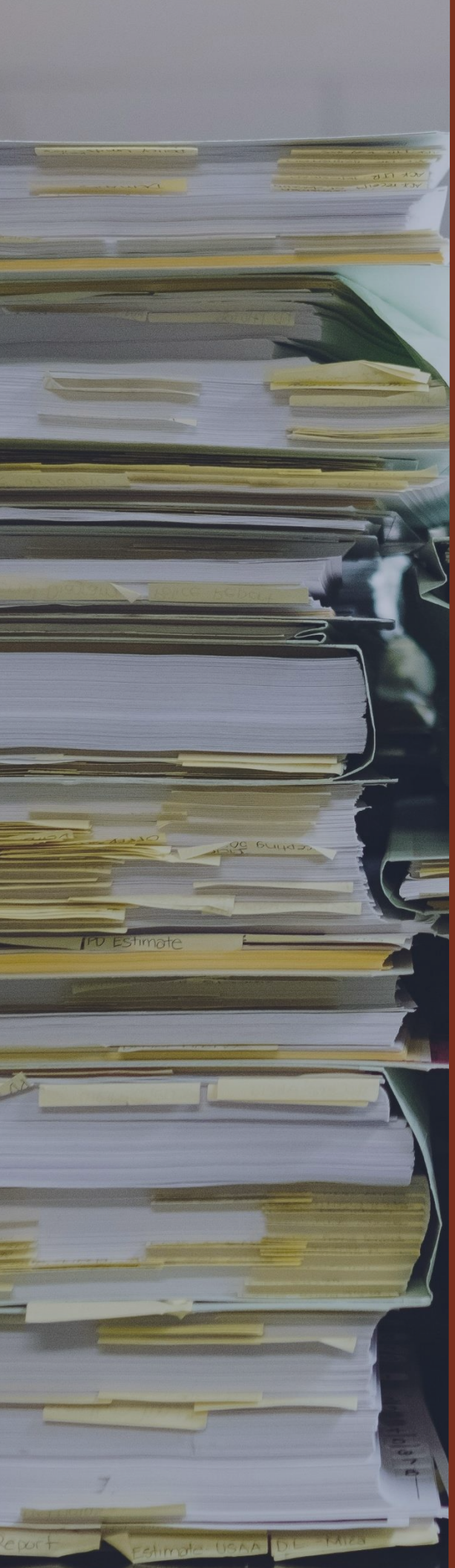




What Does Oklahoma Really Need Charter Schools to Report?

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Oklahoma Center for Education Policy
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About this Study

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Executive Summary

Oklahoma charter schools are subject to extensive reporting and oversight requirements intended to promote transparency, legal compliance, fiscal integrity, and academic accountability. Yet accountability depends not only on the amount of information collected, but also on whether reporting requirements are clear, useful, and efficiently administered. This report examines Oklahoma's charter-school reporting system through a review of state statutes, administrative rules, policy documents, and 15 interviews with charter school leaders, authorizers, and charter-sector organizations.

Findings

The analysis produces three principal findings. **First, most of the reporting burden described by charter leaders is not unique to charter schools.** Charter schools generally participate in the same state reporting and accreditation systems as traditional public school districts, and interviewees consistently identified the annual accreditation process as a major source of administrative burden. Common concerns included repeated submission of policies and other information that rarely changes, the accumulation of compliance requirements over time, and cumbersome online reporting systems. These concerns are therefore not solely charter-sector concerns; they apply to traditional public schools as well, especially smaller districts with limited central-office capacity.

Second, charter leaders often face uncertainty about which state laws, regulations, and reporting requirements actually apply to them. Oklahoma law exempts charter schools from many requirements applicable to school districts while simultaneously subjecting them to the same "reporting requirements," creating ambiguity about the boundary between the two. Five of the 11 current charter leaders interviewed described situations in which they believed requested information might not have been required, but they generally submitted it anyway rather than risk a compliance dispute. Existing guidance from the Oklahoma State Department of Education (OSDE) does not provide the comprehensive, up-to-date crosswalk that interviewees said they need.

Third, authorizer requirements create the principal reporting layer that is distinctive to charter schools, but those requirements vary substantially. Some authorizers rely heavily on information schools already submit elsewhere, while others require additional reports, formats, or data collections. At the same time, minimal reporting is not necessarily evidence of strong authorizing. Effective

oversight requires clear and rigorous performance expectations without unnecessary duplication or intrusion into school operations.

Recommendations

The report offers several recommendations to improve charter school reporting policies in Oklahoma.

First, **OSDE should expand and regularly update its existing charter compliance guidance** to identify which requirements apply to all charter schools, which apply specifically to virtual charter schools, which apply to all public schools, and which do not apply to charter schools. Second, **Oklahoma should launch a statewide review of routine compliance reporting for all public schools**, with the goal of eliminating, consolidating, automating, or reducing the frequency of low-value reporting requirements. Third, **Oklahoma's charter school sponsors should adhere to nationally recognized best practices for charter school authorizing**, ensuring that reporting requirements support meaningful oversight without unnecessarily limiting school autonomy.

The report also recommends that Oklahoma **move toward a "collect once, use many times" reporting system**, so schools do not have to resubmit the same information to multiple state agencies and authorizers. State-held data and compliance materials should be made available, with appropriate safeguards, to the authorizers responsible for overseeing each school. Finally, **lawmakers should clarify in statute how the Charter Schools Act interacts with later-enacted public school mandates**, so that charter schools, authorizers, and regulators can determine more easily which requirements apply.

Together, these reforms could reduce unnecessary administrative burden while preserving, and in some cases strengthening, meaningful public accountability.

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Introduction

Oklahoma's public charter school sector is small, varied, and increasingly important to the state's broader public school landscape. Charter schools are public schools, but they operate outside the traditional district model and are governed through contracts with authorizers that are responsible for oversight. Oklahoma's public school system remains dominated by traditional public schools: 92 percent of public school students attend traditional public schools, while eight percent attend charter schools.¹ Within the charter sector, the vast majority of students attend virtual schools, not brick-and-mortar charters.²

Like all public schools, Oklahoma charter schools are accountable for public funds, legal compliance, student access, and academic outcomes. At the same time, the charter model is premised on a tradeoff: greater operational autonomy in exchange for performance accountability. An important factor in this tradeoff is how the information used to hold charters accountable is reported to other stakeholders, such as the state and the organizations that authorize the schools. Unfortunately, charter leaders in Oklahoma often complain that reporting and compliance activities consume significant staff time, create uncertainty, and often duplicate information submitted elsewhere.

