

STATEWIDE CLASS SIZES REPORT

2021-22 SCHOOL YEAR



OKLAHOMA
Education

Prepared by the Oklahoma State Department of Education

In fulfillment of [Section 70 O.S. § 3-104.4 of Title 70](#) of the Oklahoma Statutes, this report provides data and analysis on classroom sizes for districts across the state as required by accreditation standards. It coincides with the partial lifting of a moratorium on class size audits and penalties which have been in place for more than a decade.

PURPOSE OF REPORT

[Section 3-104.4 of Title 70](#) of the Oklahoma Statutes requires that the OSDE submit a report on statewide classroom sizes to the President Pro Tempore of the Senate and the Speaker of the House of Representatives. The purpose of this report is to provide the Legislature with data on classroom sizes for districts across the state, as well as make an initial analysis of the results.

EXECUTIVE SUMMARY

On or before 1991, the Legislature charged the State Board of Education with adopting standards for the accreditation of public schools. See [70 O.S. § 3-104.4](#). The accreditation standards must, at a minimum, provide for warnings, probation or nonaccredited status for schools that fail to meet the accreditation standards. *Id.* Nearly two decades after the State Board first adopted accreditation standards governing public schools, the Legislature installed a moratorium on any penalties associated with a school having not met the accreditation standards as related to media materials and equipment, media program expenditures and media personnel. At the same time, a moratorium was also put in place on the assessment of financial penalties against any school district given a deficiency in accreditation status until certain financial conditions in the state funding formula for public schools was met. In 2019, the Legislature revised the conditions to lift the latter of the moratoriums, as follows:

Beginning with the fiscal year which begins July 1, 2021, if the amount of money appropriated to the State Board of Education for the financial support of public schools is at least One Hundred Million Dollars (\$100,000,000.00) greater than the amount of money appropriated to the State Board of Education for the financial support of public schools for the fiscal year ending June 30, 2019, pursuant to Chapter 146, O.S.L. 2018, a financial penalty shall be assessed against any school districts that do not comply with the class size limitations for kindergarten as provided for in Section 18-113.2 of this title and class size limitations for grade one as provided for in subsection A of Section 18-113.1 of this title. Provided, the One Hundred Million Dollars (\$100,000,000.00) shall not include any amount of appropriations dedicated for support or certified employee salary increases. See Senate Bill 193 (2019).

In other words, lifting the moratorium for class size penalties in kindergarten and first grade was contingent on an additional \$100 million appropriated to the State Board of Education for the financial support of public schools (i.e., school funding formula) in addition to what was appropriated in Fiscal Year 2019, excluding salary raises. The funding threshold was met when the Legislature passed HB 2900 (2021), lifting the moratorium on class size limits for kindergarten and first grade beginning in school year 2021-22. Though accreditation penalties are in effect only for these two grade levels, the required 2022 report on class sizes accounts for all grade levels across all districts.

Since class size limits had not been in effect since 2010, the statewide system to collect class size data was no longer functional. The Oklahoma State Department of Education's (OSDE) processes for collecting new data requires extensive preparation and planning for the OSDE team, the Office of Management and Enterprise Services (OMES) development team, schools and districts. These plans help ensure the data collection application supports the technical requirements of the law and schools

have sufficient training to understand how data from their local Student Information System (SIS) informs the application. As expected, a first-time data collection at the class level for the State's nearly 550 districts would be a daunting task under normal circumstances. In fact, numerous challenges have emerged over the years since class size requirements were last in place, including significant shifts in student enrollment and a worsening teacher shortage impacting the ability of districts to meet minimum class size limits. These challenges have been exacerbated by the emergence of a global pandemic that has strained the resources and exhausted the capacity of administrators, teachers and students.

