



JOY HOFMEISTER
STATE SUPERINTENDENT *of* PUBLIC INSTRUCTION
OKLAHOMA STATE DEPARTMENT *of* EDUCATION

May 11, 2020

VIA E-MAIL ONLY

Freida Burgess
Superintendent, Keyes Public Schools
Post Office Box 47
Keyes, OK 73947
FBurgess@keyesps.org

Re: Keyes Public School (“Keyes” or “the District”), Independent School District No. C-021, Cimarron County (the “District”)

Superintendent Burgess,

I am writing to notify you, in your capacity as a superintendent of Keyes Public Schools, that the State Board of Education (the “Board”) will consider the possible non-accreditation and/or mandatory annexation of the District at its May 28, 2020, meeting. The proposed effective date for mandatory annexation is June 30, 2020.

Oklahoma law provides that a school district may be annexed to one or more other districts through “mandatory annexation by the State Board of Education.” *See* 70 O.S. § 7-101. Pursuant to this statute, the Board has promulgated administrative rules governing procedures for a mandatory annexation. *See* 70 O.S. § 7-101.1. At Oklahoma Administrative Code (“OAC”) 210:1-3-2, these regulations provide that mandatory annexation will be considered by the Board in the following situations:

1. When a school district has been declared academically at-risk under the statewide system of accountability pursuant to 70 O.S. §§ 1210.541-545;
2. When a school district is non-accredited by the Board;
3. When a district fails to open or maintain a school, except when situations beyond the control of the district cause a normal delay.
See OAC 210:1-3-2.

In the current situation with the District, OSDE is advising the Board that each of these triggering conditions is present. The gravamen of the recommendation for non-accreditation and mandatory annexation is based primarily on the District’s increasingly low and unsustainable student enrollment, which has resulted in the District being unable to maintain an operational and legally functional public school. Moreover, as a result of the low enrollment, the public and

stakeholders at large are unable to verify the effectiveness of the District’s academic offerings. Finally, as noted by the Board when placing the District on probationary accreditation status on February 27, 2020, the District is subject to non-accreditation for failure to maintain compliance with applicable laws and regulations relating to instruction, civil rights laws for students with disabilities and at-risk students. As presented to the Board in February, 2020, the District’s student information data shows a significant trajectory of declining enrollment over the past several years, evidenced by student enrollments as of October 1 of each year. Specifically, the District’s enrollment is summarized in the table below. In recent years, as a result of the low enrollment, Keyes has not provided transportation for students and has entered cooperative agreements with neighboring districts for students to participate in sports. The District’s enrollment counts in the last five years have plummeted, and have continued to decrease in recent months.

School Year	October 1 Enrollment Count
2015-2016	83
2016-2017	85
2017-2018	55
2018-2019	25
2019-2020	13
May 2020	5

As a consequence of the low enrollment, the District’s School Report Card that is required as a part of Oklahoma’s school accountability system pursuant to federal and state laws reflects information on academic and related measures in **only 1 of 14 indicator categories**. For the 2018-2019 Oklahoma School Report Card, the District’s results are as follows:

Indicator	Elementary School Grade	High School Grade
Academic Achievement	No Grade	No Grade
Academic Growth (Elementary sites only)	No Grade	
Graduation (High school sites only)		No Grade
English Language Proficiency	No Grade	No Grade
Chronic Absenteeism	B	No Grade
Postsecondary Opportunities (High school sites only)		No Grade
Overall	No Grade	No Grade

See 2018-2019 Oklahoma School Report Card, Keyes Public Schools, pursuant to 70 O.S. § 1210.545. For the 2018-2019 school year, there were a total of nine (9) students who completed an assessment for the Oklahoma School Testing Program, which is used to calculate performance on certain of the accountability indicators. Because the school only had nine (9) students, the

District did not have the minimum number of students (the “N size”) necessary to enable it to receive indicator grades on the School Report Card.¹

Another consequence of the District’s extremely low student enrollment—and resultantly low numbers of teachers employed—is a failure to offer the academic opportunities Oklahoma public school students are entitled to under state law. As a part of the legal and academic standards governing the accreditation of public schools by the Board, each high school must offer at least thirty-eight (38) units of study (or their equivalent in academic subject competencies) each year. *See* Oklahoma Administrative Code 210:35-9-31(g)(3). The 2017-2018 and 2018-2019 Accreditation Compliance Reports for Keyes High School indicate that the school did not offer the minimum of 38 units of high school credit required. *See* Accreditation Reports, attached as Exhibit “A.” In practice, this deficiency means that students who live in the District are not offered the same opportunities as students in other districts to learn about a breadth of subjects at the high school level.

Similar to the impact that very low enrollment has on limiting the course offerings available for high school students, minimal enrollment has resulted in a lack of capacity to serve high risk students who live in the District. Under Oklahoma law, a student who is identified as being at risk of not completing their secondary education is entitled to alternative education services. *See* 70 O.S. § 1210.568; OAC 210:35-29-8. In 2019, Keyes’ alternative education program was assigned a general rating of “Noncompliant” under the legally required annual evaluation of such programs, and received “Noncompliant” ratings for more than half of the specific program components. There were no Alternative Education program components in which Keyes was rated as “Highly Effective.” What this means, in practice, is that a student who lives in the District and is at risk of not completing their high school education is less likely to receive services designed to help them achieve graduation than an at-risk student in another district.

In the circumstances outlined above, it is the obligation of the Oklahoma State Department of Education to recommend to the Board that it consider the non-accreditation and/or mandatory annexation of Keyes Public Schools at its next scheduled meeting on May 28, 2020.

Oklahoma law and administrative regulations provide that prior to the loss of a local school district’s accreditation, the district and its representative will be given an opportunity to be heard before the Board. *See* OAC 210:1-5-5. Further, state law provides that when a recommendation for mandatory annexation is made, written notice must be provided to the board of education of the school district and said district may then request an opportunity to appear before the Board. *See* 70 O.S. § 7-101.1. As such, this letter shall serve as official notice that the Board will consider the non-accreditation and/or mandatory annexation of the District at its May 28, 2020, meeting.

The May 28 meeting of the State Board of Education will commence at 9:30 a.m. at the Oliver Hodge Building, 2500 North Lincoln Boulevard, Room 1-20, Oklahoma City, Oklahoma. At this time, pursuant to the authority granted in the Oklahoma Open Meeting Act, at 25 O.S. § 307.1, it is anticipated that the meeting will be held by videoconference. Should the District wish

¹ Oklahoma currently has an N size of 10, meaning a school must have at least ten students in an indicator to receive an indicator grade.

to appear before the Board, please advise, and information specific to accessing and participating in the meeting remotely will be provided to you at a later date.

To the extent the opportunity to appear before the Board is requested, the governing statute provides that the Board shall “decide the issues after hearing from representatives of the school or school district and the State Department and shall make a final determination on the recommendation of the Department.” *See* 70 O.S. § 7-101.1. Provided, however, that the District elects to not request an opportunity to address the Board, non-accreditation and/or mandatory annexation of the District will proceed without delay. In light of this notice and authority, the OSDE respectfully requests that the District advise whether it requests the opportunity to appear before the Board to address these matters.

If you have questions or wish to further discuss these matters, please do not hesitate to contact me at (405) 522-3274 or Brad.Clark@sde.ok.gov.

Sincerely,



Brad S. Clark
General Counsel

cc: The Honorable Joy Hofmeister,
State Superintendent of Public Instruction
Kirk Warnick
Regional Accreditation Officer, OSDE

Title 70. Schools

 Oklahoma Statutes Citationized

 Title 70. Schools

 Chapter 1 - School Code of 1971

 Article Article VII - Annexation and Consolidation

 Section 7-101.1 - Rules and Regulations to Accomplish Mandatory Annexation or Consolidation - Notice

Cite as: O.S. §, ___ __

A. The State Board of Education shall be authorized to promulgate rules and regulations regarding the procedures necessary to accomplish mandatory annexation or consolidation, as provided by and within the requirements of the provisions of Sections 2, 8, 9, 10, 11, 12 and 13 of this act, and as otherwise provided by law.

B. In any case where mandatory annexation of a school or school district is recommended by the State Department of Education, the Department shall notify, in writing, the board of education of the school district involved. Upon receipt of the notification, the school district board shall have fifteen (15) days to request an opportunity to appear before the State Board of Education. If the school district board fails to request an opportunity to appear, the State Board shall proceed without further notice or delay, to conclude the matter. If an opportunity to appear is requested by the school district board, the State Board shall decide the issues after hearing from representatives of the school or school district and the State Department and shall make a final determination on the recommendation of the Department.

Historical Data

Laws 1989, 1st Extr. Sess., HB 1017, c. 2, § 12, eff. April 25, 1990.

Citationizer[®] Summary of Documents Citing This Document

<i>Cite</i>	<i>Name Level</i>
-------------	-------------------

None Found.

Citationizer: Table of Authority

<i>Cite</i>	<i>Name Level</i>
-------------	-------------------

None Found.

210:1-3-2. Annexation, consolidation, dispensation, and severance determination

(a) **State Board of Education role.** The State Board of Education's role is: to receive and implement an order from the State Superintendent which declares that all or part of a district has been voted to be annexed, following statutory requirements, to adjacent or transporting district(s); to decide on the division of assets and property of a disorganized district in the event the problem cannot be resolved by the boards of annexing districts; and to set standards, promulgate rules and procedures, and conduct studies relating to the consolidation of two or more adjacent school districts. [70:7-105 & 106]

(b) Mandatory annexation.

(1) Mandatory annexation will be considered by the State Board of Education upon occurrence of the following situations:

(A) When a school district has been declared "academically at-risk" pursuant to 70 O.S. 1989, §1210.541.