Reporting requirements are central to charter school accountability. Public oversight depends on timely, accurate information about enrollment, finances, student services, civil rights enforcement, governance, and academic performance. Yet the methods of collecting and disseminating this information deserve scrutiny. It is worth questioning, for example, whether the current system collects the right information, from the right entities, at the right frequency, and in an efficient way that state agencies and authorizers can use. A well-designed reporting system helps identify struggling schools, protect students and taxpayers, and support informed oversight. A poorly designed one can produce the appearance of accountability while consuming valuable staff time, obscuring responsibility, and shifting attention away from the outcomes that matter most.

This report examines how Oklahoma's charter reporting system works in practice. Drawing on interviews with charter school leaders, authorizers, and charter support organizations, as well as a review of relevant statutes, rules, and policy documents, it distinguishes between reporting requirements that are genuinely distinctive to charter schools and requirements that apply more broadly to all public schools. It also identifies where current reporting lines appear duplicative, unclear, or

misaligned; which agencies collect the information used to oversee charter schools; and how much staff time schools estimate they spend meeting these requirements.



Data and Methodology

This report draws on two complementary sources of evidence: (1) a review of relevant Oklahoma statutes, administrative rules, and policy documents, and (2) semi-structured interviews with charter school leaders, authorizers, and organizations that support Oklahoma charter schools.

First, we conducted a review of state legislation and related policy documents to identify the set of reporting requirements that apply to charter and virtual charter schools in Oklahoma. The review included provisions of Title 70 of the Oklahoma Statutes, relevant sections of the Oklahoma Administrative Code, Oklahoma State Department of Education (OSDE) reporting guidance, accreditation-related materials, Statewide Charter School Board (SCSB) rules and oversight materials, and selected authorizer documents identified through the interview process. We used this review as a starting point in distinguishing between requirements that appear to apply to all public schools, requirements that are specific to charter or virtual charter schools, and requirements whose applicability to charter schools appears ambiguous or contested. However, because this report is not a formal legal opinion and its authors are not attorneys, statutory and regulatory interpretations should be read as policy analysis and nothing in this document should be construed as legal advice.

Second, we conducted 15 semi-structured interviews with individuals who collectively brought experience from at least 13 different charter school systems, seven separate authorizers, and three charter support organizations. Interviewees included leaders from brick-and-mortar charter schools, virtual charter schools, schools authorized by different types of sponsors, and organizations with cross-sector knowledge of charter reporting and oversight. Eleven of these interviewees are current charter school or network leaders, and other interviewees had previously led charters and now work in other roles in the education space. Current charter leaders ranged in experience from three to 25 years working in charter schools. The interviews were designed to capture both formal reporting obligations and the practical experience of completing those obligations. Interview questions focused on four areas: (1) the reporting requirements schools complete each year, (2) whether any requirements are distinctive to charter or virtual charter schools, (3) whether current reporting lines are duplicative, misaligned, or unclear, and (4) the personnel resources required to complete reporting and compliance tasks. Interviews were recorded and transcribed when possible.

To estimate reporting burden, we asked interviewees to identify the staff involved in reporting and to estimate the amount of time spent on recurring reporting and

compliance tasks. These estimates should be interpreted as approximate and self-reported. In many cases, interviewees could estimate total reporting burden more readily than the subset of burden attributable only to charter-specific requirements. Data on charter school authorizers were provided by the SCSB in 2025.

In order to facilitate candor, interviewees were all guaranteed confidentiality as a part of their interviews with the research team. Throughout the report we provide quotes from the interviews to help illustrate our findings and conclusions. We attribute each quote to the broad class of interviewee (e.g., charter school leader, charter school authorizer, charter support organization personnel), and we ensure that the attribution preserves the anonymity of the interviewee.

Throughout the report we refer to three broad classes of reporting. First, “public school reporting” refers to reporting required of all Oklahoma local educational agencies. This includes charter schools as well as traditional public school districts. Second, we refer to “charter-specific reporting” to describe reporting requirements that apply to charter schools but not traditional public school districts.³ In general, however, most state reporting obligations identified in our review apply broadly to public school districts, including charter schools. Third, we consider “authorizer-specific reporting” to be those reports that charter schools must deliver to their authorizer under the terms of the charter contract or based on the authorizer’s performance framework.

Limitations

Although this report provides the most comprehensive analysis to date of charter school reporting requirements in Oklahoma, we note two limitations. First, our sample of interviewees was purposive rather than representative, meaning that the findings should be interpreted as a window into the reporting requirements faced by Oklahoma charter schools, as opposed to a set of estimates that generalize to all charter schools across the state. Second, our review did not attempt to catalog every contract-specific, grant-specific, program-specific, or authorizer-specific reporting requirement that may apply to an individual charter school. Rather, we focused on state statutes and regulations and examined authorizer-specific requirements identified through interviews and relevant authorizer documents. Because charter contracts, authorizer practices, grants, and program participation vary across schools, the reporting obligations described here should not be interpreted as an exhaustive inventory applicable to every Oklahoma charter school.

Findings

Our analysis of policy documents and legislation, combined with the insights provided by our interviewees, produced three main findings, which we describe in detail below.

In general, these findings suggest that streamlining reporting processes and providing certainty about the information charters are responsible for reporting would improve accountability while reducing regulatory burden. Our interviewees generally told us that they supported accountability, financial transparency, subgroup reporting, health and safety oversight, and authorizer review. However, the interviews surfaced consistent critiques concerning the frequency and redundancy of state-required reporting, its lack of clarity, and the general clunkiness of the reporting and accreditation processes.

Finding 1. Reporting inefficiency is not distinctive to charter schools, as the accreditation process creates substantial administrative burden for both charter and traditional public schools.

Our review of state statutes, regulations, and policy documents identified very few state reporting requirements that apply uniquely to charter schools. One limited exception is the requirement that charter schools submit modified charter contracts to OSDE.⁴ Generally, however, charter schools participate in the same state compliance and reporting systems as traditional public school districts. Our interviews with charter leaders reinforced this finding. As one interviewee summarized, “It just feels like we have all the same requirements, so there’s not that much of a difference, just less funding.”

The most significant source of state-required reporting identified in our analysis was Oklahoma’s public school accreditation process. As one charter leader put it, “Accreditation is the overwhelming beast of all of it.” Accreditation in this context differs in important ways from the accreditation processes familiar in higher education or private schools.⁵ In those sectors, accreditation typically consists of a periodic review of institutional quality and compliance conducted by an external accrediting organization. Oklahoma public school accreditation, by contrast, is an annual compliance process administered by OSDE. School districts, including charter schools that operate as districts under Oklahoma law, must document compliance with a wide range of statutory, regulatory, and administrative requirements each year.



Accreditation is the overwhelming beast of all of it.

