



# OKLAHOMA DEPARTMENT OF EDUCATION

Special Audit Report

February 18, 2026

**Cindy Byrd, CPA**  
State Auditor & Inspector

# **Oklahoma Department of Education**

## **Special Audit Report**

**February 18, 2026**



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**TO THE HONORABLE GOVERNOR J. KEVIN STITT**

Presented herein is the special audit report of the Oklahoma State Department of Education.

The goal of the State Auditor and Inspector is to promote accountability and fiscal integrity in state and local government. Maintaining our independence as we provide this service to the taxpayers of Oklahoma is of utmost importance.

We wish to take this opportunity to express our appreciation for the assistance and cooperation extended to our office during our engagement.

This report is addressed to, and is for the information and use of, the Governor, as provided by statute. This report is also a public document pursuant to the Open Records Act, 51 O.S. §§ 24A.1, *et seq.*

Sincerely,

A handwritten signature in blue ink that reads "Cindy Byrd". The signature is written in a cursive, flowing style.

CINDY BYRD, CPA  
OKLAHOMA STATE AUDITOR & INSPECTOR



## **State Department of Education**

### **Special Audit Report**

**July 1, 2020 through June 30, 2021**

## **Why We Performed This Audit**

In September 2021, Governor Stitt requested the Oklahoma State Auditor and Inspector's Office (SA&I) conduct an audit of the Oklahoma State Department of Education (SDE).<sup>1</sup> The request followed the unprecedented COVID-19 school closures and the release of an investigative audit of Epic Charter Schools that identified instances of fraud, waste, and abuse at the school level, as well as discrepancies in administrative cost reporting and oversight within the SDE.

## **Objectives**

The objectives of the audit as defined in the Governor's request were:

- Objective 1** Identify all revenue sources flowing into the SDE, including but not limited to, federal funds, state appropriations, taxes and fees. Determine if the revenues were properly allocated and expenditures from selected funds were made in accordance with applicable laws.
- Objective 2** Determine if SDE and Oklahoma school districts are complying with the Oklahoma Cost Accounting System financial transaction reporting requirements and that SDE is effectively requiring consistent application and timely accountability.

## **Background**

The supervision of instruction in the public schools of Oklahoma is entrusted in a State Board of Education (Board), whose power and duties shall be prescribed by law, with the Superintendent of Public Instruction being the President of the Board.<sup>2</sup> It is the primary responsibility of the Board to perform all duties necessary to the administration of the public school system in Oklahoma as specified in the Oklahoma School Code of 1971.<sup>3</sup>

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<sup>1</sup> Authorized by 74 O.S. § 212(C)

<sup>2</sup> Oklahoma Constitution – Article 13 § 5 – Board of Education

<sup>3</sup> 70 O.S. § 3-104 State Board of Education – Powers and Duties

The Superintendent of Public Instruction<sup>4</sup> (Superintendent) is elected by the voters of Oklahoma every four years. In addition to serving as the President of the Board, they serve as chief executive officer of SDE, providing control and direction to SDE by executing the policies set forth by the Board. The Superintendent during the time period of this audit was Joy Hofmeister, elected in 2014 and again for a second term in 2018. Ryan Walters took office as Superintendent in January 2023 and remained in office until his resignation effective September 30, 2025. Lindel Fields was appointed to the office in October 2025 and continues in that position as of the release of this report.



SDE operates primarily under the provisions of 70 O.S. §§ 1-105<sup>5</sup> and 1-115<sup>6</sup> and is charged with the responsibility of determining policies and directing administration and supervision of the public school system (Common Education pre-k through 12) of the state. The fiscal duties of SDE include administering and distributing state and federal education monies to school districts.

SDE oversees numerous parts of education, including accreditation, state standards, school improvement, special education services, federal and state finances, child nutrition programs, teacher certification and effectiveness, school finance, school transportation, reading, student testing, gifted/talented, school accountability, literacy, and Indian education. SDE also provides direct services, such as training and technical assistance, to approximately 1,805 schools in 509 traditional districts, 37 charter districts and 7 virtual charter schools.<sup>7</sup> To administer the various facets of public education, SDE operates with approximately 437 employees.

### **SDE Funding**

Oklahoma state agencies received \$7.7 billion in state appropriations in FY 21, with SDE receiving the largest portion at \$2.9 billion (39 percent). As illustrated in the chart below, the 10 largest state agencies received 88.8 percent of the state's budget, with the remaining agencies sharing 11.2 percent.<sup>8</sup>

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<sup>4</sup> 70 O.S. § 3-107.1 – Control and Duties of the State Superintendent

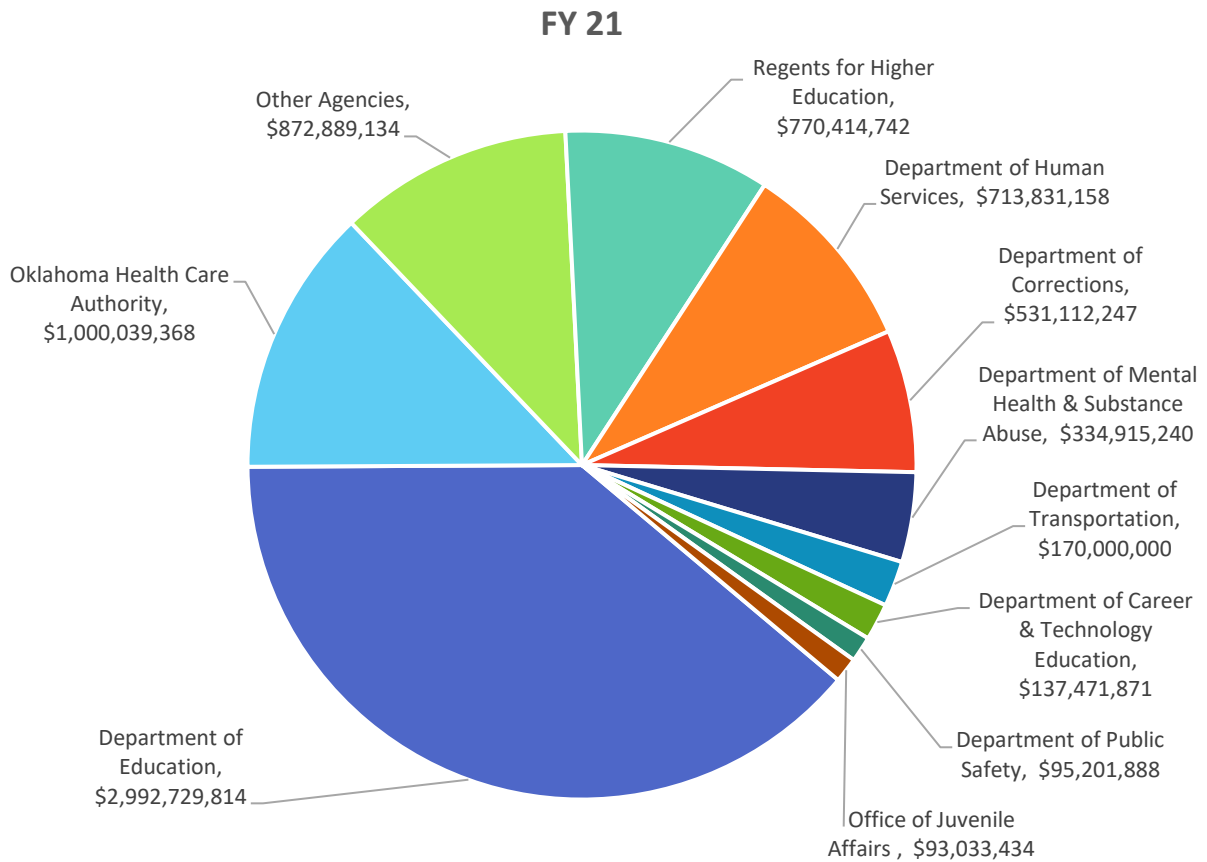
<sup>5</sup> 70 O.S. § 1-105 - State Department of Education - Definition - Agencies of State

<sup>6</sup> 70 O.S. § 1-115 – School System – Administered by State Department of Education, etc.

<sup>7</sup> Oklahoma Public Schools Fast Facts 2021-22

<sup>8</sup> Oklahoma State Senate FY '21 Appropriations Report

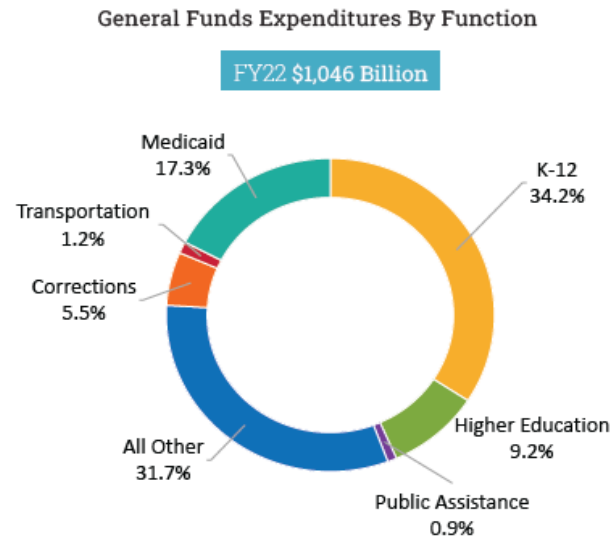
# Oklahoma Department of Education Special Audit



Source: FY 21 Appropriations Report from the State Senate

In addition to the \$2.9 billion in appropriations, SDE also received \$1.1 billion in funding from federal grants (including COVID federal grants) and other taxes and fees, and \$3.2 billion from local level sources.

According to the National Association of State Budget Officers (NASBO),<sup>9</sup> expenditures for elementary and secondary education continue to constitute the largest share of state general fund spending, comprising 34.2 percent of state general fund spending in fiscal year 2022, 37.1 percent in fiscal year 2021, and 36.8 percent in fiscal year 2020. The majority of states support K-12 education primarily through their general funds. However, a few states segregate large, dedicated revenue sources into separate education funds and therefore report most of the K-12 education spending in other state funds; examples include Michigan, New Hampshire, Vermont, and Wyoming. Other states with separate education funds, such as Alabama and Utah, combine their education fund with their general fund spending. Additionally, several states that still fund the majority of their K-12 education spending from the general fund spend a sizable amount from other state funds, which are typically dedicated revenues. In Oklahoma, K-12 education spending is funded in part by dedicated revenues from state school land earnings, gross production taxes, motor vehicle fees, and rural electrification association taxes.



### **How Funds Are Distributed to School Districts**

Oklahoma school districts receive state aid funding based on the Oklahoma State Aid funding formula<sup>10</sup> that was created by House Bill 1236 and enacted in June 1981.

The formula is student-based in that school districts receive a base amount according to the number of students and is further “weighted”<sup>11</sup> by the population of each grade level and/or category. The purpose of weight is to target school districts who serve students of higher need and therefore require additional money.

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<sup>9</sup> NASBO State Expenditure Report for Fiscal 2020-2021 – This report includes data from estimated fiscal 2022, actual fiscal 2021, and actual fiscal 2020. The report includes 50-state data broken down by fund source and program area, as well as information on state general revenue collections.

<sup>10</sup> State Aid is calculated based on the state dedicated revenues collected during the preceding fiscal year, the adjusted assessed valuation of the preceding year, and the highest weighted average daily membership for the school district of the two (2) preceding school years. Each school district submits to SDE the following data based on the first nine (9) weeks, to be used in the calculation of the average daily membership of the school district: (1) Student enrollment by grade level; (2) Pupil category counts; and (3) Transportation supplement data.

<sup>11</sup> 70 O.S. § 18-201.1 - Weighted Membership of School District for Calculation of Foundation Aid

**Members of the State Board of Education**

The State Board of Education consists of seven members. The Superintendent of Public Instruction serves as a member and the chairperson of the Board. The other six members are appointed by the Governor, confirmed by the Oklahoma Senate, and serve staggered six-year terms. Members are charged with pursuing and implementing reforms that will boost student performance and ultimately help to create the kind of educated, highly skilled workforce that will bring more and better jobs to the state.

Members of the board as of February 2026 are as follows:

Lindel Fields .....	Chairman
Chris VanDenhende.....	Congressional District 1
John Nofire .....	Congressional District 2
Ryan Deatherage .....	Congressional District 3
Mike Tinney.....	Congressional District 4
Becky Carson.....	Congressional District 5
Brian Bobek.....	At-large



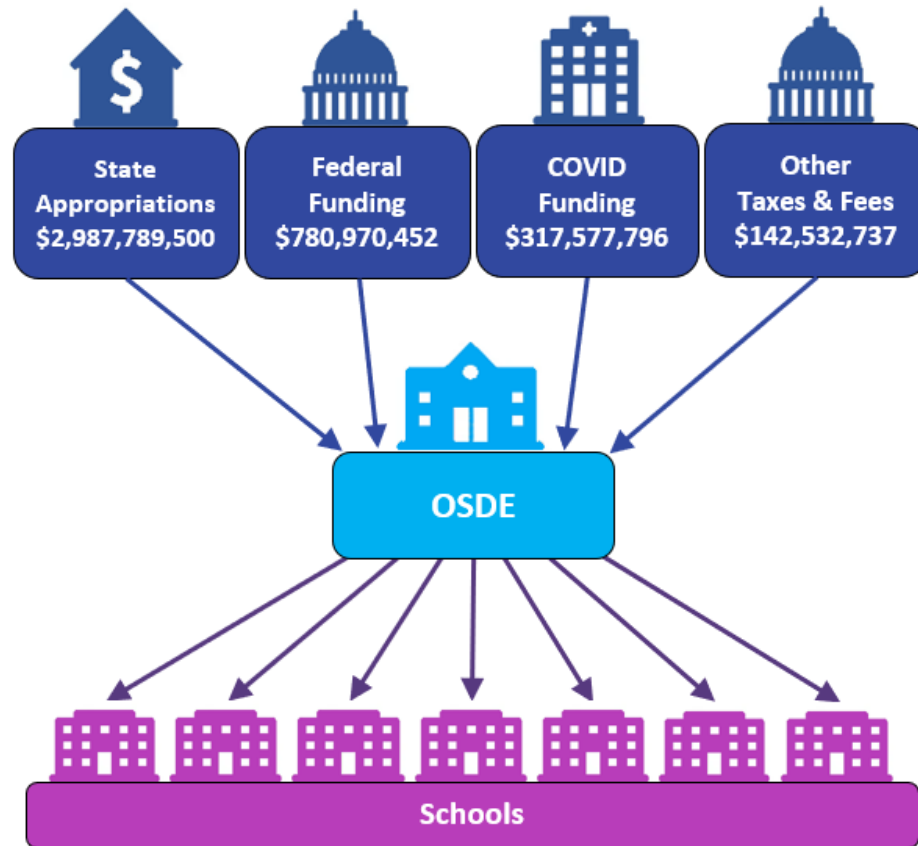


## Chapter 1: Revenues

- Revenue Sources
- Restrictions on Funding
- Other Revenue Received by School Districts

## Revenue Sources

SDE received a total of \$4,228,870,485 in revenue from various sources during FY 21. As illustrated below, funding was received from the federal government, state appropriations, COVID funding, and other taxes and fees.



The largest portion of revenues come from state appropriations, followed by federal grants, and the other taxes and fees. The vast majority of SDE's revenues are restricted for purposes set forth by the legislature through appropriation bills, state statutes, and federal regulations. Further details are provided in the "Restrictions On Funding" section of this report on page 14.

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**Appropriations**

The Oklahoma Legislature passed S.B. 1921<sup>12</sup> and S.B. 1922<sup>13</sup> making appropriations to SDE, while H.B. 4153<sup>14</sup> set the budgetary limits for all common education programs. The following table illustrates the categories/program for which the legislature directed appropriations to be spent:

Purpose	FY 21 Approps.
Financial support of public schools	\$ 2,300,970,699
Certified employee health benefit allowance	347,081,644
Support personnel health benefit allowance	188,455,377
Teacher's retirement credit	34,000,000
Purchase of textbooks and instructional materials	33,000,000
Administrative and support functions of OSDE	15,027,640
Early intervention (transfer to Fund 250)	14,400,341
Early childhood initiative	12,000,000
Reading sufficiency act	11,000,000
Alternative and high challenge education	10,000,000
Required assessments	4,205,685
Teachers' Retirement System	3,637,714
School Consolidation Assistance Fund	3,637,714
School lunch matching	3,500,000
OK School Psych/Speech Path/Audio Nat'l Certifications	2,900,000
Secure schools program	2,350,000
Teach for America	2,000,000
OK National Board Certification Revolving Fund	2,000,000
Advanced placement incentives	1,000,000
Imagine Math	1,000,000
Great Expectations	300,000
Teacher and leader effectiveness	125,000
Street School	100,000
Ag in the Classroom	38,000
	<u>\$ 2,992,729,814</u>

Net appropriations<sup>15</sup> for FY 21 were \$2,987,789,500, making up 71% of the revenue received by SDE.

