

Oklahoma School Transfer Audit and Policy Report

School Year 2025-26

Table of Contents

Executive Summary	3
Part I. Introduction and Policy Background	5
Part II. Statutory Compliance Audit	6
II.A. Sampling Methodology	6
II.B. Transfer Policy Information.....	8
II.C. Audit of Approved and Denied Transfers.....	11
II.C.1. First-Come, First-Served Provision of SB783	11
II.C.2. Denial Grounds Analysis	15
II.C.3. Military Priority.....	16
II.C.4. Teacher’s-Child Priority.....	18
Part III. Evaluation of Efficacy of Transfers	19
III.A. Transfer Access Across Student Subgroups.....	19
III.B. Statewide Transfer Denial Analysis	21
Part IV. Comparative & Trend Analysis.....	23
IV.A. Transfer Denials and Subgroup Access Over Time	23
Part V. Policy Recommendations	29
V.A. Improving the completeness of transfer application records.....	30
V.B. Supporting districts in posting capacity and program availability	30
V.C. Examining the access gap for students with disabilities.....	30
Part VI. Appendix Tables	32

Executive Summary

Senate Bill 783 (SB783) overhauled policy governing interdistrict open enrollment in Oklahoma, replacing a transfer regime that granted broad discretion to districts with one that imposed much more structure on the process. To help ensure the integrity of the interdistrict transfer program, SB783 directed the Oklahoma Office of Educational Quality and Accountability (OEQA) to annually select a random sample of ten percent of the school districts in the state and audit each district's approved and denied transfers against the provisions of the policy adopted by that district's board of education. This report fulfills the annual audit requirement for the 2025-26 school year and is organized into four main parts.

The first part presents the statutory compliance audit, which evaluates a stratified random sample of 52 districts against four auditable provisions of SB783: 1) Districts must process transfer applications in the order received, 2) Districts may deny applications only on the grounds SB783 permits—capacity, prior disciplinary issues, and a history of chronic absenteeism, 3) Districts may not deny children of active-duty military parents entry on capacity grounds, and 4) Districts may not deny children of district teachers on capacity grounds.

The audit finds that the vast majority of districts followed the procedural requirements of the law. However, we do identify potential violations of the first-come, first-served processing rule among a small number of districts as well as a handful of capacity-based denials of teacher's-child applicants that potentially violate the exemption protecting those families. The military-priority exemption produced no potential violations in the sample. The reasons districts recorded for denying transfer applications fell almost entirely within the three grounds SB783 authorizes, with capacity by far the most common.

The second part of the report moves beyond the statutory compliance audit to analyze the full set of more than 25,000 transfer applications submitted in the 2025-26 school year. This analysis examines the rates at which districts approved and denied transfer applications across four student characteristics: 1) Grade level, 2) Disability status, 3) Economic disadvantage, and 4) English learner status. The most notable finding from this analysis concerns denial rates of transfer applications for students with and without disabilities. Districts denied more than 40 percent of applications submitted by students with a disability, compared to a denial rate of less than 20 percent for students without one. With respect to grade level, districts were more likely to reject transfer applications from students in middle and high school, compared to elementary students. And applications from students who were economically disadvantaged were slightly more likely to be denied than applications from their more advantaged peers.

The third part of the report contextualizes the results of transfer approval and denials from the 2025-26 school year by comparing them to the three prior school years in which SB783 was in effect. Three notable findings emerge from this analysis. First, it shows the statewide denial rate roughly doubled between the first and second year under the open-transfer law but has held steady at roughly 20 percent ever since. Second, it makes clear that the large gap in denial rates for students with and without disabilities first emerged in 2023-24 and remained relatively consistent in the two subsequent school years. Third, the analysis shows that, beginning in 2024-25, districts cite a lack of available programs, staff, or services as the basis for about 10 percent of transfer denials.

The fourth part of the report closes with three areas the state and its districts may wish to consider as they continue to administer the open-transfer system. First, stakeholders might consider strategies for improving the completeness of transfer applications. Missing data in fields contained in the transfer application records was a recurring constraint for the analyses in this report. One avenue worth exploring is whether the fields most often left blank could be autofilled from the student information systems districts and the state already maintain. Second, we recommend that the state consider strategies for supporting districts in posting timely and accessible capacity and program-availability information. Such strategies could start by identifying districts whose posting practices are particularly well-organized and drawing templates, shared tools, or technical guidance from them that the state could make available to districts with more limited administrative infrastructure. Third, we recommend that stakeholders carefully consider the issue of transfer access for students with disabilities. Such consideration could involve providing technical assistance to districts evaluating transfers for students who require specialized services and continued state-level monitoring of the gap in denial rates between students with and without disabilities.

Part I. Introduction and Policy Background

Senate Bill 783 (SB783), which Governor Kevin Stitt signed into law during the 2021 legislative session, overhauled the policy governing interdistrict open enrollment in Oklahoma. SB783 replaced a transfer regime that granted broad discretion to districts with one that imposed much more structure on the process. Under the provisions of SB783, a student may apply at any time of year to transfer to any school district in the state, and districts are only permitted to reject student transfer applications for a limited set of reasons. The bill took effect on January 1, 2022, and required every district to have adopted a conforming written transfer policy by that date.

Under the open-transfer framework, districts must accept transfer applications in the order in which they are received—a first-come, first-served rule—and may only deny an application for a small number of reasons, including insufficient capacity at the relevant grade level and school site, the student’s discipline history, or the student’s chronic attendance issues. Students whose parent or guardian is an active-duty member of the military or a teacher in the district into which the student is applying to transfer are exempted from capacity-based denials. Transfers granted in good standing continue from year to year, though continuing transfers may be reconsidered on the same three permissible grounds.

To provide families with information designed to provide transparency and facilitate the transfer process, SB783 also required each Oklahoma district to post on its website both its transfer policy and the number of available transfer seats for each grade level served by each school site—the law requires districts to update the number of available seats quarterly, on January 1, April 1, July 1, and October 1 of each year. The law further requires districts to report transfer data—including applications received, transfers approved, transfers denied, and the reason for each denial—to the Oklahoma State Department of Education.

To ensure the integrity of the state’s interdistrict transfer program, SB783 directed the Oklahoma Office of Educational Quality and Accountability (OEQA) to annually select a random sample of ten percent of the school districts in the state and audit each district’s approved and denied transfers against the provisions of the policy adopted by that district’s board of education. This report fulfills the annual audit requirement for the 2025-26 school year.

The report is organized into four main sections. The first section carries out the statutory compliance audit required by SB783. This section describes the stratified random sampling methodology used to select the 52 districts audited this year, summarizes each district’s compliance with the requirement to post on its website its transfer policy, capacity, and number of available seats, and presents the audit of each district’s approved and denied transfers against the provisions of SB783. The second section of the report examines how the open-transfer system functions in practice, analyzing transfer access for students with disabilities and other subgroups, as well as the patterns of denial. The third section of the report sets this year’s findings against those from prior years, identifying recurring challenges and noting areas of measurable progress. The fourth and final section of the report offers actionable policy proposals, with the aim of improving district compliance and, ultimately, families’ experience with the state’s open-transfer process.

Part II. Statutory Compliance Audit

This section presents the statutory compliance audit that SB783 directs OEQA to conduct each year. It consists of three parts. Section A describes the stratified random sampling methodology we used to select the 52 districts for this year's audit. Section B addresses the law's transparency requirements, documenting whether each district in the sample published on its website its written transfer policy, its grade-level capacity figures, and its number of available seats. It also indicates whether that information was demonstrably current at the time of review. Section C presents the core of the audit, evaluating each district's approved and denied transfers against the substantive provisions of SB783.

SB783 directs OEQA to audit each district's transfer decisions against the policy its own board of education has adopted. Local board policies vary considerably, however, and that variation creates two complications. First, and most importantly, the transfer application data do not contain the information needed to evaluate compliance with every policy provision in each sampled district. Second, the variation would produce inconsistency across districts in what the audit covers. Accordingly, to ensure cross-district consistency, we evaluate compliance against the provisions specified in SB783, which every conforming local policy must incorporate. Specifically, we audit each district's transfer approvals and denials against four SB783 provisions:

- districts must process transfer applications in the order received;
- districts may deny applications only on the grounds SB783 permits—capacity, discipline, and attendance;
- districts may not deny children of active-duty military parents entry on capacity grounds; and
- districts may not deny children of district teachers on capacity grounds.

Taken together, the audit results offer a clear picture of district compliance with the spirit of SB783.

II.A. Sampling Methodology

SB783 directs OEQA to carry out each annual compliance audit using a sample containing 10 percent of Oklahoma's public school districts. As the first step in satisfying this requirement, we constructed the sampling frame consisting of all 515 non-charter Oklahoma school districts using records of district enrollment counts maintained by the Oklahoma State Department of Education. We then merged in geographic classification data from the National Center for Education Statistics to create a frame characterizing every traditional public school district by its most recent enrollment and a locale classification of City, Suburb, Town, or Rural—these attributes shaped the sampling strategy described below.

A simple random sample of the 515 districts would not have yielded a representative picture of the students served statewide. In Oklahoma, districts are disproportionately located in sparsely populated rural areas: 430 districts are classified as rural and only 9 as city. Because rural districts enroll fewer than 550 students on average while city districts enroll nearly 14,000, a random draw would consist almost entirely of rural districts and would substantially underrepresent the students concentrated in urban or suburban systems, where the bulk of

transfers occur. We therefore adopted a stratified random sampling approach, using the locale classification as the stratifying variable, so that the sample would reflect the distribution of student enrollment rather than the simple count of districts.

We allocated the 52 sample slots—just over 10 percent of the 515 districts—across the four locale strata in proportion to each stratum's share of total statewide enrollment. The suburban stratum, for example, accounts for 26.8 percent of enrollment and was accordingly assigned approximately 14 slots, with the specific districts drawn at random from within the stratum. However, because the nine city districts together account for a large share of statewide enrollment, strict proportional allocation would have selected all nine in every annual sample, leaving no city district unaudited in any given year. To preserve year-to-year variation in the audit sample, we capped the proportion of any single locale stratum that could be selected in one year at one-third, which limits any individual district's annual probability of selection to 33 percent. The slots freed by this constraint were reallocated to the remaining strata with the largest enrollment shares. The resulting sample comprises 3 city, 7 suburban, 8 town, and 34 rural districts. Using this framework, we generated three consecutive annual samples, drawn without replacement, by randomly selecting districts within each stratum. These three samples are intended to be used for this year's audit, as well as those that will be conducted in the next two years. Table 1 lists the districts selected for inclusion in the sample for this year's audit.