Charter school leader

The breadth of this process is substantial. Charter leaders showed us lists of required submissions in OSDE's Single Sign-On system and internal tracking documents used to manage them. One organization had compiled a spreadsheet containing 179 reporting and compliance items in a single year. The requirements ranged from documenting policies governing employee background checks to verifying tornado drills to confirming that all employees had undergone annual training on bloodborne pathogens. Not every item represents a separate substantive state mandate, and many serve legitimate accountability, health, safety, or administrative purposes. Taken together, however, they illustrate the volume of documentation that school administrators must monitor and submit.

Importantly, the concerns about reporting regulations expressed by interviewees were generally not objections to accountability itself. Charter leaders repeatedly acknowledged the importance of financial transparency, academic accountability, and safeguards for students and staff. One leader drew the distinction particularly clearly: "With the higher autonomy comes greater accountability. So, I don't mind the accountability, but I do mind the inefficiencies."

Our review of the interview evidence suggests that these perceived inefficiencies fall into three broad categories: the accumulation of requirements over time, the annual resubmission of information that rarely changes, and administrative friction in the reporting process itself.

Requirements accumulate

First, accreditation appears to function largely as an additive system. New statutory and regulatory requirements generate new compliance obligations, while older requirements are rarely consolidated or removed. Charter leaders therefore described a process that has expanded over time without a corresponding mechanism for determining whether each item continues to provide information commensurate with the administrative effort required to produce it. As one veteran charter leader observed, "Policy books get longer. They never get shorter."

This does not necessarily mean that individual requirements lack value. It does suggest, however, that the accreditation system would benefit from periodically asking a more fundamental set of questions: What information does the state need to ensure academic quality, fiscal integrity, and student safety? How frequently does that information meaningfully change? And does the value of collecting it annually justify the administrative cost?

Reporting the same thing again

Second, a notable share of the burden described by interviewees involved repeatedly documenting conditions or policies that had not changed. Six of the 11 current charter leaders interviewed expressed this concern. Several of these leaders described annually submitting the same policies for many years. One interviewee pointed to a Family Educational Rights and Privacy Act (FERPA) policy that had effectively been resubmitted annually for approximately 25 years.

The most vivid examples involved administrators retrieving documents that OSDE had already received and simply submitting them again. One leader described downloading a policy submitted the previous year and immediately re-uploading the same file into the same reporting category. Another explained that the school had maintained a clean accreditation record since 2015 but was nevertheless required to document the same policies annually.

These examples point to an important distinction within accreditation reporting. Some information is inherently annual. Student attendance, enrollment, financial condition, staffing, and academic performance can change materially from year to year and may warrant annual collection. Other information, particularly the existence of longstanding board policies or institutional procedures, may change infrequently. Requiring schools to reproduce the same evidence annually can consume

"The accreditation system generally applies the same annual documentation cycle regardless of a school's history of compliance"

administrative time without necessarily generating any new information for the state.

A related issue is that the accreditation system generally applies the same annual documentation cycle regardless of a school's history of compliance. Several interviewees suggested that

schools with long records of clean accreditation should face less frequent documentary review for requirements that rarely change, while schools with identified deficiencies should receive more frequent scrutiny. Such an approach would not necessarily reduce accountability; instead, it would concentrate oversight where the risk of noncompliance is greatest.

The friction adds up

Third, interviewees described avoidable administrative friction in the mechanics of submitting required information. Some requirements still involve maintaining or producing documentation that leaders viewed as unnecessarily cumbersome, while others require navigating reporting categories in OSDE's Single Sign-On portal that are not always intuitively organized. One administrator described report numbers or categories changing from year to year, requiring staff to locate the appropriate upload field again even when the underlying requirement had not changed. The same leader noted that documents already held by the state often must simply be uploaded again rather than carried forward or certified as unchanged.

Individually, inconveniences such as re-uploading a document or locating the correct reporting field may appear minor. Their significance becomes clearer when considered in the context of the overall scale of accreditation. One interviewee estimated that accreditation alone routinely required more than 50 staff hours, while other major state reports could require an employee's full-time attention for multiple weeks. Across employees involved in the process, the interviewee estimated that annual reporting consumed "hundreds of hours." Ten of the 11 current charter leaders interviewed described frustration with at least one online reporting interface.

Those time demands represent a significant cost, particularly in small organizations where administrative responsibilities are distributed among leaders whose primary roles extend well beyond regulatory compliance. Interviewees described superintendents and other senior administrators devoting time to collecting documentation, interpreting requirements, and entering information, time they believed could otherwise be devoted to instructional leadership, staff development, and school operations.

The central implication of this finding is therefore broader than the regulation of charter schools. To the extent that Oklahoma's accreditation and reporting system contains redundant or outdated requirements, those costs are borne by traditional public school districts as well as charter schools. Oklahoma's large number of small districts makes this particularly important. A small rural district and a small charter

school may have very different governance structures, but both have limited central-office capacity over which to spread fixed compliance obligations.

Accordingly, the evidence from this study suggests an opportunity to review the public school accreditation and reporting system as a whole.

Finding 2. There is ambiguity about the specific set of state-required reporting requirements charters are subject to, and this uncertainty may lead charter schools to spend time and resources on reporting activities that are not legally required.

The accountability-autonomy tradeoff is at the heart of the charter school model. This tradeoff is recognized in the Charter Schools Act—the Oklahoma legislation that authorized the creation of charter schools—by exempting charter schools from many requirements. The relevant portion of the statute reads as follows:



“Except as provided for in the Oklahoma Charter Schools Act, a charter school and virtual charter school shall be exempt from all statutes and rules relating to schools, boards of education, and school districts; provided, however, a charter school or virtual charter school shall comply with all federal regulations and state and local rules and statutes relating to health, safety, civil rights, and insurance. By January 1, 2000, the State Department of Education shall prepare a list of relevant rules and statutes which a charter school and virtual charter school must comply with as required by this paragraph and shall annually provide an update to the list.”⁶

However, a later portion of the statute contains the following language:



“A charter school or virtual charter school shall be subject to the same reporting requirements, financial audits, audit procedures, and audit requirements as a school district.”⁷

This portion of the statute plainly states that charter schools are subject to the same reporting requirements as traditional public schools, but it is not fully clear what the term “reporting requirements” encompasses. Most notably, charter leaders we

interviewed questioned whether reporting requirements include all aspects of the accreditation process. This uncertainty is compounded by legislation passed after the Charter Schools Act that imposes new requirements on public schools. For example, one charter leader pointed to Oklahoma's Open Transfer Act, which created new reporting requirements related to student transfers.⁸ Although the reporting system is designed to track students transferring between school districts, the leader questioned its applicability to charter schools, where enrollment occurs through school choice and, when applications exceed capacity, a lottery process. Requirements such as these may subsequently become items that schools must document through the accreditation process, even though the underlying statute does not necessarily characterize them as "reporting requirements."

