

Testimony on NBI 25-17: Guidelines for Evidence Submission for SATEP Compliance and Program Modifications or Changes

Hawai'i Teacher Standards Board • November 14, 2025

Aloha Chair and Members of the Board,

I apologize for my absence from today's board meeting as I am travelling to the World's Indigenous People's Conference on Education in Aotearoa. I would like to offer testimony on NBI 25-17. I support the Board's intent to clarify expectations for State-Approved Teacher Education Programs (SATEPs) and uphold high standards for teacher preparation. However, before adopting this measure, I urge the Board to strengthen collaboration with SATEPs to ensure transparency, proportionality, and mutual accountability.

Across campuses, programs have expressed concern that current evidence requirements are unclear and sometimes perceived as excessive. While oversight is essential, the lack of shared criteria and communication can create unnecessary burden, duplication, and delays in program improvement. To address these issues, I recommend three key amendments:

1. **Publish a Review Rubric and Checklist** – HTSB should establish a clear, standardized rubric and evidence checklist specifying acceptance criteria, sampling expectations, and examples of sufficient documentation. Transparency in how evidence is evaluated will help programs align submissions and reduce unnecessary back-and-forth.
2. **Establish an Appeal and Feedback Loop** – Creating an appeal process and publishing an annual summary of common issues and strong examples would promote continuous improvement and shared understanding between HTSB and SATEPs.
3. **Create a Joint Evidence Advisory Group** – Convene a short-term advisory group of SATEP and HTSB representatives to co-develop the rubric, checklist, and examples. This co-design process would ensure that expectations are realistic, aligned with accreditation standards, and responsive to Hawai'i's unique teacher preparation contexts, including Kaiapuni and community-based pathways.

Our shared kuleana is to ensure that every teacher is prepared to serve Hawai'i's keiki—and to do so through a review process that is clear, fair, and collaborative. Building trust and transparency between HTSB and the SATEPs will strengthen both program quality and the profession as a whole.

Mahalo, Kahele Dukelow

Testimony on NBI 25-17: Guidelines for Evidence Submission for SATEP Compliance and Program Modifications or Changes

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Aloha Chair and Members of the Board,

I would like to offer testimony in opposition to agenda item IV-J related to NBI 25-17. The Board's intent to clarify expectations for State-Approved Teacher Education Programs (SATEPs) and uphold high standards for teacher preparation is important. However, before adopting this measure, I urge the Board to strengthen collaboration with SATEPs to ensure transparency, proportionality, and mutual accountability.

Across campuses, programs have expressed concern that current evidence requirements are unclear and sometimes perceived as excessive. While oversight may be an important duty of this board, the lack of shared criteria and communication can create unnecessary burden, duplication, and delays in program improvement.

The critical issue with developing new business items (NBIs) like 25-17 is the **absence of a process step that includes key stakeholders** (SATEP representatives) **before issuing a request to approve the business**. When the Board develops and recommends actions like NBI 25-17 without co-designing the details with the programs responsible for implementation, it leads to standards that are divorced from practical reality. Changes to compliance guidelines frequently occur **mid-cycle** without sufficient lead time for SATEPs to adjust curriculum or communicate shifts. This creates an **unfair and potentially negative impact on active student candidates** who are **midstream** in their preparation programs. These students, who were admitted under one set of rules, may suddenly face new or shifting requirements, which can delay their graduation, complicate their licensing path, and add undue financial and logistical stress. A truly accountable process must ensure changes are implemented only after **SATEPs have been consulted and a reasonable phase-in period** that protects the academic continuity and licensure timeline of current students.

To address these issues, I recommend three key amendments:

1. **Publish a Review Rubric and Checklist** – HTSB should establish a clear, standardized rubric and evidence checklist specifying acceptance criteria, sampling expectations, and examples of sufficient documentation. Transparency in how evidence is evaluated will help programs align submissions and reduce unnecessary back-and-forth.
2. **Establish an Appeal and Feedback Loop** – Creating an appeal process and publishing an annual summary of common issues and strong examples would promote continuous improvement and shared understanding between HTSB and SATEPs.
3. **Create a Joint Evidence Advisory Group** – Convene a short-term advisory group of SATEP and HTSB representatives to **co-develop** the rubric, checklist, and examples. This co-design process would **reinsert the necessary stakeholder inclusion step** and ensure that expectations are realistic, aligned with accreditation standards, and responsive to Hawai'i's unique teacher preparation contexts, including Kaiapuni and community-based pathways.

Our shared *kuleana* is to ensure that every teacher is prepared to serve Hawai'i's *keiki*—and to do so through a review process that is **clear, fair, collaborative, and protective of the students**

currently on their pathway to licensure. Building trust and transparency between HTSB and the SATEPs will strengthen both program quality and the profession as a whole.

Mahalo,

Kau'i Sang