To compile this report, the OSDE worked to create a new data application for collecting, calculating and validating district class size information for use in annual audits and reporting. The application was designed to pull information directly from a district's SIS and cross-reference it with information gathered from school personnel reporting. The application then allowed districts to individually select the appropriate classrooms and their assigned teacher. Once schools provided this information, it displayed the resulting data back to districts for verification and ultimately certification for use in this report. The OSDE launched a pilot of the application from November 1 through November 15, 2021, which included eight districts of varying sizes in both urban and rural areas and with different SIS providers. While the core requirements for calculating class sizes are provided in statute, existing law was written without consideration of current technology and security requirements. For example, statutory language does not account for nuances like modern course coding, school staff classifications and duties, or the prospect of fully virtual classrooms and districts. As a result, the OSDE applied statutory language to make design and technological decisions as appropriate to develop the application.

The official class size application opened for district submissions on November 15, 2021, and closed on December 17, 2021. Following the closing date, the OSDE worked to synthesize submissions, including class size averages by grade at the state, district and site level. First-time data collections of this magnitude must be viewed through the appropriate lens, accounting for variables such as technical reporting and system challenges, unfamiliar requirements, new calculations and the impact of a global pandemic. With these considerations in mind, there are initial, but limited, observations. Namely, only 64 instances of course periods (i.e., an individual class period taught by an individual teacher within a school) were out of compliance in Pre-K, kindergarten and first grade. These cases were concentrated in 15 districts across 17 schools. Complete results at the district and site level can be found on the [Accreditation webpage](#).

HISTORY

During the 1989 Special Legislative Session, the Legislature passed several landmark education reforms in HB 1017, which, among other things, created the standards for accreditation of public schools, including class size limits. Under the bill, the standards took effect in 1993-94, with penalties to be implemented in 1997-98. While the original class size limits by grade band were 25 students for kindergarten, 22 students for Grades 1-3, 25 students for Grades 4-6 and 36 students for Grades 7-9, HB 1017 imposed gradual class size decreases through 1998 that remain in place today. Those limits are 20 students per class in grades 1-6 and 140 students per teacher in grades 7-12 over a six-hour period. The financial penalty for violation originally set in HB 1017 remains as well, with every student in excess of limits being prohibited from counting toward a district's Average Daily Membership (ADM) for state aid purposes. More specifically, no child is to be included in the average daily membership of a school district for the purpose of computing and paying state-appropriated funds if that child is regularly assigned to a teacher or class that includes more than the specified limit. Additionally, districts found to be in violation of class size standards in consecutive years are required to be denied further accreditation by the State Board of Education.

In 2010, a moratorium was placed on accreditation financial penalties and deficiencies for school districts not meeting various accreditation standards, including class sizes. While the moratorium was initially set to expire in 2012, the Legislature continued to extend the timeline in two-year increments through 2016. That year saw the moratorium extended yet again, but only on the condition that it would expire should appropriations equal \$3,291 per student in Weighted Average Daily Membership (WADM) as calculated by the school funding formula. While this threshold was not met, it was revised with the passage of SB 193 (2019), which specified that the existing moratorium on various accreditation standards, including class sizes, would be lifted contingent on additional appropriations to the State Board of Education for the financial support of public schools (i.e., school funding formula).

More specifically, SB 193 (2019) required financial penalties for not meeting class size limits in kindergarten and first grade to be reinstated beginning July 1, 2021, should formula appropriations in Fiscal Year 2022 exceed Fiscal Year 2019 by \$100 million, excluding any salary raises. During the 2021 session, the Legislature met this funding threshold with the passage of general appropriations made in HB 2900 (2021), directing close to \$2.5 billion for the formula, thus lifting the moratorium and imposing penalties for kindergarten and first grade in school year 2021-22. A more detailed overview of class size calculations, exemptions and penalties is contained in this report.

METHODOLOGY

State law delineates a series of class size requirements for schools with various compositions of grade levels. See 70 O.S. §§ 18-113.1 - 18-133.3. While SB 193 (2019) only requires accreditation penalties to be assessed for class sizes exceeding the limit in kindergarten and first grade, the OSDE collected and calculated all Oklahoma public school districts' class sizes as required by state law and has prepared this report in alignment with statutory requirements. See [70 O.S. § 3-104.4](#).