Later legislation can create an additional source of ambiguity depending on how charter schools are referenced. Some newer statutes expressly state that a requirement applies to public schools "and charter schools," which provides a relatively clear indication of legislative intent to include charters. Other statutes refer more generally to "schools," "public schools," or "school districts," leaving less clarity about whether the requirement overrides or falls within the exemptions established by the Charter Schools Act. One charter-sector stakeholder identified this distinction directly, arguing that requirements explicitly extended to charter schools present a different legal question from requirements written for districts or schools generally but nevertheless enforced against charter schools through accreditation. In other words, the distinction between a substantive statutory requirement and a reporting requirement can become blurred when the accreditation process requires charter schools to annually provide evidence that they have complied with a substantive requirement whose applicability to them may itself be uncertain.

Which rules actually apply?

OSDE does currently host a document listing health, safety, civil-rights, and insurance laws and rules applicable to charter schools.⁹ However, the document is undated and appears not to have been regularly updated, despite the Charter Schools Act's direction that OSDE annually update the list. The header of the document has the name of the Oklahoma State Superintendent who left office in January 2023. Moreover, the document is limited to the health, safety, civil-rights, and insurance provisions specifically referenced in the Act and does not provide the broader guidance charter leaders described needing to determine how other state

laws, regulations, accreditation requirements, and reporting obligations apply to charter schools.

Our interviews confirm that charter leaders lack an authoritative resource explaining how reporting, accreditation, and later-enacted public school mandates interact with charter school exemptions. Specifically, the charter leaders we interviewed were generally unaware of any authoritative document identifying the requirements that apply to charter schools or distinguishing applicable requirements from provisions that do not apply to charter schools. Several identified the creation of such a resource as a straightforward way to improve the current reporting system. As one charter leader explained, “I’ve asked now for six years for a list of requirements for charter schools [...] and it still hasn’t happened.”



I've asked now for six years for a list of requirements for charter schools... and it still hasn't happened.

Charter school leader

The absence of clear, authoritative guidance creates uncertainty about which reporting and compliance requirements apply to charter schools. That ambiguity is particularly consequential because Oklahoma charter schools operate within a broader regulatory framework designed primarily for public school districts, while being exempt from some requirements and subject to others specific to charter schools. Determining whether a particular statute, rule, or reporting request applies can therefore require charter leaders to interpret legal provisions themselves, seek assistance from outside experts, or contact state officials for clarification. One leader described “frequently” having to solicit outside expertise simply to determine whether a requirement applied to charter schools.

When in doubt, comply

In practice, this uncertainty appears to encourage overcompliance rather than noncompliance. Of the 11 charter leaders we interviewed, five described instances in which they believed they were being asked to submit information that may not have been required, but indicated that they generally complied anyway because doing so was easier than disputing the request or risking a compliance problem. Only one leader described routinely pushing back against requirements the school believed did not apply. Thus, ambiguity itself can generate reporting burden: even when a

requirement may not apply to a charter school, the cost of determining that with confidence or challenging the request may exceed the cost of simply complying. As one charter leader summarized, “I probably turn in more things than I need.”

This approach reduces the risk of a compliance violation but also wastes time. Interviewees described spending staff time completing reports that they later learned were not required, seeking outside assistance to interpret requirements, and repeatedly determining whether particular mandates applied to charter schools. One leader recalled having “wasted a whole week” before being informed that charter schools were exempt from the requirement.

The necessity of institutional knowledge

These costs may be especially significant for newer charter schools and administrators, who have less institutional knowledge to draw on when navigating the reporting system. Experienced leaders may know from prior practice which requests can be disregarded or whom to contact for clarification; new administrators must often reconstruct that knowledge themselves. The resulting burden is therefore not simply the number of reports charter schools must submit, but the time required to determine what they are actually required to submit in the first place.

Taken together, our review of Oklahoma law and policy and our interviews with charter-sector stakeholders indicate substantial uncertainty about the specific compliance and reporting requirements that apply to charter schools. The problem is notable because state law already anticipates the need for clarity by directing OSDE to maintain an updated list of applicable statutes and rules. Ensuring that such a resource is comprehensive, current, and readily accessible could reduce unnecessary reporting, lower administrative costs, and allow charter leaders to devote less time to determining their obligations and more time to fulfilling them.

Finding 3. Authorizer reporting requirements vary substantially, and some unnecessarily duplicate information that charter schools already report to the state.

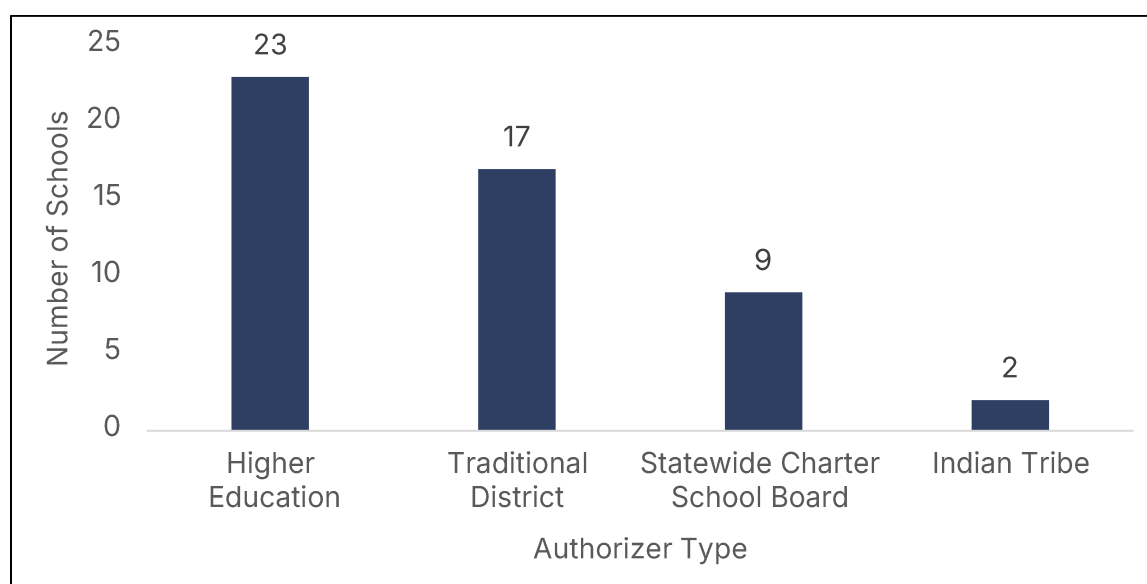
In addition to the state reporting requirements described in the previous findings, charter schools are accountable to their authorizers.¹⁰ As in other states, charter school authorizers are the institutions responsible for approving charter schools, entering into contracts with them, monitoring their performance, and deciding whether their charters should be renewed, revoked, or allowed to expire.¹¹