Table 1. Districts Selected for Open-Transfer Audit for 2025-26 School Year

District Name	Org. Location Code
UNION	72-I009-999
BISHOP	16-C049-999
PUTNAM CITY	55-I001-999
HYDRO-EAKLY	08-I011-999
CLEORA	21-C006-999
MCCLOUD	63-I001-999
PRETTY WATER	19-C034-999
GRAHAM-DUSTIN	54-I054-999
MANNSVILLE	35-C007-999
ROLAND	68-I005-999
CRUTCHO	55-C074-999
WILSON	10-I043-999
WILSON	56-I007-999
QUAPAW	58-I014-999
CLAYTON	64-I010-999
EARLSBORO	63-I005-999
STRAIGHT	70-C080-999
ROBIN HILL	14-C016-999
SOUTH ROCK CREEK	63-C032-999
THOMAS-FAY-CUSTER UNIFIED DIST	20-I007-999
SEQUOYAH	66-I006-999

COMANCHE	69-I002-999
OPTIMA	70-C009-999
GANS	68-I004-999
JONES	55-I009-999
RATTAN	64-I001-999
TIMBERLAKE	02-I093-999
AFTON	58-I026-999
TURNER	43-I005-999
BOWRING	57-C007-999
ROCK CREEK	07-I002-999
FREDERICK	71-I158-999
WRIGHT CITY	48-I039-999
FORT COBB-BROXTON	08-I167-999
CLEVELAND	59-I006-999
DEPEW	19-I021-999
RYAL	49-C003-999
JENKS	72-I005-999
YUKON	09-I027-999
MIDWEST CITY-DEL CITY	55-I052-999
ARKOMA	40-I091-999
EDMOND	55-I012-999
NORMAN	14-I029-999
COWETA	73-I017-999
SHAWNEE	63-I093-999
BLACKWELL	36-I045-999
LATTA	62-I024-999
SEMINOLE	67-I001-999
HUGO	12-I039-999
MUSKOGEE	51-I020-999
FRINK-CHAMBERS	61-C029-999
ARDMORE	10-I019-999

II.B. Transfer Policy Information

Table 2 summarizes the transfer-related information publicly available for each district in the sample. For each district, we assessed three categories of information: (1) Whether capacity information (the number of seats at each grade level at each school site) is published on the district website; (2) Whether availability information (the number of open seats at the time of review) is published; and (3) Whether a formal written transfer policy document is publicly accessible. Additionally, where applicable, this table presents the currency of each district's capacity and availability postings:

Table 2. Transfer Policy Information by District

District Name	Org. Location Code	Capacity		Availability		Policy Posted
		Listed?	Current?	Listed?	Current?	
UNION	72-I009-999	X	No	—	No	X
BISHOP	16-C049-999	X	No	X	No	X
PUTNAM CITY	55-I001-999	X	Yes	X	Yes	X
HYDRO-EAKLY	08-I011-999	X	Yes	X	Yes	X
CLEORA	21-C006-999	X	Yes	X	Yes	X
MCCLOUD	63-I001-999	X	Yes	X	Yes	X
PRETTY WATER	19-C034-999	X	Yes	X	Yes	X
GRAHAM-DUSTIN	54-I054-999	X	Yes	X	Yes	—
MANNSVILLE	35-C007-999	—	—	—	—	—
ROLAND	68-I005-999	X	No	X	No	X
CRUTCHO	55-C074-999	X	Yes	X	Yes	X
WILSON	10-I043-999	X	Undated	X	Undated	X
WILSON	56-I007-999	—	—	—	—	—
QUAPAW	58-I014-999	X	Yes	X	Yes	X
CLAYTON	64-I010-999	X	Yes	X	Yes	X
EARLSBORO	63-I005-999	—	—	—	—	—
STRAIGHT	70-C080-999	—	—	—	—	—
ROBIN HILL	14-C016-999	X	No	—	No	X
SOUTH ROCK CREEK	63-C032-999	—	No	—	No	X
THOMAS-FAY-CUSTER UNIFIED DIST	20-I007-999	—	No	—	No	X
SEQUOYAH	66-I006-999	X	Undated	X	Undated	—
COMANCHE	69-I002-999	X	Yes	X	Yes	—
OPTIMA	70-C009-999	—	Undated	X	Undated	—
GANS	68-I004-999	X	No	—	No	X
JONES	55-I009-999	—	No	—	No	X
RATTAN	64-I001-999	—	—	—	—	X
TIMBERLAKE	02-I093-999	X	Yes	X	Yes	X
AFTON	58-I026-999	X	Undated	—	Undated	—
TURNER	43-I005-999	X	No	X	No	—
BOWRING	57-C007-999	X	Yes	X	Yes	X
ROCK CREEK	07-I002-999	X	No	X	No	—
FREDERICK	71-I158-999	X	No	X	No	X
WRIGHT CITY	48-I039-999	—	—	—	—	—
FORT COBB-BROXTON	08-I167-999	X	Yes	—	Yes	X
CLEVELAND	59-I006-999	X	No	—	No	X

DEPEW	19-I021-999	X	Yes	X	Yes	X
RYAL	49-C003-999	—	No	—	No	X
JENKS	72-I005-999	X	Yes	X	Yes	X
YUKON	09-I027-999	X	Yes	X	Yes	X
MIDWEST CITY- DEL CITY	55-I052-999	—	No	—	No	X
ARKOMA	40-I091-999	X	Undated	—	Undated	X
EDMOND	55-I012-999	—	Yes	X	Yes	X
NORMAN	14-I029-999	X	Yes	X	Yes	X
COWETA	73-I017-999	X	Yes	X	Yes	X
SHAWNEE	63-I093-999	X	Yes	X	Yes	X
BLACKWELL	36-I045-999	X	No	X	No	X
LATTA	62-I024-999	X	Yes	X	Yes	X
SEMINOLE	67-I001-999	—	—	—	—	—
HUGO	12-I039-999	X	No	—	No	—
MUSKOGEE	51-I020-999	X	Undated	—	Undated	X
FRINK- CHAMBERS	61-C029-999	X	Yes	X	Yes	X
ARDMORE	10-I019-999	X	Yes	X	Yes	X

An “X” indicates that the information was found and publicly accessible at the time of review. A “—” indicates the information was not listed, not published, or could not be confirmed as current.

Of the 52 districts sampled, 38—or 73 percent—had a written transfer policy publicly listed on their website. While this is a solid majority, it also means that roughly one in four sampled districts had no formal policy document available for public review, leaving families in those districts without a written statement of the rules governing their transfer applications. Among districts with a posted policy, some were difficult to find due to policies being buried behind multiple pages or inconsistency in policy placement across district websites. For example, some districts have an entire “Transfers” heading or category on their website, while others have student transfer policies listed under “Parents,” “State Required Information,” “Enrollment,” or another category. On the whole, most districts had posted a written school transfer policy on their website, but there were some inconsistencies in the details of these postings.

Looking at the full picture of district disclosure, just over half (approximately 55 percent) published all three required elements designed to help parents navigate the transfer process: 1) A written policy, 2) Capacity figures, and 3) Current availability data. Another 15 percent published a policy and capacity information but stopped short of publishing availability, meaning families could find the rules and the theoretical maximum enrollment, but not how many seats were actually open at the time of their application. Capacity is helpful, but publicly listed availability is necessary for families to gauge whether the district is likely to accept a transfer application. A smaller group of districts, roughly 16 percent, published capacity or availability data with no accompanying written policy, leaving those numbers without any stated framework for how transfers are accepted or denied. The remaining 14 percent had no locatable transfer information of any kind.

Oklahoma law requires districts to update and republish their capacity and availability figures on a quarterly schedule—by January 1, April 1, July 1, and October 1 of each year. Among districts that did publish capacity or availability data, only about 60 percent had information that was current at the time of review, meaning it had been updated within the most recent quarter. Notably, one school district, Putnam City Schools, discloses and updates capacity on a daily basis. About 25 percent of districts had capacity or availability data on their website that was one or more quarters out of date, and 15 percent had undated information, with no indication of when it was last reviewed or revised. In practical terms, this means a family relying on a district's posted availability figures to decide whether to apply could be working from data that is months—or even years—old.

II.C. Audit of Approved and Denied Transfers

This section reports the audit of each sampled district's approved and denied transfer decisions, evaluating them against the substantive provisions of SB783 noted above: the first-come, first-served rule; the three permissible grounds for denial—capacity, discipline, and attendance; and the priority provisions for military families and students whose parent is a teacher in the district into which the student is applying to transfer. The subsections below take up each provision in turn, describing how we operationalized the requirement using the transfer-application data and reporting the results for each audited district.

II.C.1. First-Come, First-Served Provision of SB783

Methods

SB783 requires a receiving district to act on transfer applications in the order it receives them, approving applications up to the capacity it has declared for the relevant grade level and school site. We evaluate compliance with this requirement in two complementary ways. The first, which we refer to as the capacity-denial analysis, asks whether a district that turned an applicant away for lack of capacity nonetheless admitted a later applicant who had competed for the same seats. The second, the processing-order analysis, asks whether a district acted on the applications in its queue in the order the applications arrived. Because they answer different questions, a district may perform well on one but not the other, and we close this subsection by explaining what each contributes to the audit.

As the first step in the capacity-denial analysis we grouped every application in the audit sample by four characteristics: the receiving district, the receiving school, the grade level, and the transfer quarter in which the family submitted the application. Together these four characteristics identify a single pool of capacity—the set of applications for the same declared seats—and the first-come, first-served rule governs the order in which a district acts on the applications within that pool. We ordered the applications in each group by the date on which the family submitted the completed application.

Within each group, we identified the earliest application a district denied for lack of capacity and flagged as a potential violation any application with a later submission date that the district approved. We do not flag approved applications with a statutory priority, namely the children of active-duty military families and the children of district teachers, whom SB783 exempts from capacity-based denials. A potential violation, then, is an approval of a non-priority application that a district granted after it had already turned away an earlier applicant, for the same grade and

site, on capacity grounds. We refer to these flagged cases as potential violations, rather than violations per se, because the audit procedure assumes a district's available capacity, once reached, holds steady for the rest of the quarter. Capacity can, however, shift mid-quarter for legitimate reasons, such as families moving into or out of a district. Accordingly, a flag should be interpreted as marking a pattern that warrants review rather than a confirmed breach of the first-come, first-served rule.

Applying this test as designed requires non-missing records for each of the four grouping characteristics, and here the transfer data presented a substantial limitation. The data record three of the four—receiving district, grade level, and transfer quarter—for every application in the sample. They do not, however, record the receiving school for most applications. Indeed, a receiving school identifier is absent for about 74 percent of the applications, leaving us unable to determine the specific school within the district a family applied to attend. Because SB783 directs districts to declare capacity at the grade and site level, the receiving school is an essential part of the grouping. Two applications submitted to the same district and grade but to different schools draw on separate pools of capacity and cannot meaningfully be compared against one another.

Rather than dropping the large share of records with no school identifier, we conducted the capacity-denial analysis in two parallel forms. The first, which we refer to as the school-level analysis, applies the test as described above, grouping applications by district, school, grade, and quarter. This is our preferred approach, but it can be applied only to the roughly 26 percent of applications for which the receiving school is recorded. The second, the district-level analysis, omits the school from the grouping and compares applications within each combination of district, grade, and quarter. This approach allows us to evaluate every application, but it treats all schools within a district as a single pool of capacity and so provides only a broad indication of compliance. We report both analyses for every audited district, treating the school-level result as the primary finding wherever it can be calculated. The district summary in the appendix reports the missing-school rate for each district, and we return to this limitation in our recommendations, since reliable school-level identification of transfer applications is required for a complete capacity-denial audit in future years.

The processing-order analysis asks a broader and more basic question: did the district act on applications in the order it received them? For each application we compared two dates present in the transfer records: 1) The date the family submitted the completed application and 2) The date the district recorded its decision. If a district works its queue in the order applications arrive, then ordering its applications by submission date should place their decision dates in the same order.

For each district we ordered the approved applications by submission date and identified those whose decision dates depart from that order. Specifically, we identified the set of applications whose removal would leave every remaining decision in proper order. These are the applications a district can fairly be said to have processed out of sequence, and their count is a conservative measure of how far its processing departed from the order of receipt.

The processing-order analysis carries a data limitation of its own. The transfer data record a decision date only for applications a district approved. The data do not record a decision date for denied applications, which prevents them from being placed on the processing timeline. The analysis is therefore confined to approved applications—about 72 percent of the records in the audit sample—and is best understood as describing the order in which districts issued their approvals.

The two analyses answer different substantive questions, but complement each other in a manner that provides a multi-dimensional view of district compliance with the first-come, first-served requirements of SB783. The capacity-denial analysis flows directly from the statutory language and identifies cases in which an earlier transfer applicant was denied entry to the district while a later applicant was admitted. Of course, it has no relevance to contexts without capacity constraints, which represents a large majority of applications. By contrast, the processing-order analysis only applies to approved applications and speaks to the regularity of a district's procedures rather than to a clear breach of the statute.