(B) When a school district is nonaccredited by the State Board of Education.

(C) When a district, without officially dispensing with school, fails to open or maintain a school (except when situations beyond the control of the district cause a normal delay). [Title 70 O.S. § 8-106].

(2) When it comes to the attention of the State Board of Education that a local school district is facing the possibility of mandatory annexation, the State Board of Education shall provide the district with an opportunity to be heard. The State Board of Education shall notify the superintendent and each school board member of the time, date and place of the meeting. At the meeting, representatives of the school district, including patrons, shall have an opportunity to address the State Board of Education and to provide information to the Board. The President of the State Board of Education may set time limits on individual presentations and may require groups to select a representative to speak on behalf of the group.

(3) When the State Board of education determines that a local school district is to be mandatorily annexed, the following steps will be followed:

(A) The Board will notify one or more of the potential receiving districts that they are responsible for taking an inventory of property and securing the buildings and other property of the district being mandatorily annexed. In selecting the district(s) responsible for this procedure, the State Board of Education may rely on recommendations from the State Superintendent.

(B) The State Board of Education will immediately notify the district superintendent of the Board's action.

(C) The state superintendent shall notify the parents or legal guardians of all students in the district being annexed that they must apply for a transfer to the state superintendent within 10 days of the State Board of Education's action to annex. The state superintendent may require the parents to furnish a legal description of their residence at the time the transfer request is made.

(D) Once the state superintendent has received the transfer requests, she/he shall notify the State Department of Education, in writing, of the breakdown of where students are asking to attend school by transfer and provide the State Department of Education with the legal description of the residence of each student.

(E) The State Department of Education will utilize the transfer requests and legal descriptions submitted to the state superintendent as a guide in plotting the proposed boundary lines for dividing the annexed district. To the maximum extent possible, the preference of the students and parents shall be acknowledged.

(F) The State Department of Education will present the proposed boundary lines for division of the annexed district to the State Board of Education for approval. The proposal shall be accompanied by the legal description of the property being annexed.

(G) The assets and liabilities of the annexed district shall become part of the annexing districts. When an annexing district assumes a debt incurred by the annexed district prior to July 1, the district assuming the debt should receive a comparable portion of the assets.

(H) When two or more annexing districts are involved in the division of an annexed district, the assets and liabilities are divided by agreement between the boards of education. If the boards of education are unable to agree, the matter shall be divided by the State Board of Education.

(c) Consolidation of school districts.

(1) A petition by the board of education of any school district desiring a study of the consolidation of such school district with another school district or districts, or proposing such consolidation, shall be signed by the president and clerk of such board of education, and such petition shall be considered by the State Board of Education at its next

regular meeting. If a study of the proposed consolidation is deemed proper and advisable, the Secretary of the State Board of Education shall forthwith advise the boards of education of all districts involved that a study of the proposed consolidation is going to be made.

(2) The State Board of Education reserves the right to make a study of the advisability of consolidating two or more school districts in any area of the State, on its own initiative, and without any petition from a board of education. When such decision is made, each school district involved shall forthwith be advised that such study is going to be made, and such districts shall be directed to determine, by such procedures as the State Board of Education may prescribe what, if any, consolidation should be carried on in the area under study.

(3) All studies of the advisability of consolidation shall be under the direction of the President of the State Board of Education, who shall utilize the services of appropriate divisions of the State Department of Education.

(4) If after a study of the population, wealth, terrain, trade areas and other pertinent factors, it is determined that two or more school districts should be consolidated, the board of education of each school district involved shall be so advised.

(5) No election to determine consolidation shall be called or held unless there shall have been filed with the State Board of Education a petition therefore, signed by a majority of the school district electors of each school district included in the proposed consolidation. When such a petition is received and is determined to be sufficient, the State Board of Education shall call an election for the purpose of affording to the school district electors in the school districts involved an opportunity to express their wishes through a majority vote of the school district electors in the entire territory involved. Notice of such election, stating the time and date thereof and the polling places, shall be posted in five (5) public places in each school district involved, not less than ten (10) days before date of such election. Such election shall be conducted by one or more members of the State Department of Education, as designated by the President of the State Board of Education.

(6) If a majority vote at such election is in favor of consolidation, the State Board of Education shall issue a written order to such effect, declaring the participating school districts dissolved and the new school district established. Copies of such order shall be sent to the county treasurer, county assessor and the county clerk of each county in which the districts involved are situated, and to the Oklahoma Tax Commission, and to the board of education of each school district involved. If a majority vote at such election is not in favor of consolidation, the State Board of Education shall make a written order to such effect, and shall send a copy thereof to the board of education of each school district involved.

(7) The local board of education members representing the school district having the largest number of enumerated children shall serve as board members of the newly-formed school district for the remainder of their term.

(8) All liabilities, assets, powers and duties shall become the responsibility of the newly-formed school district.

(d) Dispensing with a school district.

(1) Should residents of a district desire to dispense with all or part of this school district, it is the duty of the State Superintendent to notify the State Board of Education of a majority vote of eligible electors at an annual or special election or by a petition signed by sixty (60) percent of eligible school district electors to dispense with either grades 1 thru 8 or grades 9 thru 12, or both, and such procedure shall be accomplished prior to June 30. Subsequently, parents of such children in the dispensed grades should file an application transfer for the ensuing year with the State Superintendent. Any district which dispenses with its entire school district for the ensuing year shall be mandatorily annexed on July 1 by the State Board of Education to an adjacent school district(s) to which pupils have been transferred.

(2) Provided that if a school district does not officially dispense with its school following the preceding procedure and fails to open and maintain a school during such ensuing year, the State Board of Education, except as otherwise provided, shall at its next regular meeting annex such district, as provided by law. [70-8-106]

(e) Severance determination. Pursuant to 70 O.S. §7-203(B), the State Board of Education may promulgate rules regarding its authority to budget and make expenditures of monies contained in the School Consolidation Fund. School Consolidation Funds can be used by annexing or consolidating districts to provide employment assistance in the form of severance for school district employees who are dismissed due to annexation or consolidation under 70 O.S. §7-203(B)(1)(c). The procedure for employees to make a severance application and process to receive a severance determination shall be communicated to all affected employees by the annexed or consolidated district superintendent. The severance application process is as follows:

(1) To qualify for severance, district employees (teachers, administrators, and support personnel) must first seek severance allowance from the annexing or consolidating district(s) prior to making application to the State Department of Education.

(A) Any annexing or consolidating school district(s) that receive School Consolidation Funds must accept and consider all requests for severance made by district employees who were dismissed due to annexation or consolidation, but not subsequently employed by the consolidating or annexing district(s).

(B) The annexing or consolidating district(s) may elect to award qualifying employees a severance in an amount up to and not to exceed eighty percent (80%) of the individual's salary or wages, exclusive of fringe benefits.

(C) Severance allowance from the annexing or consolidating district(s) is permissive in any amount from 0% to 80% of the individual's salary or wages, exclusive of fringe benefits, for the school year preceding the consolidation or annexation.

(D) For the purposes of calculation, the district(s) shall include only the salary or wages actually paid to the employee for the school year preceding the consolidation or annexation.

(E) Applications for severance shall be considered on an individual case by case basis.

(F) Each district shall promulgate their own rules and procedures for accepting, reviewing, and awarding severance. The criteria used for awarding severance must be measurable, objective, non-discriminatory, and uniformly applied.

(2) If the annexing or consolidating district makes an award of employment assistance in the form of severance, the district employee will not be eligible to make application to the State Department of Education for severance allowance unless the employee has also been denied unemployment compensation.

(3) Unemployment benefits received by any district employee dismissed due to annexation or consolidation may be counted as a form of employment benefit under 70 O.S. §7-203(B)(1)(c). Unemployment compensation may be considered as part of the total employment assistance received and may be taken into account or offset when severance allowance determinations are made.

(4) If a district employee is not employed by the annexing or consolidating district(s) and is subsequently denied severance or unemployment compensation by the annexing or consolidating district(s), pursuant to 70 O.S. §7-203(B)(1)(c), the district employee will be eligible to make an application for severance to the State Board of Education. Qualifying applicants shall receive a severance allowance from the State Board of Education pursuant to the following procedure:

(A) Severance allowance from the State Board of Education shall be in an amount up to and not to exceed eighty percent (80%) of the individual's salary or wages, exclusive of fringe benefits. An award of a severance allowance by the State Board of Education will be made only if:

(i) the applicant was not employed by the consolidating or annexing district and

(ii) severance or unemployment compensation was denied at the district level.

(B) Severance allowance from the State Department of Education can be in any amount from 0% to 80% of the individual's salary or wages, exclusive of fringe benefits, for the school year preceding the consolidation or annexation.

(C) For the purposes of calculation, the State Department of Education shall include only the salary or wages actually paid to the employee by the district for the school year preceding the consolidation or annexation.

(D) Only timely applications for severance received by the State Department of Education, Finance Division, will be considered. All applications for severance to the State Department of Education must be received no later than September 1 of the fiscal year immediately following the fiscal year in which the annexation or consolidation occurred. The application for employment assistance in the form of severance can be found on the SDE website, www.sde.ok.gov, or by contacting the State Department of Education, Finance Division.

(5) Severance allowance by the State Department of Education can be denied only for good cause with supporting documentation of the following:

(A) The applicant was hired by the consolidating or annexing district(s), regardless of the number of hours, part time or full time status, or rate of pay.