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<sup>12</sup> S.B. 1921 "Rainy Day" Fund Appropriations bill

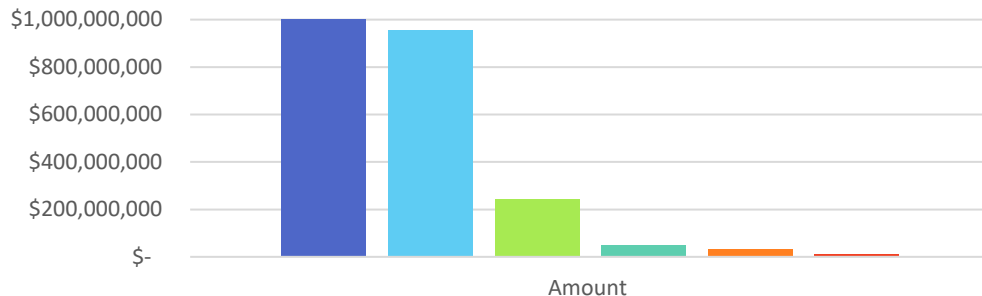
<sup>13</sup> S.B. 1922 General Appropriations (GA) bill

<sup>14</sup> H.B. 4153 Common Education Budget Limits bill - See table of all programs with budgetary limits and the fund from which the monies were appropriated in Appendix A

<sup>15</sup> \$2,992,729,814 original appropriations less \$1,302,600 Mineral Leasing revenue shortfall and \$3,637,714 transferred directly to Teacher's Retirement System (TRS) by OMES.

**Appropriations for the Financial Support of Schools**

**Funding Sources for Financial Support of Schools**



Fund	Amount	Description
Education Reform Revolving Fund (62 O.S. § 34.89)	\$1,015,074,419	Dedicated revenue fund appropriated only to SDE. Per HB 1017, the fund consists of personal and corporate income taxes, sales tax and use tax. A portion of cigarette and tobacco tax revenues, tribal gaming and horse track gaming revenues are also allocated to the fund. See additional details under Revenues
General Fund	\$ 953,338,319	Principal funding source for most Oklahoma government operations. Unrestricted revenues flow into the general fund.
Rainy Day Fund (68 O.S. § 3034.1)	\$ 243,668,709	Designed to collect surplus funds or monies receipted over and above the itemized estimate of needs for the general fund. Transfers from the surplus funds occur at the time the budget is approved.
Common Education Tech Fund (62 O.S. § 34.90)	\$ 46,938,566	Monies collected from the tax levied on natural gas or casinghead gas. Funds appropriated to the Common Education Fund may be budgeted and expended by SDE as authorized by the Legislature.
Oklahoma Education Lottery Fund	\$ 32,739,428	Established by OKCONST O.S. § Article 10 section 41 and 3A O.S. § 713 (11/2/2004) - see additional details at under Revenues
Mineral Leasing Fund	\$ 9,211,258	State-managed fund to provide a stable source of funding for important state programs and initiatives, while also promoting responsible and sustainable development of Oklahoma's natural resources

Of the aforementioned funds, citizens ask the most questions about the sources of revenue that are contributed to the Education Reform Revolving Fund and the Lottery Fund.

**Education Reform Revolving Fund (1017)**

The state legislature passed House Bill 1017 in 1990 to create the Education Reform Act, which set up a system of funding designed to permanently improve school funding. This funding was to increase appropriations from the state's general revenue fund to support education. Additional revenue was generated through tax increases and other measures which included income tax, sales tax, motor vehicle tax, gross production tax on oil and gas, and taxes on cigarettes and tobacco products. Additionally, tribal gaming and horse track gaming revenues are now allocated to the 1017 Fund. The combination of these revenue sources would contribute to the overall funding recognized for education. The legislation included specific requirements about the size of classes, scheduled teacher pay raises, minimum qualifications for teachers, standards for what was taught, and statewide testing. To implement these requirements, the legislature appropriated more than \$560 million over a five-year period.

The taxes raised by HB 1017 are allocated directly to the 1017 Fund and can be appropriated only to the Department of Education.

According to 62 O.S. § 34.88, the Office of Accountability is required to track apportionment of revenues deposited to the Education Reform Revolving Fund in the State Treasury, and to provide an accounting of these funds to the Governor, Speaker of the House of Representatives, and President Pro Temp of the Senate, within 30 days after the end of the year.

It's important to note that the impact of HB 1017 on education funding can be influenced by economic conditions which may cause a change in tax revenue collections.

In FY 21, SDE received appropriations of \$1,015,074,419 from fund 1017.

**Lottery Fund**

In November 2004, Oklahoma voters approved a state lottery with a 68% yes vote.

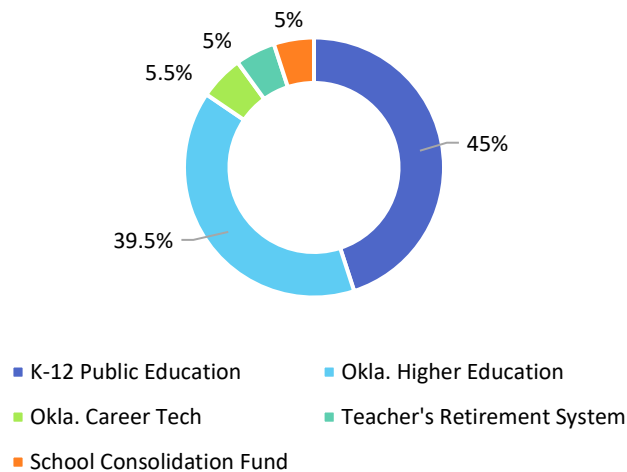
According to 3A O.S. § 713, the Lottery Commission pays, from gross proceeds, the operating expenses of the Commission. At least 45% of gross proceeds are made available as prize money and at least 35% of the gross proceeds must be deposited into the "Oklahoma Education Lottery Fund", which is used to fund educational reform initiatives in the state. It also requires the State Board of Equalization to annually make sure the lottery is adding to education funding rather than replacing it. This helps provide assurance that funding provided by the lottery isn't replacing other funding used to support education.

Supporters and elected officials initially predicted that lottery contributions to education could range from \$150 million to \$300 million. However, several sources of income never made it to the final legislation (e.g., video gambling machines). According to the Lottery Commission, a total of \$1,219,160,007 billion has been contributed since 2005. This is an average of \$67.7 million a year to help support the funding of education.

Monies in the Oklahoma Education Lottery Fund shall only be appropriated as follows:

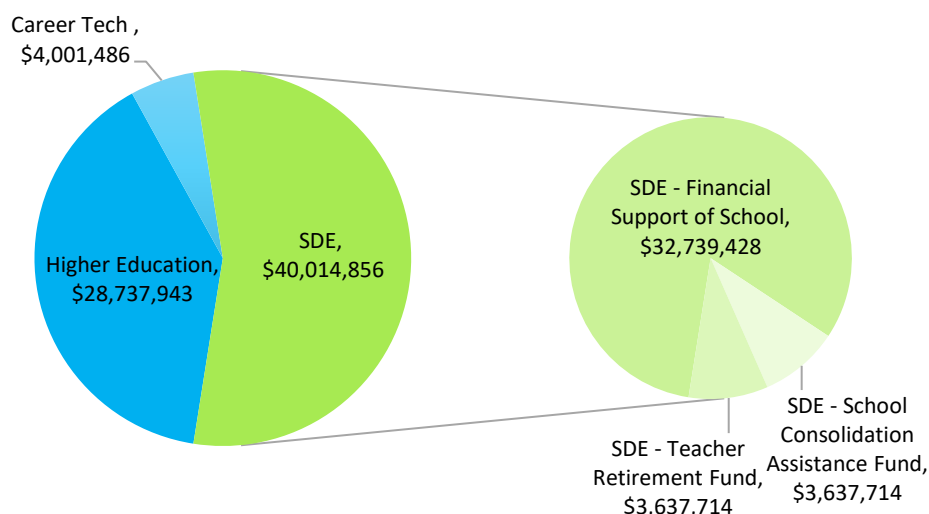
- The distribution of the 35% is illustrated in the table below:

**Education Lottery Fund Allocation**



- Lottery Funds appropriated in FY 21 (SB 1922) totaled \$72,754,285 with SDE receiving \$40,014,856.
- Of the \$40 million SDE received, \$3.6 was dedicated to teacher retirement and another \$3.6 to school consolidation assistance.

## Dedicated SDE Funds



In 2022, Governor Kevin Stitt signed HB 3488, allowing excess Oklahoma Lottery dollars to go towards increasing teacher salaries.

While the lottery was never intended to fully fund education, it is an additional revenue source that the State would not otherwise have to support education.

### **Federal Funds**

SDE received federal funding from 52<sup>16</sup> grants in FY 21 totaling \$1,098,548,248.<sup>17</sup> Of that, \$317,577,796 was one time funding from COVID related grants. The Child Nutrition Program Cluster is the largest dollar grant (\$271,373,749 which includes \$9,676,559 in CNP COVID grants) and the only grant that requires a state match. The state match for the CNP was \$3,140,137 in FY 21.

Several other grants require state funding for maintenance of effort requirements or for payroll associated with those who administer the federal programs. Five federal grants received by SDE totaling \$519,684,484, required the state to contribute \$28,042,890. See the graph below with the details of the five grants and the purpose of the state dollars.

<sup>16</sup> See list of Federal Awards in Appendix B. Multiple grants are issued under the same CFDA# with some being considered a cluster program.

<sup>17</sup> Federal revenues were subject to audit in the State of Oklahoma Single Audit or State of Oklahoma Annual Comprehensive Financial Report (ACFR) Audit for FY 21.

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CFDA #	Program Title	Federal Grantor	Federal Revenue	Total State Dollars Associated w/Fed Programs	Purpose of State dollars
10.555, 10.555, 10.556, 10.559 & 10.579	Child Nutrition Program - Cluster	U.S. Dept. of Agriculture	\$ 271,373,749	\$ 3,500,000	Matching \$3,140,137 and MOE \$359,863
84.010	Title I Grants to Local Education Agencies	U.S. Dept. of Education	\$ 218,682,246	\$ 616,517	Payroll & Operational Costs
84.181	Special Education - Grants for Infants and Families	U.S. Dept. of Education	\$ 4,765,788	\$ 14,500,000	Payroll, Operational Costs and Interagency Agreement w/ Health Dept.
84.367	Title IIA Supporting Effective Instructions State Grants (formerly Improving Teacher Quality State Grants)	U.S. Dept. of Education	\$ 19,055,967	\$ 250,000	Payroll
84.369	Grants for State Assessments and Related Activities	U.S. Dept. of Education	\$ 5,806,735	\$ 9,176,373	Payroll & Operational Costs
			<b>\$ 519,684,484</b>	<b>\$ 28,042,890</b>	

The state of Oklahoma spent \$28 million in FY 21 to receive over \$1 billion in federal funding and the largest portion of those funds were directly related to child nutrition and children at risk academically and those from low-income families. This is an immaterial amount of money for the state to contribute towards ensuring some of the most basic needs of Oklahoma children are met.

**State Tax Revenues**

Tax revenues received totaled \$133,547,886. These funds are dedicated for public education purposes such as motor vehicle driver education, grants to schools for school bus camera equipment, and as part of the state aid funds provided to all public schools for the purpose of common education.

**Other Fees**

Other revenues collected totaled \$8,984,851. These revenues were generated from fees for teacher certificates, services, reimbursements, and other miscellaneous charges.



## Restrictions On Funding

Of the \$4.2 billion dollars received by SDE, a large portion is restricted for purposes set forth by appropriation bills, statutes, or federal regulations. To help ensure funds are spent in accordance with laws and regulations, separate funds have been established within the state accounting system<sup>18</sup> to track receipts and expenditures. However, \$1.5 million or 53% of FY 21 appropriations were placed into SDE's general fund (191XX). Because these funds were for restricted programs, as outlined in HB 4153, SDE encumbered the funds in PeopleSoft<sup>19</sup> using codes to differentiate departments, divisions, internal operating units, and school districts to ensure funds were expended appropriately. In addition to the agency's general fund, SDE maintains 27 separate funds, created by statute for specific purposes.

An example of a restricted fund is fund 210, established by 70 O.S. § 6-204.4<sup>20</sup> for the purpose of providing annual bonuses to teachers possessing National Board certifications. See additional funds restricted by statute in Appendix C.

Fund #	Fund Name	Statutory Reference	Purpose
210	Ok Natl Bd Cert Revolving Fund	TITLE 70, SEC. 6-204.4	To provide an annual bonus for those teachers possessing National Board certification.

We sampled 60 claims from eight different funds and reviewed them to determine whether each expenditure was for the purpose set forth by the applicable statute. No exceptions were noted as a result of our procedures.

### **Spending Limits on Common Education Programs**

HB 4153 sets forth the budgetary limits for all common education programs. Of the 24 Common Education line items identified on page 8, *all but six* are required by statute. An example of a line-item program required by law is illustrated in the table below:

Program Specific Line Item	Description of Program	Statutorily Required	Amount Received per HB 4153
Early Intervention SoonerStart	SoonerStart is Oklahoma's early intervention program serving infants and toddlers with developmental delays from birth to 36 months.	70 O.S. § 13-124	\$14,400,341

<sup>18</sup> Statewide Accounting Manual - PeopleSoft is the state's system of record for procurement, accounting, and financial reporting. The state's accounting system of record is maintained and administered by CAR and used by all state agencies to record their official financial transactions.

<sup>19</sup> States Accounting System

<sup>20</sup> 70 O.S. § 6-204.4

The six programs that are not required by statute but listed as a line-item appropriation are as follows (description language from contracts or vendor resources):

<b>Imagine Math (Vendor)</b>	Supplemental math programs to provide comprehensive, supplemental math instruction and tutoring for all Oklahoma 5 <sup>th</sup> and 8 <sup>th</sup> grade students that include authentic assessment, adaptive learning pathways, embedded scaffolds, and actionable data.
<b>Great Expectations</b>	Teacher professional development program based on the latest research of the most effective teaching practices.
<b>Street School (Vendor)</b>	Street School is an academic and therapeutic program designed for youth that have dropped out or are at risk of dropping out. Program assists the hardest to reach and most deficient students in increasing college, career, and citizen readiness.
<b>Ag in the Classroom</b>	Program of the Oklahoma Department of Agriculture, Food and Forestry, Oklahoma State Department of Education, and the Oklahoma Cooperative Extension Service. The purpose of Oklahoma Ag in the Classroom is to help familiarize Oklahoma school children with Oklahoma's food and fiber industry by providing resources for Oklahoma teachers.
<b>Secure Schools Program</b>	Funds intended to be used for the Rave Panic Button app that would allow teachers or other staff members to dial 911 to alert authorities of an emergency.
<b>Teach for America (Vendor)</b>	National corps of recent college graduates and professionals of all academic majors and career interests who commit two years to teach in urban and rural public schools and become leaders in the effort to expand educational opportunity.

Of the six programs not required by law, SDE requested funding for five. The line-item for Imagine Math was directed by the Legislature without being requested by SDE.

#### **Specific Vendors Receiving Line-Item Appropriations**

In addition to the line-item appropriations for common education programs, the legislature also dictated in H.B. 4153 that SDE use appropriations for services that are NOT required, using three named vendors. Those vendors were Imagine Learning,<sup>21</sup> Teach for America, and Street School. See details in table below. Although all three of these vendors have a history of providing services to SDE, the legislature has taken the authority away from SDE to competitively bid for these services.

<sup>21</sup> According to their website, Imagine Learning is a suite of adaptive digital curriculum and assessment solutions for PreK-8. While funding appropriated is specific to math, other products are available for English, Science, Social and Emotional Learning, etc.

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Vendor	FY 21 Approps.	Acquisition Type	Brief Description (from purchase order)
Imagine Learning	\$ 1,000,000	Sole Source Type 8	Contract to provide comprehensive, supplemental math instruction and tutoring for all Oklahoma 5th and 8th grade students (OSDE has the option to add grades 3, 4, 6, and 7).
Teach for America	\$ 2,000,000	Sole Source Type 8	Contract to provide Oklahoma schools with teacher recruitment on a national level amid a state-wide teacher shortage.
Street School	\$ 100,000	Sole Source Type 8	Street School Inc. is a non-profit, alternative education and counseling program that provides Tulsa area students education services in an alternative setting.