Results

Here we report the findings of the two approaches to assessing compliance with the first-come, first-served provisions of SB783, the capacity-denial analysis and the processing-order analysis. We present the results of each analysis separately and then provide a holistic discussion designed to draw the results together into an overall picture.

We start with the capacity-denial analysis. This analysis asks whether a district that denied a transfer applicant for lack of capacity then approved a later-submitted applicant applying to transfer to the same grade in the same school in the same quarter. Of the 6,110 transfer applications in the audit sample, districts denied 1,311 for lack of capacity, and the analysis tests whether any of those denials was followed by a later approval for the same seats. As described above, we conducted two variants of this analysis because the receiving-school identifier is missing for nearly three-fourths of transfer applications.

The first variant, which we refer to as the school-level variant, groups each district's applications by receiving school, grade level, and the quarter in which the application was submitted. Each group represents a fixed set of seats, and the analysis flags any application a district approved after it had denied an earlier applicant for capacity in the same group. Although this is our preferred approach, it can be conducted only for the 1,570 applications with a non-missing receiving school—26 percent of the sample. As shown in Table 3, across the 52 audited districts, the analysis finds that 32 were compliant, 17 could not be evaluated—either because they received no transfer applications or the receiving school field was missing for all application records—and three showed a potential violation. The three districts with a potential violation were Sequoyah, Union, and Yukon, which together accounted for 91 flagged applications. These are cases where a district denied a transfer applicant for lack of capacity but approved a later-submitted applicant applying to transfer to the same grade in the same school in the same quarter (and held no priority).

Table 3. Results of Capacity-Denial Analysis

	Applications grouped by	By district, grade, and
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	school, grade, and quarter	quarter
Districts (52 audit records)		
Compliant	32	33
Potential violation	3	14
Could not be evaluated	17	5
Transfer applications (6,110 total)		
Evaluated by this analysis	1,570	6,110
Flagged as potential violations	91	640

The second variant, which we refer to as the district-level variant, groups each district's applications only by grade level and quarter, with no regard to the receiving school. This variant can be run for all 6,110 applications, but because it pools the seats of every school in a district it may treat applications for different schools' seats as though they applied for the same seats. Its counts are therefore an upper bound rather than a precise measure. Under this variant, 33 district records were compliant, 14 showed a potential violation, and 5 could not be evaluated because the district received no transfers. Results for each district under both variants are reported in Table A1.

We turn next to the processing-order analysis. This analysis sets capacity aside and asks a simpler question, namely whether a district acted on applications in the order it received them. It compares, within each district, the date a family submitted a completed application with the date the district recorded its decision. If a district worked its queue in order, then sorting its approvals by submission date would also place the decision dates in order. Because a decision date is recorded only for approved applications, this analysis only evaluates approvals. Of the 6,110 applications, 4,404, or 72 percent, were approvals that could be placed on the processing timeline. The remaining 1,706 were denials or approvals with no recorded decision date.

We measure out-of-order processing using an approach we refer to as the minimum-removal-set metric, which identifies the smallest set of approvals whose removal would leave a district's remaining approvals in perfect submission order. It isolates the applications a district actually handled out of turn rather than the on-time applications that merely fall behind a single slow file. As shown in Table 4, 1,564 of the 4,404 assessable approvals, or 36 percent, were processed out of order. This metric classifies 21 of the 52 district records as compliant, 26 as showing a potential violation, and 5 as having no applicable transfers. Every district that received transfers could be evaluated, because the test requires only that a district have approved at least one application. Results for each district are reported in Table A2.

Table 4. Results of Processing-Order Analysis

Districts (52 audit records)	
Compliant	21
Potential violation	26
Could not be evaluated	5
Transfer applications (6,110 total)	

Evaluated by this analysis	4,404
Flagged as processed out of order	1,564
Processing time of out-of-order approvals (days)	
Median	18
Middle 50% (25th–75th percentile)	8–35
Maximum	215

The two analyses measure different things, and reading them together gives a fuller picture than either does alone. The capacity-denial analysis aligns with the statutory spirit of the first-come, first-served provision, which is intended to prevent a seat going to a later applicant after an earlier one was denied for lack of capacity. The processing-order analysis speaks to a broader administrative pattern, decisions issued out of the order in which applications arrived, which may or may not coincide with a capacity-denial violation. The two analyses nonetheless point in a consistent direction. All three districts flagged by the school-level capacity-denial variant—Sequoyah, Union, and Yukon—also appear among the 26 processing-order potential violations. More generally, a small group of large suburban districts, such as Union, Norman, Putnam City, Edmond, Jenks, and Midwest City-Del City, accounts for most of the flagged applications across the analyses. We reiterate, though, that a potential violation should be read as a pattern that warrants a closer look, as opposed to definite noncompliance. As described earlier, a district's declared capacity can change during a quarter for legitimate reasons, and a district can depart from strict arrival order for legitimate reasons as well, such as waiting on an applicant to complete a file. In summary, the findings identify where review may be warranted and do not provide a final word on district compliance.

II.C.2. Denial Grounds Analysis

Methods

SB783 permits a receiving district to deny a transfer application on three grounds: 1) Insufficient capacity at the relevant grade level and school site; 2) A record of disciplinary infractions; and 3) A record of poor attendance. To evaluate compliance with this provision, we classify the recorded reason for every denied application in the audit sample into one of six mutually exclusive categories. Three of the six correspond to the grounds SB783 authorizes—capacity, discipline, and attendance. The remaining three fall outside them: 1) Denials citing a separate statutory provision concerning the availability of programs, staff, or services for students with specialized educational needs; 2) Administrative denials, recording either invalid documentation or that the student is no longer enrolled in the sending district; and 3) Denials carrying no recorded reason. We retain the last category for completeness, although every denied application in this year's sample carried a recorded reason.

Results

Sampled districts denied 1,690 of the 6,110 transfer applications in the audit sample. Table 5 reports the distribution of those denials across the reasons districts recorded. The denials concentrated overwhelmingly on capacity grounds, with 1,311, or 77.6 percent, citing this reason for denial. The other two grounds SB783 authorizes accounted for far smaller shares—139 denials (8.2 percent) cited a student's history of absences, and 124 (7.3 percent) cited a disciplinary ground, all but three of them a violation of school regulations. In total, 1,574 denials, or 93.1 percent, rested on one of the three grounds SB783 explicitly permits.

Table 5. Distribution of Recorded Denial Reasons

Denial Reason	Denials	Share of Denials
<i>Denials on a ground SB783 permits</i>		
Capacity	1,311	77.6%
Discipline	124	7.3%
Attendance	139	8.2%
Subtotal	1,574	93.1%
<i>Denials on a ground outside SB783</i>		
Program Availability	85	5.0%
Administrative	31	1.8%
No reason recorded	0	0.0%
Subtotal	116	6.9%
All denials	1,690	100.0%

The remaining 116 denials, 6.9 percent of the total, cited grounds outside of the three categories explicitly listed in SB783. Of these, 85 cited a statutory provision concerning the availability of programs, staff, or services for students with Individualized Education Programs (IEPs) while the other 31 denials were administrative, with 16 citing invalid or insufficient supporting documentation and 15 recording that the student was no longer enrolled in the district. Every denied application carried a recorded reason.

The denials citing the lack of available programs, staff, or services for students with specialized educational needs are concentrated in a small number of districts. Midwest City-Del City (19), Coweta (16), McLoud (10), Union (9), and Norman (8) together account for 62 of the 85. A majority of the 31 administrative denials were issued by Union, which recorded 17. Table A3 in the appendix presents the denial counts for each audited district.

II.C.3. Military Priority

Methods

SB783 exempts the children of active-duty military families from capacity-based denials. A receiving district that has reached its declared capacity may continue to deny other transfer applications on that basis, but it may not deny a student whose parent or guardian is on active military duty for lack of capacity.

The transfer data identify military-connected applicants directly, containing a variable indicating whether a parent or guardian of the student is on active military duty. We used this indicator to isolate the military-connected applications that sampled districts denied, and we examined the recorded reason for each transfer refusal. For each sampled district, we report the number of

military-connected applications received, the number the district approved, and the number it denied on capacity grounds.

Results

Of the 6,110 transfer applications in the audit sample, 119 were submitted by families in which a parent or guardian is on active military duty. Sampled districts approved 115 of these applications and denied four, an approval rate of 96.6 percent. None of the four denials cited a lack of capacity, and the analysis therefore identifies no potential violations of the military exemption among the audited districts.

The four denied applications merit a brief description, because the military exemption only applies to capacity denials and leaves a district free to deny a military-connected applicant on the other grounds permitted by SB783. Three of the four denials, one recorded by Norman and two by Midwest City-Del City, cited a violation of school regulations. The fourth, recorded by Jones, cited the lack of available programs, staff, or services for students with specialized educational needs. As noted above, no military-connected applicant in the audit sample was turned away because a district had reached its capacity.

Across the 52 audited districts, 13 received at least one military-connected application during the audit year, and none of the 13 denied such an applicant for lack of capacity. A further 34 districts received transfer applications but none from military-connected families, and the remaining five received no transfer applications at all. Table 6 summarizes this picture.

Table 6. Results of Military Priority Analysis

Districts (52 audit records)	
Compliant	13
Potential violation	0
No military applicants	34
No applicable transfers	5
Military-connected applications	
Received	119
Approved	115
Denied	4
Denied for lack of capacity (potential violations)	0

Military-connected applications were concentrated in a small number of districts. Norman received 49, Bishop 22, and Midwest City-Del City 21, and these three districts together accounted for 92 of the 119 military-connected applications in the sample, or 77 percent. The remaining 27 applications were spread across 10 districts, each of which received between 1 and 6. This concentration is consistent with district enrollment size and with the locations of Oklahoma's larger military communities. Results for every audited district, including the number of military-connected applications each received, approved, and denied on capacity grounds, are reported in Table A4.

II.C.4. Teacher's-Child Priority

Methods

SB783 exempts the children of district teachers from capacity-based denials. As the Oklahoma State Department of Education's guidance to districts explains, a child whose parent or legal guardian is employed as a teacher in a district shall be allowed to transfer into that district regardless of capacity. The exemption applies only to capacity-based denials—a district is free to deny a teacher's-child applicant on the disciplinary or attendance grounds described above. In the statutory language, "teacher" refers to certified teachers, nurses, librarians, counselors, and administrators but does not extend to support employees.

The transfer data identify teacher's-child applicants via an indicator recording whether a parent of the transfer applicant is a teacher in the receiving district. We used this indicator to isolate the teacher's-child applications that sampled districts denied, and we examined the recorded reason for each, with denials citing insufficient capacity treated as a potential violation of the exemption. For each sampled district, we report the number of teacher's-child applications received, the number the district approved, and the number it denied on capacity grounds.

Results

The teacher's-child priority analysis asks whether any sampled district denied a teacher's-child applicant for lack of capacity. Of the 6,110 transfer applications in the audit sample, 660 were submitted by families in which a parent is a teacher in the receiving district. Sampled districts approved 621 of these applications and denied 39, an approval rate of 94.1 percent. Of the 39 denials, 14 cited a lack of capacity, and the analysis records each of these as a potential violation of the exemption.

The 14 capacity denials were recorded by seven districts. Edmond accounted for five, Jenks for three, Union recorded two, and Bishop, Coweta, Putnam City, and Turner each processed a single capacity-based denial. In total, seven districts show a potential violation under this provision while 30 districts received at least one teacher's-child application and denied none for capacity, rendering them compliant with this provision of SB783. The remaining 15 districts could not register a violation because they received no transfer applications from teacher's-child families. Table 7 summarizes these results.