(B) The applicant was dismissed or non-reemployed by the local school district board for reasons other than consolidation or annexation (i.e. reduction in force or inability to pay due to financial exigency),

(C) The applicant received severance from the consolidating or annexing district(s) and in addition to unemployment compensation,

(6) Severance allowance by the State Department of Education can be reduced or adjusted below eighty (80%) percent of the applicant's salary or wages, excluding fringe benefits, for good cause with supporting documentation. Good cause to reduce or adjust severance can include, but is not limited to, consideration of the following:

(A) The annexation or consolidation was mandatory rather than voluntary.

(B) The applicant's length of service to the district.

(C) The applicant's service record, job performance, or conduct warrants consideration of a reduction or adjustment in severance. The application of this criteria must be supported by verifiable documentation and evidence that is made available for the Board's review.

(D) The applicant was hired by the local school board after the annexation or consolidation election results are called by the State Superintendent of Public Instruction.

(E) The applicant was hired by the local school board after the State Board of Education voted to non-accredit the district.

(F) The applicant failed to apply for or make an attempt to gain employment with the consolidating or annexing district(s).

(G) The applicant failed to apply for or attempt to obtain a severance allowance from the consolidating or annexing district(s).

(H) The applicant received unemployment compensation. The amount of unemployment compensation received can be considered an offset when determining severance.

(7) Severance Determinations. Upon receiving the application for severance the State Department of Education, Finance Division staff shall review the applications for severance and make a written recommendation to the State Board of Education regarding each severance application. Each severance application will be considered on an individual case by case basis and a recommendation for severance allowance or denial will be made by the SDE staff to the State Board of Education in writing during a regularly scheduled Board of Education meeting.

(A) The applicant will be notified of the SDE staff recommendation and will be given written notice of the time, place, and date of the regularly scheduled State Board of Education meeting that the Board will consider and voting upon the SDE staff recommendation for severance.

(B) The State Board of Education will vote on all SDE staff recommendations for severance in open meeting. All votes of the State Board of Education approving or denying a severance application will be considered a final order of the Board.

(8) The applicant will be notified in writing of the State Board of Education's final determination regarding severance allowance. The applicant will have ten (10) days from the date the notification of severance determination is received within which time to file a petition for appeal or reconsideration of the Board's determination.

(9) Any petition, reconsideration, or hearing on the Board's final order regarding severance shall be made pursuant to, and governed by, the Due Process Procedures of the State Board of Education as outlined in 210:1-5-1 of the Oklahoma Administrative Code.

(f) **Guidelines and forms.** Copies of corresponding State Department of Education forms and guidelines for the implementation of annexations/consolidation and severance are available from the consolidation officer of the State Department of Education.

[Source: Amended at 11 Ok Reg 1973, eff 5-26-94; Amended at 29 Ok Reg 965, eff 6-26-12]



BOISE CITY PUBLIC SCHOOL DISTRICT

700 S. E. 1st St.
P. O. Box 1116
Boise City, OK 73933
Superintendent's Office (580) 544-3110
JH/HS Principal's Office (580) 544-3111
Elementary Principal's Office (580) 544-3161

Superintendent Hofmeister and Members of the Oklahoma State Board of Education:

I am interested and concerned about the outcome of the pending annexation of the Keyes school district into another district or districts. I believe that I do have a rather unique perspective on the entire situation. I am a current and life-long resident of the Keyes district and I attended that school for my entire public school education, graduating with the class of 1981. My wife and one of my two daughters also graduated from the school. Also, I taught Junior High and High School science in Keyes for 19 years - from 1991-2010. In 2010, I was beginning to see that the student numbers were indicating a declining trend that has finally culminated in the situation that the school finds itself in at this time. When the student number problem became evident to me, I took an opportunity that presented itself in the neighboring district of Boise City. I taught both Junior High and High School science for 6 years, and then worked as a teaching principal in Boise City for the past 2 years. This year I was hired by the Boise City district to fill the role of Superintendent.

During my time at Keyes and Boise City, there has generally been healthy cooperation between the schools to try to provide the best possible opportunities for the students in both schools. Some years ago, there was a sports co-op in place that allowed Keyes boys to go to Boise City to play football and Boise City boys played baseball at Keyes. More recently Boise City has readily welcomed sports co-ops with the Keyes district in cross country, softball, basketball, track, and golf. The Boise City Board of Education has consistently made these activities available to our school neighbors to help the Keyes students have opportunities that they would not otherwise. In the last 3 years or so there has been a marked increase of students and teachers making the move from the Keyes district to Boise City. Currently there are 28 students enrolled in Boise City that reside in the Keyes district and 5 teachers have made the move as well. To my knowledge there have been no staff movements from Keyes to Yarbrough district and I am aware of only 1 student who lives in the Keyes district that now attends Yarbrough. That student's mother is a teacher in Yarbrough school, and I don't believe he ever attended school in Keyes.

Geographically speaking, Keyes is 15 miles from Boise City and 25 miles from Yarbrough. Keyes and Boise City are both in Cimarron County while Yarbrough is in Texas County. I point this out because I think there was some inadvertent misinformation at the February meeting of the State Board on this point. I think it also relevant that Yarbrough co-oped basketball this year with Hardesty - a district that is 69 miles from Keyes. Also, because I am a lifetime resident of the Keyes district, I have had multiple conversations with people in the district that do not want their tax dollars going into another county. Many of those same individuals are upset that the

Keyes school leadership did not make adequate efforts to determine the will of the district residents before proceeding with the annexation process. At this point the Keyes school leadership desires that the State Board of Education make a decision for them that they did not have the will to make.

It is my belief that there are some underlying sentiments against Boise City within some of the Keyes school leaders, and I think that has played a part in how this whole process has unfolded. Ultimately what should be the decisive factor in this decision should be the welfare of the few remaining students in the Keyes system. I can say unequivocally that the students that have transferred to the Boise City district from Keyes have been well accepted by both their student peers and all of our staff and faculty. Some of those students have done better than others in classes and activities, but that is of course true of the students who reside in our district as well. Boise City offers more educational and extracurricular opportunities than does Yarbrough. The second important factor that should weigh heavily in this decision is the will of the residents of the Keyes district. They should have a voice concerning where their school should be annexed. I do not believe there was much if any effort by the Keyes school leadership to determine the direction that the people of the district wanted to go in this matter. That just seems wrong to me.

In conclusion, I believe that Boise City is the best choice for the Keyes school to annex into for multiple reasons:

1. Already most transfers out of Keyes are enrolled in Boise City.
2. Boise City offers more academic and extracurricular opportunities than does Yarbrough.
3. Boise City is geographically closer.
4. Boise City is in the same county.
5. Boise City is the county seat of Cimarron County and many Keyes people go there for other purposes. Yarbrough has just a school on its site.
6. The vast majority of the current residents of the Keyes district would prefer annexation to Boise City.

Thank you for your consideration and allowing me to share my thoughts and concerns with you in this matter.

Respectfully submitted,



Bob Cochran

Superintendent

Boise City Public Schools



School Board Members

President

Mr. Mike Johnson

Vice-President

Mr. Marco Martinez

Clerk

Mrs. Lisa Sauls

Member

Mr. Brent Powell

Member

Mr. Keith Laird

Superintendent

Mr. Jim Wiggin
580.545.3328 Ext. 118
jwiggin@yarbrough.k12.ok.us

Dean of Students

Mrs. Derenda Aranda
580.545.3328 Ext. 117
daranda@yarbrough.k12.ok.us

District Treasurer

Mrs. Verlena Furr
580.545.3327 Ext. 119
vfurr@yarbrough.k12.ok.us

District Secretary

Mrs. Kista Gutierrez
580.545.3327 Ext. 116
kgutierrez@yarbrough.k12.ok.us

School Secretary

Mrs. Jean Ann Wiggin
580.545.3327 Ext. 114
jwiggin@yarbrough.k12.ok.us

Address

Route 1 Box 31
Goodwell, OK 73939

Physical Address

Eight Miles South of Elkhart, KS
on Highway Ninety-Five

Fax

580.545.3392

Web Site

www.yarbrough.k12.ok.us

Facebook Page

www.facebook.com/yarbroughlobos

E-mail

lobos@yarbrough.k12.ok.us

Colors

Maroon & Gray

Mascot

Lobo

Motto

Meeting Tomorrow's Challenges
With Quality Panhandle Education
In Every Classroom

Creed

I am a special and vital part of
Yarbrough School. I have great
expectations for myself. I will
determine what I will become. I am
a bright and sagacious student,
accepting the responsibility for my
behavior and its results.
I am a winner!

I strive for success and excellence. I
accept the challenge to become the
very best I can be, for the education
I receive today will make me a
leader of tomorrow.
I will succeed!



Yarbrough School District I-001

May 11, 2020

Marley Billingsley
Legal Assistant
Oklahoma State Department of Education
Office of Legal Services
2500 North Lincoln Boulevard
Oklahoma City, OK 73105

Dear Ms. Billingsley:

We are writing on behalf of Yarbrough School District in regards to the possible closing of the Keyes School District. As an adjoining district, along with Boise City, we are interested in how Keyes might be dissolved and would like to share our views on the matter. First and foremost, it is our desire to be good neighbors throughout the process. We are not seeking to annex the entire district; however, we would like to respectfully request that Yarbrough be considered to receive a portion.

While Keyes is primarily considered a Cimarron county school district and Yarbrough is primarily considered a Texas county school district, each school does extend into the adjacent county. Yarbrough has approximately 58 square miles in Cimarron county, and Keyes has approximately 8 square miles in Texas county. We currently provide transportation to one family that lives in the Cimarron county portion of Yarbrough's district, and we would be willing to provide transportation services to any portion of Keyes that might be annexed to Yarbrough.