State statute requires class size penalties to be determined according to whether the class size limits were exceeded during the first nine weeks of each school year. As such, if a district exceeds class size limits following the first nine weeks, it will not receive penalties or deficiencies. Class sizes for all elementary grade levels are calculated by dividing average daily membership (ADM) by the full-time equivalency (FTE) of instructional staff assigned to each grade level by site. However, high school class sizes are determined based on enrollment – a one-day snapshot on October 1 – divided by FTE. See [70 O.S. § 18-113.3](#). Additionally, districts that have a bonded indebtedness exceeding 85% within the preceding five years are exempt from any penalty. See [70 O.S. § 18-113.1](#). A list of districts exceeding 85% bonded indebtedness can be found in Appendix A.

The compositions and requirements described below were utilized as OSDE calculated class sizes following district completion and submission of this new data report.

REQUIREMENTS

The following subsection describes the requirements for varying grades, including those schools containing grades K-3, 4-6, 7-12 and alternative grade compositions. For districts exceeding the class size membership limitation (see Table 1), the penalty for the first year is calculated to reduce state aid in an amount as follows:

- a. *Multiply each pupil in excess of the class size membership limit as provided in this subsection by the grade level weight and by the Base Foundation Support Level for the current school year, and*
- b. *Multiply each pupil in excess of the class size membership limit as provided in this subsection by the grade level weight and by the Incentive Aid guarantee for the current school year times twenty (20), and*
- c. *Sum the products of paragraphs a and b. See [70 O.S. § 113.1](#).*

For districts exceeding the applicable class size membership limitation for two consecutive years, the district is to receive a penalty of denial of accreditation. See [70 O.S. § 18-113.3\(G\)](#). In addition, any school district which exceeds the class size limitations is required to submit a written report to the State Board of Education, on or before July 1 of each year, setting forth the procedures the district will follow in order to come into compliance with the class size requirements. *Id.*, at subsection (H).

Schools Containing Grades K-3

For schools that include kindergarten through grade three, class sizes are limited to **20 students**. However, exemptions from the penalty are provided for two reasons:

1. If a class creation would result in a new section that includes fewer than 10 students, and
2. A teacher's assistant is employed to serve with each teacher in a class that exceeds the class size limitation.

See 70 O.S. [§ 18-113.1\(A\)](#), [18-113.2\(A\)](#).

Schools Containing Grades 4-6

For schools that include grades four through six, class sizes are limited to **20 students**. However, exemptions from the penalty are provided if a class creation would result in a new section that includes fewer than 16 students. See [70 O.S. § 18-113-1\(B\)](#).

Schools Containing Grades 7-12

For schools that include grades seven through twelve, a teacher is only to be responsible for the instruction of not more than **140 students** on any given six-hour school day. See [70 O.S. § 18-113.3\(C\)](#).

Schools Containing Alternative Grade Compositions

For those schools that include grades one through five, the stipulations for grades K through three apply (i.e., 20 students unless a new class would have fewer than 10 students).

For those schools that include grades six through eight and grades nine through twelve, the stipulations for grades seven through twelve apply (i.e., 140 students in six hours). See [70 O.S. § 18-113.1\(D\)](#).

Since class size limitation statutes make no reference to virtual schools (either blended or full-time) the OSDE interpreted the law to include all public school districts, regardless of instructional delivery method.

Course Exemptions from Class Size Limitation

In addition to the requirements described above, there are several course types to which the class size limitation does not apply. These courses include the following:

- › Physical education classes
- › Chorus, band, orchestra and similar music classes

See [70 O.S. § 18-113.1\(C\)](#).

Other Specifications

Special education teacher FTE, Title I teachers, teachers of classes not subject to size limitations and the ADM of self-contained special education classes are not counted in class size computations. See [70 O.S. § 18-113.3\(A\)](#).

Schools providing early childhood (Pre-K) programs are subject to the 20-student limit without the possibility for the exemptions. Further, Pre-K classes may not exceed a child-to-adult ratio of 10:1. See [OAC 210:35-5-41](#).