- **Imagine Math** was appropriated \$1 million to provide comprehensive, supplemental math instruction and tutoring to all 5th and 8th grade students. SDE had the option to expand the agreement to grades 3, 4, 6, and 7 for an additional \$1 million, but chose not to. However, school districts had the option to expand student access for all Oklahoma 3rd, 4th, 6th, and 7th graders and received related professional development and technical assistance at a minimum discount of 20% off the retail pricing throughout the duration of Agreement.

We obtained additional information from Imagine Learning and noted 212 school districts and 123 schools purchased additional programs totaling \$13,181,650 during FY 21. The types of programs purchased included Math, Math Facts, Language & Literature, Español, Professional Services, Courseware, Instructional Services, Hardware and Other, and Other Intervention.

- **Teach for America** was appropriated \$2 million to recruit and select teachers nationally and partner with Oklahoma districts, schools, and other education providers to place them in schools serving low-income communities.
- **Street School** was appropriated \$100,000 to provide Tulsa area students with education services in an alternative setting.

Although SDE has utilized all three vendors in the past without the direction from the legislature, there have been years when SDE determined that some services would not be provided to school districts due to a reduced budget.

There does not appear to be a statute restricting the legislature from specifying certain vendors in the line items of appropriation bills. However, by making these decisions, the legislature is removing SDE's executive authority to implement and administer policy related to education, about which SDE is the most knowledgeable.

It's also unclear whether the legislature is taking steps to ensure the mandated curriculum services conform to state academic standards.

These mandates have potential impacts on schools' and districts' other purchasing decisions as well. For example, after the legislature appropriated \$1 million to Imagine Math during FY 21 for services to 5th and 8th grade students, school districts also had the option to expand student access for 3rd, 4th, 6th, and 7th graders, and received related professional development and technical assistance at a discount. A total of 103 districts and 243 schools chose to purchase additional Imagine Learning programs for a total of \$13,181,650. It is unclear whether schools would have freely chosen to purchase Imagine Learning products if SDE hadn't been mandated to provide part of the services; schools received products for two grades and therefore may have felt obligated to choose the same product for other grade levels for consistency.

## Other Revenue Received by School Districts

Although not specifically included in our audit objectives, we determined it would be useful to document total revenues, including COVID funds, that were received by Oklahoma school districts during FY 21.

As previously stated, the majority of the funds appropriated to SDE are distributed to school districts through the State Aid Funding Formula.<sup>22,23</sup> This allocation distributes to districts based on their Weighted Average Daily Membership (WADM)<sup>24</sup> and also considers other funding the district may receive, including property taxes and other state-dedicated revenue such as gross production tax and school land earning. Oklahoma school districts received a total of \$3,351,843,657, from the State of Oklahoma making up 44% of the revenues received by the districts.

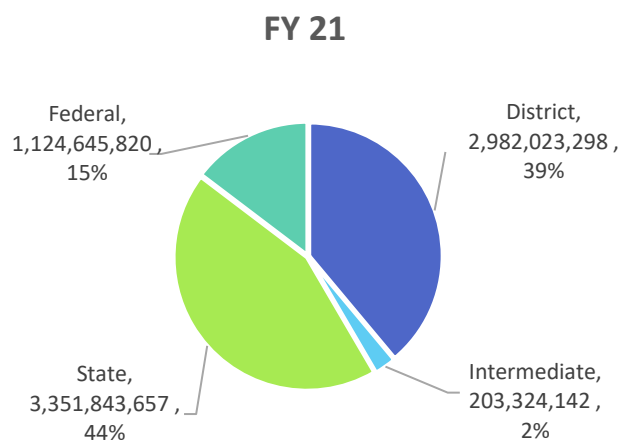
Other funds received by districts during FY 21 include district revenue sources, federal funds, and intermediate sources of revenue. In total, school districts received \$7,661,836,916 from varying revenue sources for the 2020-2021 school year.

### District Sources

District sources include various types of revenue collected by the district including taxes, tuition and fees, athletics, and school activities.

### Intermediate Sources

Intermediate sources are classified as ad valorem tax, county apportionments, resale of property fund distribution, and county sales tax.



<sup>22</sup> State Aid Funding Formula – The goal of the formula is to provide equity across all schools, regardless of socio-economic status or proportion of students with special needs.

<sup>23</sup> SA&I conducted audits at the request of Oklahoma City Public Schools and Western Heights Public Schools which verified error in the funding formula.

<sup>24</sup> The WADM is calculated using the Average Daily Membership and the adjusted to reflect the weights of individual students. Students are assigned a greater weight if they belong to a student group that requires additional educational services, such as students with disabilities.

**State Sources**

State sources of income include gross production tax, BIA tax, motor vehicle collections, state school land earnings, vehicle tax stamp, farm implement tax stamp, and state aid (from SDE). Of the \$3,351,843,656 total received by districts from the State of Oklahoma, 85% is from SDE with the remaining 15% from other state agencies such as the Oklahoma Tax Commission and the Commissioners for the Land Office.<sup>25</sup>

**Federal Sources**

Federal sources of revenue consist primarily of federal grant funds passed through from the SDE at 92%. The remaining 8% is federal grant funds received directly by the districts.

**COVID Funds**

Included in the amount of funds received from the State of Oklahoma was \$295,859,816 in COVID Funds. See the amount of COVID funds received by each school district in Appendix F.

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<sup>25</sup> See Appendix D



## Chapter 2: Expenditures

- **State Aid Distributions to Schools**
- **Central Administrative Personnel**
- **Professional Services Contracts**
- **Federal vs. State Expenditures**
- **COVID Expenditures**

## Expenditures

SDE had expenditures in excess of \$4 billion during FY 21. An analysis of the expenditures provided that \$3,996,203,196 were funds passed through to local school districts, other state agencies, or federal refunds. The remaining \$58,558,500 was directly related to school districts.

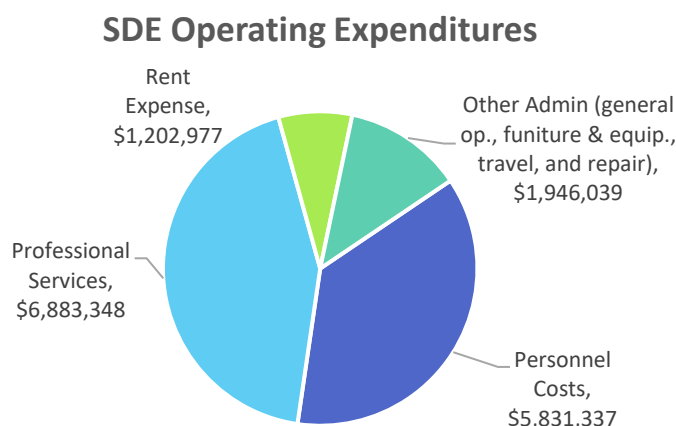
<b>Total FY 21 Expenditures</b>	<b>\$ 4,070,625,398</b>
<b><u>Payments to Local Governments</u></b>	
Direct payments to local school districts (State and Federal)	\$ 3,950,948,941
Payments to other state agencies	43,771,628
Federal refunds	1,482,627
<b>Total payments to local governments</b>	<b>\$ 3,996,203,196</b>
<b><u>Expenditures Directly Related to School Districts</u></b>	
Personnel Costs	\$ 25,248,402
Professional Services	27,501,134
Travel	183,964
Hot Spots	3,000,000
Software	2,625,000
<b>Total expenditures directly related to school districts</b>	<b>\$ 58,558,500</b>
<b>Total SDE Operating Expenditures</b>	<b>\$ 15,863,701</b>

The following expenditures were directly related to school districts and therefore excluded as SDE general operating expenses:

\$ 3,943,383,185	State and federal funding passed through to school districts
\$ 43,771,628	Payments to other agencies for things such as school security, early intervention, and teachers' retirement
\$ 27,353,469	Professional Service contracts directly to school districts
\$ 25,248,402	Salary expenses attributable to employees who work on programs or provide services directly to school districts
\$ 7,600,000	The Lindsey Nicole Henry Scholarship providing scholarships to a private school of choice for students with disabilities
\$ 3,000,000	Hotpots wireless devices to help schools with remote learning
\$ 2,625,000	Exact Path software licenses (diagnostic tool for assessment and instruction) for schools
\$ 1,482,627	Federal Refunds returned to the US Department of Education and the US Department of Agriculture
\$ 183,964	Travel expenses of mileage reimbursement, primarily for field employees performing work related to school districts



The remaining \$15,863,701 is considered the general operating expenditures of SDE. See breakdown in the pie chart:



### **State Aid Distributions to Schools**

Oklahoma school districts receive state aid funding that is distributed based on the Oklahoma State Aid funding formula<sup>26</sup> that was created by House Bill 1236 and enacted in June 1981.

Further, the formula is student-based in which school districts receive a base amount according to the number of students, then this formula is further “weighted” by the population of each grade level and/or category, according to *70 O.S. §18-201.1*. The purpose of weight is to target school districts who serve students of higher need and therefore require additional money.

### ***Dedicated State Funds***

A combined \$2.3 billion in state appropriations and other state dedicated funds were distributed through the funding formula as illustrated in the table below:

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<sup>26</sup> State Aid is calculated based on the state dedicated revenues collected during the preceding fiscal year, the adjusted assessed valuation of the preceding year, and the highest weighted average daily membership for the school district of the two (2) preceding school years. Each school district submits to SDE, the following data based on the first nine (9) weeks, to be used in the calculation of the average daily membership of the school district: (1) Student enrollment by grade level; (2) Pupil category counts; and (3) Transportation supplement data.

*Oklahoma Department of Education  
Special Audit*

FY 2021 Sources of Revenue applied to State-Aid		Statutory Reference
<b>State Appropriated:</b>		
General Revenue Fund	\$ 953,338,319	70 O.S. 18-200.1
Education Revolving Fund (HB 1017)	1,015,074,419	62 O.S. 34.89
Common Education Technology Fund	46,938,566	62 O.S. 34.90
<b>Total State Appropriated</b>	<b>\$ 2,015,351,304</b>	
<b>Other State-dedicated Revenues:</b>		
Oklahoma Lottery Trust Fund	\$ 32,739,428	3A O.S. 713
Mineral Leasing Funds	7,908,658	SB 1922
Constitutional Reserve (Rainy Day) Fund	243,668,709	SB 1922
<b>Total State-dedicated</b>	<b>\$ 284,316,795</b>	
<b>Total State dollars dedicated to funding formula</b>	<b>\$ 2,299,668,099</b>	

In addition to the \$2.3 billion distributed through the funding formula, an additional \$577 million in state aid funds were distributed to local school districts for Textbooks, Reading Sufficiency, Alternative Education, Certified FBA Funds, Support FBA, Drivers ED, and School Consolidation Assistance. The amount of funding each program received was determined by either student count or the number of certified and support staff. The table below identifies the amount each program received in FY 21, along with their respective statutory requirements:

Other State Aid to School Districts:		Statutory Reference
<b>Textbooks</b>	\$ 33,000,000	70 O.S. § 16-114a
<b>Reading Sufficiency</b>	\$ 11,000,000	70 O.S. § 1210.508(D)
<b>Alternative Education</b>	\$ 10,000,000	70 O.S. § 1210.568
<b>Certified FBA</b>	\$ 347,081,644	70 O.S. § 26-104
<b>Support FBA</b>	\$ 188,455,377	70 O.S. § 26-104
<b>Drivers ED</b>	\$ 900,000	70 O.S. § 19-122
<b>School Consol. Assistance Fund</b>	\$ 3,637,714	70 O.S. § 7-203

Further analysis of these programs provided the following:

- Textbooks – The textbook allocation is to be determined by the State Board of Education. The initial allocation calculated is based on audited end-of-year average daily attendance of the preceding school year and multiplied by Fifty-five Dollars (\$55.00). Textbooks are selected by the **State Textbook Committee** as authorized by 70 O.S. § 16-101. Textbook Committee members are chosen according to 70 O.S. § 16-102.
- Reading Sufficiency Act (RSA) – The Reading Sufficiency Act is designed to ensure that Oklahoma students are reading on grade level by the end of third grade, in order to better enable their learning careers after that point.

Per 70 O.S. § 1210.508B, “the purpose of the Reading Sufficiency Act is to ensure that each child attains the necessary reading skills by completion of the third grade which will enable that student to continue development of reading skills and to succeed throughout school and life.” This statute discusses that the Legislature finds that it is essential for children in the public schools to read early and well in elementary school, and their belief that clear goals, assessments, and accountability will increase the number of children reading at or above grade level.

Per 70 O.S. § 1210.508(D), Reading Sufficiency Act funds are allocated as follows:

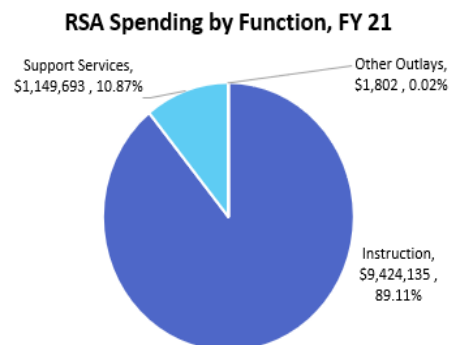
- School districts’ reading sufficiency plans and count reports of students who need this assistance are approved by SDE,
- Total funds available for the year are divided by total students in need of assistance,
- Each school district is allocated an amount equal to that per-student amount times the number of students in need of remediation/intervention in the district.

Beginning in the 2022-2023 school year, for districts receiving over \$2,500, at least 10% of funding must be spent on relevant, approved professional development for teachers of prekindergarten through grade five, with other provisions in place for teachers attending summer training.

A total of 425 school districts spent RSA funds totaling \$10,575,630 in FY 21.

The total per district spending in FY 21 ranged extremely from \$12 for Davidson Public Schools to \$1.3 million for Oklahoma City Public Schools.

Schools classify their spending to determine how the RSA funding was used. Nearly 90% of expenditures were categorized as instructional, which includes salaries and other compensation, books, and supplies. The other 11% were categorized as support services, which includes primarily training and development and related supplies and services.



- Alternative Ed – Each alternative education program of a school district receives funding based on the average daily membership (ADM) of students

who participated in an alternative education program in the prior school year. The per-student funding amount is based on the funding available for the program each fiscal year.

- Certified and Support FBA – The flexible benefit allowance that is credited to eligible certified and support school employees. The amount appropriated for funding is calculated by multiplying the number of eligible school district employees employed by school districts who are participating in the health insurance plan offered by the State and Education Employees Group Insurance Board.
- Drivers Ed – Funds are allocated to each school district that provides a driver education program.
- School Consolidation Assistance – Assistance to school districts which have entered into a mutual contract with a superintendent as authorized pursuant to 70 O.S. § 5-106A in paying the salary or wages of the superintendent.

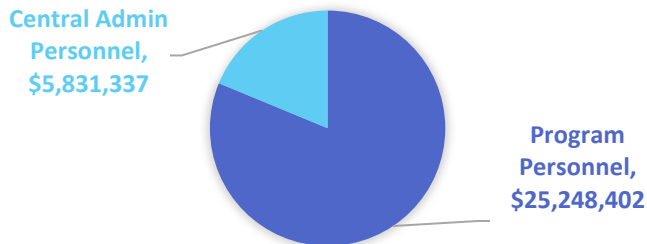
### **Central Administrative Personnel**

Several divisions perform duties with administrative purposes central to SDE's operations.

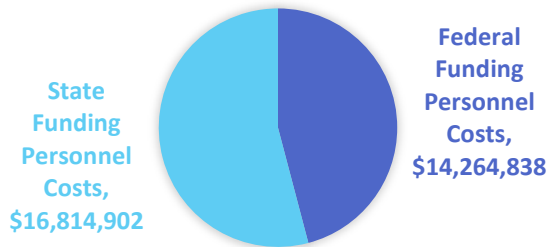
- Executive Services includes administration, event coordination, and the superintendent advisory council
- Financial Services includes the comptroller, state aid, accounting, OCAS, and operational support
- Department Services includes legal services, the state board, communications, human resources, and staff with duties related to school personnel records, accreditation, and transportation

The personnel expenditures associated with these divisions for FY 21 totaled \$5,831,337.