Currently, Boise City is approximately 1,070 square miles. Keyes is 372 square miles, and Yarbrough is 375 square miles. If combined, Yarbrough and Keyes would still be considerably smaller in area than Boise City. In considering the land area sizes of the districts in question, a possible division line could be set at county road N0430. Please see attached map. This division would add approximately 237 square miles to Yarbrough and 136 square miles to Boise City, with Boise City receiving the vast majority of the actual town of Keyes. If this division were used, we would like to request permission to bus from within the city limits of Keyes. We understand that there are only a few students that have remained at Keyes; however, we would appreciate the opportunity to be their school of choice and be able to offer them transportation to Yarbrough. We are extremely proud of our school and all that we have to offer our students, parents, and community members. Please see attached information.

Thank you for your time and consideration.

Sincerely,


Mr. Jim Wiggin
Superintendent


Mr. Mike Johnson
School Board President

Boise City +135.75 Yarbrough +237

59 sq mi

Cimarron County Transportation Districts

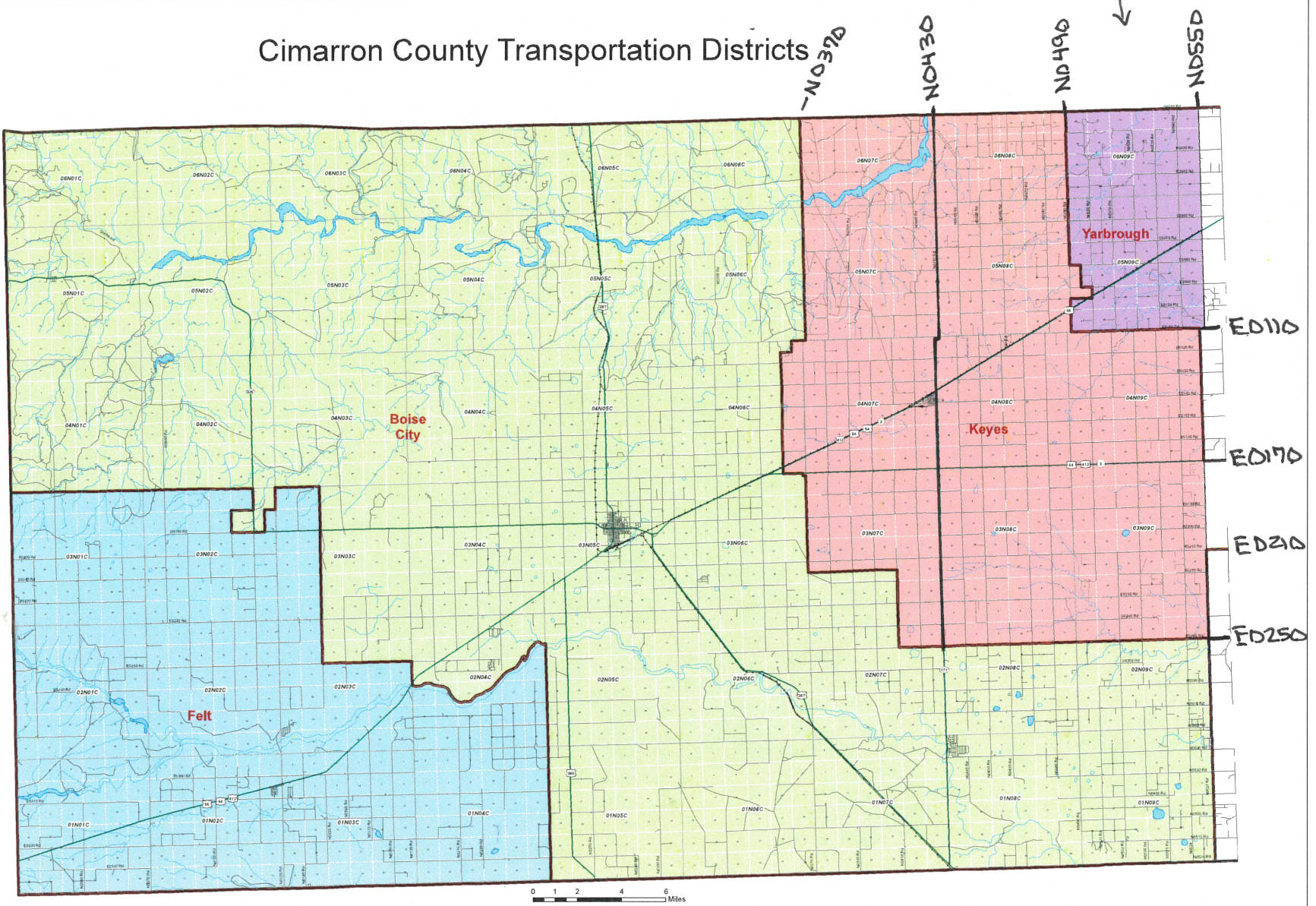
No Career Tech Center

- Boise City
- Felt
- Keyes
- Yarbrough

Transportation Districts

Ad Valorem Reference Number

Boise City	13/113/00
Felt	13/114/00
Keyes	13/115/00
Yarbrough	13/568/00





School Board Members

President

Mr. Mike Johnson

Vice-President

Mr. Marco Martinez

Clerk

Mrs. Lisa Sauls

Member

Mr. Brent Powell

Member

Mr. Keith Laird

Superintendent

Mr. Jim Wiggan
580.545.3328 Ext. 118
jwiggan@yarbrough.k12.ok.us

Dean of Students

Mrs. Derenda Aranda
580.545.3328 Ext. 117
daranda@yarbrough.k12.ok.us

District Treasurer

Mrs. Verlena Furr
580.545.3327 Ext. 119
vfurr@yarbrough.k12.ok.us

District Secretary

Mrs. Kista Gutierrez
580.545.3327 Ext. 116
kgutierrez@yarbrough.k12.ok.us

School Secretary

Mrs. Jean Ann Wiggan
580.545.3327 Ext. 114
wiggan@yarbrough.k12.ok.us

Address

Route 1 Box 31
Goodwell, OK 73939

Physical Address

Eight Miles South of Elkhart, KS
on Highway Ninety-Five

Fax

580.545.3392

Web Site

www.yarbrough.k12.ok.us

Facebook Page

www.facebook.com/yarbroughlobos

E-mail

lobos@yarbrough.k12.ok.us

Colors

Maroon & Gray

Mascot

Lobo

Motto

Meeting Tomorrow's Challenges
With Quality Panhandle Education
In Every Classroom

Creed

*I am a special and vital part of
Yarbrough School. I have great
expectations for myself. I will
determine what I will become. I am
a bright and sagacious student,
accepting the responsibility for my
behavior and its results.
I am a winner!*

*I strive for success and excellence. I
accept the challenge to become the
very best I can be, for the education
I receive today will make me a
leader of tomorrow.
I will succeed!*



Yarbrough School District I-001

While Boise City is a great school with many quality curricular and extra-curricular offerings, Yarbrough has much to offer its students as well.

✓ Outstanding Curriculum

- Full Day PreK & Kindergarten Programs
- Elementary Reading Program based on Reading First Principles
- Reading Resource Room
- DIBELS, Early STAR & STAR Reading Assessments
- Advanced Math & Science Courses
- Technology & Foreign Language Courses
- Concurrent Classes with OPSU
- PreK-12 Art, Humanities, Music, Vocal & Instrumental Courses
- Indoor & Outdoor Gardening with Hydroponics, Aquaponics, Vertical Gardening, Traditional Gardening & Honeybees
- Accelerated Reader, SuccessMaker & Study Island Programs
- Small Student to Teacher Ratio with a Teacher & Paraprofessional in every Combined Elementary Classroom
- Central Library with over \$20,000 in new books added over the past 5 years

✓ Extra-Curricular Activities

- Cross-Country, Volleyball, Cheerleading
- Basketball, Golf, Track
- Academic Team, National Honor Society, Student Council, Robotics
- OSSAA Competition for 7-12 Vocal & Instrumental Music Programs
- School-sponsored 4-H Club including Livestock Showing & Judging

✓ Technology Resources

- PreK-12 1to1 Laptop Program in place since 2000
- District-wide 100mbps Wireless Internet
- Google G-Suite for Education Domain
- Part-time Educational Technology Integration Specialist
- Smartboards, Projectors & Document Cameras District-wide
- Elementary Hands-on Technology Center with iPads, Osmos & SmartTable
- iMac Video Production Computer Lab with Green Screen Equipment
- Elementary PC Computer Lab
- Media Center Computer Lab
- eBooks available for Student Checkout
- 3D Printing
- Coding, Robotics, Drones & STEM Activity Kits
- STEM Lab with Video Conferencing Collaboration Tools



School Board Members

President

Mr. Mike Johnson

Vice-President

Mr. Marco Martinez

Clerk

Mrs. Lisa Sauls

Member

Mr. Brent Powell

Member

Mr. Keith Laird

Superintendent

Mr. Jim Wiggins
580.545.3329 Ext. 118
jwiggins@yarbrough.k12.ok.us

Dean of Students

Mrs. Derenda Aranda
580.545.3328 Ext. 117
daranda@yarbrough.k12.ok.us

District Treasurer

Mrs. Verlena Furr
580.545.3327 Ext. 119
vfurr@yarbrough.k12.ok.us

District Secretary

Mrs. Kista Gutierrez
580.545.3327 Ext. 116
kgutierrez@yarbrough.k12.ok.us

School Secretary

Mrs. Jean Ann Wiggins
580.545.3327 Ext. 114
wiggins@yarbrough.k12.ok.us

Address

Route 1 Box 31
Goodwell, OK 73939

Physical Address

Eight Miles South of Elkhart, KS
on Highway Ninety-Five

Fax

580.545.3392

Web Site

www.yarbrough.k12.ok.us

Facebook Page

www.facebook.com.yarbroughlobos

E-mail

lobos@yarbrough.k12.ok.us

Colors

Maroon & Gray

Mascot

Lobo

Motto

Meeting Tomorrow's Challenges
With Quality Panhandle Education
In Every Classroom

Creed

I am a special and vital part of
Yarbrough School. I have great
expectations for myself. I will
determine what I will become. I am
a bright and sagacious student,
accepting the responsibility for my
behavior and its results.
I am a winner!