CLASS SIZE APPLICATION

To most appropriately and accurately determine the current class sizes for classrooms across the state, several data sets were collected from districts using the School Interoperability Framework (SIF) specification 2.0r1, as required in [70 O.S. § 3-160](#). While most of the data, apart from bonded indebtedness, were part of existing OSDE collections, class size considerations required districts to use a new approach while reporting from a perspective not used before. When this data was last collected, it was aggregated and calculated at the district level without the ability for the OSDE to audit the data. This prevented the OSDE from ensuring that the data collected was reliable and accurate. However, the new data collection process has built-in audits, cross-checks and validations during the reporting cycle. The requested data objects included:

- › **Enrollment file:** The count of students in a district and school.
- › **School course information object:** The list of available courses (e.g., Algebra I, Biology) for schools to enroll students.
- › **Course code:** A list of the course identifiers available statewide.
- › **Section information reference ID:** This data element allows schools to place students into a course section. Each course section (i.e., section information reference ID) is unique to a district and school. This primary data element can be used to determine how many students are assigned to class (i.e., course section).
- › **Student section enrollment:** Identifies what students are enrolled in what course sections by district and school.
- › **Student personal reference ID:** This data element uniquely determines what student identifiers are assigned to what course section (i.e., section information ref ID). Ostensibly, any student should be assigned to a single course section within a school for a given period.
- › **Teacher assignment object:** This file identifies where certified teachers within a school are assigned to a given course section. Teachers will be assigned to multiple course sections throughout the day, but ostensibly only to one course section per period. It is worth noting that periods are not commonly structured across schools or districts, making this data point more difficult to incorporate.

- › **School personnel record:** Identifies all non-certified personnel associated with a district. The use of this file for class size exploration requires personnel assignment at the school level.

These data files and elements may not be an exhaustive representation of what is necessary to accurately determine class sizes. While each of these files is individually certified and validated, their combination determines the students, teachers and school personnel assigned to a given school, course section and time of day and thus the results in the newly developed application.

DATA AND RESULTS

Based on an analysis of period by course, teacher, school and district, fewer than 1% of class periods were found to be out of compliance with statutory requirements. Specifically, only 64 instances of course periods (i.e., an individual class period taught by an individual teacher within a school) were out of compliance in Pre-K, kindergarten and first grade. Cases of non-compliance were concentrated in 15 districts across 17 schools. The majority of these cases exhibited class sizes of fewer than 35 students, with the vast majority class sizes between 20 and 29. There are several class size outliers that range from 40 to nearly 150, suggesting that data validation efforts at the district level can be improved to yield more accurate reporting.

The table below provides an overview of the course periods out of compliance with statutory requirements by district and school.

Table 1. Number of non-compliant Classes in Pre-K, K and Grade 1 by District and School

DISTRICT	SITE	CLASSES NOT IN COMPLIANCE
Ardmore	Lincoln ES	2
Ardmore	Will Rogers ES	10
Barnsdall	Barnsdall ES	2
Claremore	Catalayah ES	4
Claremore	Westside ES	8
Crooked Oak	Central Oak ES	4
Drummond	Drummond ES	4
Haskell	Mary White ES	1
Henryetta	Henryetta ES	3
Kingston	Kingston ES	5
Lone Grove	Lone Grove Primary ES	5
Mcloud	Mcloud Early Childhood Center	2
Muskogee	Cherokee ES	3
Perry	Perry ES	2
Rattan	Rattan ES	1
Sperry	Sperry ES	4
Stratford	Stratford ES	4
Grand Total		64

CONCLUSION & RECOMMENDATIONS

In assessing the significance of the class size data collected for this report, it is important to note the challenges districts faced in providing extensive amounts of classroom-level data for the first time in over a decade in a newly created application. Significant disruptions over the 2019-20 and 2020-21 school years due to COVID-19, staffing shortages at all levels and a short timeline for new data collection made this report particularly challenging.