Authorizers may include traditional school districts, qualifying institutions of higher

education, certain federally recognized Indian tribes, and the SCSB.¹² Figure 1 shows that a plurality of charter schools in Oklahoma are authorized by institutions of higher education in the state.¹³

This authorizer relationship represents the principal layer of reporting that is distinctive to charter schools. Authorizers need information to determine whether schools are meeting the terms of their charter contracts, remaining financially and organizationally viable, and complying with applicable law. As a result, authorizers commonly collect academic, financial, governance, operational, and compliance information from the schools they oversee. The existence of additional reporting to an authorizer is therefore an inherent feature of charter school accountability.

Figure 1. Institutions of higher education authorize nearly half (23/51) of Oklahoma's charter schools.



Note. N = 51. Data were provided by the Statewide Charter School Board in 2025.

Our interviews indicate, however, that the amount and nature of authorizer-required reporting in Oklahoma vary substantially depending on the authorizer. Charter leaders with experience under multiple authorizers described markedly different reporting expectations. One interviewee with familiarity with both higher education authorizers and the SCSB described reporting relationships with higher education authorizers as more straightforward than reporting to the SCSB. Referring to their higher education authorizer, the interviewee described providing annual information on “finance, attendance, academic achievement” and presenting an annual progress report to the authorizer’s governing board. By contrast, the interviewee said that when dealing with the SCSB, “they request, like, tons of reports.”

This variation was not limited to the contrast between the SCSB and other authorizers. Another leader whose organization has operated under multiple authorizers similarly emphasized this variation, commenting that authorizer practices “shouldn’t vary this much at this point, because the state law sort of dictates what the authorizer should be doing.” The leader described a higher education authorizer with which the organization had worked as focusing primarily on contractual requirements, including financial condition, enrollment, organizational systems, and academic performance, with an annual report used to assess the school against the terms of its charter.

More oversight or just more paperwork?

Importantly, additional authorizer reporting does not necessarily create substantial administrative burden when the authorizer relies on information the school already produces. Another charter leader described an earlier period when reporting to a district authorizer was burdensome, but said the parties eventually agreed that the authorizer would request the same reports the school already completed for other purposes. The result, the leader reported, was that “we finished theirs in five minutes for the whole year, because we’ve already done them.” This example illustrates an important distinction: an authorizer may conduct meaningful oversight without requiring the school to construct an entirely separate reporting infrastructure.

Other interviews, however, identified cases in which authorizer requirements resulted in schools resubmitting information already reported to the state, producing it in a different format, or collecting additional information specifically for the authorizer. Another charter leader, for example, described submitting financial information to OSDE and then reporting it again to the school’s district authorizer, sometimes under different specifications. Graduation-rate reporting similarly required additional work because the district authorizer and the state used different reporting conventions, although this leader noted that the district authorizer had recently begun moving toward greater reliance on the state-reported measure.

An example of an authorizer collecting information that goes beyond existing state measures is the Tulsa Public Schools (TPS) performance framework.¹⁴ The framework includes parent satisfaction as an indicator, which requires a survey administered by participating schools. Tulsa-based stakeholders told us of a case in which a school had already surveyed families, but TPS required the school to submit results differently. As one interviewee told us, “they wanted a different survey, and in

a different format,” and that required altering an existing survey process to satisfy the authorizer requirement.

This example also demonstrates that duplication is not necessarily static. Both charter leaders and a district authorizer described efforts over time to reduce redundant reporting. Tulsa-based stakeholders told us that TPS now

attempts to align reporting timelines for its charters with state reporting schedules and, where possible, obtain information directly from OSDE rather than requiring schools to reproduce it. At the same time, some authorizers told us that they lack direct access to important OSDE data systems, including Single Sign-On and state reporting databases. Consequently, schools sometimes must duplicate efforts, transmitting information to the authorizer that they have already provided to the state. Some of this duplication appears to result from the inability of state and authorizer information systems to communicate with one another.

“Duplication appears to result from the inability of state and authorizer information systems to communicate with one another”

At the same time, the TPS experience illustrates that additional authorizer requirements can serve a useful accountability purpose when they are clearly connected to a transparent performance framework. TPS evaluates its charter schools across academic, financial, and organizational domains, and stakeholders told us that the framework has improved through consultation with charter schools. One Tulsa-based stakeholder described a “sandbox” that allows TPS-authorized charter schools to enter projected performance data, anticipate their ratings, and compare their performance with peer charter schools. Although that stakeholder continued to identify shortcomings with some individual measures, that person also noted improvement, remarking that “the transparency has been nice” and that the framework was “a lot better than it used to be.”

One of the clearest examples of the administrative burden created by authorizer reporting came from a charter leader’s experience with the SCSB. One charter leader recalled that the charter at one point submitted more than 70 reports in a single year to the SCSB, all in addition to reporting required by OSDE and the federal government. This leader also noted that the burden has since declined in part because the SCSB began to obtain some information directly through schools’ Single

Sign-On accounts rather than requiring schools to submit it again. This experience demonstrates both the potential scale of authorizer-specific reporting and the gains that can result when authorizers obtain existing data directly.

Although interviewees were often unable to isolate the personnel time attributable specifically to charter status from their overall reporting burden, the interviews do offer a rough sense of what charter-specific reporting (principally, the authorizer-specific layer described above) actually costs schools. That cost varies considerably by authorizer. At the low end, one charter leader whose authorizer now simply reuses the school's existing reports put the resulting authorizer-specific workload at only a few minutes a year. At the high end, one SCSB-authorized charter leader who described submitting more than 70 reports annually to the SCSB alone, on top of state and federal reporting, estimated that this authorizer-specific work consumed roughly two weeks of a principal's time, about a week of an assistant superintendent's time, and one to two days of a chief financial officer's time each year: on the order of 130 combined staff hours annually. Other interviewees described sharp, one-time spikes rather than steady annual burdens. One charter-sector stakeholder estimated that an unanticipated statewide data-collection request from the SCSB cost participating schools roughly 30 hours of staff time to complete, and a leader of a separate SCSB-authorized school described an unannounced "academic audit" that consumed approximately a full week of leadership time during the opening weeks of a school year.