I strive for success and excellence. I
accept the challenge to become the
very best I can be, for the education
I receive today will make me a
leader of tomorrow.
I will succeed!



Yarbrough School District I-001

- ✓ Strong Community Support
 - Bond 2008 - \$300,000 - Passed 82%
 - Activity Bus
 - Three Van Type Vehicles
 - Construction of Covered Parking Area for All District Owned Vehicles
 - Replace Desktop Computers in the Elementary Computer Lab, the Middle School/High School Business Classroom & the Library
 - Purchase & Install New Playground Equipment
 - Purchase & Install Energy Efficient Windows for Teacherages
 - Bond 2011 - \$400,000 - Passed 90%
 - Yellow Route Bus
 - Remodel Elementary, Middle & High School Restrooms
 - Two Van Type Vehicles
 - Replace Sidewalk & Porches in Front of the School
 - Classroom Furniture & Fixtures Including Teacher & Student Desks, Chairs, Shelves & Cabinets
 - Efficient Heating/Air Units for Teacherages
 - Brick & Grout Repair/Replacement & Cleaning for Entire School Building
 - Carpeting & Flooring Including Elementary Lab, South Gym Bleachers, Office Areas & Elementary Classroom
 - Music Department Including Risers, Stands, Chairs & Sound Equipment
 - Science Department Including Lab Equipment, Supplies, Repairs & Furniture
 - Technology Including Items as Needed to Maintain 1to1 Program
 - Phone/Intercom System Including Digital Phones & Speakers
 - Fencing Including Vinyl Fencing in Front of the School & Chain Link Fencing for Wind Turbine Area
 - Bond 2015 - \$400,000 - Passed 87%
 - Remodel Teacherage Restrooms
 - Make Improvements to Sewer Lines
 - Remodel School Cafeteria & Kitchen Including Equipment, Furniture, Heating/Air, Flooring & Lighting
 - Replace Windows in the South Gym & Cafeteria & Replace Outside Doors District-Wide as Needed
 - Replace Computers in the Elementary Computer Lab & the Library
 - North Gym Improvements Including Sand, Paint & Refinish Floor, Player Seating, Lighting & Install Safety Mats under Goals
 - Renovate/Repair North Lobby Concession Stand & Kitchen Area of Pre-K/K Classroom
 - Replace/Repair Propane Lines and Relocate Existing Tanks to a Safer Location
 - Install Upgrades to Security System District-Wide as Needed
 - Replace Water Fountains District-Wide as Needed
 - Install New Hall Clocks District-Wide as Needed



School Board Members

President

Mr. Mike Johnson

Vice-President

Mr. Marco Martinez

Clerk

Mrs. Lisa Sauls

Member

Mr. Brent Powell

Member

Mr. Keith Laird

Superintendent

Mr. Jim Wiggins
580.545.3329 Ext. 118
jwiggins@yarbrough.k12.ok.us

Dean of Students

Mrs. Derenda Aranda
580.545.3328 Ext. 117
daranda@yarbrough.k12.ok.us

District Treasurer

Mrs. Verlena Furr
580.545.3327 Ext. 119
vfurr@yarbrough.k12.ok.us

District Secretary

Mrs. Kista Gutierrez
580.545.3327 Ext. 116
kgutierrez@yarbrough.k12.ok.us

School Secretary

Mrs. Jean Ann Wiggins
580.545.3327 Ext. 114
wiggins@yarbrough.k12.ok.us

Address

Route 1 Box 31
Goodwell, OK 73939

Physical Address

Eight Miles South of Elkhart, KS
on Highway Ninety-Five

Fax

580.545.3392

Web Site

www.yarbrough.k12.ok.us

Facebook Page

www.facebook.com/yarbroughlobos

E-mail

lobos@yarbrough.k12.ok.us

Colors

Maroon & Gray

Mascot

Lobo

Motto

Meeting Tomorrow's Challenges
With Quality Panhandle Education
In Every Classroom

Creed

I am a special and vital part of
Yarbrough School. I have great
expectations for myself. I will
determine what I will become. I am
a bright and sagacious student,
accepting the responsibility for my
behavior and its results.
I am a winner!

I strive for success and excellence. I
accept the challenge to become the
very best I can be, for the education
I receive today will make me a
leader of tomorrow.
I will succeed!



Yarbrough School District I-001

- ✓ Grant Writing - 15 Years - \$1,570,000.00
 - Reading First Grant - over \$700,000.00
 - 1:1 Stimulus Technology Grant - over \$170,000.00
 - Oklahoma Educational Technology Trust Grant #1 - \$65,000.00
 - Oklahoma Educational Technology Trust Grant #2 - \$65,000.00
 - 21st Century Community Learning Center Grant - \$440,000.00
 - Additional Federal Migrant Funds - \$13,500.00
 - Additional Federal Title I Funds - \$17,000.00
 - Additional Federal School Improvement Funds - \$19,000.00
 - Priority/Reward Grant - \$5,000
 - 21st Century Community Learning Center STEM Mini-Grant - \$5,500.00
 - Stimulus Kitchen Equipment Grant - \$5,000.00
 - Salad Bar Grant - \$2,600.00
 - Monsanto Fund Hydroponic Greenhouse Grant - \$25,000
 - Oklahoma Dept. of Environmental Quality Aquaponics Grant - \$1,000
 - Texas County Healthy Schools Greenhouse Grant - \$500
 - Monsanto Fund STEAM Makerspace & Robotics Grant - \$10,000
 - Oklahoma Dept. of Environmental Quality Vertical Gardens Greenhouse Grant - \$1,000
 - Oklahoma Energy Resources Board STEM Grant - \$880.18
 - Monsanto Fund OASIS Physics Lab Equipment Grant - \$10,000
 - Dollar General Literacy Grant - Lobo Literacy - \$2,500
 - Oklahoma School Assurance Group Safety Equipment Grant - \$345.00
 - Scotts Miracle-Gro Grassroots Greenhouse Grant - \$1,000
 - Dollar General Summer Literacy Grant - \$1,500
 - Bayer Fund Sweet Science Honeybee Grant - \$10,000

- ✓ Decades of Innovation
 - Aviation Classes - Late 60's to Early 70's
 - Satellite Distance Learning Courses - Early 80's
 - Full Motion Interactive Distance Learning Courses - Early 90's
 - Elementary Computer Lab with Self-paced Math & Reading Software - Early 90's
 - PreK-12 1to1 Take-home Laptop Program - 2000
 - Mobile "Cool Bus" Summer School - 2014
 - Indoor Hydroponics/Aquaponics Greenhouse - 2015
 - Makerspace STEAM & Robotics Lab - 2017
 - Physics Equipment Lab - 2018
 - Wind Turbine Project: Oct. 2008 - April 2020
 - Provides Approximately One-Third of School's Electricity
 - Financed through the Oklahoma Department of Commerce Energy Loan Fund for Schools
 - 925,984 Kilowatt-hours Generated
 - 51,825 Hours in Production
 - 556 Tons of CO2 Reduced
 - Sweet Science Honeybee Project - 2020

Superintendent Hofmeister and Members of the Board of Education,

My name is Carol Stewart. I'm a resident in the Keyes School District. I would like to see our district annex with the Boise City School District.

Most of the students have already transferred to Boise City. At the beginning of the year only 3 students went to Yarbrough and 2 of them have moved out of the area.

I thank you for considering the feelings of those who live in this district.

Regards,

A handwritten signature in black ink that reads "Carol Stewart". The signature is written in a cursive style with a large initial 'C' and 'S'.

Carol Stewart

Cheri Fleming

I am a resident of Keyes. I graduated from Keyes, as did my children. I would like to address the closing of our school. I hope you will consider dividing the district between Boise City and Yarbrough. Boise City classrooms are at maximum capacity, and I understand they aren't hiring any more teachers.

It's very disappointing to me that our school is closing, but I suppose it is now a moot point. The community voted in and trusted the board members and administration to do the right thing, but they had their own agenda.

Our city's population is mostly elderly. There are no businesses interested in coming in, especially now that there will no longer be a school. I'm angry that we already have empty, dilapidated houses and buildings, and now we will have the empty school complex and teacherages. I hope that our community will be able to use the facilities, but I'm afraid we won't be able to afford the upkeep. Our gym,(Which is the best in the county), auditorium, cafeteria, and pool, will all go to waste.

I don't know what else to say, except that it's so very sad that this is taking place, and I am disgusted with the people responsible.

Superintendent Hofmeister & Members of the State Board of Education,

I am writing this letter as a concerned citizen of Keyes, OK, District I-11, in regard to the annexation of the Keyes Public Schools. I am a Keyes High School graduate as are many generations in my family, I am also a life long citizen in this District and community. I have 2 children that had attended Keyes Schools up until 2 years ago when we made the decision to move them to Boise City Public Schools. My husband and I did not feel our children were receiving the best education they could get nor the push they needed to prepare for later ventures in life. Boise City Schools has exceeded my expectations on education plus the bonus of extracurricular activities. I am a firm believer that we need to annex with Boise City Public Schools.