### PERSONNEL COSTS CENTRAL VS. PROGRAM



### PERSONNEL COST FUNDING



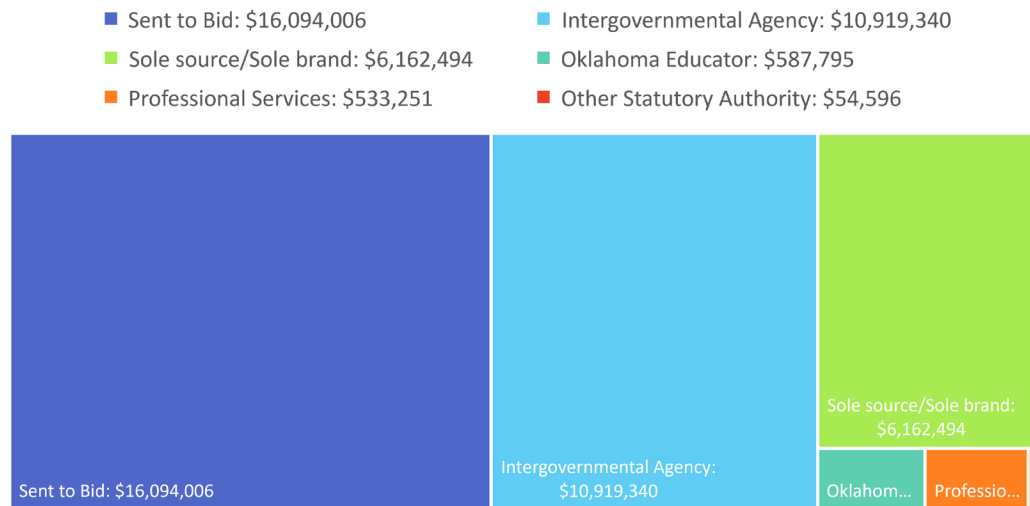
The majority of SDE personnel costs are associated with programs serving the districts or administering and delivering federal programs. These programs include Curriculum and Instruction (which itself includes many subject areas and programs such as Early Childhood, Standards Implementation, and Gifted/Talented), Assessment, Accountability, Professional Services, Early Intervention, Educator Effectiveness, Child Nutrition, School Support, and Student Support. Some of these staff members are centrally located and some work in the field.

Nearly half of overall SDE personnel costs are paid with federal dollars.

### Professional Service Contracts

The Agency contracts with various vendors to provide professional services for school districts and federal programs as well as for central administrative needs. There were 239 professional contracts with expenditures totaling \$34,384,483 in FY 21.

### Professional Services Proportionate Purchase Authority



A detailed review of documentation for all 239 professional service contracts provided that SDE complied with applicable sections of the Oklahoma Central Purchasing Act. The following was noted:

- 22 contracts with expenditures totaling \$16,094,006 were competitively bid. The other 217 contracts with expenditures totaling \$18,290,477 were not bid out due to being sole source or sole brand acquisitions, purchases from intergovernmental agencies, purchases mandated by the legislature, certain professional services exempt from bidding or exempt under other state statutes. All purchases not competitively bid were appropriately justified as required.
- A total of \$13,644,333 in professional services expenditures from 99 vendors were for purchases prescribed by the legislature.
- 50 of the 239 professional services vendors were not Oklahoma-based companies. Appropriate justification was incorporated in the purchasing documentation for each one.

### **Federal Expenditures vs State Expenditures**

In FY 21, SDE received federal funding from 27 grants totaling \$1,098,548,248. Of that, \$317,577,796 was from one-time COVID related grants.<sup>27</sup> The largest grant is the Child Nutrition Program and is the only grant with true matching dollars. Several other grants have some sort of maintenance of effort requirements or include payroll for those who administer the program.

<sup>27</sup> See Appendix E

## Oklahoma Department of Education Special Audit

The following table illustrates the federal dollars that have state dollars associated with them and the purpose of the state dollars.

CFDA #	Program Title	Federal Grantor	Federal Revenue	Total State Dollars Associated w/Fed Programs	Purpose of State Dollars
10.555, 10.555, 10.556, 10.559 & 10.579	Child Nutrition Program - Cluster	U.S. Dept. of Agriculture	\$ 271,373,749	\$ 3,500,000	Matching \$3,140,137 and MOE \$359,863
84.010	Title I Grants to Local Education Agencies	U.S. Dept. of Education	\$ 218,682,246	\$ 616,517	Payroll & Operational Costs
84.181	Special Education - Grants for Infants and Families	U.S. Dept. of Education	\$ 4,765,788	\$ 14,500,000	Payroll, Operational Costs and Interagency Agreement w/ Health Dept.
84.367	Title IIA Supporting Effective Instructions State Grants (formerly Improving Teacher Quality State Grants)	U.S. Dept. of Education	\$ 19,055,967	\$ 250,000	Payroll
84.369	Grants for State Assessments and Related Activities	U.S. Dept. of Education	\$ 5,806,735	\$ 9,176,373	Payroll & Operational Costs
			<b>\$ 519,684,484</b>	<b>\$ 28,042,890</b>	

The State of Oklahoma spent \$28 million in FY 21 to receive over \$1 billion in federal funding with the largest portion of those funds directly related to child nutrition, children at risk academically, and those from low-income families. This is an immaterial amount of money for the state to contribute towards ensuring some of the most basic needs of Oklahoma children are met.

### **COVID Expenditures**

The Elementary and Secondary School Emergency Relief Fund (ESSER) is a federal program administered by the Department of Education in response to the COVID-19 pandemic and designed to provide emergency financial assistance to public school districts. SDE received a total of \$317,577,796 in COVID-related funding in FY 21. This funding was intended for preventing, preparing for, and responding to COVID-19. For each iteration of ESSER, SDE was required to allocate at least 90 percent of funds to local school districts in proportion to the amount of funds each district had received under Title I, Part A of the Elementary and Secondary Education Act in the latest fiscal year. Each source of funding was required to be tracked separately.

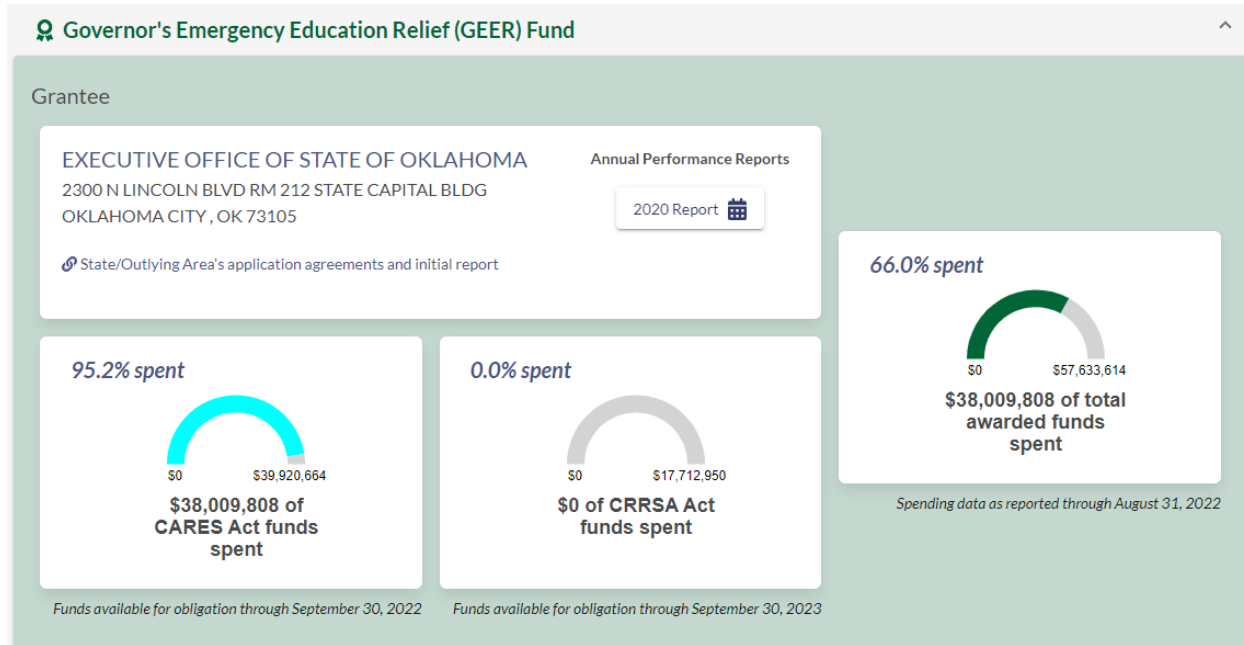
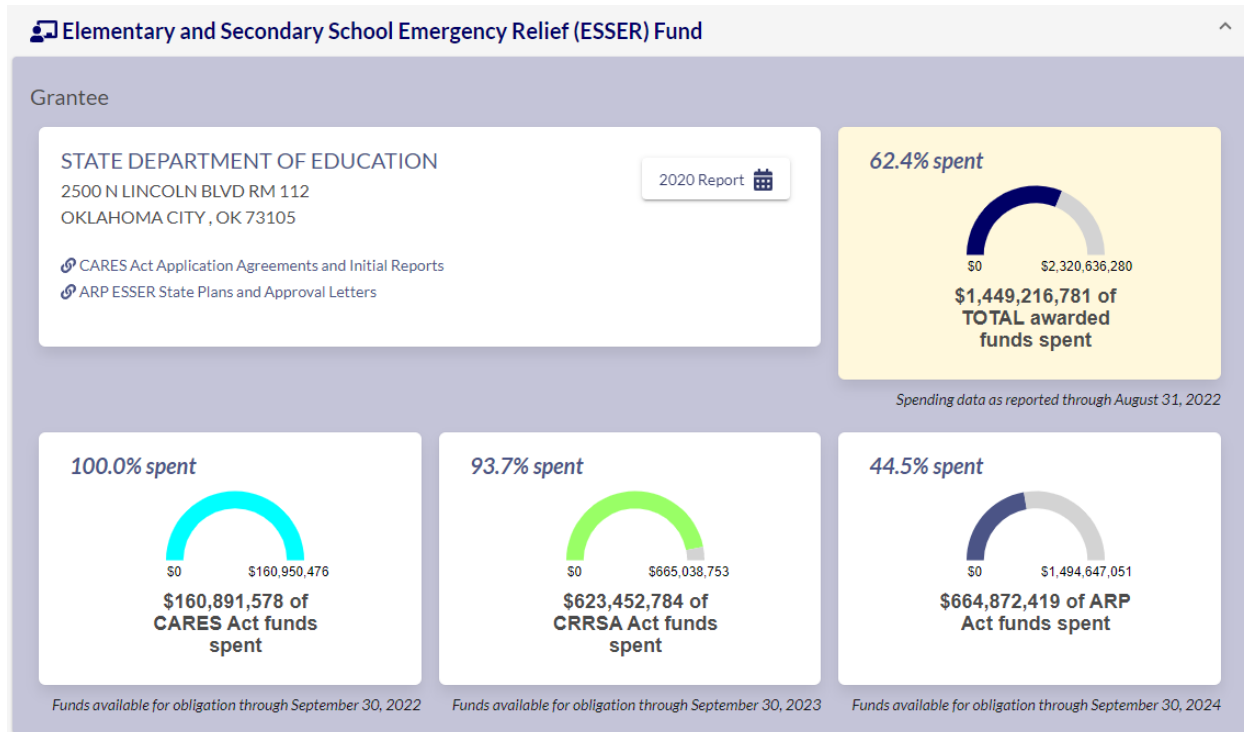
According to the United States Department of Education (USDE) Educational Stabilization Fund transparency portal,<sup>28</sup> of the \$2.3 billion the USDE has allocated to Oklahoma to support students in the wake of the pandemic, \$1.449 billion had been spent by August 31, 2022.

<sup>28</sup> <https://covid-relief-data.ed.gov>

- **ESSER I:** Under the Coronavirus Aid, Relief and Economic Security Act (CARES), passed March 2020, \$160,950,476 was allocated to Oklahoma in May 2020. Oklahoma has spent 100% of ESSER I funds. This included a set-aside amount of \$15,290,296 for “emergency needs” to address issues related to coronavirus. Of those, \$8,000,000 were distributed to districts through competitive Incentive Grants.
- **ESSER II:** Under Coronavirus Response and Relief Supplemental Appropriations (CRRSA), Oklahoma was allocated \$665 million in January 2021. The state had spent 93.7% of ESSER II funds as of August 31, 2022 (deadline September 2023).
- **ESSER III:** Under the American Rescue Plan (ARP), Oklahoma was allocated nearly \$1.5 billion in March 2021. The state has spent 44.5% of these funds as of August 31, 2022 (deadline September 2024). The state can use up to 0.5% of allocation for admin costs and emergency needs related to COVID-19.
- **GEER:** Under ESSER I and II, \$39,920,664 was awarded in education relief funds for governors to provide subgrants to districts “most significantly impacted by coronavirus.” The Governor allocated \$8 million to the Incentive Grant mentioned under ESSER I, bringing the total to \$16,000,000 sent to SDE.
- **IDEA:** Under the American Rescue Plan (ARP), Oklahoma was allocated \$6.5 million to address challenges in ensuring services for children with disabilities, including supporting early intervention and special education services for infants, toddlers, children, and youth with disabilities and their families.



# Oklahoma Department of Education Special Audit



All COVID funds were subject to audit in the Single Audit. During the course of the FY 21 Single Audit, one finding related to the Governors Emergency Education Relief (GEER) grant was noted with questioned costs totaling \$8,404,700. Although the

grant was related to Education, funds were handled and controlled by the Governor's Office and not SDE. The findings are noted in the FY 21 Single Audit.<sup>29</sup>

It should also be noted that this is one-time funding and any programs funded or established using these funds will have to be supplemented with other funding in the future or cease operating.

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<sup>29</sup> 2021 State of Oklahoma Single Audit Report ([www.sai.ok.gov](http://www.sai.ok.gov))



## Chapter 3: OCAS

- Oklahoma Cost Accounting System
- Responsibility
- Training, Requirements, and Accountability
- Risk Assessment and Accountability
- Other Oversight Entities

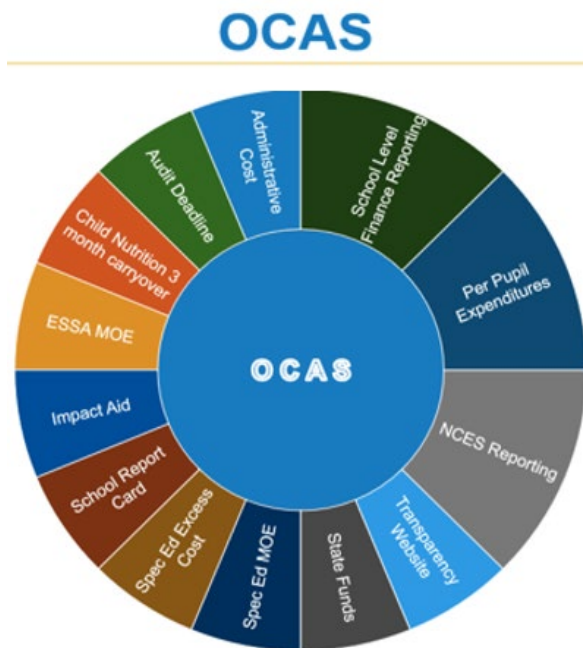
## Oklahoma Cost Accounting System

The **Oklahoma Cost Accounting System (OCAS)** began in 1988 with 11 test schools and by May 1991, was codified in statute.<sup>30</sup> OCAS was fully implemented for revenue and expenditure reporting effective July 1, 1992. The objective of OCAS is to obtain consistency in financial coding and support schools in accurately implementing laws and regulations concerning school finance. It also helps facilitate compliance and transparency in federal and state reporting.

All Oklahoma public schools are required to use OCAS in the process of reporting to SDE their annual expenditure and revenue data. The *OCAS Manual*<sup>31</sup> is prepared and updated annually to assist schools in utilizing the complex coding structure of the OCAS system. By using the manual, schools can better understand and utilize the OCAS system effectively and efficiently.

SDE also uses the OCAS data received from each district for compliance with the *School District Transparency Act*,<sup>32</sup> the *Student Data Accessibility, Transparency and Accountability Act*,<sup>33</sup> and to meet the requirements of annual federal program reporting.<sup>34</sup>

The *School District Transparency Act* requires SDE to make financial related information available on its website at [www.sde.ok.gov](http://www.sde.ok.gov). SDE's website provides public access to inclusive OCAS data for all 546 school districts spanning a 14-year period. More than 20 detailed expenditure and revenue reports are available for public viewing or download, including a comprehensive accounting of school administrative costs. The *Student Data Accessibility, Transparency and Accountability Act* speaks to student data. Both OCAS financial data and student data is used in at least 13 different areas of SDE's required compliance reporting.



<sup>30</sup> 70 O.S. § 5-135.2

<sup>31</sup> The *State Board of Education Policies and Procedures for Implementation of OCAS*.