The burden is not confined to schools. Strong authorizing requires dedicated staff capacity, and TPS, one of Oklahoma's more established authorizers, now dedicates a full-time staff position to charter oversight. At the same time, reporting duplication TPS once imposed on its schools has declined, suggesting that dedicated staff and more efficient reporting can coexist. Taken together, these estimates suggest that authorizer-specific reporting, as distinct from the broader accreditation and state reporting burden documented elsewhere in this report, typically appears to range from negligible to roughly 100-150 staff hours per year, concentrated among a handful of administrators, with occasional spikes when authorizers introduce new requirements without advance notice.



We have no idea what the rubric is. [...] What's a one? What's a two?

Charter school leader

The administrative burden of authorizer reporting also depends on how clearly schools understand what information will be used and how it will affect accountability decisions. A leader of one SCSB-authorized charter school, for example, described difficulty interpreting the SCSB performance framework even after receiving a numerical rating. Although the framework used a zero-to-five scoring scale, that leader told us, “We have no idea what the rubric is,” and asked, “What’s a one? What’s a two?” After the overall rating of that leader’s organization changed substantially from one year to the next, the leader reported that there was “just nothing that shares with us how we’re getting graded.” This type of uncertainty creates a different kind of administrative cost: schools must devote time not only to supplying information but also to determining how the authorizer is interpreting it and what performance expectations they must meet.

Current SCSB rules reflect both sides of this issue. On the one hand, charter schools overseen by the Board must grant it read-only access to state and school reporting systems, including Single Sign-On, OCAS, and student information systems. On the other hand, those schools must also annually submit a substantial set of documents through the Board’s own online reporting system, Epicenter, including budgets, audit documents, quarterly financial statements, enrollment counts, accreditation documents, statistical-report summaries, board materials, graduation-rate documents, and other information. Of course, some of these materials may be necessary for the Board to discharge its authorizing responsibilities, and some may not be available through existing state systems. But the simultaneous existence of direct system access and separate submission requirements raises an important efficiency question: which information must genuinely be collected from schools, and which information can the Board retrieve from a source to which it already has access?



To avoid duplication of administrative efforts, the sponsor shall require that data submitted under the performance provisions must be submitted by the charter school in the exact format required for submission of data to the Oklahoma State Department of Education.¹⁵

Oklahoma regulations place limits on the additional data authorizers may request from charter schools. An authorizer generally may not request a metric or data point from a charter school unless it produces or publishes the same metric for the other schools under its sponsorship, or unless the information is unique to the charter

school.¹⁶ The same rule also directs authorizers to minimize duplicative administrative work by accepting performance data in the same format required by OSDE and expressly permits schools to authorize OSDE to share required data directly with their authorizer.

Taken together, our interviews suggest that the administrative burden associated with authorizer reporting depends less on the mere existence of authorizer oversight than on how that oversight is implemented. Authorizer requirements create relatively little additional burden when they draw on existing state reports, use compatible formats, or, ideally, permit the authorizer to retrieve required data directly. Administrative costs increase when schools must report the same information to multiple entities, translate identical information into different formats, upload documents already available through another system, or create new data collections primarily to satisfy an authorizer requirement.

Reporting burden is not the same as accountability

However, minimizing reporting burden is not sufficient to ensure strong authorizing. Our interviews also raised concerns about authorizers at the opposite end of the spectrum. One charter leader described reporting to a higher education authorizer as largely consisting of an annual presentation and basic information on finances, attendance, and academic achievement. Other charter-sector stakeholders questioned whether some higher education authorizers devote sufficient staff or attention to evaluating the schools they oversee. One stakeholder characterized several such authorizers as “extremely immature and uninvolved,” arguing that they lacked dedicated authorizing capacity and provided little ongoing engagement with their schools. Thus, the substantial variation we observed among Oklahoma authorizers may reflect both unnecessary administrative burden in some cases and insufficiently developed accountability systems in others.

Accordingly, reducing authorizer reporting burden is conceptually distinct from weakening authorizer-based accountability. In principle, a strong authorizer could hold its schools to rigorous and detailed performance standards while obtaining much of the information needed to assess those standards directly from OSDE or other existing sources, requiring relatively little additional reporting from the schools themselves. Conversely, an authorizer could impose relatively weak or inconsistent standards while still requiring schools to complete numerous unnecessary reports.



If you have authorizers who aren't really sure what information they need to be getting [...] they can certainly overreach

Charter school leader

This distinction is consistent with widely recognized practices in charter school authorizing. National authorizing standards emphasize clearly defined academic, financial, and organizational expectations; transparent performance frameworks; meaningful consequences for persistent failure; and preservation of school-level operational autonomy.¹⁷ Several Oklahoma stakeholders articulated a similar distinction. One former charter leader described the authorizer's role as holding a charter school accountable for the commitments it made in exchange for greater autonomy: "you said you were going to do something different, and we were going to give you some autonomy to do something different," and the authorizer should therefore hold the school accountable to those commitments. Another interviewee made the distinction more explicitly, saying, "I'm a big fan of outcomes based," and arguing that an authorizer should establish expected outcomes without unnecessarily getting "into the how" a school achieves them.



Sponsors including the Statewide Charter School Board shall develop and maintain chartering policies and practices consistent with recognized principles and standards for quality charter sponsoring[.]¹⁸

Collect once, use many times

The relevant question, then, is not simply how much information an authorizer collects, but whether each additional requirement produces information that the authorizer needs to evaluate school performance and that it cannot reasonably obtain elsewhere. As one former charter leader put it, "if you have authorizers who aren't really sure what information they need to be getting ... they can certainly overreach." Oklahoma could more consistently apply a "collect once, use many times" principle to charter reporting while also encouraging authorizers to maintain clear, rigorous, and transparent performance frameworks. Authorizers should have access to all the information necessary to evaluate the schools they oversee, but, wherever possible, they should obtain existing state data directly, accept reports in

the format already required by OSDE, and clearly identify why any additional information is necessary for an authorizer-specific accountability purpose.



Policy Recommendations

Based on the findings in this report, we make the following recommendations for future policy related to charter school reporting requirements.

First, OSDE should expand and regularly update its existing charter compliance guidance. OSDE should publish and maintain a clear, authoritative document detailing which requirements apply to all charter schools, which apply specifically to virtual charter schools, which apply to all public schools, and which do not apply to charter schools. Charter leaders should not have to rely on institutional memory, informal guidance, or their willingness to push back in order to know what the law requires. A public document would reduce confusion, prevent overcompliance, and create a common reference point for schools, authorizers, accreditation officers, and state agencies.

