committee.



The undersigned hereby certifies that the foregoing Resolution was duly adopted on the 14111 day of November 2015, at the 56th Annual Convention of the Association of Hawaiian Civic Clubs in Lahaina, Maui

  
Annelle C. Amaral, President



Kihei Charter School  
“innovative 21<sup>st</sup> century public education”

Gene Zarro  
Vice-chair  
Kihei Charter School Board of Governance

September 27, 2016

State of Hawai‘i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAII‘I ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517  
RELATING TO CHARTER SCHOOL AUTHORIZERS

September 27, 2016, 2:00 p.m.  
Board of Education - Queen Lili‘uokalani Building

**Testimony in Support of passing these Administrative Rules**

Aloha Chairperson Mizumoto, Vice-chairperson De Lima and members of the State of Hawaii BOE:

The charter school movement continues to evolve, as it should, to be a vital part of the Hawaii Public School System. In the course of this evolution areas of concern will show themselves and need to be addressed.

Establishing a pathway for additional charter school authorizers is one of those evolutionary steps that needs to be established.

Much of the stress we are experiencing in our relationship with the Charter School Commission is due to work overload at the Commission due to the fact that charter schools in Hawaii now number 34 schools nearly twice as much as the recommended size of an authorizer.

I support the testimony of NĀ LEI NA‘AUAO (“NLN”) Alliance for Native Hawaiian Education & Friends.

I was part of the meeting with Na Lei Na‘Auao where we discussed the draft rules and I believe that there is much to discuss as we move forward but I would not want these opportunities for future conversations to slow down the approval of these very important administrative rules.

I want to thank the Board of Education for their great efforts in moving this important issue forward.

Sincerely

Gene Zarro  
Vice-chair KCS  
Emailed testimony

State of Hawai‘i, Board of Education

PUBLIC HEARING ON PROPOSAL TO PROMULGATE NEW HAWAI‘I  
ADMINISTRATIVE RULES CHAPTERS 8-515 AND 8-517 RELATING TO CHARTER  
SCHOOL AUTHORIZERS

September 27, 2016    2:00 p.m.    Queen Lili‘uokalani Building

**FULL SUPPORT**

Ke Ana La‘ahana Public Charter School a seventh (7<sup>th</sup>) through twelfth (12<sup>th</sup>) grade school currently sits in the “piko” of the “piko” of Keaukaha. Our mission in part states that “our educational program is driven by, families, community, and culture.” An authorizer should believe in the mission and vision of the schools it oversees. It is also important that the authorizer be aligned with the epistemology of those schools and affords them the ability as well as provides them the opportunity and support to reach their goals and objectives.

We fully support and are grateful for the work of the Board of Education on the Administrative Rules relating to charter school authorizers. We are confident that the establishment of multiple authorizers will benefit all children of Hawai‘i to attain academic success.

Me ka ‘oia’i’o,

W. Mapuana Waipa

Ke Ana La‘ahana PCS

Fiscal and Cultural Coordinator

Mr. Lance Mizumoto, Chair  
Hawai'i State Board of Education  
1390 Miller Street  
Honolulu, Hawaii 96813

Re: Public Hearing to Promulgate New Hawai'i Administrative Rules for Multiple Authorizers, Chapters 8-515 and 8-517

Aloha Chair Mizumoto and members:

Mahalo for the opportunity to share testimony this afternoon on the Hawai'i Board of Education proposal to approve the adoption of administrative rules chapters 8-515 and 8-517 to recognize multiple authorizers in the state of Hawai'i.

On behalf of Kawaikini New Century Public Charter School, on the island of Kaua'i, which has been in existence for 8 years, since 2008, I strongly support the testimony provided by Na Lei Na'auao and all of it's 20 charter schools. The testimony outlines as follows:

- a. authorizers duties to include receipt of all applicable funding for students
- b. funding following the student
- c. the legitimate concern of fear of retaliation for a charter leaving the current authorizer
- d. and 4 amendments to the administrative rules chapter 8-515 and 8-517

This is a great step in a positive direction, allowing more Authorizers. In the eight years that Kawaikini has existed, five of which I have been the Executive director, I have seen the many changes in the charter schools community. In any organization, there are many successes, and there are also many improvements that can and should be made. Allowing other Authorizers is one of those improvements that should, and must be made.

Along with additional authorizers, I believe it's critical that Authorizers believe in and support the visions and missions of it's member schools. Allowing more authorizers gives charter schools the opportunity to choose one that they can work with, one who would still maintain professionalism, and can also be open and frank in deliberations.

Finally, the relationship with the current authorizer has been very tense and intense. One of my areas of concern has been in regards to providing technical support. In NACSA's 2015 edition of Principles and Standards for quality charter school authorizing, under it's 4<sup>th</sup> standard, Ongoing oversight and evaluation, NACSA recommends to "provide clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations." Providing clear technical

guidance to schools would help to breakdown the walls of separation and distrust, and begin to forge a positive relationship.

I want to add my mahalo to those staff who have gone beyond their normal duties, and have provided some assistance.

Mahalo for the opportunity to provide testimony.