<sup>32</sup> 70 O.S. § 5-135.4

<sup>33</sup> 70 O.S. § 3-168

<sup>34</sup> 20 U.S.C.A. § 9543(l)

## Responsibility

### Local Control

Although the State Board of Education and the State Department of Education define the procedures for implementation of OCAS and administer the laws pertaining to school finance, it is key to stop and recognize that OCAS reporting and compliance **is the responsibility of the local school board.**



Each school district has a governing board, a local board of education, which is elected or appointed to oversee local school operations. The local board of education should perform all functions necessary for the administration of a school district<sup>35</sup> and are mandated by statute<sup>36</sup> to use the OCAS system. The local board of education is also responsible for hiring the district's superintendent, who is the executive officer of the board and is responsible for certifying the accuracy of the OCAS data submitted to SDE.

The OCAS system, if used correctly, can be a reliable tool for accountability and transparency. However, if a local school district chooses to manipulate data or misclassify expenditures there is a significant risk the inaccuracies will go undiscovered.

**SDE is not responsible for the accuracy of the financial information reported through OCAS, that responsibility lies with the local districts.** Statutes are silent as to SDE's role in validating OCAS data reporting but indicates their primary role is providing oversight and public transparency of the reported information along with timely reporting of that information to the U.S. Department of Education.

### Independent Audits

Some responsibility for OCAS accountability falls with the independent auditor. Statute<sup>37</sup> requires each school district, through their board of education, to obtain an annual financial and compliance audit. The auditor is to examine documents, reports, systems of internal control, accounting and financial procedures, and other evidence to ascertain the school administration has properly complied with statutory requirements and SDE rules and regulations in conduct of its financial transactions. To ensure compliance with statutory requirements the audit should include an examination of revenue and expenditures to include a review of OCAS classification codes.

During fieldwork SA&I interviewed a sample of independent auditors who performed FY 21 financial audits of school districts.<sup>38</sup> The auditors all stated they perform a

<sup>35</sup> 70 O.S. § 5-117

<sup>36</sup> 70 O.S. § 5-135.2

<sup>37</sup> 70 O.S. § 22-101 – 22.113

<sup>38</sup> Districts included in Phase 2 risk assessment analysis discussed later in this report.

review of OCAS requirements for revenues and expenditures during their annual audits. The auditors reported that at least 70 percent or more of all revenues are confirmed with OCAS classification codes. Each auditor also tests a sample of expenditures for OCAS codes and requirements along with a review of federal program costs.

### **Legislative Oversight**

Legislators and legislation are also responsible for OCAS. Legislation defines administrative costs, limits, and penalties, and outlines requirements for actual revenue and expenditure reporting.

Since OCAS laws were implemented in 1992 supporting administrative rules have been updated 16 times to increase oversight. SDE in conjunction with the State Board of Education continue to modify these rules to strengthen reporting requirements, while governing statutes remain largely unchanged.

Legislators acted in the wake of the EPIC Charter School investigation to include educational management organizations in the calculation of administrative costs, but no additional legislation has been enacted to increase financial accountability or hold those responsible for not complying with the law.

## **Training, Requirements, and Accountability**

Oklahoma politics in recent years have focused on education. A large portion of this awareness came to the forefront after SA&I's audit report on EPIC Charter Schools was released in October 2020.<sup>39</sup> An important part of that report detailed significant issues with the administration and reporting of OCAS, the accountability for related administrative costs overages, and the management of these issues by SDE.

In 2016, SDE discovered questionable OCAS reporting by EPIC but failed to hold EPIC accountable or enforce required penalties. EPIC's lack of cooperation with SDE, facilitated by the school's educational management organization, resulted in a significant abuse of administrative costs limits.



The EPIC report not only demonstrated how OCAS data was manipulated to conceal administrative costs, but it also served as a catalyst for change. The State Board passed emergency administrative rules to address the issues and increase accountability. The report also initiated discussions between legislators and governing boards on oversight and financial accountability for all public schools.

Since the reporting of EPIC, increased training, oversight, and the utilization of new risk assessment procedures have been implemented at SDE to help detect problem

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<sup>39</sup> Epic Charter Schools Investigative Audit – Part One ([www.sai.ok.gov](http://www.sai.ok.gov))

areas and assist school districts with corrections to their OCAS data before submission.

### **Training**

SDE's first level of oversight is training. OCAS manuals are updated, published, and posted to the SDE website annually. SDE also provides a handbook of common coding errors and problem issues otherwise known as *Coded Obstacles School Districts Encounter Daily* (CODED). This handbook provides further instruction and assistance with OCAS coding requirements, providing specific coding examples and commonly used codes to help reduce coding errors. SDE, as a pass-through agency for funding and reporting, is the bridge between school districts and the federal government. SDE Financial Specialists support schools throughout the year bridging the gap between training and implementation of OCAS coding.

In addition to the OCAS and CODED manuals, SDE participated in 21 different training sessions during FY 21. The training was hosted at various locations across the state by the Oklahoma School Advisory Council, Oklahoma Association Serving Impacted Schools, and the Oklahoma Association of School Business Officials. Attendees are equipped with the necessary resources to avoid common mistakes and overcome the challenges of implementing OCAS effectively. Since FY 21, SDE has implemented additional training called *Engage*, a PowerPoint aimed at teaching the roles and responsibilities of treasurers and encumbrance clerks and providing OCAS updates.



The amount of training needed by school district personnel is subjective, but it appears that adequate resources are provided by SDE for districts to be sufficiently informed on the implementation, reporting, and management of OCAS transactions. Additionally, the SDE Director of Finance and the five<sup>40</sup> financial specialists responsible for the administration of OCAS are also available for questions and concerns of the local districts.

### **Requirements**

Three conditions are required for full compliance with OCAS reporting:

- 1) a district must operate pursuant to OCAS and report actual, properly coded revenues and expenditures,<sup>41</sup>
- 2) a district must submit OCAS data in a timely manner,<sup>42</sup> and
- 3) a district must keep their administrative costs below statutorily defined limits.<sup>43</sup>

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<sup>40</sup> During FY 21 five financial specialists manage OCAS administration for all 546 school districts.

<sup>41</sup> Oklahoma Administrative Code § 210:25-7-1

<sup>42</sup> Oklahoma Administrative Code § 210:25-5-4

<sup>43</sup> 70 O.S. § 18-124

### **Accountability**

If a school district does not operate pursuant to OCAS, SDE has the authority to penalize the district through a state aid payment reduction defined as a non-compliance penalty. Not operating pursuant to OCAS is defined as a district **not**:



- accurately recording and reporting revenue and expenditures by OCAS dimensions,
- submitting OCAS financial records on time and as required,
- ascertaining that current and accurate OCAS codes are being utilized,
- complying with regulations as outlined in Administrative Code,
- reconciling all recorded and reported revenue and expenditures with bank receipts and statements, purchase orders, warrant registers, investment ledgers, and all balance sheet accounts.

Timely submission of school district OCAS reports is crucial to allow SDE time to meet federal reporting deadlines.<sup>44</sup> Schools are required to submit OCAS data between July 1 and September 1 each year. Each school has between September 1 and September 30 to review the submission and finalize the data before the district's superintendent certifies it. After September 30 school districts may appeal to SDE and demonstrate "good cause" to make additional changes to the data. "Good cause" is defined as a miscalculation or showing that relevant data was omitted from the previously certified submission.<sup>45</sup>

### **OCAS Non-Compliance, Administrative Costs and Penalties**

Annually, SDE presents non-compliance and administrative costs penalties to the State Board for assessment.

#### **Non-Compliance Penalties**

Non-compliance penalties are assessed as a reduction in the monthly payment of a district's state aid equal to one percent (1%) for the first payment, two percent (2%) for the second payment, three percent (3%) for the third payment, four percent (4%) for the fourth payment, and five percent (5%) for each subsequent payment.

According to statute,<sup>46</sup> the reduction may be waived by the State Board if the district can demonstrate that failure to operate pursuant to such system was due to circumstances beyond the control of the district and that every effort is being made to operate pursuant to OCAS. SDE notifies each school District via certified mail when

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<sup>44</sup> SDE met their filing deadlines for FY 21.

<sup>45</sup> Oklahoma Administrative Code § 210:25-5-4

<sup>46</sup> 70 O.S. § 5-135.2



they are non-compliant. They are provided with an opportunity to address the deficiency before the State Board of Education.

Between 2012 and 2019 the total non-compliance penalty presented to the State Board was \$333,541; the Board waived all but \$16,075.

In 2020<sup>47</sup> the Board was presented with 11 districts that failed to meet the September 1, 2020, reporting deadline, 45 districts that did not meet the September 30, 2020, deadline and three that failed to meet both deadlines. The Board denied all but one waiver of these penalties, assessing a total of \$2,207,014 in non-compliance penalties, \$2,065,652 of this penalty was EPIC Charter Schools, resulting in all other districts combined being penalized \$141,362.

Non-Compliance Penalties	
Year	Amount
2011	\$4,321
2012	\$-
2013	\$-
2014	\$-
2015	\$3,303
2016	\$4,433
2017	\$-
2018	\$-
2019	\$4,018
2020	\$2,207,014
2021	\$2,332
<b>Total</b>	<b>\$2,225,422</b>

For 2021, only two districts failed to meet the reporting deadlines resulting in only \$2,333 in assessed non-compliance penalties.

#### Administrative Costs Penalties

Administrative costs are defined in statute<sup>48</sup> and limited to five, seven, or eight percent<sup>49</sup> of a school district's total expenditures. The amount which exceeds the designated percentage is to be withheld the following year from a district's state aid. Per statute, "each school site within a school district shall take steps to ensure that the administrative costs for the school comply with the expenditure limits." OCAS



rules also place the responsibility for accurately reporting administrative costs on superintendents and the districts. **The statutes do not direct SDE to audit or validate the information.**

For the 11-year period between 2011 and 2021, administrative costs assessed penalties withheld from state aid totaled \$12,122,403. When assessed penalties are withheld from the offending school district the funds are then available for all other districts. It is noteworthy that \$10,755,574 of the assessed penalties were attributable to EPIC Charter Schools' improper expenditure reporting in 2019 and 2020.

***A total of \$1,098,957 of the administrative cost penalties were waived by the State Board between 2011 and 2014 without the statutory authority to do so.***<sup>50</sup>

<sup>47</sup> For FY 2020 reporting.

<sup>48</sup> 70 O.S. § 18-124(D)

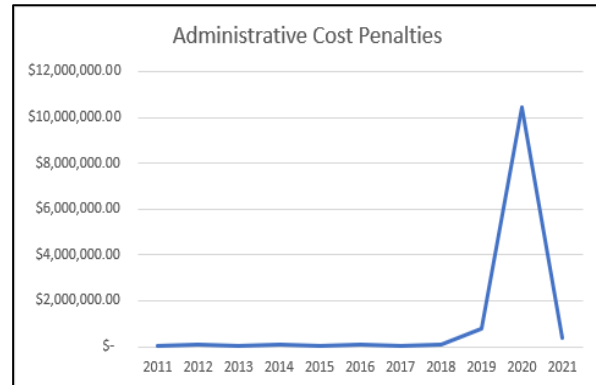
<sup>49</sup> Five percent is the limit for districts exceeding 1,500 students, seven percent for districts between 500 and 1,500 students, and eight percent for districts with 500 or fewer students.

<sup>50</sup> 70 O.S. § 18-124

Unlike the non-compliance penalty statute that gives express authority for waivers, statute does not allow for waivers of administrative cost penalties. When State Superintendent Joy Hofmeister took office in 2014, the waiving of administrative cost penalties was stopped.

**Total OCAS Non-Compliance and Administrative Cost Penalties**

Of the \$14,347,825 in total OCAS non-compliance and administrative cost penalties assessed between 2011 and 2021, \$12,821,226 was attributable to EPIC Charter Schools. The abuse by EPIC brought to the forefront OCAS reporting and related accountability. With only \$1,526,599 in total non-



compliance and administrative costs penalties assessed for all other 545 school districts during an 11-year period, the occurrences of districts not operating pursuant to OCAS or districts exceeding allowed administrative costs were minimal.

SDE should continue to work with legislators evaluating whether administrative costs limits are necessary, set at appropriate levels, and are accomplishing the task intended.

## Risk Assessment and Accountability

In December 2020, SDE implemented a Risk Assessment process to help detect problem areas in OCAS reporting and to assist school districts with corrections before submitting their final FY 21 data. Because SDE is a pass-through agency responsible for reporting revenue and expenditures to the federal government, the tool was focused on compliance-based issues for reporting compliance.

Phase I of the Risk Assessment focused on evaluating 16 areas of concentration for all school districts and assigning a point value based on compliance. The results from Phase I resulted in 108 school districts being selected for review in Phase 2.

The 108 school districts were asked to upload their data to reflect no entry errors and provide additional supporting documentation including, at a minimum, encumbrance registers, board agendas, and expenditure reports.

**Results of Risk Assessment**

The risk assessment matrix placed considerable weight on deadlines. Districts were penalized if they requested data be reopened after the September 1 deadline, they

were also scored on the percentage of change in the beginning and ending fund balances, if their annual audits were not submitted or if audits included findings, comments, or recommendations related to fraud or the mismanagement of funds.

After the financial specialists scored the districts, the top scoring districts were identified as “high risk,” the higher the score the greater the risk.

Because the districts were split by county before scoring took place, there were districts with higher scores and greater risk that were not selected for review in Phase II. This reduced SDE’s ability to address districts with the greatest need for intervention or training. For example, two districts were both selected for Phase II review with a score of 54 points. There were four other districts with the same score that were not selected and 58 districts with a greater risk score that were not selected.

**SA&I recommends SDE modify the sample selection process to select districts with the greatest risk regardless of the county they are located in.**

Participating school districts provided mixed feedback regarding the risk assessment process. Half of the districts reported it was helpful or that it assisted them in correcting or identifying issues. The remaining respondents did not think it was an effective oversight tool.

The Risk Assessment process is not designed to audit OCAS coding accuracy or to locate fraud or the misappropriation of funds by school districts. The tool is compliance based to assist SDE in achieving their reporting responsibilities. It was concluded that the risk assessment procedure aided SDE in facilitating corrective measures with OCAS compliance.

## Other Oversight Entities

The responsibility for oversight and review of various financial aspects of school districts, including a focus on administrative costs issues, is shared with other agencies and positions outside of SDE. Although these entities are not involved in the day-to-day administration and review of OCAS data, they have been tasked with evaluating areas related to administrative costs in our local school districts.

### **Office of Educational Quality and Accountability**

The Office of Educational Quality and Accountability (OEQA) has been tasked to conduct performance reviews to determine the effectiveness and efficiency of the budget and operations of school districts that have “**administrative service costs** which are above the expenditure limits established for school districts...or have total

expenditures in excess of the district's adopted budget.”<sup>51</sup> There are also other criteria established for which schools are to be selected for a performance review.

In 2021 OEQA conducted school performance reviews on two of the 546 Oklahoma school districts, neither of these schools exceeded their administrative cost limits.

*Members of OEQA as of December 31, 2021*

**Commission for Educational Quality and Accountability Members**

Mr. Ryan Walters, Chair/Secretary of Education  
Dr. Joanna Lein, Teacher Education Program Representative  
Ms. Katherine Nations, Parent of Public School Student  
Mr. Kenneth Parker, Business Representative  
Vacant, K-6 Teacher  
Mr. Dalton Savage, 7 – 12 Teacher  
Mr. John Daniel, School Administrator

**Secretary of Education**

The Secretary of Education (Secretary) is a cabinet member serving at the pleasure of the Governor.<sup>52</sup> The duties of the Secretary include overseeing OEQA and analyzing “the revenues for all systems of education and the expenditure of common education revenue, **giving close attention to expenditures for administrative expenses** related to common schools.”<sup>53</sup> Statute also requires a report of these matters whenever appropriate and indicates any recommendations regarding funding for education or statutory changes be made to the Speaker of the House of Representatives, the President Pro Tempore of the Senate and the Governor.

**School Finance Review Commission**

Approved by the Governor in 2017, House Bill 1578 established the School Finance Review Commission (Commission). The Commission is to share in school oversight responsibility and is to be provided with staff and administrative support by the OEQA Commission. All meetings of the Commission should be held in compliance with the Oklahoma Open Meeting Act, which means they should be documented and minutes properly maintained.

According to statute,<sup>54</sup> the School Finance Review Commission **shall** conduct a review of all matters related to school finance, including but not limited to teacher compensation, benefits, and **administration costs**. The Commission is mandated to provide a report of its findings to the Governor, the President Pro Tempore of the Senate, and the Speaker of the House of Representatives no later than December

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<sup>51</sup> 70 O.S. § 3-118.1

<sup>52</sup> The Secretary of Education during FY 21 was Ryan Walters.