Oklahoma can look to other states for examples of how to provide such guidance in a manner that is both clear and current. The Texas Education Agency, for example, maintains an annually updated document titled Texas District Reporting and Data Submissions that specifies each report or data submission that districts or charters are required to submit.¹⁹ Notably, the Texas document contains a column that explicitly states whether charter schools are subject to that submission or reporting requirement. In Colorado, the Department of Education maintains a website titled “Waivers & Policy Guidance” that specifies: (1) the set of statutes that charter schools are automatically exempt from upon establishment of a signed charter contract, referred to as “automatic waivers,” (2) the set of statutes that charter schools cannot be exempted from, referred to as “prohibited waivers,” and (3) an annually updated list of waivers that have been approved for each charter school in the state.²⁰

Although the details differ between the approaches taken by Texas and Colorado, the end result is the same: Charter school leaders in each state have clarity regarding their state-required reporting obligations. Oklahoma should strive to provide such clarity to its charter leaders.

Second, Oklahoma should launch a statewide review of routine compliance reporting for all public schools with the goal of eliminating unnecessary reporting. Oklahoma may benefit from a systematic review of accreditation and routine compliance reporting across all public schools, not just charters. The legislature, executive branch, or state education agencies could establish a time-limited working group charged with identifying reporting requirements that can be eliminated,

consolidated, automated, or moved to less frequent review. New Mexico undertook such an effort in 2022, leading to a significant reduction in school reporting burden.²¹

The working group should include charter and traditional district leaders, authorizers, OSDE staff, accreditation officials, legislators, and data-system experts, and the review should distinguish information that genuinely requires annual collection from policies, procedures, trainings, certifications, and other materials that change infrequently. Such an endeavor may determine, for example, that some schools should be permitted to certify that previously submitted information remains unchanged rather than resubmitting the same documentation each year. Other reporting may prove unnecessary, while some requirements may warrant less frequent documentary review for schools with sustained records of compliance. Such a review could identify specific requirements for elimination or modification and recommend ways to streamline data collection while preserving oversight of student safety, fiscal integrity, civil rights, academic performance, and other areas where regular monitoring is justified.

Third, Oklahoma's charter school sponsors should adhere to nationally recognized best practices for charter school authorizing, focusing particularly on the principle of upholding school autonomy. Oklahoma law requires charter school authorizers, including the SCSB, to maintain "chartering policies and practices consistent with recognized principles and standards for quality charter sponsoring in all major areas of sponsoring responsibility."²² The National Association of Charter School Authorizers' (NACSA) *Principles & Standards for Quality Charter School Authorizing* is broadly recognized as the clearest statement of those practices.²³ One of NACSA's three main principles for quality charter school authorizing is Uphold School Autonomy, a principle that includes:

- Minimizing administrative and compliance burden on schools;
- Only collecting from schools the information they are not able to reliably get from other sources; and
- Focusing on holding schools accountable for outcomes rather than processes and inputs.

Given their statutory obligation, Oklahoma authorizers should initiate internal review processes to ensure that they are minimizing the administrative and compliance burden on schools while still exercising high-quality oversight of academic performance, financial health, legal compliance, and organizational effectiveness. As part of that review, authorizers should ensure that performance frameworks clearly explain the purpose, scoring criteria, and intended use of each required metric.

Other states have enacted measures designed to ensure authorizers' adherence to standards for quality authorizing. For example, since 2016, Ohio has annually evaluated all charter authorizers in the state on three dimensions, one of which is adherence to best practices.²⁴ These evaluations have consequences: Poorly rated authorizers can be prohibited from sponsoring new schools or, in cases of very low evaluations, stripped of all authorizing authority. Similarly, Georgia law requires charter authorizers in the state to undergo an annual evaluation designed to judge adherence to best practices, reporting the results publicly.²⁵

Fourth, Oklahoma should move toward a “collect once, use many times” reporting system. Oklahoma should stop requiring charter schools to serve as couriers between state agencies and authorizers. When a charter school submits required data or compliance documentation to OSDE or another state entity, that information should be available, subject to appropriate privacy protections, to the school's authorizer.

State law and administrative rules already point in this direction: charter contracts must require performance-framework data to be submitted in the same format required by OSDE “to avoid duplicative administrative efforts,” and OSDE rules allow a charter school to authorize OSDE to share performance-framework data directly with the school's sponsor.²⁶ Complementing these statutory and regulatory provisions, authorizers may also include data access provisions in charter contracts. For example, SCSB rules require its sponsored schools to “grant the Statewide Charter School Board read-only access to all state and school reporting systems, including, but not limited to, Single-Sign On, OCAS, the student information system, and the Wave.”²⁷

Oklahoma should build on those provisions by improving these data-sharing processes. Ideally, OSDE or the Office of Educational Quality and Accountability (OEQA) would house these data, and each authorizer would have read-only access to the state-held reporting products needed to oversee the schools it sponsors. The goal should be simple: schools report required information once, and public oversight bodies share it responsibly on the back end.

Finally, lawmakers should clarify in statute how the Charter Schools Act interacts with later-enacted public school mandates. At present, charter leaders and regulators can reasonably disagree about how later-enacted requirements directed at “public schools” interact with the Charter Schools Act's general exemptions and autonomy provisions. To resolve the ambiguities, lawmakers should make explicit

when newly enacted requirements are intended to apply to charter schools rather than leaving schools and regulators to resolve that question after enactment.²⁸

Other states have dealt with similar kinds of legal ambiguity over the years. For example, charter school stakeholders in Arizona,²⁹ Georgia,³⁰ and California³¹ have asked their respective Attorneys General (AGs) to provide clarity on charter schools' obligations when statutory language conflicts, with the AGs issuing opinions that vary in their substantive conclusions. Ultimately, full clarity on this issue requires legislative action.

Endnotes

¹ Oklahoma Statewide Charter School Board, *Annual Report of Oklahoma Charter Schools*, interactive data dashboard, accessed July 10, 2026, <https://escmatrix.com/okcharter-report/>

² A recent OCEP analysis of high schools finds sharply different outcomes across these sectors: in-person charter high schools compare favorably to large urban districts on several measures, while virtual charter schools post generally weak results, including a 54 percent four-year graduation rate overall and 49 percent for economically disadvantaged students. Adam Tyner, *Oklahoma's Public High School Outcomes by Sector*, Oklahoma Center for Education Policy, May 2026, <https://ou.edu/content/dam/education/centers-and-partnerships/education-policy/High-School-Outcomes-May-2026-vsi.pdf>

³ Our review identified very few such requirements in Oklahoma law. One example is the requirement that a charter school provide OSDE with a copy of any modified charter contract within 30 calendar days. Okla. Admin. Code § 210:40-87-7(d).

⁴ Ibid.