More specifically, statewide closures in the 2019-20 school year resulted in unprecedented shifts in how courses were assigned and instruction was delivered, as most schools made shifts to distance learning. The following school year (2020-21) posed additional considerations as districts coped with ongoing personnel shortages and temporary classroom assignments, all while accounting for classrooms with blended or fully online delivery models that defied traditional understandings of student attendance and teaching loads. While the first semester of the 2021-22 school year saw more schools approaching pre-pandemic levels of operation, the data included in this report should be understood in the context of the monumental, and in many cases ongoing, disruptions of the pandemic.

Future class size analysis will benefit from greater amounts of data provided by annual audits, which will likely reveal trends beyond the static data in this first-time report.

Based on the reported data, the OSDE offers the following conclusions: The current number of non-compliant cases represent a fraction of a percentage of all cases of courses by teacher, school and district across the state (e.g., Mr. or Ms. Smith's 2nd-period class). The vast majority of non-compliant class periods included between 20 and 30 students, suggesting that those cases truly represent classrooms that have students in excess of the class size requirements. Conversely, the majority of outliers were non-core classes (e.g., computer science, library science, educational technology).

Stemming from this report, and in light of the data and various other challenges and considerations, the OSDE recommends a full review of the decades-old class size requirements in state statute. Revisions to class size statutes should reflect the current organization, staffing and course coding in Oklahoma's schools and classrooms. These considerations should include, but not be limited to creating specific provisions for schools that offer full-time virtual or blended instruction, whether the school be traditional, charter or full-time virtual charter, and updating and clarifying specific courses that should be exempted from size limits due to nontraditional delivery methods in addition to courses like physical education, band, etc. For example, library, computer lab and health and nutrition classes may be rotational, with teachers providing instruction to an entire grade band but not to all students in a single class at the same time.

LIMITATIONS

The data presented in the table above represent a novel data collection that connects several data files from several collection efforts. The lack of historical precedent for a collection of this type may provide a rationale for why so few class periods demonstrate non-compliance. When considering the potential number of course periods in elementary schools across the state, more than 64 cases of non-compliance could reasonably be expected. Furthermore, the outliers reflecting triple-digit counts of students in a single course period reinforce the possibility that the processes used to collect these data require additional training, reinforcement and validation.

The data throughout this report reflect the constraints and realities schools faced in 2021-22 as they restarted in-person instruction in the face of a pandemic. Any new data collection, under even normal circumstances, will struggle with collection errors, validation challenges and reporting slowdowns. The OSDE is encouraged by school and district efforts to submit and certify the data required for the class size report. Furthermore, the OSDE is optimistic that data collection and validation efforts will improve with future iterations of this report as monitoring expands to additional grades and schools.

Appendix A

Districts 85% Bonded Indebtedness within Last Five Years

ADA (62-1019)	CORDELL (75-1078)
ADAIR (46-1002)	COWETA (73-1017)
ALEX (26-1056)	CRESCENT (42-1002)
ALINE-CLEO (44-1004)	CRUTCHO (55-C074)
ARAPAHO-BUTLER (20-1005)	DALE (63-1002)
BARTLESVILLE (74-1030)	DEER CREEK (55-1006)
BATTIEST (48-1071)	DEER CREEK-LAMONT (27-1095)
BEARDEN (54-C029)	DEPEW (19-1021)
BEAVER (04-1022)	DOVER (37-1002)
BETHANY (55-1088)	DURANT (07-1072)
BETHEL (63-1003)	EDMOND (55-1012)
BIXBY (72-1004)	EL RENO (09-1034)
BLANCHARD (47-1029)	ELGIN (16-1016)
BLUEJACKET (18-1020)	EMPIRE (69-1021)
BRIDGE CREEK (26-1095)	ENID (24-1057)
BRISTOW (19-1002)	FAIRLAND (58-1031)
BROKEN ARROW (72-1003)	FORT COBB-BROXTON (08-1167)
BRUSHY (68-C036)	FOYIL (66-1007)
BUFFALO (30-1004)	FREDERICK (71-1158)
CACHE (16-1001)	GERONIMO (16-1004)
CANEY (03-1026)	GLENCOE (60-1101)
CANTON (06-1105)	GLENPOOL (72-1013)
CARNEY (41-1105)	GRACEMONT (08-1086)
CATOOSA (66-1002)	GRANDFIELD (71-1249)
CEMENT (08-1160)	GROVE (63-C027)
CHANDLER (41-1001)	GUTHRIE (42-1001)
CHATTANOOGA (16-1132)	GUYMON (70-1008)
CHELSEA (66-1003)	HAILEYVILLE (61-1011)
CHICKASHA (26-1001)	HENNESSEY (37-1016)
CHISHOLM (24-1042)	HILLDALE (51-1029)
CHOCTAW-NICOMA PARK (55-1004)	HINTON (08-1161)
CLEORA (21-C006)	HOBART (38-1001)
CLEVELAND (59-1006)	HOMINY (57-1038)
COALGATE (15-1001)	HULBERT (11-1016)
COLCORD (21-1004)	HYDRO-EAKLY (08-1011)
COMMERCE (58-1018)	IDABEL (48-1005)