<sup>53</sup> All duties of the Secretary are defined in 70 O.S. § 3-118.

<sup>54</sup> 70 O.S. § 3-117.3

31, 2023, and every four years thereafter. Commission members were to be appointed before March 1, 2021.

An email<sup>55</sup> dated October 25, 2022, notified the Governor's office and then Secretary of Education Ryan Walters that the Commission was no longer active, and it was believed the Commission completed its mission under former Executive Director Daniel Craig. However, no minutes of Commission meetings could be located, and SA&I was informed the Commission had not met since May 2021. There was also no evidence provided that the Commission reviewed any school finance items or produced a report addressing administration costs as required by law.

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<sup>55</sup> From then OEQA Interim Executive Director Renee Launey-Rodolf.

## APPENDIX A – FY 21 State Appropriations by Fund

Fund	Fund Name	Appropriation Bill	FY 21 Approps.	Purpose
100	Constitutional Reserve Fund (Rainy Day Fund)	SB 1921 (2020)	\$ 243,668,709	Financial support of public schools
105	GR - Appropriations	SB 1922 (2020), Sec. 9 HB 4153 (2020), Sec. 1.2	33,000,000	Purchase of textbooks and instructional materials
191		SB 1922 (2020), Sec. 1 HB 4153 (2020), Sec. 1.2	953,338,319	Financial support of public schools
191			34,000,000	Teacher's retirement credit
191			10,000,000	Alternative and high challenge education
191			1,000,000	Advanced placement incentives
191			11,000,000	Reading sufficiency act
191			125,000	Teacher and leader effectiveness
191			4,205,685	Required assessments
191			2,000,000	Teach for America
191			300,000	Great Expectations
191			100,000	Street School
191			38,000	Ag in the Classroom
191			1,000,000	Imagine Math
191			14,400,341	Early intervention (transfer to Fund 250)
191			3,500,000	School lunch matching
191			2,350,000	Secure schools program
191			12,000,000	Early childhood initiative
191		SB 1922 (2020), Sec. 10 HB 4153 (2020), Sec. 1.2	347,081,644	Certified employee health benefit allowance
191		SB 1922 (2020), Sec. 11 HB 4153 (2020), Sec. 1.2	188,455,377	Support personnel health benefit allowance
191		SB 1922 (2020), Sec. 12 HB 4153 (2020), Sec. 1.3	15,027,640	Administrative and support functions of OSDE
210	Ok Natl Bd Cert Revolving Fund	HB 4153 (2020), Sec. 7.1 HB 2765 (2019), Sec. 8 SB 1048 (2019), Sec. 2.2	2,000,000	May be budgeted and expended by the State Board of Education to provide an annual bonus for those teachers possessing National Board certification.
260	School Consolidation Assist Fund	SB 1922 (2020), Sec. 13 and 14 HB 4153 (2020), Sec. 3 HB 2765 (2019), Sec. 14 HB 1020 (2018), Sec. 9 and 14 HB 3705 (2018), Sec. 13 SB 1600 (2018), Sec. 14	3,637,714	From the Education Lottery Trust Fund as may be necessary for transfer to the School Consolidation Assistance Fund

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Fund	Fund Name	Appropriation Bill	FY 21 Approps.	Purpose
270	Education Reform Revolving Fund	HB 2743(2020), Sec. 3.B(1) SB 1922 (2020), Sec. 2, Sec. 145 HB 2765 (2019), Sec. 2 HB 1019 (2018), Sec. 6.B.	<b>1,015,074,419</b>	May be budgeted and expended beginning with the fiscal year ending June 30, 1993, by the State Board of Education for the purposes of implementing reforms contained in Enrolled House Bill No. 1017
271	Common Educ Tech Rev Fund	SB 1922 (2020), Sec. 3 HB 2765 (2019), Sec. 3 HB 1020 (2018), Sec. 4 HB 3705 (2018), Sec. 3 SB 1600 (2018), Sec. 3	<b>46,938,566</b>	May be budgeted and expended by the State Department of Education as authorized by the Oklahoma Legislature.
290	OK Sch Psy, SLP & ANC Revolving	HB 4153 (2020), Sec. 7.2 HB 2765 (2019), Sec. 8 SB 1048 (2019), Sec. 2.2	<b>2,900,000</b>	May be budgeted and expended by the State Board of Education to provide an annual bonus for individuals meeting the requirements of Section 6-206 of this title.
295	TRS Dedicated Rev Revolve Fund	SB 1922 (2020), Sec. 15 & 16 HB 4153 (2020), Sec. 4 HB 2765 (2019), Sec. 15 & 16 HB 1020 (2018), Sec. 16 HB 3705 (2018), Sec. 15	<b>3,637,714</b>	Teacher Retirement System
380	Education Lottery Rev Fund	SB 1922 (2020), Sec. 6 & 7 HB 2765 (2019), Sec. 6 & 7 HB 1020 (2018), Sec. 7 HB 3705 (2018), Sec. 6 SB 1600 (2018), Sec. 7	<b>32,739,428</b>	Financial support of public schools
551/ 559	Mineral Leasing Fund/Fin Support of Public Schools	SB 1922 (2020), Sec. 4&5 HB 2765 (2019), Sec 4&5 HB 1020 (2018), Sec. 5 HB 3705 (2018), Sec. 4 SB 1600 (2018), Sec. 4	<b>9,211,258</b>	Financial support of public schools
<b>Total Appropriations \$</b>			<b>2,992,729,814</b>	

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**APPENDIX B – Federal Grant Funding by Grant Type**

Federal Grantor	CFDA #	Program Title	Federal Revenue
U.S. Dept. of Agriculture	10.553	School Breakfast Program	\$ 32,788,680
	10.553	COVID-19 School Breakfast Program	1,633,369
	10.555	National School Lunch Program	79,143,325
	10.555	COVID-19 National School Lunch Program	2,701,524
	10.556	Special Milk Program for Children	3,263
	10.558	Child Care Audit	233,632
	10.558	Child and Adult Care Food Program	62,275,326
	10.558	COVID-19 Child and Adult Care Food Program	4,250,006
	10.559	Summer Food Service	107,186
	10.559	Summer Food Service Program for Children	149,286,658
	10.559	COVID-19 Summer Food Service Program for Children	5,341,667
	10.560	State Administrative Expenses for Child Nutrition	3,510,427
	10.579	Farm Bill Equipment	368,077
	10.582	Fresh Fruit and Vegetable Program	2,338,018
U.S. Dept. of Defense	12.620	Troops to Teachers Grant Program	418,218
U.S. Dept. of Justice	16.839	STOP School Violence	55,294
	16.839	DOJ Threat Assessment	138,838
	16.839	DOJ CAT 7 Grant Bullying Prevention	189,080
	16.839	DOJ CAT 8 School Safety and Security	413,305
	16.839	DOJ CAT 7 Fusion Center	90,000
U.S. Dept. of Treasury	16.839	DOJ CAT 2 Ready 4 Life	63,845
	21.019	COVID-19 Coronavirus Relief Fund	227,359
U.S. Dept. of Education	84.010	Title I Grants to Local Education Agencies	218,682,246
	84.011	Migrant Education State Grant Program	626,976
	84.013	Title I State Agency Program for Neglected and Delinquent Children and Youth	218,711
	84.027	Special Education Grants to States	153,205,756
	84.027	IDEA PART B- COVID ASSISTANCE	5,282,267
	84.173	Special Education Preschool Grants	3,235,450
	84.181	Special Education - Grants for Infants and Families	4,765,788
	84.184	OK Cares	722,553
	84.184	OK School Climate Transformation Project	710,025
	84.196	Education for Homeless Children and Youth	913,461
	84.206	Javits Gifted and Talented Students Education	413,002
	84.287	Twenty-First Century Community Learning Centers	11,342,822
	84.299	OK Future Native Leaders Project	637,301
	84.323	IDEA State Program Improvement Act	1,029,988
	84.358	Title VI Part BI (REAP)	5,352,107
	84.365	English Language Acquisition State Grants	5,538,405
	84.367	Title IIA Supporting Effective Instructions State Grants	19,055,967
	84.369	Grants for State Assessments and Related Activities	5,806,735
	84.371	Striving Readers (2018) (Comprehensive Literacy Development)	6,790,648
	84.424	Title IV Student Support and Academic Enrichment Program	6,238,938
	84.424	ARTech	171,286
	84.425D	COVID-19 Education Stabilization Fund (ESSER I)	123,133,419
	84.425D	COVID-19 Education Stabilization Fund (ESSER II)	164,185,969
	84.425U	ARP ESSER (COVID 19)	1,671,195
	84.425R	ESSER II EANS	1,151,020
	84.425C	Governor's Education Emergency Relief (Incentive)	8,000,000
U.S. Dept. of Health and Human Services	93.243	Substance Abuse/Mental Health Services Project of Regional & Nat'l Significance	358,964
	93.243	Project Aware East	1,352,895
	93.981	Project Get Fit	249,493
Total Federal Grants			\$ 1,098,548,248



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**APPENDIX C – Funds Restricted by Statute**

Fund #	Fund Name	Statutory Reference	Purpose
200	Transportation Revolving Fund	TITLE 70, SEC. 9-110 & 111	For the purchase of pupil-transportation equipment suitable for the transportation of children to and from the common schools and to make one or more units of such pupil-transportation equipment available for use by any school district in the State of Oklahoma.
210	Ok Natl Bd Cert Revolving Fund	TITLE 70, SEC. 6-204.4	To provide an annual bonus for those teachers possessing National Board certification.
225	Grants And Donations Fund	TITLE 70, SEC. 3-104 PARAGRAPH 12	Administration of any land, money, buildings, gifts, donation or other things of value which may be offered or bequeathed to the schools under the supervision or control of said Board.
230	School Investigative Audit Rev Fund	TITLE 70, SEC. 18.C	The performance of special audits conducted pursuant to the provisions of Section 213 of Title 74 of the Oklahoma Statutes
235	Drug Abuse Ed Rev Fund	TITLE 63, SEC. 2-417	For drug abuse education programs.
240	Teacher Certification Fund	TITLE 70, SEC. 3-104 PARAPGRAPH 6B	For consultative services, publication costs, actual and necessary travel expenses as provided in the State Travel Reimbursement Act incurred by persons performing research work, and other expenses found necessary by the State Board of Education for the improvement of the preparation and certification of teachers in Oklahoma.
241	Ok Teacher Recuritment Rev Fund	TITLE 70, SECTION 6-132	For the purpose of operating teacher recruitment programs.
250	Ok Early Intervention Rev Fund	TITLE 70, SECTION 13-124.1	For the purpose of providing early intervention services to children with disabilities in accordance with Part C of the Individuals with Disabilities Education Act (IDEA) and the Oklahoma Early Intervention Act.
251	Personal Fin Lit Ed Rev Fund	TITLE 70, SECTION 11-103.6h-1	For the purposes set forth in Section 11-103.6h of Title 70.
255	Motor Vehicle Driver Education	TITLE 47, SECTION 1132.2	To assist in defraying the cost of motor vehicle driver education.
260	School Consolidation Assist Fu	TITLE 70, SECTION 7-203	For the purposes established by this section, the Legislature and in accordance with rules promulgated by the State Board of Education.
270	Education Reform Revol. Fund	TITLE 70, SEC. 18-400	For the purposes of implementing reforms contained in Enrolled House Bill No. 1017
271	Common Educ Tech Rev Fund	TITLE 62, SEC. 34.90	May be budgeted and expended by the State Department of Education as authorized by the Oklahoma Legislature.
277	SBE Charter School	TITLE 70, SECTION 3-132; TITLE 70, Section 3-142.A	Admin fee retained by State Board of Education for charter schpols sponsored by the Board.
278	Charter School Closure Reimb	TITLE 70, SECTION 3-142.G	For the purpose of reimbursing charter school sponsors for costs incurred due to the closure of a charter school.
280	Publ School Classroom Sup Revl	TITLE 70, SEC 1-123	For the purposes of providing grants to public school classroom teachers as provided for in subsection B of this section. The grants shall be used by the classroom teacher for supplies, materials, or equipment for the class or classes taught by the teacher.
285	Income Tax Checkoff Revolv Fnd	TITLE 68, SEC. 2368.5C	For the purpose of funding common education in this state. Such monies shall be apportioned as and in the manner that state aid is provided to the common schools of this state.

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Fund #	Fund Name	Statutory Reference	Purpose
286	Ok Youth and Govt Revolving Fd	TITLE 68, SEC. 2368.17C	For the purpose of providing grants to the Oklahoma chapter of the Y.M.C.A. Youth and Government program for purposes of educating young people regarding government and the legislative process.
287	DeerCreek Foundation Lic Plate	TITLE 47, SEC. 1104.23	For the purpose of providing grants to the Deer Creek Schools Foundation for purposes of promoting and funding the academic and artistic achievement of all students and teachers of Deer Creek Public Schools.
290	OK Sch Psy, SLP & ANC Revolvin	TITLE 70 SECTION 6-206.1	To provide an annual bonus for individuals meeting the requirements of Section 6-206 of this title.
296	Camera School Bus Stops Rev Fund	TITLE 70 Section 9-119	For the purposes of providing grants to public school districts as provided for in subsection B of this section. The grants shall be used by the districts for installation of camera equipment on buses to aid in identifying drivers violating the provisions of Section 11-705 of Title 47 of the Oklahoma Statutes.
340	CMA Programs Disbursing Fund	TITLE 62, SEC 34.48,34.9	Subject to specific requirements of various federal programs.
380	Education Lottery Rev Fund	ARTICLE X, SEC. 41 (Trust Fund) TITLE 3, SEC. 713.1 (Rev. Fund)	See further discussion in body of report
400	Common Sch Bldg Equal. Fund	ARTICLE X, SEC. 32	Such Fund shall be used to aid school districts in acquiring buildings, under such regulations as may be prescribed by the administering agency, unless otherwise provided by law, and the amount paid therefrom to or for any school district shall be determined by a formula established by the Legislature.
430	Agency Relationship Fund	TITLE 62, SEC. 34.48,34.9	Subject to specific requirements of various federal programs.
435	School Lunch Div Fed Adm Fund	TITLE 70, SECTION 3-104 PARA. 10 & 11	Authority to secure and administer the benefits of the National School Lunch Act, Public Law 396 of the 79th Congress of the United States, in the State of Oklahoma and to employ or appoint and fix the compensation of such additional officers or employees and to incur such expenses as may be necessary for the accomplishment of the above purpose, administer the distribution of any state funds appropriated by the Legislature required as federal matching to reimburse on children's meals.
443	Interagency Reimbursement Fund	TITLE 74, SEC. 581	Costs related to contracts with other agencies.
450	Federal Educational Programs	TITLE 62, SEC. 34.48, 34.9 AND TITLE 70, SEC. 18-104	Subject to specific requirements of various federal programs.
490	CARES Act 2020	TITLE 62, § 34.9	Subject to specific requirements of the CARES Act 2020

Funds with no activity not included.