Table 7. Results of Teacher's-Child Priority Analysis

Districts (52 audit records)	
Compliant	30
Potential violation	7
No teacher's-child applicants	10
No applicable transfers	5
Teacher's-child applications	
Received	660
Approved	621

Denied	39
Denied for lack of capacity (potential violations)	14

Of the 25 non-capacity denials of teacher’s-child applicants, 11 cited disciplinary violations, nine claimed lack of availability of programs, staff, or services for students with specialized educational needs, four were based on a history of absences, and one was administrative. Results for every audited district, including the number of teacher’s-child applications received, approved, and denied on capacity grounds, are reported in Table A5.

Part III. Evaluation of Efficacy of Transfers

III.A. Transfer Access Across Student Subgroups

Methods

The compliance audit above examines a sample of 52 districts and asks whether those districts followed the procedural requirements of SB783. This section turns to a broader question, asking whether student subgroups accessed interdistrict transfers at rates comparable to the broader student population during the 2025-26 school year. To address this question, we draw upon the full set of interdistrict transfer applications submitted across Oklahoma in the 2025-26 school year. The full data contain 25,941 separate applications to transfer to 476 different districts in the state.

We compare the rates at which districts approved and denied transfer applications across four student characteristics. The first is grade level, which we group into applications for transfers in elementary grades (pre-K through Grade 5), middle school grades (Grades 6-8), and high school grades (Grades 9-12). The second is disability status, identified by whether the applicant has an IEP. The third and fourth characteristics are economic disadvantage and English learner status, respectively. For each characteristic we report the number of applications, the number approved and denied, and the approval and denial rates.

We highlight two factors to keep in mind when interpreting the results below. First, because the data only contains information on applicants—as opposed to data on students who do and do not submit applications—the analysis can only measure whether students in subgroups who do apply are approved and denied at comparable rates. It cannot speak to the question of whether student subgroups submit applications at rates proportional to their presence in Oklahoma’s schools. Second, any observed differences in denial rates cannot be interpreted as evidence of differential treatment of applications from different student groups. Although such an interpretation cannot be ruled out, observed differences may also be attributable to differences in the set of districts to which the different student groups apply. For example, districts differ in their capacity constraints and a subgroup that applies disproportionately to districts with less capacity will experience a higher denial rate, even in the absence of any differential treatment.

Results

Across the full set of 25,941 applications, districts approved 20,585 and denied 5,356, an overall denial rate of 20.6 percent that provides valuable context for interpreting the subgroup approval and denial rates presented below. Starting with students with disabilities, Figure 1 shows that districts denied 42.1 percent of the 3,007 applications submitted by students with an IEP, more

than double the 17.8 percent denial rate for students without one. Of students with an IEP whose application was denied, 37 percent of the denials were due to a lack of available services or personnel while about 48 percent of the denials were capacity-based. This contrasts with denial reasons for students without an IEP, where nearly 75 percent were due to capacity and only 2 percent were attributed to a lack of available services. Notably, the difference in denial rates for students with and without disabilities is the largest of the four subgroups we analyze.

Turning to grade level, the results show that applications to transfer in elementary grades were denied at the lowest rate (18.2 percent) while applications to transfer in middle and high school grades were denied at higher rates, 24.2 percent and 23.8 percent respectively. Interestingly, about 75 percent of denials at the elementary level were due to capacity, but the analogous numbers at the middle and high school level were just 65 and 56 percent, respectively. At the middle and, especially, high school levels, denials due to a history of disciplinary issues or chronic absenteeism are much more common than in elementary school.

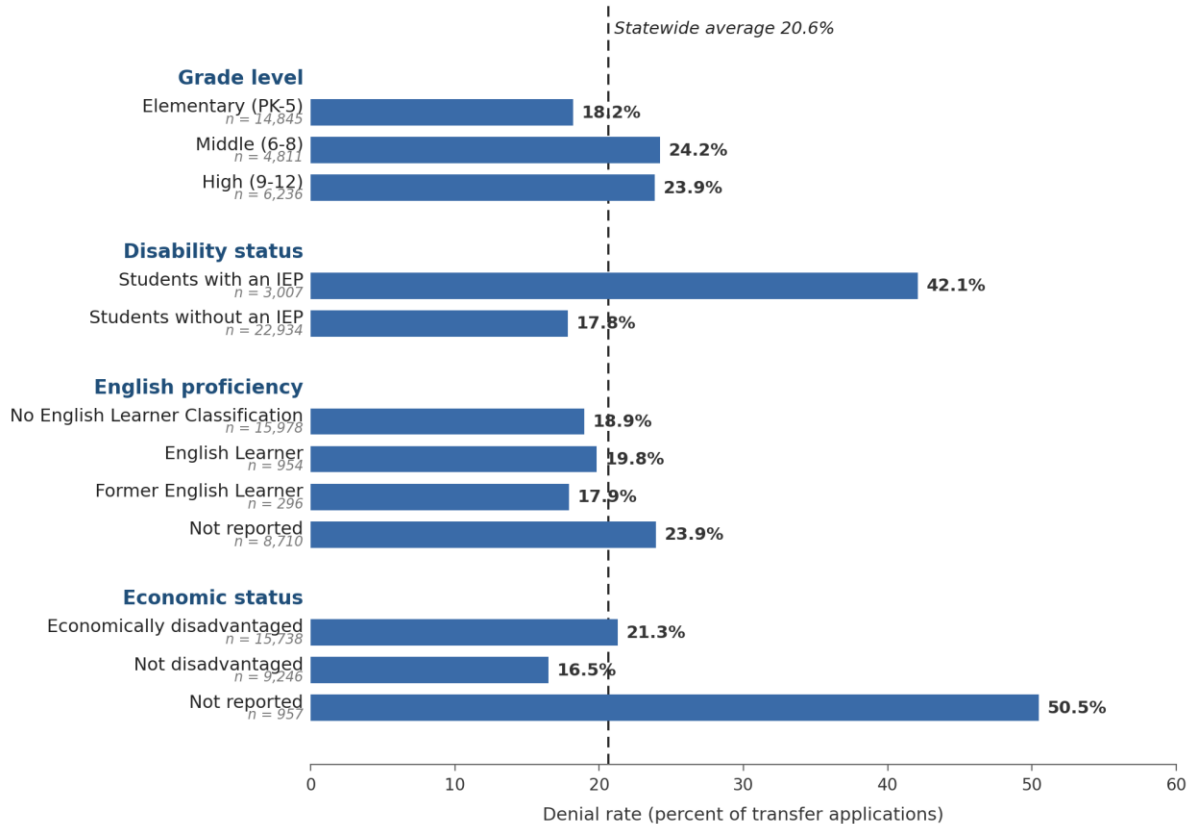
Moving on to students who are and are not economically disadvantaged, districts denied 21.3 percent of the 15,738 applications from students identified as economically disadvantaged, compared with just 16.5 percent of the 9,246 applications from students who were not, a difference of about 5 percentage points. On just under 1,000 applications, the economic disadvantage field was blank, and districts denied just over half of those applications. The high denial rate for those applications suggests that the absence of information in this field is not random, but rather related in some fashion to the circumstances that produce a denial.

Our final student characteristic, English learner status, exhibits relatively little variation in denial rates across categories. About 19 percent of transfer applications from students without any English learner designation were denied while the denial rate for transfer applications from students classified as English learners was 19.8 percent, a difference of less than one percentage point. Transfer applicants who held an English learner designation in the past were denied at a comparable rate of 18 percent. Interestingly, mirroring the economic disadvantage subgroup, the highest denial rate was concentrated among applications on which a student's English learner status was not reported—almost 24 percent of these applications were denied.

Figure 1. Transfer Denial Rates by Student Subgroup, 2025-26 School Year

Transfer Denial Rate by Student Subgroup

Oklahoma interdistrict transfer applications, 2025-26 school year (N = 25,941)



III.B. Statewide Transfer Denial Analysis

Methods

The statutory compliance audit above examines the grounds for application denials for the 52 districts that comprise the audit sample. This section extends that analysis to every receiving district in the state for the full set of interdistrict transfer applications submitted during the 2025-26 school year. As noted above, the full transfer data contain 25,941 applications to 476 receiving districts for that year, of which 5,356 were denied.

Above we describe how SB783 permits a receiving district to deny a transfer application on three grounds: 1) Insufficient capacity at the relevant grade level and school site; 2) A record of disciplinary infractions; and 3) A record of poor attendance. In this analysis, we classify the recorded reason for every denied application into one of six mutually exclusive categories. Three of the six correspond to the grounds SB783 authorizes—capacity, discipline, and attendance. The remaining three fall outside the provisions of the law: 1) Denials citing a separate statutory provision concerning the availability of programs, staff, or services for students with specialized educational needs; 2) Administrative denials, recording either invalid documentation or that the

student is no longer enrolled in the sending district; and 3) Denials carrying no recorded reason, which comprised just three applications in 2025-26.

Results

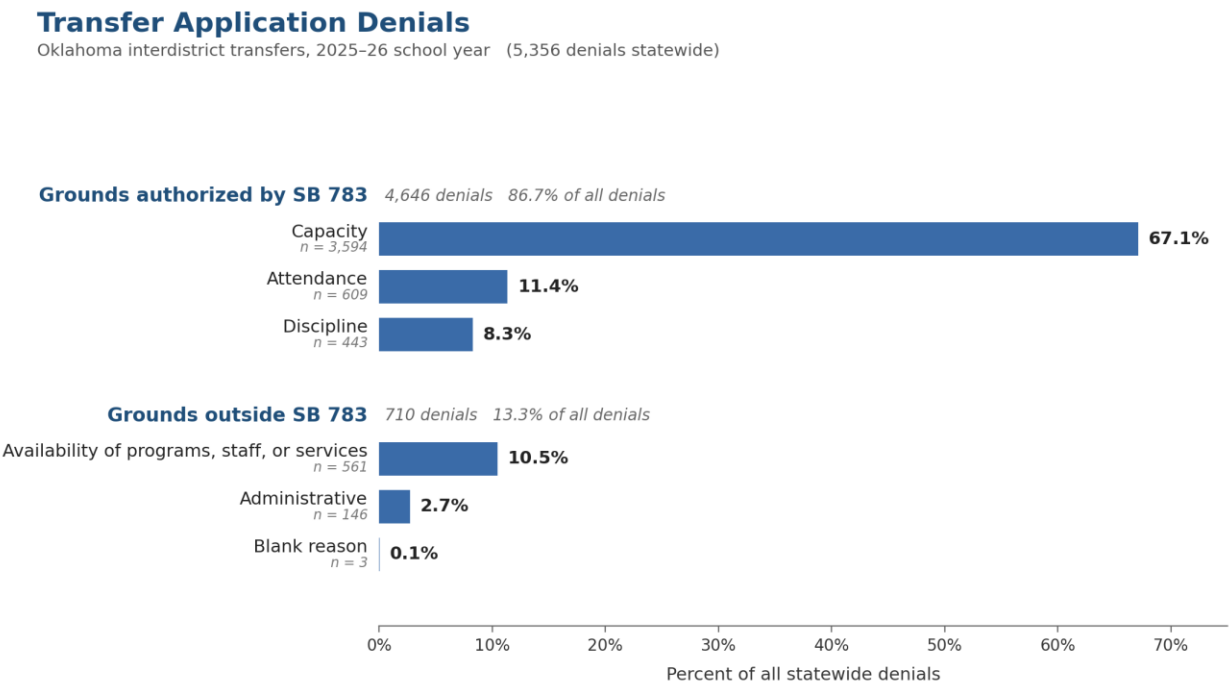
Of the 25,941 transfer applications submitted statewide during the 2025-26 school year, districts approved 20,585 and denied 5,356, an overall denial rate of 20.6 percent. Nearly every denial carries a recorded reason, and the distribution of those reasons is shown in Figure 2.