⁵ Private school accreditation is often required for educational entities to participate in private educational choice programs, such as education savings accounts. Michael B. Horn and Raphael Gang, "Start-Up Culture Comes to K-12 Accreditation: ESA Laws Can Support—or Stifle—New Schools," *Education Next* 25, no. 4 (September 23, 2025), <https://www.educationnext.org/start-up-culture-comes-to-k-12-accreditation-esa-laws/>

⁶ Oklahoma Charter Schools Act, 70 O.S. § 3-136(A)(1).

⁷ Oklahoma Charter Schools Act, 70 O.S. § 3-136(A)(5).

⁸ Jude Schwalbach and Ahmed Almoaswes, "Oklahoma Now Has the Best Open Enrollment Policy in the Country," Reason Foundation, July 30, 2024, <https://reason.org/commentary/oklahoma-now-has-the-best-open-enrollment-policy-in-the-country/>

⁹ Oklahoma State Department of Education, *Health, Safety, Civil Rights, and Insurance: Laws and Rules Applicable to Charter Schools*, accessed August 21, 2026, <https://oklahoma.gov/content/dam/ok/en/osde/documents/services/assessments/Charter-School-Compliance-Rules-and-Statutes.pdf>; Oklahoma Charter Schools Act, 70 O.S. § 3-136(A)(1).

¹⁰ Oklahoma law generally refers to these entities as "sponsors," but this report uses the more common term "authorizers."

¹¹ For a review of research on charter school authorizers, see Shelby L. Smith, Adam Kho, and Ron Zimmer, "Charter School Authorizers," in *Live Handbook of Education Policy Research*, ed. Douglas Harris (Association for Education Finance and Policy, 2026), accessed August 18, 2026, <https://livehandbook.org/k-12-education/market-based-schooling/charter-school-authorizers/>

¹² Virtual charter schools in Oklahoma may be authorized only by the SCSB.

¹³ Still, because most charter school students in Oklahoma are enrolled in virtual charter schools, the SCSB authorizes schools enrolling the majority of Oklahoma charter school students.

¹⁴ Tulsa Public Schools, *Tulsa Public Schools Charter Performance Framework: Technical Guide to Measures, Methods, and Application*, June 2026, <https://docs.google.com/document/d/e/2PACX-1vSZLTudYYJxJs1PSYQ9KkU5M8Et5DdHckzQC8QgGfRjGE4NmQxCZmNTuxGXXvcMkITNIz70hiFu9ntM/pub>

¹⁵ Okla. Admin. Code § 210:40-87-7(c). The Charter Schools Act uses similar language: "The sponsor shall require a charter school or virtual charter school to submit the data required in this subsection in the identical format that is required by the State Department of Education of all public schools in order to avoid duplicative administrative efforts or allow a charter school or virtual charter school to provide permission to the Department to share all required data with the Board." Oklahoma Charter Schools Act, 70 O.S. § 3-136(A)(18).

¹⁶ The rule provides that a sponsor generally may not request a metric that it does not produce or publish for all schools under its sponsorship unless the information is unique to the charter school. It

also requires performance-framework data to be submitted in the same format required by OSDE and permits a sponsor to allow a charter school to authorize OSDE to share required performance-framework data directly with the sponsor. Okla. Admin. Code § 210:40-87-7(c).

¹⁷ The National Association of Charter School Authorizers recommends that authorizers establish clearly defined and measurable academic, financial, and organizational performance standards and incorporate those expectations into charter contracts and performance frameworks. National Association of Charter School Authorizers, *Principles & Standards for Quality Charter School Authorizing* (Chicago: National Association of Charter School Authorizers, 2023), https://qualitycharters.org/wp-content/uploads/2023/03/Principles-and-Standards_2023.pdf

¹⁸ Oklahoma Charter Schools Act, 70 O.S. § 3-134(K).

¹⁹ Texas Education Agency, *Texas District Reporting and Data Submissions, 2025-26*, <https://tea.texas.gov/system/files/2026-02/district-reporting-schedule-2025-26.pdf>

²⁰ Colorado Department of Education, "Waivers & Policy Guidance," <https://ed.cde.state.co.us/cdechart/waivers>; Colorado Department of Education, "Charter Schools, Waivers 2026-27," <https://ed.cde.state.co.us/fs/resource-manager/view/b35824b0-cce4-4d6f-b0d1-132d913fd109>

²¹ New Mexico undertook a similar effort to streamline districts' compliance and reporting processes in 2022. Gov. Michelle Lujan Grisham signed an executive order directing the New Mexico Public Education Department to carry out an eight-week initiative to reduce administrative reporting required by districts and charter schools by 25 percent. The effort resulted in substantial reductions in reporting requirements across several domains, including instructional materials, college and career readiness, and finance and operations. New Mexico Public Education Department, "New Mexico Public Education Department (NMPED) Recommendations for State-Level Data Collection and Process Improvements," August 2022, <https://www.governor.state.nm.us/wp-content/uploads/2022/09/NMPED-Admin-Burdens-Report.pdf>

²² Oklahoma Charter Schools Act, 70 O.S. § 3-134(K).

²³ National Association of Charter School Authorizers, *Principles & Standards for Quality Charter School Authorizing*.

²⁴ The Ohio Department of Education and Workforce produces annual reports for each authorizer. Ohio Department of Education and Workforce, "Overall Sponsor Ratings," <https://education.ohio.gov/Topics/Community-Schools/Sponsor-Ratings-and-Tools/Overall-Sponsor-Ratings>

²⁵ State Charter Schools Commission of Georgia, "SCSC Authorizer Evaluations," <https://scsc.georgia.gov/about-us/georgia-charter-school-authorizing-standards/scsc-authorizer-evaluations>

²⁶ Okla. Admin. Code § 210:40-87-7(c); Oklahoma Charter Schools Act, 70 O.S. § 3-136(A)(18).

²⁷ Okla. Admin. Code § 777:10-1-3(b) ("School Establishment Requirements").

²⁸ For unresolved questions under existing law, state officials could also seek formal legal guidance, including an Attorney General opinion where appropriate.

²⁹ Terry Goddard, Arizona Attorney General, *Application of Proposition 203 to Charter Schools*, Ariz. Att'y Gen. Op. No. 103-002 (R03-010), July 25, 2003, <https://azmemory.azlibrary.gov/nodes/view/59725>

³⁰ Georgia Office of the Attorney General, Official Opinion 2010-5, October 7, 2010. <https://law.georgia.gov/opinions/2010-5>

³¹ California: 101 Ops. Cal. Att'y Gen. 92 (2018), Op. No. 11-201 (Dec. 26, 2018). https://oag.ca.gov/system/files/opinions/pdfs/11-201_4.pdf