## APPENDIX D – School District Revenue by Source

<b>District Sources of Revenue</b>	
1100 Taxes Levied/Assessed	2,467,757,189.42
1200 Tuition and Fees	17,509,015.25
1300 Earnings-Investments & Bond Sales	16,964,983.22
1400 Rental Disposals & Commissions	12,763,599.11
1500 Reimbursements	197,847,020.38
1600 Other Local Sources	126,584,512.55
1700 Child Nutrition Programs	12,688,769.58
1800 Athletics	36,725,468.88
1900 School Activities	93,182,739.43
	<b>2,982,023,297.82</b>
<b>Intermediate Sources of Revenue</b>	
2100 County 4 Mill Ad Valorem Tax	160,104,743.41
2200 County Apportionment	37,470,271.29
2300 Resale of Property Fund Distribution	3,909,027.28
2400 County Sales Tax	1,414,528.54
2900 Other Intermediate Sources	425,571.33
	<b>203,324,141.85</b>
<b>State Sources of Revenue</b>	
3110 Gross Production Tax	57,603,654.54
3111 BIA Tax	82,943.02
3120 Motor Vehicle Collections	259,875,375.85
3130 Rural Electric Cooperative Tax	44,026,433.06
3140 State School Land Earnings	93,515,273.51
3150 Vehicle Tax Stamp	1,424,427.95
3160 Farm Implement Tax Stamp	285,054.41
3190 Other Dedicated Revenue	999,636.76
	<b>457,812,799.10</b>
3210 Foundation & Salary Incentive Aid	2,283,979,928.05
3230 Mentor Teacher Stipend	0
3250 Education Flexible Benefit Allowance	519,382,938.77
	<b>2,803,362,866.82</b>
3310 Alternative & At-Risk Education	9,997,234.91
3330 Community Education	0
3360 I.C.T.E.	0
3380 Psychometric Services	0
3390 Arts In Education	0
	<b>9,997,234.91</b>
3400 State-Categorical	50,957,196.90
3500 Special Programs	0
3600 Other State Sources	5,982,750.38
3700 Child Nutrition Programs	3,128,463.00
3800 State-Vocational Programs	20,602,345.45
	<b>80,670,755.73</b>
	<b>3,351,843,656.56</b>
<b>Federal Sources of Revenue</b>	
4100 Federal Direct	74,715,081.50
4200 Disadvantaged Students	240,685,421.77
4300 Individuals with Disabilities	148,933,590.66
4400 Title IV, V, VI and X	29,222,255.09
4500 Other Intermediate Sources	10,465,042.84
4600 Adult and Comm. Education	323,508,820.11
4700 Child Nutrition Programs	289,061,026.31
4800 Federal Vocational Education	8,054,581.63
	<b>1,124,645,819.91</b>
<b>FY 21 Total Revenue to School Districts</b>	<b>7,661,836,916.14</b>

## APPENDIX E– DETAIL OF COVID RELIEF FUNDS

- The **Coronavirus Aid, Relief and Economic Security (CARES) Act** was signed into law in March 2020 and included **ESSER I**, which allowed the use of funds related to preventing, preparing for, and responding to COVID-19, as described above.
  - Oklahoma received \$160,950,476 through ESSER I in May 2020. In order to receive funds, the district superintendent or Federal programs officer had to complete an application, providing required information and assurances. Applications were reviewed at multiple levels until they reached final approval status.
    - Within that funding, \$15,290,296 (or 10% minus 0.5% for administration) was set aside for emergency needs to address issues related to coronavirus.  
**CARES Incentive Grants:** Of those emergency needs set-aside funds, SDE planned to allocate \$8,000,000 to districts through a competitive Incentive Grant. Using GEER funds described later, the governor contributed another \$8,000,000 to this program, bringing the total available to \$16,000,000. Funds received under the Incentive Grant program could not be used for personnel costs, including salaries, benefits and/or stipends. Districts had to commit to spend at least 30% of ESSER funds on specific projects (such as expanding connectivity, purchasing a management system to support distance learning, and providing mental health supports for students experiencing trauma related to COVID-19) to be eligible to apply for incentive grants. Grant applications were split into five tiers based on October 2019 enrollment data and ranked by two reviewers using an established rubric. Awards ranged from up to \$50,000 for up to 500 students to up to \$500,000 for 7,500+ students.
    - **CARES Hotspot Grant:** Also using the set-aside funds for emergency needs, SDE spent \$3,000,000 to purchase 50,000 Verizon Ellipsis Jetpack 900L hotspot wireless devices for schools to help with remote learning. These were awarded to districts through a competitive grant and intended to provide connectivity to students who did not have an internet connection at home to access online learning content for distance learning. In addition, SDE intended for the hotspots to serve low-income students to help bridge the digital divide. Districts receiving the award were required to pay for the monthly service plan for each awarded device for a minimum of six months beginning when the devices are received by the district. Hot spot usage was also subject to other requirements, including timely deployment of devices to eligible students, following specific protocols after the six-month initial period was over, and not providing the devices to teachers or staff.
  - SDE was permitted to set aside one half of one percent of ESSER I funds for administrative costs. Admin state set-asides for ESSER I totaled \$804,752.38.
- The **Coronavirus Response and Relief Supplemental Appropriations (CRRSA)** was signed into law in December 2020 and included **ESSER II**, which again allowed the use of funds related to preventing, preparing for, and responding to COVID-19.
  - \$665,038,753 was allocated to Oklahoma in January 2021. In order to apply to receive funds, the district superintendent or Federal programs officer was required to

already have an approved CARES Act application. They then had to agree to the assurances in the ESSER II application, which was approved by the Office of Federal Programs.

- SDE was again permitted to set aside \$63,178,682 for emergency needs and a maximum of \$3,325,194 for administration; for FY 21 only \$41,289.96 was expended on administration.
- Under GEER II, the CRRSA also included the separately funded Emergency Assistance for Non-Public Schools (EANS) program, which is discussed later.
- **The American Rescue Plan (ARP)** was signed into law in March 2021 and included **ESSER III** (or ARP ESSER), which was intended to assist school districts in safely reopening schools and keeping them open for in-person instruction while addressing disruptions to teaching and learning resulting from the pandemic, and again allowed the use of funds for preventing, preparing for, and responding to COVID-19.
  - \$1,494,647,051 was allocated to Oklahoma for ESSER III in March 2021. Only \$1,671,195.48 was expended during FY 21. As with ESSER I, applications were required and reviewed at multiple levels until they reached final approval status.
  - Of the total amount received from ARP ESSER, districts were required to reserve at least 20 percent of funds to address learning loss through the implementation of evidence-based interventions and ensure that those interventions responded to students' social, emotional, and academic needs, and addressed the disproportionate impact of COVID-19 on underrepresented student subgroups.
  - Districts receiving ARP ESSER funds were also required to make a plan available online for the safe return to in-person instruction and continuity of services. They also required districts to engage in meaningful consultation with a wide range of stakeholders in determining their plan with opportunity for public comment.
  - States were again permitted to set aside one half of one percent of funds for administrative costs.
- **Governor's Emergency Education Relief (GEER)**
  - **GEER I:** Under the CARES Act, Governors received funds to support educational entities impacted by coronavirus. Governor Stitt passed through \$8,000,000 of GEER I funds to SDE, which was distributed to schools through competitive grants. In order for a district to receive a grant from these funds, SDE determined the LEAs "most significantly impacted by coronavirus" by requiring districts to describe how they were most significantly impacted in academics, health and mental health, and economic and social factors. Districts were then evaluated using a rubric.
  - **GEER II:** Established under the CRRSA Act, GEER II had the same general purpose as GEER I. However, within GEER II was established the separate **Emergency Assistance for Non-Public Schools (EANS)** program. EANS provided governors with a reservation of funds to provide services or assistance to eligible nonpublic schools to address the impact that COVID-19 has had on non-public school students and teachers in the State. While governors applied for these funds, as State education agency SDE automatically became administrator of the funds. A total of 56 non-public schools applied for the EANS program and allocation calculations were employed to ensure that, in accordance with program rules, schools that enroll low-income students and those most impacted by COVID-19 were prioritized. Final

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allocations were approved by the State Superintendent, after which the schools had to complete formal applications, which underwent multiple reviews until they reached final approval status within the Office of Federal Programs. \$1,151,020.11 were expended under this program during FY 21, with an additional \$3,678,557 in accounts payable reported at the end of that fiscal year.

The following table illustrates the COVID grant totals and remaining balances as of June 30, 2022, per SDE Finance.

	ESSER I	ESSER II	ESSER III
<b>Total Received</b>	<b>\$ 160,950,476</b>	<b>\$ 665,038,753</b>	<b>\$1,494,647,051</b>
90% to LEAs	144,855,428	598,534,878	1,345,182,346
Total Awarded	144,855,428	598,534,878	1,345,182,346
Total Encumbered (as of 6/30/22)	144,855,428	598,534,878	1,345,182,346
<b>Total Expended (as of 6/30/22)</b>	<b>(142,718,452)</b>	<b>(507,179,626)</b>	<b>(314,439,386)</b>
Total Remaining (Awarded-Encumbered)	2,136,976	91,355,251	1,030,742,959
10% Set Aside (less 0.5% for admin)	15,290,296	63,178,682	141,991,470
Total Awarded	15,290,296	63,178,682	141,991,470
Total Encumbered (as of 6/30/22)	15,290,296	52,770,468	109,558,620
<b>Total Expended (as of 6/30/22)</b>	<b>(15,078,007)</b>	<b>(34,481,548)</b>	<b>(25,988,352)</b>
Total Remaining	212,289	18,288,920	83,570,268
0.5% Admin	804,752	*	10,798,429
Total Encumbered (as of 6/30/22)	804,752		10,798,429
<b>Total Expended (as of 6/30/22)</b>	<b>804,752</b>		<b>(1,668,169)</b>
Total Remaining	-		9,130,260

\*consolidated as allowed

Source: COVID grant totals as of June 30, 2022, per SDE Finance

**APPENDIX F– COVID Funds Received by Individual School Districts**

District Name	Amount	District Name	Amount
ACHILLE	\$ 92,371.77	BOKOSHE	\$ 90,096.38
ADA	\$ 1,581,829.76	BOONE-APACHE	\$ 148,502.88
ADAIR	\$ 155,022.41	BOSWELL	\$ 100,939.82
AFTON	\$ 177,419.60	BOWLEGS	\$ 128,720.45
AGRA	\$ 456,995.94	BOWRING	\$ 10,123.64
ALBION	\$ 23,252.55	BRAGGS	\$ 38,477.15
ALEX	\$ 440,133.43	BRAY-DOYLE	\$ 97,862.07
ALINE-CLEO	\$ 21,553.63	BRIDGE CREEK	\$ 664,484.31
ALLEN	\$ 574,042.62	BRIGGS	\$ 192,269.51
ALLEN-BOWDEN	\$ 97,971.11	BRISTOW	\$ 1,008,353.85
ALTUS	\$ 1,489,359.48	BROKEN ARROW	\$ 7,400,814.59
Altus Christian Academy	\$ 54,850.18	BROKEN BOW	\$ 807,273.51
ALVA	\$ 145,836.12	BRUSHY	\$ 173,516.40
AMBER-POCASSET	\$ 123,917.62	BUFFALO	\$ 192,479.35
ANADARKO	\$ 1,279,468.89	BUFFALO VALLEY	\$ 61,439.19
ANDERSON	\$ 45,820.01	BURLINGTON	\$ 18,071.28
ANTLERS	\$ 55,087.21	BURNS FLAT-DILL CITY	\$ 158,315.59
ARAPAHO-BUTLER	\$ 5,007.77	BUTNER	\$ 120,407.58
ARDMORE	\$ 3,187,411.83	BYNG	\$ 1,050,616.65
ARKOMA	\$ 159,114.26	CACHE	\$ 762,988.36
ARNETT	\$ 21,576.82	CADDO	\$ 333,086.34
ASHER	\$ 84,122.00	CALERA	\$ 142,356.32
ASTEC CHARTERS (E004)	\$ 235,503.68	CALUMET	\$ 152,949.14
ATOKA	\$ 751,341.53	CALVIN	\$ 57,105.72
AVANT	\$ 37,754.76	CAMERON	\$ 141,937.66
BALKO	\$ 9,915.39	CANADIAN	\$ 178,069.80
BANNER	\$ 31,622.69	CANEY	\$ 127,011.03
BARNSDALL	\$ 211,540.73	CANEY VALLEY	\$ 100,967.00
BARTLESVILLE	\$ 4,361,777.92	CANTON	\$ 75,592.16
BATTIEST	\$ 202,757.77	CANUTE	\$ 59,525.99
BEARDEN	\$ 32,896.35	CARLTON ACADEMY - CANADIAN CHARTER	\$ 75,599.85
BEAVER	\$ 30,860.69	CARNEGIE	\$ 146,436.13
BEGGS	\$ 401,488.47	CARNEY	\$ 128,515.34
BELFONTE	\$ 73,472.50	CASHION	\$ 89,683.19
BENNINGTON	\$ 268,095.10	CATOOSA	\$ 462,782.48
BERRYHILL	\$ 898,811.47	CAVE SPRINGS	\$ 97,189.07
BETHANY	\$ 87,124.68	CEMENT	\$ 194,629.32
BETHEL	\$ 658,625.23	CENTRAL	\$ 248,659.74
BIG PASTURE	\$ 105,451.87	CENTRAL HIGH	\$ 140,041.66
BILLINGS	\$ 29,807.02	CHANDLER	\$ 453,508.97
BINGER-ONEY	\$ 138,826.17	CHATTANOOGA	\$ 44,437.74
BISHOP	\$ 123,398.17	CHECOTAH	\$ 322,812.42
Bishop Kelley High School	\$ 156,651.63	CHELSEA	\$ 520,185.02
Bishop McGuinness Catholic High School	\$ 235,705.85	CHEROKEE	\$ 75,581.88
BIXBY	\$ 1,562,668.77	CHEYENNE	\$ 48,151.26
BLACKWELL	\$ 448,307.58	CHICKASHA	\$ 2,348,253.36
BLAIR	\$ 33,850.75	CHISHOLM	\$ 419,002.36
BLANCHARD	\$ 293,009.42	CHOCTAW-NICOMA PARK	\$ 1,633,721.74
BLUEJACKET	\$ 58,267.39	CHOUTEAU-MAZIE	\$ 252,101.24
BOISE CITY	\$ 140,503.49	CIMARRON	\$ 220,522.63

# Oklahoma Department of Education Special Audit

District Name	Amount
CLAREMORE	\$ 355,647.44
Claremore Christian	\$ 41,118.29
CLAYTON	\$ 470,746.46
CLEORA	\$ 64,780.07
CLEVELAND	\$ 505,278.71
CLINTON	\$ 388,476.86
COALGATE	\$ 290,114.22
COLBERT	\$ 183,444.20
COLCORD	\$ 395,324.49
COLEMAN	\$ 98,136.68
COLLEGE BOUND CHARTER SCHOOL	\$ 98,953.94
COLLEGIATE HALL CHARTER SCHOOL	\$ 302,190.19
COLLINSVILLE	\$ 1,160,285.59
COMANCHE	\$ 393,750.99
COMMERCE	\$ 389,011.34
Cookson Hills Christian School	\$ 39,546.91
COPAN	\$ 51,053.14
CORDELL	\$ 219,395.95
COTTONWOOD	\$ 143,779.65
COVINGTON-DOUGLAS	\$ 66,009.08
COWETA	\$ 237,988.33
COYLE	\$ 84,606.88
CRESCENT	\$ 277,729.26
CROOKED OAK	\$ 446,724.40
CROWDER	\$ 341,674.73
CRUTCHO	\$ 571,373.96
CUSHING	\$ 998,302.33
CYRIL	\$ 67,131.40
DAHLONEGAH	\$ 47,576.92
DALE	\$ 151,297.80
DARLINGTON	\$ 408,553.70
DAVENPORT	\$ 105,557.97
DAVIDSON	\$ 90,456.95
DAVIS	\$ 182,109.85
DEBORAH BROWN (CHARTER)	\$ 1,154,824.76
DEER CREEK	\$ 904,405.82
DEER CREEK-LAMONT	\$ 98,937.59
DENISON	\$ 143,975.87
DEPEW	\$ 119,536.02
DEWAR	\$ 61,341.15
DEWEY	\$ 324,179.29
DIBBLE	\$ 117,595.39
DICKSON	\$ 448,017.43
DOVE SCHOOL OF DISCOVERY (TULSA)	\$ 32,150.45
DOVE SCHOOLS OF OKC	\$ 1,008,940.18
DOVER	\$ 109,333.53
DRUMMOND	\$ 243,946.67
DRUMRIGHT	\$ 193,155.49
DUKE	\$ 24,643.74
DUNCAN	\$ 948,794.17

District Name	Amount
DURANT	\$ 490,917.75
EAGLETOWN	\$ 54,338.79
EARLSBORO	\$ 165,906.25
EDMOND	\$ 1,341,202.36
EL RENO	\$ 728,862.36
ELGIN	\$ 187,330.06
ELK CITY	\$ 1,524,201.15
ELMORE CITY-PERNELL	\$ 227,308.57
EMPIRE	\$ 43,361.33
ENID	\$ 4,773,513.13
EPIC BLENDED LEARNING CENTER	\$ 325,317.21
Epic One-on-One	\$ 2,111,414.98
ERICK	\$ 43,741.03
EUFAULA	\$ 899,648.14
FAIRLAND	\$ 370,201.99
FAIRVIEW	\$ 297,103.04
FANSHAWE	\$ 90,420.45
FARGO	\$ 135,293.86
FELT	\$ 13,607.72
FLETCHER	\$ 166,198.01
FLOWER MOUND	\$ 132,907.46
FOREST GROVE	\$ 148,507.11
FORT COBB-BROXTON	\$ 366,504.44
FORT GIBSON	\$ 380,641.08
FORT SUPPLY	\$ 15,145.08
FORT TOWSON	\$ 111,583.66
FOX	\$ 103,314.19
FOYIL	\$ 94,421.98
FREDERICK	\$ 669,412.74
FREEDOM	\$ 62,268.91
FRIEND	\$ 72,749.72
FRINK-CHAMBERS	\$ 69,918.33
FRONTIER	\$ 83,666.44
GARBER	\$ 232,354.26
GEARY	\$ 108,504.56
GERONIMO	\$ 201,786.24
GLENCOE	\$ 64,879.42
GLENPOOL	\$ 1,506,607.83
GLOVER	\$ 2,500.00
GOODWELL	\$ 78,329.46
GORE	\$ 118,582.26
GRACEMONT	\$ 44,995.14
GRAHAM-DUSTIN	\$ 225,613.38
GRAND VIEW	\$ 177,278.77
GRANDFIELD	\$ 59,463.85
GRANDVIEW	\$ 127,947.01
GRANITE	\$ 104,606.48
GREENVILLE	\$ 10,188.14
GROVE	\$ 1,289,835.99
GROVE	\$ 194,657.27