As with the analysis above, capacity is the dominant reason for denial statewide. Districts cited capacity limits as the reason for about two-thirds of all denials. The two other denial grounds authorized by SB783 account for an additional fifth of all denials. Specifically, districts cited disciplinary issues for about 8 percent of application denials and a history of absenteeism as the rationale for an additional 11 percent. Together, the three denial grounds SB783 expressly authorizes account for nearly 87 percent of application denials statewide.

The remaining 13 percent of denials were grounded in a reason that falls outside the three authorized by SB783. The largest of these was the availability of programs, staff, or services, a separate statutory provision that served as the basis for almost 11 percent of all denials. Administrative denials, which combine invalid or insufficient documentation with applicants no longer enrolled in the sending district, accounted for 3 percent of application refusals.

Of the 476 districts that received at least one transfer application, 185 did not issue any denials while the remaining 291 refused at least one application. Among the nearly 300 districts issuing at least one denial, 133 confined their denials entirely to the three grounds authorized by SB783 while 158 issued at least one denial on a ground outside the law. One of the grounds outside SB783 warrants particular discussion. Specifically, districts cited a lack of available programs, staff, or services as the basis for more than ten percent of all denials and, as noted in the prior section, more than a third of all denials for students with an IEP. Such a pattern will likely be of interest to policymakers.

Figure 2. Reasons Districts Cited for Denying Transfer Applications, 2025-26 School Year



Part IV. Comparative & Trend Analysis

IV.A. Transfer Denials and Subgroup Access Over Time

The two preceding sections analyze interdistrict transfers across Oklahoma for the 2025-26 school year. This section benchmarks the results from 2025-26 against those from the three prior school years—2022-23 through 2024-25—following enactment of SB783. Specifically, we compare: 1) Denial rates across years, 2) Denial reasons across years, and 3) Subgroup access across years. We perform these analyses using the same approach we applied in our analogous analyses for the 2025-26 school year.

Across each of the four school years the open-transfer law has been in effect, districts received between 18,640 and 35,744 transfer applications and denied between 11 and 22 percent of them. Figure 3 plots the year-by-year picture. Notably, the denial rate roughly doubled between the first and second years under the open-transfer law, rising from 11.3 percent in 2022-23 to 20.5 percent in 2023-24, and it has held steady at just over 20 percent in subsequent years.

Figure 3. Statewide Transfer Application Denial Rate, 2022-23 to 2025-26

Transfer Application Denial Rate, 2022-23 to 2025-26

Oklahoma interdistrict transfers; statewide rate of denied applications.

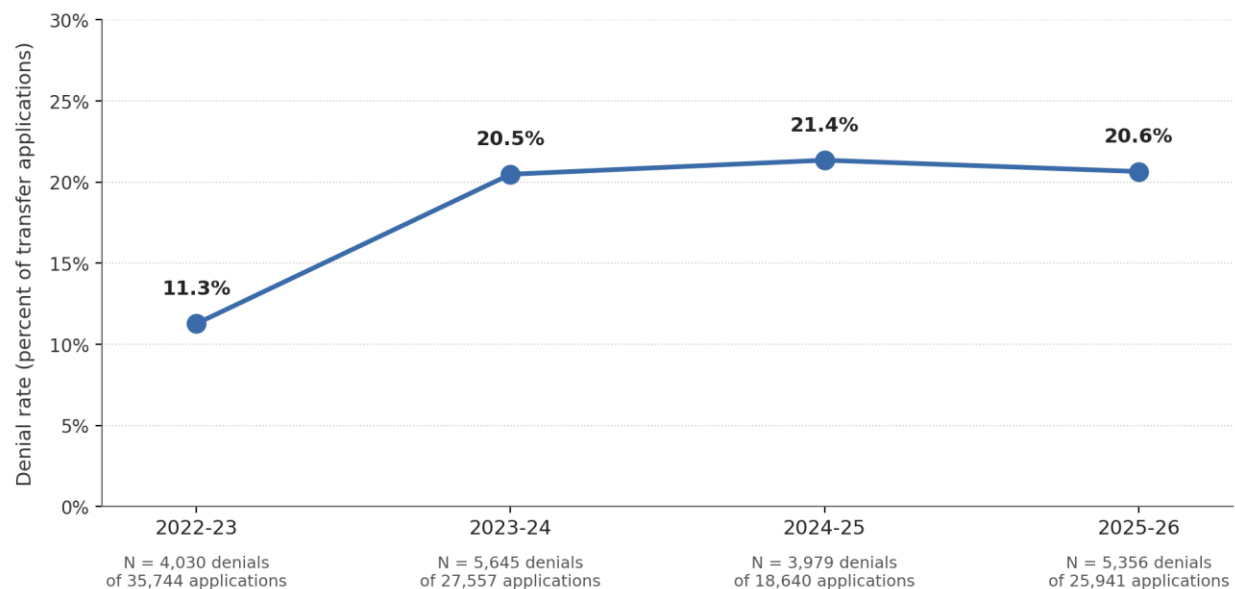
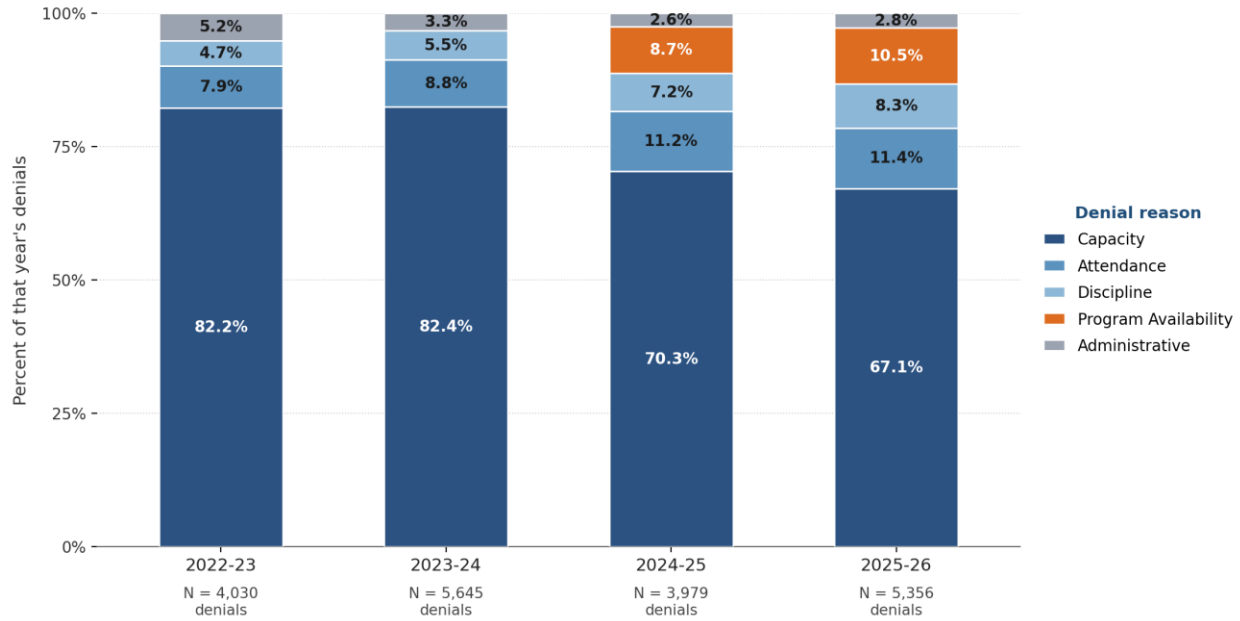


Figure 4 presents the distribution of denial reasons for each of the four years we analyze. In 2022-23 and 2023-24, capacity accounted for more than 80 percent of all denials, with the remainder split among attendance, discipline, and administrative reasons. The picture shifted in 2024-25, when districts began citing a lack of available programs, staff, or services as a basis for denial. That ground accounted for roughly 10 percent of all denials in 2024-25 and 2025-26. Together with modest increases in attendance- and discipline-based denials, its emergence resulted in a meaningful decline in the share of denials citing capacity constraints, which fell from over 80 percent in the first two years to between 65 and 70 percent in 2024-25 and 2025-26.

Figure 4. Distribution of Transfer Denial Reasons, 2022-23 to 2025-26

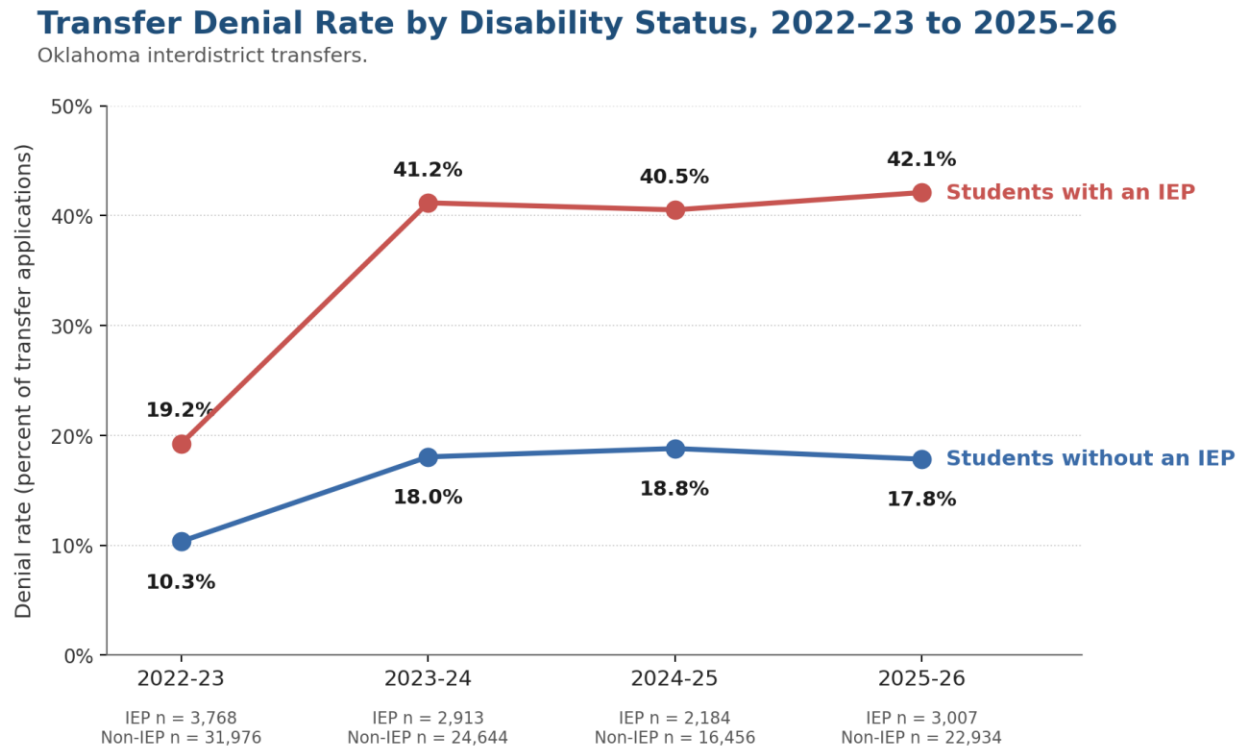
Transfer Denials by Reason, 2022-23 to 2025-26

Oklahoma interdistrict transfers; each bar shows that year's denial mix.



Turning to the rates at which districts denied transfers across different student subgroups, Figure 5 presents the denial rate for students with and without an IEP. In 2022-23, districts denied 19.2 percent of the transfer applications submitted by students with an IEP, compared to 10.3 percent of the applications submitted by students without one, a difference of 8.9 percentage points. In 2023-24, the denial rate for students with an IEP jumped to 41.2 percent while the rate for other students rose to 18.0 percent, opening a gap of 23.2 percentage points. The gap has remained relatively stable since. Over the past three years, students with disabilities have been denied requested transfers at more than double the rate of their non-disabled peers.