INDIAHOMA (16-1002)
 JAY (21-1001)
 JENKS (72-1005)
 JENNINGS (59-C002)
 JONES (55-1009)
 KETCHUM (18-1006)
 KEYS (11-1006)
 KILDARE (36-C050)
 KINGFISHER (37-1007)
 KREBS (61-C009)
 LATTA (62-1024)
 LAWTON (16-1008)
 LEEDEY (65-1003)
 LEXINGTON (14-1057)
 LITTLE AXE (14-1070)
 LOOKEBA SICKLES (08-1012)
 MANNFORD (19-1003)
 MARIETTA (43-1016)
 MCCORD (57-C077)
 MERRITT (05-1002)
 MIDWEST CITY-DEL CITY (55-1052)
 MILLWOOD (55-1037)
 MOORE (14-1002)
 MOUNDS (19-1005)
 MUSTANG (09-1069)
 NORMAN (14-1029)
 NORTH ROCK CREEK (63-1010)
 OAKDALE (55-C029)
 OKLAHOMA CITY (55-1089)
 OKLAHOMA UNION (53-1003)
 OKTAHA (51-1008)
 OLIVE (19-1017)
 OSAGE (46-C043)
 OWASSO (72-1011)
 PECKHAM (36-C027)
 PIEDMONT (09-1022)
 PITTSBURG (61-1063)
 PLAINVIEW (10-1027)
 PRAGUE (41-1103)
 PRESTON (56-1005)
 PRETTY WATER (19-C034)
 PRYOR (46-1001)
 PURCELL (47-1015)
 PUTNAM CITY (55-1001)
 QUINTON (61-1017)
 RED OAK (39-1002)
 RINGLING (34-1014)
 RIPLEY (60-1003)
 ROBIN HILL (14-C016)
 RUSH SPRINGS (26-1068)
 RYAN (34-1001)
 SALINA (46-1016)
 SAND SPRINGS (72-1002)
 SAPULPA (19-1033)
 SEQUOYAH (66-1006)
 SHATTUCK (23-1042)
 SHAWNEE (63-1093)
 SHIDLER (57-1011)
 STILLWATER (60-1016)
 STRINGTOWN (03-1007)
 STUART (32-1054)
 TANNEHILL (61-C056)
 TECUMSEH (63-1092)
 TEXHOMA (70-1061)
 THOMAS-FAY-CUSTER UNIFIED DIST (20-1007)
 TULSA (72-1001)
 TURPIN (04-1128)
 TUTTLE (26-1097)
 UNION (72-1009)
 VINITA (18-1065)
 WAUKOMIS (24-1001)
 WAYNOKA (76-1003)
 WEBBERS FALLS (51-1006)
 WELCH (18-1017)
 WESTERN HEIGHTS (55-1041)
 WILSON (10-1043)
 WOODALL (11-C021)
 YARBROUGH (70-1001)
 YUKON (09-1027)