Boise City is the Cimarron County Seat and only 15 miles from us and where the majority of our students have gone. Whereas, Yarbrough is in Texas County and 25 miles from us, I would also like to add that Yarbrough Schools have co-oped sports with Hardesty Public Schools the past few years which is 1 hour and 10 minutes from us. There are currently 28 students that have transferred from Keyes Schools to Boise City Schools. I feel as though the community has been stripped of their right to vote and voices to be heard on this matter, I have visited with many citizens in our district and they feel the same. I hope this letter along with others that have been sent in will be taken into consideration. Thank you for your time.

Attached is also a petition we got together. We only spent 2 full days getting signatures due to the COVID-19. There was not one person that I talked to that didn't want to sign and I know many more were wanting to up until the Stay at Home Order.

Thank You,

A handwritten signature in black ink that reads "Erica Bailey". The signature is written in a cursive style with a large initial "E".

Erica Bailey

PETITION FOR ANNEXATION

To the Honorable Joy Hofmeister, State Superintendent of Public Instruction and the Board of Education of KEYES School District No. 3 of CIMARRON County, Oklahoma, also known as the KEYES Public School District.

We, the undersigned Petitioners petition for the Annexation of the KEYES Public School District within the described territory:

We, the undersigned, individually certify that we are school district electors registered to vote within the territory described above and petition the State Superintendent of Instruction to call for an annexation election in the manner provided by 70 O.S. § 7-101. Attached to this petition is a resolution for the Board of Education of _____ Public School District concurring with our petition for the calling of an election for the annexation petitioned herein.

We, the undersigned, petition for the annexation of the territory described above to be annexed to the BOISE CITY School District No. 2 of CIMARRON County, Oklahoma, also known as the BOISE CITY Public School district.

SIGNATURE	ADDRESS	PRINTED NAME
<u>Erica Bailey</u>	<u>PO Box 404 Keyes, OK 73947</u>	<u>Erica Bailey</u>
<u>Marge Wilmoth</u>	<u>Keyes, OK 73947</u>	<u>Marge Wilmoth</u>
<u>JARRON C. Stewart</u>	<u>Keyes, OK 73947</u>	<u>JARRON C. Stewart</u>
<u>Stephanie Cochran</u>	<u>Box 141 Keyes, OK 73947</u>	<u>Stephanie Cochran</u>
<u>Jo Ann Cochran</u>	<u>Box 374 Keyes, OK 73947</u>	<u>Jo Ann Cochran</u>

PETITION FOR ANNEXATION CONTINUED

SIGNATURE	ADDRESS	PRINTED NAME
<u>Lori Stewart</u>	<u>P.O. Box 53 Keyes OK 73947</u>	<u>Lori Stewart</u>
<u>Wade Coyer</u>	<u>Po box 684 BOWEN CITY 73937</u>	<u>Wade Coyer</u>
<u>Marciana Corichi</u>	<u>400 Monroe Ave Keyes OK 73947</u>	<u>Marciana Corichi</u>
<u>Clarena Forthman</u>	<u>P.O. Box 64 Keyes OK 73947</u> <u>Keyes Ok 73947</u>	<u>CLARENA FORTHMAN</u>
<u>George Cline</u>	<u>P.O. Box 91</u> <u>KEYES OK</u>	<u>GEORGE CLINE</u>
<u>Linda Betts</u>	<u>Box 3</u> <u>Keyes, OK 73947</u>	<u>LINDA BETTS</u>
<u>Arthur Betts</u>	<u>Box 3</u> <u>Keyes, OK.</u>	<u>ARTHUR BETTS</u>
<u>Sandra Percifield</u>	<u>Box 136</u> <u>KEYES, OK.</u>	<u>SANDRA PERCIFIELD</u>
<u>Bill Percifield</u>	<u>Box 136</u> <u>KEYES OK</u>	<u>Bill Percifield</u>
<u>Carol Stewart</u>	<u>Keyes, OK</u>	<u>Carol Stewart</u>
<u>Mark Thompson</u>	<u>PO Box 145</u> <u>Keyes, OK</u>	<u>Mark Thompson</u>
<u>Chris Thompson</u>	<u>PO BOX 145</u> <u>Keyes, OK</u>	<u>Chris Thompson</u>
<u>Joyce Balenseifen</u>	<u>PO Box 435</u> <u>Keyes, OK</u>	<u>Joyce Balenseifen</u>

PETITION FOR ANNEXATION CONTINUED

SIGNATURE	ADDRESS	PRINTED NAME
<u>Brent Balenseifer</u>	<u>Box 435</u> <u>KEYES OK</u>	<u>BRENT BALENSEIFER</u>
<u>Cassandra Bergen</u>	<u>Box 376</u> <u>Keyes, OK 73947</u>	<u>CASANDRA BERGEN</u>
<u>Deborah Copeland</u>	<u>P.O. Box 32 Keyes OK 73947</u> <u>HC 2 Box 146</u>	<u>Deborah Copeland</u>
<u>Angela Arthaud</u>	<u>Keyes, OK 73947</u> <u>HC 2 Box 146</u>	<u>Angela Arthaud</u>
<u>Scott Arthaud</u>	<u>Keyes OK 73947</u> <u>HC 2 Box 144</u>	<u>Scott Arthaud</u>
<u>Wendy Arthaud</u>	<u>Keyes, OK 73947</u> <u>HC 2, Box 144</u>	<u>Wendy Arthaud</u>
<u>Loretta Arthaud</u>	<u>Keyes, OK 73947</u> <u>Keyes, OK 73947</u>	<u>Loretta Arthaud</u>
<u>Racheal Hinds</u>	<u>PO Box 82</u>	<u>Racheal Hinds</u>
<u>Ron Hinds</u>	<u>Box 82 Keyes</u> <u>73947</u>	<u>RON HINDS</u>
<u>Richard Gardner</u>	<u>Box # 2 Keyes</u>	<u>Richard Gardner</u>
<u>Jessica Hinds</u>	<u>P.O. Box 411 Keyes, OK</u>	<u>Jessica Hinds</u>
<u>Reta Hinds</u>	<u>P.O. Box 104 Keyes OK</u>	<u>Reta Hinds</u>
<u>Norman Hinds</u>	<u>P.O. Box 104 Keyes</u>	<u>Norman Hinds</u>

PETITION FOR ANNEXATION CONTINUED

SIGNATURE	ADDRESS	PRINTED NAME
<u>Lisa Fry</u>	<u>P.O. Box 337</u>	<u>Lisa Fry</u>
<u>[Signature]</u>	<u>Keyes, OK 73947</u>	<u>[Signature]</u>
<u>Colton Fry</u>	<u>HCR 2 BOX 119</u>	<u>Colton Fry</u>
<u>[Signature]</u>	<u>Keyes</u>	
<u>[Signature]</u>	<u>HCR 2 BOX 180</u>	
<u>[Signature]</u>	<u>KEYES</u>	
<u>[Signature]</u>	<u>PO Box 102, 607 Burrow Dr.</u>	<u>Johnnie B. Stewart</u>
<u>[Signature]</u>	<u>Keyes, OK 73947</u>	
<u>[Signature]</u>	<u>PO. 123 KEYES, OK 73947</u>	<u>NICK WILMARTH</u>
<u>Shannon Jones</u>	<u>P.O. Box 793</u>	<u>Shannon Jones</u>
<u>[Signature]</u>	<u>Boise City, OK 73933</u>	
<u>Debbie Crews</u>	<u>HC 2 Box 36A</u>	<u>Debbie Crews</u>
<u>[Signature]</u>	<u>Boise City, OK 73933</u>	
<u>Kent Crews</u>	<u>HC 2 Box 36A</u>	<u>Kent Crews</u>
<u>[Signature]</u>	<u>Boise City, OK 73933</u>	
<u>David Bailey</u>	<u>PO Box 404</u>	<u>David Bailey</u>
<u>[Signature]</u>	<u>Keyes, OK 73947</u>	
<u>Toby Barnum</u>	<u>PO Box 110</u>	<u>TOBY BARNUM</u>
<u>[Signature]</u>	<u>KEYES OK 73947</u>	
<u>Shirley Barnum</u>	<u>Box 110</u>	<u>Shirley Barnum</u>
<u>[Signature]</u>	<u>Keyes OK 73947</u>	
<u>Tom Gardner</u>	<u>Keyes OK 73947</u>	<u>Tom Gardner</u>
<u>[Signature]</u>		
<u>Kristine Huxley</u>	<u>PO Box 192</u>	<u>Kristine Huxley</u>
<u>[Signature]</u>	<u>Keyes, 73947</u>	

Ginger Born

I am a teacher at Keyes ISD and the school is closing this year. I just want to address the issue of consolidation. It is my opinion, Yarbrough is the better school for Keyes to join with. Having taught at Keyes for 2 years, I know the students would benefit from the smaller classes at Yarbrough. The student/teacher ratio is smaller at Yarbrough, which I feel would help the students achieve greater success. I know we all want students to thrive and become the best they can be.

Thanks,
Ginger Born

Superintendent Hofmeister and Members of the State Board of Education,

I am J.B. Stewart, a fourth-generation farmer from Keyes, OK. I am currently Mayor of the Town of Keyes. My 3 children and I are all graduates of Keyes High School. I also served as a member of the Keyes School Board of Education for 15 years.

I am **extremely** concerned with the recent developments regarding the annexation of the Keyes School District. The residents of the district have been told there would be an election held in which we could vote our preferences on annexation. There have been no public meetings where residents could have their wishes heard. Also, no vote is on record from the Keyes Board of Education expressing how they want the district divided or annexed in its entirety. It now appears the matter is in the hands of the State Department of Education to determine the annexation.