Figure 5. Transfer Denial Rate by Disability Status, 2022-23 to 2025-26

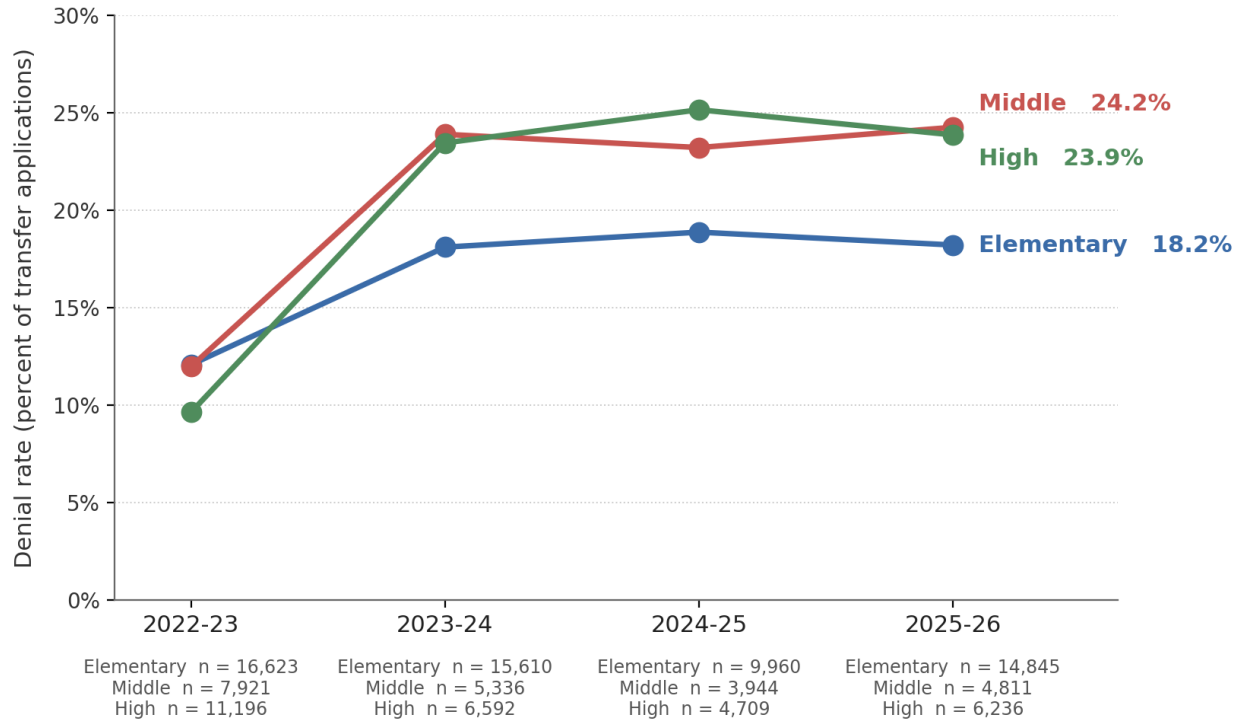


Moving on to grade level, Figure 6 shows that denial rates varied little across elementary, middle, and high school grades in 2022-23. The story differs, however, in the three subsequent years. Across those years, between 23 and 25 percent of applications to transfer in middle and high school grades were denied, while only 18-19 percent of applications to transfer in elementary grades were refused.

Figure 6. Transfer Denial Rate by Grade Band, 2022-23 to 2025-26

Transfer Denial Rate by Grade Band, 2022-23 to 2025-26

Oklahoma interdistrict transfers.

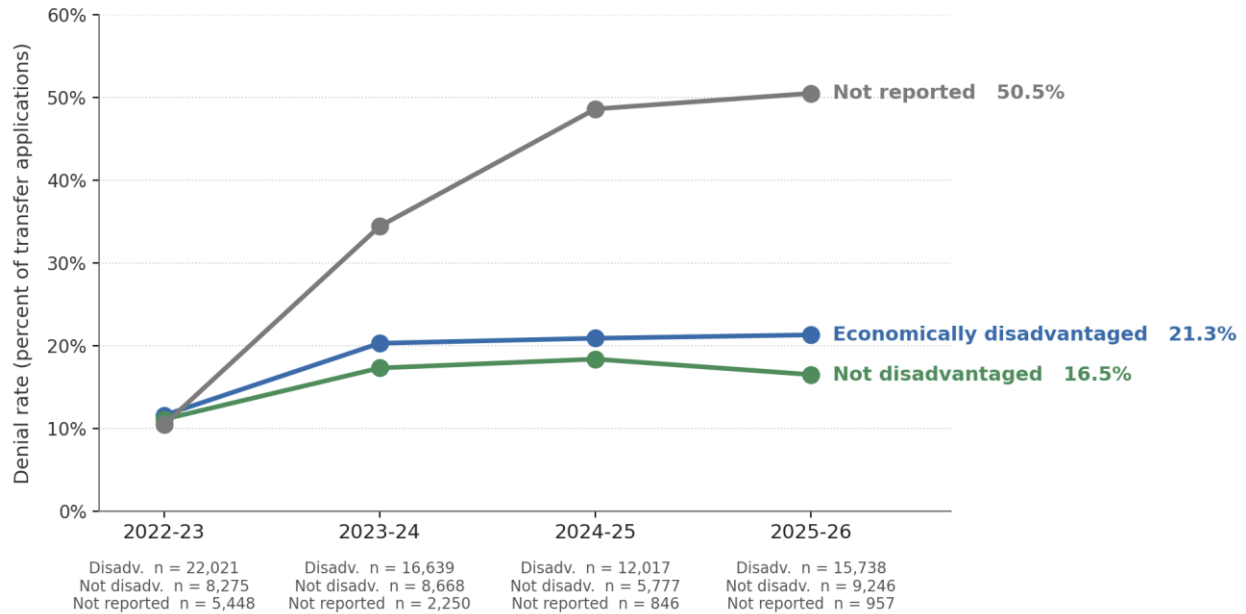


Continuing with economic disadvantage, Figure 7 shows that economically disadvantaged applicants have been denied at slightly higher rates than other applicants, with the gap hovering between 3 and 5 percentage points in each of the past three years. In 2025-26, districts denied 21.3 percent of applications from economically disadvantaged students and 16.5 percent of applications from other students. Interestingly, denial rates were substantially higher among applications on which the economic disadvantage field was left blank, rising from roughly 11 percent in 2022-23 to 50.5 percent in 2025-26. The persistent and growing rate at which blank-field applications were denied suggests that missing economic disadvantage information is not random but rather a potential source of denial itself.

Figure 7. Transfer Denial Rate by Economic Status, 2022-23 to 2025-26

Transfer Denial Rate by Economic Status, 2022-23 to 2025-26

Oklahoma interdistrict transfers.

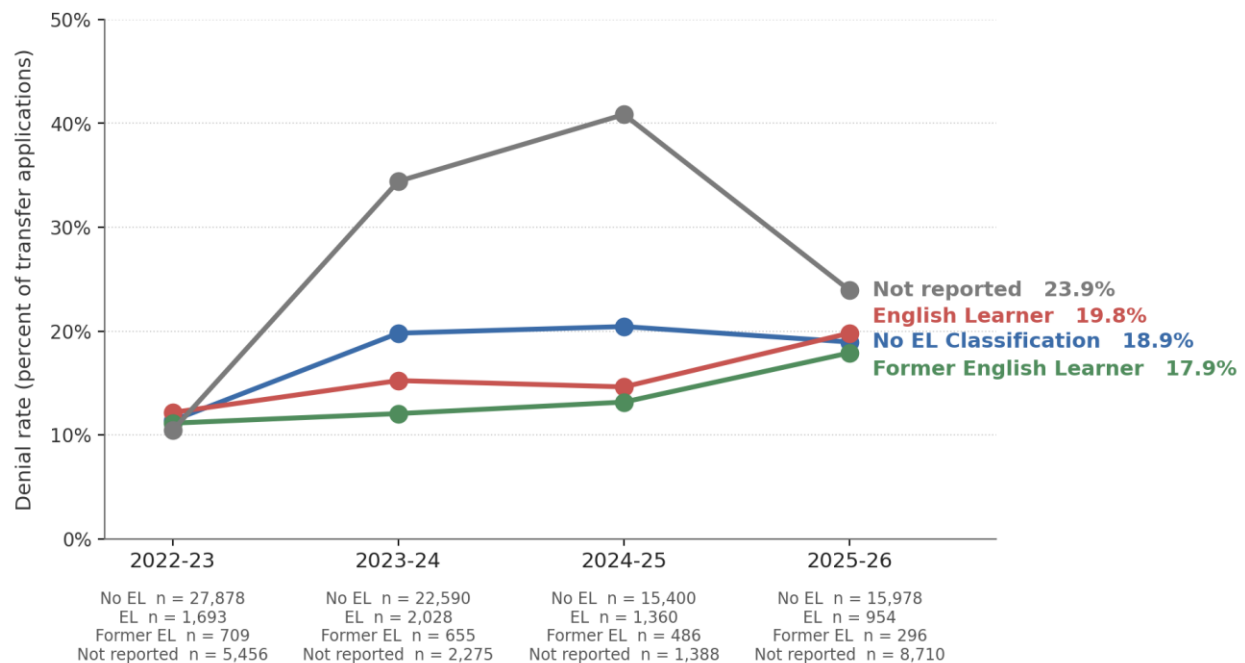


Our final subgroup is English learner status, displayed in Figure 8. In 2023-24 and 2024-25, English learners—both current and former—were denied at notably lower rates than applicants without an English learner classification (about 14 percent versus 20 percent), while applications with the English learner field left blank were denied at substantially higher rates than any of the reported categories (about 41 percent in 2024-25). In 2025-26 both patterns largely disappeared. The three reported categories converged to denial rates between 18 and 20 percent, and the denial rate for applications missing English learner status fell to 24 percent, much closer to the rates for the reported categories.

Figure 8. Transfer Denial Rate by English Proficiency, 2022-23 to 2025-26

Transfer Denial Rate by English Proficiency, 2022-23 to 2025-26

Oklahoma interdistrict transfers.



In summary, three takeaways emerge from the four years of data. First, the most consequential pattern is the gap in denial rates between students with disabilities and other students. It opened in 2023-24, has held between 22 and 24 percentage points in every year since, and reached its widest point of 24.3 percentage points in 2025-26, leaving students with disabilities denied requested transfers at more than double the rate of other students. Second, the most notable change since 2022-23 was the emergence in 2024-25 of program availability as a basis for denying transfers, a ground the open-transfer law does not include among the three it authorizes. Program availability has accounted for roughly one in ten denials in each of the past two years, and capacity's share has fallen correspondingly from over 80 percent in 2022-23 and 2023-24 to between 65 and 70 percent in 2024-25 and 2025-26. Third, beyond these two findings, the patterns documented in 2025-26 have characterized the open-transfer system since 2023-24. The overall denial rate and the remaining subgroup gaps have looked broadly similar in every year since the law's second year of operation, suggesting that 2025-26 reflects how the system has settled into operation rather than a one-year departure.

Part V. Policy Recommendations

We close the report with three broad recommendations the state and its districts may wish to consider as they continue to administer the open-transfer system created by SB783. We frame these as areas worthy of attention, as opposed to concrete prescriptions, because implementation would involve trade-offs that fall outside the scope of this report.

V.A. Improving the completeness of transfer application records

Missing data in fields contained in the transfer application records was a recurring constraint for the analyses reported above. The receiving school code was unrecorded for nearly three-quarters of applications, which prevented us from running the school-level first-come, first-served test for most of the audited districts and forced us to fall back on the less informative district-level analysis. Subgroup access comparisons were similarly limited by the nontrivial number of records in which the English proficiency and economic disadvantage fields were left blank. Notably, applications with those fields blank were denied at substantially higher rates than applications with those fields filled in.

