

DEPARTMENT OF CUSTOMER SERVICES
KA 'OIHANA LAWELawe KUPA
CITY AND COUNTY OF HONOLULU

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January 14, 2026

The Honorable Tyler Dos Santos-Tam, Chair
and Members
Committee on Government Efficiency & Customer Services
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawaii 96813

Dear Chair Dos Santos-Tam and Councilmembers:

SUBJECT: Resolution 26-1, Requesting the State of Hawaii to Evaluate
and Consider Requiring a Test of Knowledge of the Rules of
the Road for Driver's License Renewals

HEARING: Thursday, January 15, 2026, 2:30 p.m.

The Department of Customer Services (CSD), Division of Motor Vehicles (DMV), respectfully offers comments on Resolution 26-1, which proposes to request the State Department of Transportation evaluate implementation of a requirement for applicants for a renewal of a driver's license to successfully complete a test of knowledge of the rules of the road, and the Hawaii State Legislature to consider amending the statutes pertaining to motor vehicle driver licensing to reinstitute the requirement that applicants for driver's license renewal be tested on their knowledge of the rules of the road as part of the applicants' determination of fitness to continue to operate a motor vehicle.

While CSD DMV supports the intent of the proposed request and efforts to enhance road safety, we appreciate the opportunity to provide the following comments regarding anticipated operational impacts associated with instituting and administering a tiered driver's license renewal testing system for your consideration:

- **Statewide Coordination of Data and Systems Integration:** A tiered testing system will require enhanced database sharing and close coordination across all counties statewide, the State Department of Transportation, the State Judiciary, and the Honolulu Department of Information Technology to support eligibility

determinations, test tracking, and enforcement, and to ensure consistent standards, procedures, and public communications.

- **Testing Capacity:** Under current staffing and facility configurations, CSD DMV's capacity to administer additional testing during renewals is limited. Any expansion of testing requirements would place significant strain on existing operations and would require additional funding and staffing to develop and maintain.

CSD DMV would seek to contract a third-party vendor to provide online testing services. Confirmation of successful completion of required testing would be processed by CSD DMV personnel.

To provide context for the potential number of tests that may be required, for existing driver license renewals, the following are the projected driver license renewal volumes based on expiration date:

	City and County of Honolulu	State of Hawai'i
CY2026	110,744	166,068
CY2027	128,732	194,265
CY2028	106,250	161,250

To provide context for the potential increase in the number of tests that may be required in the future due to new driver licenses being issued annually, in calendar year 2025 there were 32,434 new driver licenses issued in the City and County of Honolulu, and 44,445 new driver licenses issued statewide.

Due to the high volume of annual driver license renewals, CSD DMV would be in strong support of driver license renewal protocols that focus on drivers with unsafe driving records based on a driver's traffic abstract and/or historical driving data. CSD DMV recommends focusing implementation and/or reinstitution of a requirement for applicants for a renewal of a driver's license to successfully complete a test of knowledge of rules of the road to drivers with unsafe records.

- **Customer Service Considerations:** Implementing a tiered system would introduce additional complexity in the appointment scheduling process and at customer service windows, resulting in increased processing times and the potential for customer confusion.

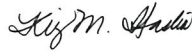
An adequate amount of time will be required to initiate communications and coordinate efforts with the State Department of Transportation, the State Judiciary, the City and County of Honolulu's Department of Information Technology, and the counties

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of Hawai'i, Kaua'i, and Maui, regarding implementation of all necessary administrative procedures and updates; funding to support additional staffing; funding for information technology upgrades; and the establishment of data-sharing arrangements with the Judiciary.

Thank you for the opportunity to provide testimony on Resolution 26-1.

Sincerely,



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Kimberly M. Hashiro
Director

APPROVED:



Michael D. Formby, Managing Director
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