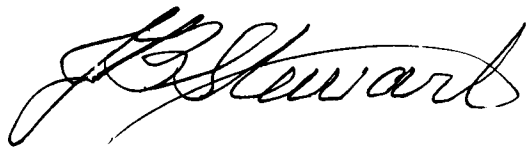
I believe that 28 students have transferred to Boise City School District over the past 3 years. Boise City School is 15 miles by car or bus from Keyes School. (Please see attached map). Whereas, Yarbrough School is 24 miles from Keyes School by car or bus. (Please see attached map). The town of Boise City is the County Seat of Cimarron County as well as the business center of the community. Yarbrough School is a rural school located on OK Highway 95 which is 7 miles east of the Cimarron – Texas County line in Texas County. Boise City has the county's only grocery store, a Dollar General, two convenience stores with fuel as well as many other businesses. The town of Keyes and the surrounding area **must** be annexed with the Boise City School District to avoid an academic and economic tragedy in Cimarron County.

I urgently and respectfully request that the State Board of Education perform due diligence to determine the destiny of this district. With the arrival of the COVID-19

virus, public meetings are not possible and public statements will not be a reality at your meetings.

I sincerely appreciate the State Board of Education's consideration of this issue. If you have any questions or need more information, please contact me at this e-mail address or 580-518-1946.

Regards,

A handwritten signature in black ink, appearing to read "JB Stewart". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

JB Stewart



Keyes High School



Boise City High School



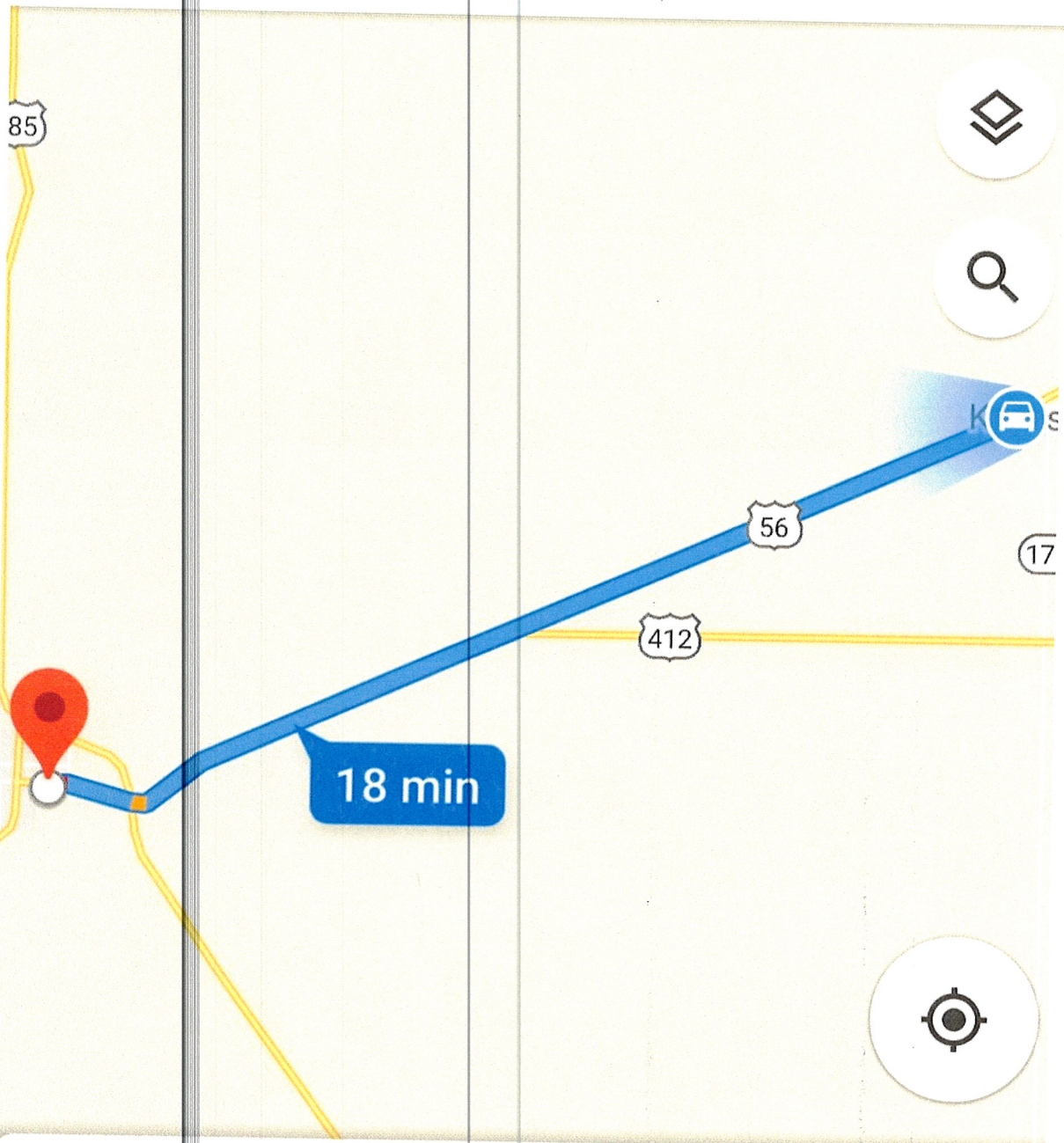
18 min



5 hr



1 hr 18



18 min (15 mi)

Fastest route, the usual traffic

5:25 65°

41%

← from Keyes High School

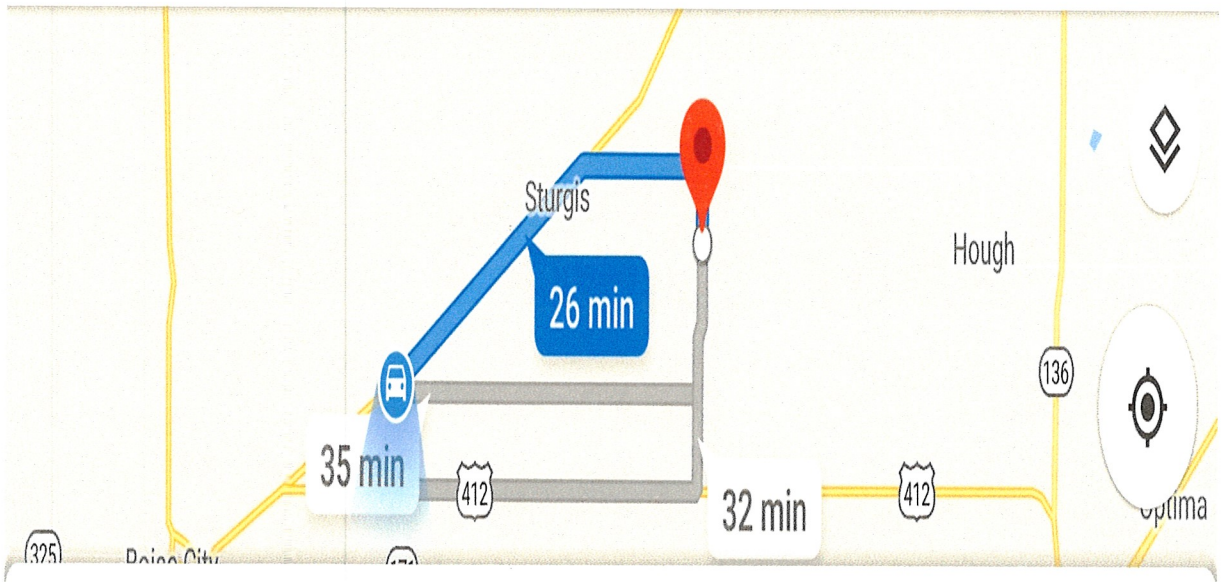
↔ to Yarbrough Public Schools

🚗 26 min

🚏 -

🚶 8 hr

🚲 1 hr 51



26 min (24 mi)

Fastest route, the usual traffic

☰ Steps & more

▶ Start

Mr. Billingsley,

With the recent closure of the Keyes Public Schools, the question for area residents on what school district to consolidate with has come up. Parents and residents are split on the decision on whether to consolidate with the Boise City School District or the Yarbrough School District. I feel like the fair decision which provides choice would be an even split consolidation where school buses from both Boise City and Yarbrough could pick up Keyes area students. This should also include a split of ad-valorem among the Boise City and Yarbrough School Districts, which the Keyes School District once received. Thank you for your consideration.

Sincerely,
Kenny Bob Tapp
Boise City, Ok

Sent from my iPhone

Joyce Balenseifen:

As our community deals with the trauma of our school closing, as a voter and taxpayer of the Keyes district I also want to have a voice in where my tax dollars go. I have visited with Marley a couple different times so i may be repeating some of the information i have.

A little background to help you understand the value i place on education. I am the parent of three sons, all graduates of the University of Oklahoma. My oldest graduated from Keyes in 2005, my middle son from Keyes in 2009 and my third in 2014 from Boise City. Our hard choice to move to the Boise City district in 2011 was made because the Keyes school, in my opinion, was failing to prepare my child for higher education. He spent his freshmen year in Algebra I playing cards and I am certain without the move, and a great math teacher who helped him catch up in math, his ACT scores would not have been high enough to be able to attend OU. Most of the parents i have visited with who have moved out of the Keyes school in more recent years also moved for education, citing uncertified teachers, lack of classes offered and no extra curricular activities. I was told there are 28 children living in the Keyes district that attend Boise City presently.

I want to be annexed into the Boise City District where the majority of the children who are residents of the Keyes district attend today. These same kids that i support in their extracurricular activities such as 4-H, Scouting and church activities. I called the Keyes School to find out what grades the students left there were in. I was told that all 5 of the high schoolers were talking the number of credits to graduate this year, the 2 jr high kids were going to be home schooled next year, the girl in elementary school already had a brother attending Boise City and the elementary boy has his dad and grandparents that live at Felt and is already playing elementary basketball there. I believe there will be none of these students that will attend Yarborough School next year.