If the state intends to monitor the open-transfer system at the level of detail suggested by SB783, it will be important to have more complete transfer application records. One avenue worth exploring is whether some of the fields most often left blank—IEP status, English proficiency, and economic disadvantage—could be autofilled from the student information systems districts and the state already maintain. Such an approach would not work for the receiving school field, but could be a first step in improving the completeness of the transfer records.

V.B. Supporting districts in posting capacity and program availability

Capacity has been the dominant ground for denying transfer applications in every year of the data, accounting for between two-thirds and four-fifths of all denials. Together, the volume of capacity-based denials and the variation across districts in the share of applications denied on this basis suggest that up-to-date information regarding availability and capacity is not readily available to many families interested in transferring.

Some districts in our sample appear to have developed routines for keeping capacity information current that other districts may find useful as a starting point. Putnam City Schools, in particular, appears to have implemented an effective process for declaring and posting capacity by grade and school site, and there may be value in the state taking a closer look at districts of this kind to see whether templates, shared tools, or technical guidance could be drawn from their practice and made available to districts that lack the administrative infrastructure to develop such processes on their own. More generally, anything that improves the accuracy, timeliness, and visibility of available seats would give families a clearer picture of where transfers are possible and, in turn, would likely reduce the share of capacity-based denials.

V.C. Examining the access gap for students with disabilities

The single most consistent subgroup pattern in the four years of data is the gap in denial rates between students with and without disabilities. Applications from students with an IEP were denied between 40 and 42 percent of the time in each of the three most recent years. These denial rates are more than twice that for applications from students without an IEP. The denial-reason analysis shows that the lack of programs, staffing, and resources required to meet the student's educational needs is one of the most commonly-cited reasons for denial (along with capacity).

It is beyond the scope of this report to judge the validity of transfer denials for students with IEPs, which underscores our decision to offer no concrete recommendations for addressing the substantial gap in denial rates between students with and without IEPs. That said, the state may consider providing clearer guidance to districts regarding the application of the availability-of-programs denial ground to transfer requests. Similarly, the state could consider providing technical assistance to districts to help them evaluate transfers for students who require specialized services. More generally, though, continued state-level monitoring of the denial gap between students with and without IEPs will be important for understanding access to the transfer process.

Part VI. Appendix Tables

Table A1. First-Come, First-Served Capacity-Denial Analysis: Results by District

District	Code	In-Scope Transfers	Capacity Denials	Missing-School Rate	Applications Grouped by School, Grade, and Quarter		Applications Grouped by District, Grade, and Quarter	
					Potential Violations	Status	Potential Violations	Status
AFTON	58I026	47	0	93.6%	0	Compliant	0	Compliant
ARDMORE	10I019	45	0	4.4%	0	Compliant	0	Compliant
ARKOMA	40I091	14	0	0.0%	0	Compliant	0	Compliant
BISHOP	16C049	187	81	87.2%	0	Compliant	22	Potential Violation
BLACKWELL	36I045	3	1	100.0%	n/a	Insufficient Data	0	Compliant
BOWRING	57C007	1	0	100.0%	n/a	Insufficient Data	0	Compliant
CLAYTON	64I010	0	0	n/a	n/a	No Applicable Transfers	n/a	No Applicable Transfers
CLEORA	21C006	14	2	35.7%	0	Compliant	0	Compliant
CLEVELAND	59I006	27	0	14.8%	0	Compliant	0	Compliant
COMANCHE	69I002	88	0	100.0%	n/a	Insufficient Data	0	Compliant
COWETA	73I017	149	39	40.9%	0	Compliant	10	Potential Violation
CRUTCHO	55C074	76	0	100.0%	n/a	Insufficient Data	0	Compliant
DEPEW	19I021	0	0	n/a	n/a	No Applicable Transfers	n/a	No Applicable Transfers
EARLSBORO	63I005	6	0	100.0%	n/a	Insufficient Data	0	Compliant
EDMOND	55I012	380	239	63.2%	0	Compliant	26	Potential Violation
FORT COBB-BROXTON	08I167	17	0	58.8%	0	Compliant	0	Compliant
FREDERICK	71I158	26	0	19.2%	0	Compliant	0	Compliant
FRINK-CHAMBERS	61C029	26	1	11.5%	0	Compliant	0	Compliant
GANS	68I004	1	0	100.0%	n/a	Insufficient Data	0	Compliant
GRAHAM-DUSTIN	54I054	0	0	n/a	n/a	No Applicable Transfers	n/a	No Applicable Transfers
HUGO	12I039	11	0	90.9%	0	Compliant	0	Compliant
HYDRO-EAKLY	08I011	31	1	41.9%	0	Compliant	0	Compliant
JENKS	72I005	406	239	100.0%	n/a	Insufficient Data	62	Potential Violation
JONES	55I009	98	59	100.0%	n/a	Insufficient Data	2	Potential Violation
LATTA	62I024	118	18	89.8%	0	Compliant	8	Potential Violation
MANNSVILLE	35C007	0	0	n/a	n/a	No Applicable Transfers	n/a	No Applicable Transfers

MCLOUD	63I001	125	9	98.4%	0	Compliant	10	Potential Violation
MIDWEST CITY-DEL CITY	55I052	503	5	99.2%	0	Compliant	1	Potential Violation
MUSKOGEE	51I020	97	1	94.8%	0	Compliant	0	Compliant
NORMAN	14I029	1,374	2	89.3%	0	Compliant	56	Potential Violation
OPTIMA	70C009	0	0	n/a	n/a	No Applicable Transfers	n/a	No Applicable Transfers
PRETTY WATER	19C034	32	0	100.0%	n/a	Insufficient Data	0	Compliant
PUTNAM CITY	55I001	525	113	80.0%	0	Compliant	65	Potential Violation
QUAPAW	58I014	29	3	96.6%	0	Compliant	0	Compliant
RATTAN	64I001	20	0	100.0%	n/a	Insufficient Data	0	Compliant
ROBIN HILL	14C016	58	4	8.6%	0	Compliant	0	Compliant
ROCK CREEK	07I002	20	2	10.0%	0	Compliant	0	Compliant
ROLAND	68I005	47	0	12.8%	0	Compliant	0	Compliant
RYAL	49C003	10	0	0.0%	0	Compliant	0	Compliant
SEMINOLE	67I001	22	0	54.5%	0	Compliant	0	Compliant
SEQUOYAH	66I006	133	45	12.8%	21	Potential Violation	27	Potential Violation
SHAWNEE	63I093	124	2	27.4%	0	Compliant	0	Compliant
SOUTH ROCK CREEK	63C032	45	12	100.0%	n/a	Insufficient Data	2	Potential Violation
STRAIGHT	70C080	5	0	0.0%	0	Compliant	0	Compliant
THOMAS-FAY-CUSTER UNIFIED DIST	20I007	8	1	87.5%	0	Compliant	0	Compliant
TIMBERLAKE	02I093	1	0	0.0%	0	Compliant	0	Compliant
TURNER	43I005	9	5	100.0%	n/a	Insufficient Data	0	Compliant
UNION	72I009	848	343	62.3%	20	Potential Violation	287	Potential Violation
WILSON	10I043	51	0	84.3%	0	Compliant	0	Compliant
WILSON	56I007	14	0	64.3%	0	Compliant	0	Compliant
WRIGHT CITY	48I039	36	0	2.8%	0	Compliant	0	Compliant
YUKON	09I027	203	84	17.7%	50	Potential Violation	62	Potential Violation

Table A2. First-Come, First-Served Processing-Order Analysis: Results by District

District	Code	In-Scope Transfers	Approvals Assessed	Out-of-Order Approvals	Share Out of Order	Out-of-Order Processing Time (days)			Status
						Median	Middle 50%	Maximum	
AFTON	58I026	47	46	4	8.7%	3	3–8	20	Potential Violation
ARDMORE	10I019	45	34	0	0.0%	—	—	—	Compliant
ARKOMA	40I091	14	14	0	0.0%	—	—	—	Compliant
BISHOP	16C049	187	105	18	17.1%	10	8–11	34	Potential Violation
BLACKWELL	36I045	3	2	0	0.0%	—	—	—	Compliant
BOWRING	57C007	1	1	0	0.0%	—	—	—	Compliant
CLAYTON	64I010	0	n/a	n/a	n/a	n/a	n/a	n/a	No Applicable Transfers
CLEORA	21C006	14	12	0	0.0%	—	—	—	Compliant
CLEVELAND	59I006	27	26	0	0.0%	—	—	—	Compliant
COMANCHE	69I002	88	82	9	11.0%	10	6–13	22	Potential Violation
COWETA	73I017	149	88	23	26.1%	27	14–29	35	Potential Violation
CRUTCHO	55C074	76	72	15	20.8%	6	3–19	140	Potential Violation
DEPEW	19I021	0	n/a	n/a	n/a	n/a	n/a	n/a	No Applicable Transfers
EARLSBORO	63I005	6	6	0	0.0%	—	—	—	Compliant
EDMOND	55I012	380	140	9	6.4%	6	1–8	15	Potential Violation
FORT COBB-BROXTON	08I167	17	17	6	35.3%	4	4–31	60	Potential Violation
FREDERICK	71I158	26	26	0	0.0%	—	—	—	Compliant
FRINK-CHAMBERS	61C029	26	25	0	0.0%	—	—	—	Compliant
GANS	68I004	1	1	0	0.0%	—	—	—	Compliant
GRAHAM-DUSTIN	54I054	0	n/a	n/a	n/a	n/a	n/a	n/a	No Applicable Transfers
HUGO	12I039	11	10	1	10.0%	33	33–33	33	Potential Violation
HYDRO-EAKLY	08I011	31	28	5	17.9%	10	10–17	109	Potential Violation
JENKS	72I005	406	156	88	56.4%	34	12–45	64	Potential Violation
JONES	55I009	98	31	0	0.0%	—	—	—	Compliant
LATTA	62I024	118	98	54	55.1%	35	10–65	130	Potential Violation
MANNSVILLE	35C007	0	n/a	n/a	n/a	n/a	n/a	n/a	No Applicable Transfers
MCCLOUD	63I001	125	101	27	26.7%	7	5–10	29	Potential Violation
MIDWEST CITY-DEL CITY	55I052	503	336	181	53.9%	22	13–36	215	Potential Violation

MUSKOGEE	51I020	97	82	30	36.6%	11	5–24	45	Potential Violation
NORMAN	14I029	1,374	1,348	674	50.0%	15	8–28	150	Potential Violation
OPTIMA	70C009	0	n/a	n/a	n/a	n/a	n/a	n/a	No Applicable Transfers
PRETTY WATER	19C034	32	29	0	0.0%	—	—	—	Compliant
PUTNAM CITY	55I001	525	378	228	60.3%	31	14–45	138	Potential Violation
QUAPAW	58I014	29	24	3	12.5%	19	15–20	21	Potential Violation
RATTAN	64I001	20	19	0	0.0%	—	—	—	Compliant
ROBIN HILL	14C016	58	54	0	0.0%	—	—	—	Compliant
ROCK CREEK	07I002	20	18	0	0.0%	—	—	—	Compliant
ROLAND	68I005	47	47	2	4.3%	13	10–16	19	Potential Violation
RYAL	49C003	10	10	0	0.0%	—	—	—	Compliant
SEMINOLE	67I001	22	20	1	5.0%	6	6–6	6	Potential Violation
SEQUOYAH	66I006	133	87	3	3.4%	13	9–21	29	Potential Violation
SHAWNEE	63I093	124	119	43	36.1%	8	3–22	91	Potential Violation
SOUTH ROCK CREEK	63C032	45	30	4	13.3%	40	30–48	58	Potential Violation
STRAIGHT	70C080	5	5	0	0.0%	—	—	—	Compliant
THOMAS-FAY-CUSTER UNIFIED DIST	20I007	8	6	0	0.0%	—	—	—	Compliant
TIMBERLAKE	02I093	1	1	0	0.0%	—	—	—	Compliant
TURNER	43I005	9	4	0	0.0%	—	—	—	Compliant
UNION	72I009	848	453	127	28.0%	28	2–29	87	Potential Violation
WILSON	10I043	51	50	2	4.0%	6	5–7	8	Potential Violation
WILSON	56I007	14	14	0	0.0%	—	—	—	Compliant
WRIGHT CITY	48I039	36	36	3	8.3%	2	2–2	2	Potential Violation
YUKON	09I027	203	113	4	3.5%	7	5–10	14	Potential Violation