**Oklahoma Department of Education  
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District Name	Amount
GUTHRIE	\$ 2,270,040.26
GUYMON	\$ 944,375.31
GYPSY	\$ 63,209.59
HAILEYVILLE	\$ 87,858.91
HAMMON	\$ 135,298.56
HANNA	\$ 24,348.47
HARDESTY	\$ 103,630.56
HARMONY	\$ 78,182.43
HARRAH	\$ 263,138.30
HARTSHORNE	\$ 259,613.47
HASKELL	\$ 222,825.87
HAWORTH	\$ 278,000.12
HAYWOOD	\$ 33,568.82
HEALDTON	\$ 234,490.31
HEAVENER	\$ 1,170,029.02
HENNESSEY	\$ 809,900.69
HENRYETTA	\$ 759,459.85
HILLDALE	\$ 1,042,561.75
HINTON	\$ 251,226.82
HOBART	\$ 396,920.14
HODGEN	\$ 41,380.19
HOLDENVILLE	\$ 776,286.87
HOLLIS	\$ 666,076.88
HOLLY CREEK	\$ 350,158.53
HOMINY	\$ 265,513.84
HOOVER	\$ 103,810.18
HOWE	\$ 239,390.81
HUGO	\$ 495,803.14
HULBERT	\$ 127,976.25
HYDRO-EAKLY	\$ 123,178.53
IDABEL	\$ 760,403.16
INDIAHOMA	\$ 37,939.62
INDIANOLA	\$ 103,744.44
INOLA	\$ 116,836.45
INSIGHT SCHOOL OF OKLAHOMA	\$ 33,831.19
JAY	\$ 1,181,098.44
JENKS	\$ 3,834,194.82
JENNINGS	\$ 221,286.68
JOHN W REX CHARTER ELEMENTARY	\$ 39,680.00
JONES	\$ 368,885.99
JUSTICE	\$ 256,853.71
JUSTUS-TIAWAH	\$ 1,765,395.42
KANSAS	\$ 669,859.07
KELLYVILLE	\$ 844,850.74
KEOTA	\$ 329,443.34
KETCHUM	\$ 315,872.50
KEYS	\$ 368,502.08
KEYSTONE	\$ 65,069.69
KIEFER	\$ 200,767.30
KILDARE	\$ 23,044.98

District Name	Amount
KINGFISHER	\$ 181,130.22
KINGSTON	\$ 708,583.29
KINTA	\$ 270,204.77
KIOWA	\$ 97,842.98
KIPP TULSA ACADEMY PREP CHARTER	\$ 84,085.71
KONAWA	\$ 575,194.36
KREBS	\$ 60,761.72
KREMLIN-HILLSDALE	\$ 174,694.59
LANE	\$ 103,639.84
LATTA	\$ 199,773.11
LAVERNE	\$ 168,348.20
LAWTON	\$ 17,265,907.19
LE FLORE	\$ 74,863.44
LEACH	\$ 34,285.11
LEEDEY	\$ 88,362.72
Legacy Christian School	\$ 26,009.46
LeMonde International School	\$ 115,866.35
LEXINGTON	\$ 153,906.31
LIBERTY	\$ 540,675.70
LIBERTY	\$ 236,476.17
LINDSAY	\$ 191,674.79
LITTLE AXE	\$ 736,511.26
LOCUST GROVE	\$ 1,440,313.19
LOMEGA	\$ 37,322.94
LONE GROVE	\$ 235,555.64
LONE STAR	\$ 224,144.50
LONE WOLF	\$ 31,450.62
LOOKEBA SICKLES	\$ 205,545.95
LOWREY	\$ 54,669.61
LUKFATA	\$ 64,390.80
LUTHER	\$ 120,769.57
MACOMB	\$ 126,142.15
MADILL	\$ 964,719.55
MANGUM	\$ 238,673.36
MANNFORD	\$ 835,737.45
MANNVILLE	\$ 68,225.00
MAPLE	\$ 2,500.00
MARBLE CITY	\$ 38,100.38
MARIETTA	\$ 259,576.58
MARLOW	\$ 819,494.06
MARYETTA	\$ 729,094.49
MASON	\$ 55,341.50
MAUD	\$ 148,491.30
MAYSVILLE	\$ 110,784.91
MCALESTER	\$ 828,956.91
MCCORD	\$ 3,776.00
MCCURTAIN	\$ 29,024.74
MCCLOUD	\$ 816,126.77
MEDFORD	\$ 36,178.62
MEEKER	\$ 128,905.45

# Oklahoma Department of Education Special Audit

District Name	Amount
MERRITT	\$ 368,366.83
MIAMI	\$ 1,407,597.10
MIDDLEBERG	\$ 24,111.74
MIDWAY	\$ 79,854.35
MIDWEST CITY-DEL CITY	\$ 7,648,648.00
MILBURN	\$ 172,771.75
MILL CREEK	\$ 41,828.54
MILLWOOD	\$ 1,019,962.82
MINCO	\$ 137,170.24
Mingo Valley Christian School	\$ 65,228.58
MOFFETT	\$ 67,078.84
MONROE	\$ 27,980.76
MOORE	\$ 16,369,198.79
MOORELAND	\$ 99,431.61
MORRIS	\$ 245,390.65
MORRISON	\$ 259,809.17
MOSS	\$ 46,023.39
MOUNDS	\$ 297,634.82
MOUNTAIN VIEW-GOTEB0	\$ 35,206.82
MOYERS	\$ 2,816.00
MULDROW	\$ 1,121,049.89
MULHALL-ORLANDO	\$ 19,951.99
MUSKOGEE	\$ 3,833,179.39
MUSTANG	\$ 983,522.72
NASHOBA	\$ 376,755.98
NAVAJO	\$ 48,785.83
NEW LIMA	\$ 191,135.81
NEWCASTLE	\$ 824,206.36
NEWKIRK	\$ 161,986.00
NINNEKAH	\$ 252,965.73
NOBLE	\$ 701,596.89
NORMAN	\$ 1,219,216.02
NORTH ROCK CREEK	\$ 693,719.43
NORWOOD	\$ 69,850.16
NOWATA	\$ 184,339.44
OAK GROVE	\$ 62,762.25
OAKDALE	\$ 38,573.42
OAKS-MISSION	\$ 154,184.05
OILTON	\$ 216,005.44
OKARCHE	\$ 23,548.53
OKAY	\$ 188,648.00
OKC CHARTER: HARDING CHARTER	\$ 317,066.02
OKC CHARTER: HARDING FINE ARTS	\$ 2,384.57
OKC CHARTER: HUPFELD/W VILLAGE	\$ 115,048.56
OKC CHARTER: INDEPENDENCE MS	\$ 117,638.79
OKC CHARTER: KIPP REACH COLL.	\$ 185,448.90
OKC CHARTER: SANTA FE SOUTH CHARTER	\$ 954,438.41
OKEENE	\$ 56,393.82
OKEMAH	\$ 148,247.98
Oklahoma Christian Academy	\$ 157,016.17

District Name	Amount
OKLAHOMA CITY	\$ 22,768,288.65
OKLAHOMA CONNECTION ACADEMY	\$ 136,712.88
OK INFO AND TECH CHARTER SCHOOL	\$ 12,984.28
OKLAHOMA UNION	\$ 96,595.38
OKLAHOMA VIRTUAL CHARTER ACADEMY	\$ 459,864.21
OKMULGEE	\$ 1,180,206.04
OKTAHA	\$ 592,013.46
OLIVE	\$ 251,471.02
OLUSTEE-ELDORADO	\$ 36,838.05
OOLOGAH-TALALA	\$ 387,213.60
OPTIMA	\$ 77,219.90
OSAGE	\$ 77,749.02
OSAGE HILLS	\$ 76,042.75
OSDE/OJA:OK YOUTH ACADEMY CHARTER	\$ 2,638.35
OWASSO	\$ 501,036.88
PADEN	\$ 89,079.43
PANAMA	\$ 357,309.46
Panola	\$ 625.00
PANOLA ELEMENTARY	\$ 27,133.96
PAOLI	\$ 370,826.81
PAULS VALLEY	\$ 1,095,609.20
PAWHUSKA	\$ 296,635.43
PAWNEE	\$ 618,806.22
PEAVINE	\$ 28,785.86
PECKHAM	\$ 31,604.59
PEGGS	\$ 272,240.31
PERKINS-TRYON	\$ 28,944.42
PERRY	\$ 167,161.19
PIEDMONT	\$ 580,379.73
PIONEER	\$ 133,868.78
PIONEER-PLEASANT VALE	\$ 85,690.85
PITTSBURG	\$ 102,066.03
PLAINVIEW	\$ 526,903.12
PLEASANT GROVE	\$ 84,188.98
POCOLA	\$ 170,470.12
PONCA CITY	\$ 1,145,605.03
POND CREEK-HUNTER	\$ 201,126.27
PORTER CONSOLIDATED	\$ 515,548.44
PORUM	\$ 247,326.57
POTEAU	\$ 629,696.58
PRAGUE	\$ 327,441.24
PRESTON	\$ 442,429.97
PRETTY WATER	\$ 275,476.87
PRUE	\$ 285,358.78
PRYOR	\$ 524,374.97
PURCELL	\$ 552,560.52
PUTNAM CITY	\$ 13,795,265.11
QUAPAW	\$ 102,642.52
QUINTON	\$ 123,165.06
RATTAN	\$ 90,546.00

# Oklahoma Department of Education Special Audit

District Name	Amount
RAVIA	\$ 108,289.09
RED OAK	\$ 293,039.22
REYDON	\$ 48,013.68
RINGLING	\$ 326,429.16
RINGWOOD	\$ 225,707.58
RIPLEY	\$ 276,609.55
RIVERSIDE	\$ 38,932.67
ROBIN HILL	\$ 147,000.36
ROCK CREEK	\$ 112,161.27
ROCKY MOUNTAIN	\$ 99,708.71
ROFF	\$ 62,362.76
ROLAND	\$ 339,281.67
RUSH SPRINGS	\$ 76,913.13
RYAL	\$ 36,416.87
RYAN	\$ 220,694.95
Sacred Heart Catholic School	\$ 20,791.79
Sacred Heart Catholic School	\$ 73,336.05
Saints Peter and Paul	\$ 24,996.50
SALINA	\$ 264,200.40
SALLISAW	\$ 197,946.51
SAND SPRINGS	\$ 668,912.03
SAPULPA	\$ 925,962.21
SASAKWA	\$ 457,126.60
SAVANNA	\$ 86,871.37
SAYRE	\$ 372,598.12
SCHULTER	\$ 47,264.62
SEILING	\$ 61,761.52
SEMINOLE	\$ 927,250.34
SENTINEL	\$ 70,083.76
SEQUOYAH	\$ 291,007.07
SHADY GROVE	\$ 172,661.97
SHADY POINT	\$ 247,271.45
SHARON-MUTUAL	\$ 62,170.59
SHATTUCK	\$ 224,892.74
SHAWNEE	\$ 1,658,614.77
SHIDLER	\$ 74,639.98
SILO	\$ 486,323.73
SKIATOOK	\$ 789,641.85
SMITHVILLE	\$ 119,185.11
SNYDER	\$ 317,336.52
SOPER	\$ 116,396.26
SOUTH COFFEYVILLE	\$ 127,301.15
SPERRY	\$ 185,493.65
SPIRO	\$ 420,097.32
SPRINGER	\$ 178,727.29
St Pius X	\$ 17,552.88
STERLING	\$ 38,648.09
STIDHAM	\$ 46,151.87
STIGLER	\$ 395,650.43
STILLWATER	\$ 2,295,481.24

District Name	Amount
STILWELL	\$ 1,250,104.24
STONEWALL	\$ 518,253.86
STRATFORD	\$ 256,337.55
STRINGTOWN	\$ 116,885.90
STROTHER	\$ 77,377.78
STROUD	\$ 100,000.00
STUART	\$ 137,443.00
SULPHUR	\$ 349,003.25
SWEETWATER	\$ 253,686.98
TAHLEQUAH	\$ 599,778.63
TALIHINA	\$ 46,149.16
TALOGA	\$ 53,752.53
TANNEHILL	\$ 48,027.35
TECUMSEH	\$ 500,390.21
TEMPLE	\$ 180,874.31
TENKILLER	\$ 183,452.33
TERRAL	\$ 81,702.39
TEXHOMA	\$ 32,072.11
THACKERVILLE	\$ 73,257.61
The Academy of Classical Studies	\$ 210,133.74
THOMAS-FAY-CUSTER UNIFIED DIST	\$ 182,367.29
TIMBERLAKE	\$ 138,119.80
TIPTON	\$ 91,651.41
TISHOMINGO	\$ 313,732.63
TONKAWA	\$ 188,938.82
TULSA	\$ 16,530,002.60
TULSA CHARTER: SCHL ARTS/SCI.	\$ 108,226.44
TULSA HONOR ACADEMY	\$ 107,824.43
TULSA LEGACY CHARTER SCHOOL	\$ 162,027.76
TUPELO	\$ 84,442.20
TURKEY FORD	\$ 33,199.50
TURNER	\$ 140,318.31
TURPIN	\$ 2,329.49
TUSHKA	\$ 170,571.83
TUSKAHOMA	\$ 11,972.00
TUTTLE	\$ 100,967.29
TWIN HILLS	\$ 341,023.47
TYRONE	\$ 94,959.35
UNION	\$ 8,245,062.77
UNION CITY	\$ 219,330.95
VALLIANT	\$ 484,835.20
VANOSS	\$ 165,280.65
VARNUM	\$ 379,304.99
VELMA-ALMA	\$ 184,866.90
VERDEN	\$ 84,850.14
VIAN	\$ 329,936.57
VICI	\$ 30,754.55
VINITA	\$ 266,263.00
WAGONER	\$ 1,372,794.28
WAINWRIGHT	\$ 29,437.20

*Oklahoma Department of Education  
Special Audit*

District Name	Amount
WALTERS	\$ 178,910.75
WANETTE	\$ 43,712.30
WAPANUCKA	\$ 150,418.46
WARNER	\$ 446,377.15
WASHINGTON	\$ 463,916.71
WATONGA	\$ 193,251.97
WATTS	\$ 62,126.22
WAUKOMIS	\$ 46,064.80
WAURIKA	\$ 206,673.88
WAYNE	\$ 109,602.98
WAYNOKA	\$ 28,244.88
WEATHERFORD	\$ 835,548.14
WEBBERS FALLS	\$ 130,898.13
WELCH	\$ 88,123.17
WELEETKA	\$ 241,714.45
WELLSTON	\$ 100,960.92
WESTERN HEIGHTS	\$ 588,715.64
WESTVILLE	\$ 732,697.41
WETUMKA	\$ 85,573.01
WEWOKA	\$ 884,932.47
WHITE OAK	\$ 44,761.80
WHITE ROCK	\$ 93,903.04
WHITEBEAD	\$ 43,755.36
WHITEFIELD	\$ 25,124.63
WHITESBORO	\$ 54,936.72
WICKLIFFE	\$ 25,790.42
WILBURTON	\$ 107,236.71
WILSON	\$ 132,520.03
WILSON	\$ 137,314.25
WISTER	\$ 175,434.01
WOODALL	\$ 138,656.26
WOODLAND	\$ 104,246.31
WOODWARD	\$ 3,769,361.62
Woodward Christian School	\$ 1,130.47
Wright Christian Academy	\$ 26,951.61
WRIGHT CITY	\$ 394,061.86
WYANDOTTE	\$ 143,050.31
WYNNEWOOD	\$ 177,546.17
WYNONA	\$ 32,726.87
YALE	\$ 400,255.08
YARBROUGH	\$ 52,388.73
YUKON	\$ 4,589,942.32
ZANEIS	\$ 63,638.39
ZION	\$ 389,130.64



Cindy Byrd, CPA | State Auditor & Inspector

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