Table A3. Denial Counts by District and Reason

District	Code	Total Denials	Capacity	Discipline	Attendance	Program Availability (O.S. 70-13-103)	Administrative
AFTON	58I026	1	0	1	0	0	0
ARDMORE	10I019	11	0	2	4	5	0
ARKOMA	40I091	0	0	0	0	0	0
BISHOP	16C049	82	81	0	0	1	0
BLACKWELL	36I045	1	1	0	0	0	0
BOWRING	57C007	0	0	0	0	0	0
CLAYTON	64I010	0	0	0	0	0	0
CLEORA	21C006	2	2	0	0	0	0
CLEVELAND	59I006	1	0	0	0	1	0
COMANCHE	69I002	6	0	0	4	1	1
COWETA	73I017	61	39	3	2	16	1
CRUTCHO	55C074	4	0	0	1	3	0
DEPEW	19I021	0	0	0	0	0	0
EARLSBORO	63I005	0	0	0	0	0	0
EDMOND	55I012	240	239	0	1	0	0
FORT COBB-BROXTON	08I167	0	0	0	0	0	0
FREDERICK	71I158	0	0	0	0	0	0
FRINK-CHAMBERS	61C029	1	1	0	0	0	0
GANS	68I004	0	0	0	0	0	0
GRAHAM-DUSTIN	54I054	0	0	0	0	0	0
HUGO	12I039	1	0	0	0	0	1
HYDRO-EAKLY	08I011	3	1	0	0	2	0
JENKS	72I005	250	239	8	2	0	1
JONES	55I009	67	59	3	0	3	2
LATTA	62I024	20	18	1	1	0	0
MANNSVILLE	35C007	0	0	0	0	0	0
MCCLOUD	63I001	24	9	1	2	10	2
MIDWEST CITY-	55I052	167	5	64	79	19	0

DEL CITY							
MUSKOGEE	51I020	15	1	4	7	1	2
NORMAN	14I029	25	2	5	10	8	0
OPTIMA	70C009	0	0	0	0	0	0
PRETTY WATER	19C034	3	0	1	0	2	0
PUTNAM CITY	55I001	147	113	20	14	0	0
QUAPAW	58I014	5	3	0	1	0	1
RATTAN	64I001	1	0	0	0	1	0
ROBIN HILL	14C016	4	4	0	0	0	0
ROCK CREEK	07I002	2	2	0	0	0	0
ROLAND	68I005	0	0	0	0	0	0
RYAL	49C003	0	0	0	0	0	0
SEMINOLE	67I001	2	0	0	0	0	2
SEQUOYAH	66I006	46	45	0	1	0	0
SHAWNEE	63I093	5	2	3	0	0	0
SOUTH ROCK CREEK	63C032	15	12	0	2	0	1
STRAIGHT	70C080	0	0	0	0	0	0
THOMAS-FAY-CUSTER UNIFIED DIST	20I007	2	1	0	0	1	0
TIMBERLAKE	02I093	0	0	0	0	0	0
TURNER	43I005	5	5	0	0	0	0
UNION	72I009	380	343	5	6	9	17
WILSON	10I043	1	0	0	0	1	0
WILSON	56I007	0	0	0	0	0	0
WRIGHT CITY	48I039	0	0	0	0	0	0
YUKON	09I027	90	84	3	2	1	0

Table A4. Military Priority Analysis: Results by District

District	Code	In-Scope Transfers	Military-Connected Applications	Approved	Denied	Capacity Denials	Status
AFTON	58I026	47	1	1	0	0	Compliant
ARDMORE	10I019	45	0	0	0	0	No Military Applicants
ARKOMA	40I091	14	0	0	0	0	No Military Applicants
BISHOP	16C049	187	22	22	0	0	Compliant
BLACKWELL	36I045	3	0	0	0	0	No Military Applicants
BOWRING	57C007	1	0	0	0	0	No Military Applicants
CLAYTON	64I010	0	0	0	0	0	No Applicable Transfers
CLEORA	21C006	14	0	0	0	0	No Military Applicants
CLEVELAND	59I006	27	0	0	0	0	No Military Applicants
COMANCHE	69I002	88	0	0	0	0	No Military Applicants
COWETA	73I017	149	2	2	0	0	Compliant
CRUTCHO	55C074	76	0	0	0	0	No Military Applicants
DEPEW	19I021	0	0	0	0	0	No Applicable Transfers
EARLSBORO	63I005	6	0	0	0	0	No Military Applicants
EDMOND	55I012	380	4	4	0	0	Compliant
FORT COBB-BROXTON	08I167	17	0	0	0	0	No Military Applicants
FREDERICK	71I158	26	0	0	0	0	No Military Applicants
FRINK-CHAMBERS	61C029	26	0	0	0	0	No Military Applicants
GANS	68I004	1	0	0	0	0	No Military Applicants
GRAHAM-DUSTIN	54I054	0	0	0	0	0	No Applicable Transfers
HUGO	12I039	11	0	0	0	0	No Military Applicants
HYDRO-EAKLY	08I011	31	0	0	0	0	No Military Applicants
JENKS	72I005	406	0	0	0	0	No Military Applicants
JONES	55I009	98	1	0	1	0	Compliant
LATTA	62I024	118	0	0	0	0	No Military Applicants
MANNSVILLE	35C007	0	0	0	0	0	No Applicable Transfers
MCCLOUD	63I001	125	2	2	0	0	Compliant
MIDWEST CITY-DEL CITY	55I052	503	21	19	2	0	Compliant
MUSKOGEE	51I020	97	2	2	0	0	Compliant
NORMAN	14I029	1,374	49	48	1	0	Compliant
OPTIMA	70C009	0	0	0	0	0	No Applicable Transfers
PRETTY WATER	19C034	32	0	0	0	0	No Military Applicants
PUTNAM CITY	55I001	525	3	3	0	0	Compliant
QUAPAW	58I014	29	1	1	0	0	Compliant
RATTAN	64I001	20	0	0	0	0	No Military Applicants
ROBIN HILL	14C016	58	5	5	0	0	Compliant
ROCK CREEK	07I002	20	0	0	0	0	No Military Applicants
ROLAND	68I005	47	0	0	0	0	No Military Applicants
RYAL	49C003	10	0	0	0	0	No Military Applicants
SEMINOLE	67I001	22	0	0	0	0	No Military Applicants
SEQUOYAH	66I006	133	0	0	0	0	No Military Applicants
SHAWNEE	63I093	124	6	6	0	0	Compliant
SOUTH ROCK CREEK	63C032	45	0	0	0	0	No Military Applicants
STRAIGHT	70C080	5	0	0	0	0	No Military Applicants
THOMAS-FAY-CUSTER UNIFIED DIST	20I007	8	0	0	0	0	No Military Applicants
TIMBERLAKE	02I093	1	0	0	0	0	No Military Applicants
TURNER	43I005	9	0	0	0	0	No Military Applicants
UNION	72I009	848	0	0	0	0	No Military Applicants
WILSON	10I043	51	0	0	0	0	No Military Applicants
WILSON	56I007	14	0	0	0	0	No Military Applicants
WRIGHT CITY	48I039	36	0	0	0	0	No Military Applicants
YUKON	09I027	203	0	0	0	0	No Military Applicants
All audited districts		6,110	119	115	4	0	

Table A5. Teacher's-Child Priority Analysis: Results by District

District	Code	In-Scope Transfers	Teacher's-Child Applications	Approved	Denied	Capacity Denials	Status
AFTON	58I026	47	8	8	0	0	Compliant
ARDMORE	10I019	45	8	8	0	0	Compliant
ARKOMA	40I091	14	3	3	0	0	Compliant
BISHOP	16C049	187	11	10	1	1	Potential Violation
BLACKWELL	36I045	3	2	2	0	0	Compliant
BOWRING	57C007	1	0	0	0	0	No Teacher's-Child Applicants
CLAYTON	64I010	0	0	0	0	0	No Applicable Transfers
CLEORA	21C006	14	1	1	0	0	Compliant
CLEVELAND	59I006	27	1	1	0	0	Compliant
COMANCHE	69I002	88	9	9	0	0	Compliant
COWETA	73I017	149	12	10	2	1	Potential Violation
CRUTCHO	55C074	76	7	7	0	0	Compliant
DEPEW	19I021	0	0	0	0	0	No Applicable Transfers
EARLSBORO	63I005	6	0	0	0	0	No Teacher's-Child Applicants
EDMOND	55I012	380	80	75	5	5	Potential Violation
FORT COBB-BROXTON	08I167	17	2	2	0	0	Compliant
FREDERICK	71I158	26	3	3	0	0	Compliant
FRINK-CHAMBERS	61C029	26	4	4	0	0	Compliant
GANS	68I004	1	0	0	0	0	No Teacher's-Child Applicants
GRAHAM-DUSTIN	54I054	0	0	0	0	0	No Applicable Transfers
HUGO	12I039	11	3	3	0	0	Compliant

HYDRO-EAKLY	08I011	31	2	1	1	0	Compliant
JENKS	72I005	406	55	52	3	3	Potential Violation
JONES	55I009	98	9	6	3	0	Compliant
LATTA	62I024	118	18	18	0	0	Compliant
MANNSVILLE	35C007	0	0	0	0	0	No Applicable Transfers
MCCLOUD	63I001	125	18	18	0	0	Compliant
MIDWEST CITY-DEL CITY	55I052	503	71	65	6	0	Compliant
MUSKOGEE	51I020	97	26	25	1	0	Compliant
NORMAN	14I029	1,374	48	42	6	0	Compliant
OPTIMA	70C009	0	0	0	0	0	No Applicable Transfers
PRETTY WATER	19C034	32	0	0	0	0	No Teacher's-Child Applicants
PUTNAM CITY	55I001	525	97	92	5	1	Potential Violation
QUAPAW	58I014	29	4	4	0	0	Compliant
RATTAN	64I001	20	4	3	1	0	Compliant
ROBIN HILL	14C016	58	0	0	0	0	No Teacher's-Child Applicants
ROCK CREEK	07I002	20	3	3	0	0	Compliant
ROLAND	68I005	47	9	9	0	0	Compliant
RYAL	49C003	10	0	0	0	0	No Teacher's-Child Applicants
SEMINOLE	67I001	22	8	8	0	0	Compliant
SEQUOYAH	66I006	133	8	8	0	0	Compliant
SHAWNEE	63I093	124	36	35	1	0	Compliant
SOUTH ROCK CREEK	63C032	45	2	2	0	0	Compliant
STRAIGHT	70C080	5	0	0	0	0	No Teacher's-Child Applicants
THOMAS-FAY-CUSTER UNIFIED DIST	20I007	8	0	0	0	0	No Teacher's-Child Applicants

TIMBERLAKE	02I093	1	0	0	0	0	No Teacher's-Child Applicants
TURNER	43I005	9	1	0	1	1	Potential Violation
UNION	72I009	848	52	49	3	2	Potential Violation
WILSON	10I043	51	2	2	0	0	Compliant
WILSON	56I007	14	2	2	0	0	Compliant
WRIGHT CITY	48I039	36	0	0	0	0	No Teacher's-Child Applicants
YUKON	09I027	203	31	31	0	0	Compliant
All audited districts		6,110	660	621	39	14	