In reading our local board minutes for the last several months, I see some 'discussion' items about the future of the school but no vote was recorded on annexation. I also see where our local superintendent Freida Burgess reports that she has heard nothing from the state. Yet in Mr Clark's remarks to the State Board at the February meeting, he says 1. 'The District Superintendent is well aware of and I believe she believes the district should close' and 2. "The Board members have discussed this but they do not want to make this decision, they would rather this body make this decision." His statements indicate to me that he had conversations with Freida Burgess. I believe the voters of this district have been denied their due process by this current superintendent and board. I respectfully ask for your decisions to be based on all the facts, the desire of the district people and not on a part time superintendent that does not live here and has not participated in our community.

Debbie Brown:

My name is Debbie Brown and I am a very new member of the Keyes school board of education. I have had several concerned citizens approach me regarding our upcoming annexation which is happening as a result of our not meeting accreditation and the declining numbers of our student body.

Their concerns are mostly with how their opportunity to vote on a resolution about the school with which they would like to annex has been taken from them. I've spoken with Bryan Drummond the Keyes school legal counsel and Brandon Carey with the OSSBA on this matter and they both recommended the voters take part in an email campaign in hopes their voices can be heard.

I am sending this email asking that you please consider the voice of these voters as you move forward with the annexation decision.

On another note, if I understand correctly the Keyes board is to have an online meeting with the state board of education on Friday, April 17th. Several of these voters would like to attend if it is at all possible. They understand they will not be able to speak but there is a distrust between the voters and the Keyes board and they would like to hear about the meeting first hand if possible.

Respectfully I know our state board of education members have a very full plate and I would not be asking for any of your time if I didn't believe it to be of great importance that I speak with someone before the annexation decision is made. My contact number is 580.518.1860.

Bob Cochran:

Mr. Clark,

I sent you a letter in mid March to express concerns about the annexation of the Keyes Public School district. I realize that our world was changing rapidly at that time and has certainly spun into a whole new level of chaos since then. I am concerned that my comments may have been lost in all that madness. I have included that original correspondence in this email, not in an effort to appear pushy or belligerent, but just to satisfy myself that you read those comments. I would very much appreciate an acknowledgement that you did receive this message and attached letter. Thank you!

Mr. Clark,

I am interested and concerned about the outcome of the pending annexation of the Keyes school district into another district or districts. I believe that I do have a rather unique perspective on the entire situation. I am a current and life-long resident of the Keyes district and I attended that school for my entire public school education, graduating with the class of 1981. My wife and one of my two daughters also graduated from the school. Also, I taught Junior High and High School science in Keyes for 19 years - from 1991-2010. In 2010, I was beginning to see that the student numbers were indicating a declining trend that has finally culminated in the situation that the school finds itself in at this time. When the student number problem became evident to me, I took an opportunity that presented itself in the neighboring district of Boise City. I taught both Junior High and High School science for 6 years, and then worked as a teaching principal in Boise City for the past 2 years. This year I was hired by the Boise City district to fill the role of Superintendent.

During my time at Keyes and Boise City, there has generally been healthy cooperation between the schools to try to provide the best possible opportunities for the students in both schools. Some years ago, there was a sports co-op in place that allowed Keyes boys to go to Boise City to play football and Boise City boys played baseball at Keyes. More recently Boise City has readily welcomed sports co-ops with the Keyes district in cross country, softball, basketball, track, and golf. The Boise City Board of Education has consistently made these activities available to our school neighbors to help the Keyes students have opportunities that they would not otherwise.

In the last 3 years or so there has been a marked increase of students and teachers making the move from the Keyes district to Boise City. Currently there are 28 students enrolled in Boise City that reside in the Keyes district and 5 teachers have made the move as well. To my knowledge there have been no staff movements from Keyes to Yarbrough district and I am aware of only 1 student who lives in the Keyes district that now attends Yarbrough. That student's mother is a teacher in Yarbrough school, and I don't believe he ever attended school in Keyes.

Geographically speaking, Keyes is 15 miles from Boise City and 25 miles from Yarbrough. Keyes and Boise City are both in Cimarron County while Yarbrough is in Texas

County. I point this out because I think there was some inadvertent misinformation at the February meeting of the State Board on this point. I think it also relevant that Yarbrough cooped basketball this year

with Hardesty - a district that is 69 miles from Keyes. Also, because I am a lifetime resident of the Keyes district, I have had multiple conversations with people in the district that do not want their tax dollars going into another county. Many of those same individuals are upset that the

Keyes school leadership did not make adequate efforts to determine the will of the district residents before proceeding with the annexation process. At this point the Keyes school leadership desires that the State Board of Education make a decision for them that they did not have the will to make.

It is my belief that there are some underlying sentiments against Boise City within some of the Keyes school leaders, and I think that has played a part in how this whole process has unfolded. Ultimately what should be the decisive factor in this decision should be the welfare of the few remaining students in the Keyes system. I can say unequivocally that the students that have transferred to the Boise City district from Keyes have been well accepted by both their student peers and all of our staff and faculty. Some of those students have done better than others in classes and activities, but that is of course true of the students who reside in our district as well. Boise City offers more educational and extracurricular opportunities than does Yarbrough. The second important factor that should weigh heavily in this decision is the will of the residents of the Keyes district. They should have a voice concerning where their school should be annexed. I do not believe there was much if any effort by the Keyes school leadership to determine the direction that the people of the district wanted to go in this matter. That just seems wrong to me.

In conclusion, I believe that Boise City is the best choice for the Keyes school to annex into for multiple reasons:

1. Already most transfers out of Keyes are enrolled in Boise City.
2. Boise City offers more academic and extracurricular opportunities than does Yarbrough.
3. Boise City is geographically closer.
4. Boise City is in the same county.
5. Boise City is the county seat of Cimarron County and many Keyes people go there for other purposes. Yarbrough has just a school on its site.
6. The vast majority of the current residents of the Keyes district would prefer annexation to Boise City.

Thank you for your consideration and allowing me to share my thoughts and concerns with you in this matter.

--

Bob Cochran

Superintendent at Boise City Public School

Debbie Crews:

Dear Ms Hofmeister,

My family has had three generations graduate from Keyes Schools so it is dear to me, and it breaks my heart to see it close but I know it must be done considering the very few students enrolled there.

That being said, I'd like to let you know that I would like to see the Keyes school annexed to the Boise City school district. Most of the kids from Keyes are already attending school there since it is the closest school for them, and it has an outstanding faculty and staff.

The town of Boise City also has a grocery store, bank and several other businesses. It would be a major inconvenience for parents to have to travel 30+ miles east to attend school activities at Yarbrough then have to travel 15 miles west to conduct business and shop.

Please consider this when making your decision.

Thank you and stay well,
Debbie Crews

Scott Arthaud:

As a resident of Keyes, OK, for my entire life of 49 years, as a landowner and property tax contributor, and as a graduate of Keyes High School, it is my strong opinion that our school be annexed with Boise City Public Schools. This seems to be the only reasonable choice based upon historical community, school, and business relationships as well as logistics. There is no other logical choice.

There are currently only three school districts in our county, and with the closure of Keyes Public School, it seems best for that tax money to stay within our county. With the struggles that Keyes School has had over the past few years, many families in the Keyes School District have chosen to send their children to Boise City Schools. It seems only right, then, that our tax money should go where the majority of the students of Keyes are attending.

I am frustrated that our community was not given opportunity to communicate our opinions prior to now, and I highly value this opportunity.

In speaking to a Keyes school board member, I was informed that the current superintendent of Keyes School misrepresented the majority opinion of our school board, which is that the Keyes School District be annexed to Boise City. It is unfortunate that this miscommunication took place.

Please listen to the voice of the people of Keyes and allow us to annex our school to Boise City School District. This decision will be most beneficial for our county, and ultimately the students of our community.

Respectfully,
Scott Arthaud

Harry J Minns:

To Whom It May Concern:

As a tax payer, resident, and graduate of the Keyes School District, I would like to voice my concern about the consolidation of the District. I would like the Keyes District to be part of the Boise City District and part of Cimarron County.

As Keyes school has continued to decline, I do not believe the people that were part of its failure should be making the decisions about who we should be consolidating with. As the school has declined and parents have moved their children for a better education, 95% of these parents have chosen Boise City School district to send their children. I think that alone should be the greatest factor on determining where our money and children should be going. Since we did not have a vote of the constituents of the district, the choice of parents over the last 10 years should be a guide.

My employee's children attend Boise City and one child has graduated from Boise City. When Keyes did not meet state standards, parents were given the right to transfer their children out of the district and the district had to provide bussing. Realizing that Boise City was a better education for their children after the one year probation, they continue to send their children to Boise City. They drove 30 miles a day for 8 years to take and pick up their children so they could go to a better school. They picked Boise City not Yarbrough for their children's education.

The current Keyes School Board would not be elected if they were running on a platform of consolidating with Yarbrough, most were appointed because no one wanted to be part of how the school was being administered the last few years.

Sincerely,

Harry J Minns

Loretta Hiner Arthaud:

I am Loretta Hiner Arthaud, resident of Keyes, Oklahoma. I was born in Boise City, OK, and raised in the Keyes community. My father and mother's families came to Cimarron County in the 1920's. I and my 3 brothers and 2 children graduated from Keyes High School. My husband and our son farm in Cimarron County. Beginning in 2011 our grandchildren have attended Boise City School, and 2 grandsons have graduated from Boise City, and one grandson will be a Junior in the fall at Boise City. In the last few years, there have been many students transfer from Keyes to Boise City School.

In January, 2020, our community was told that Keyes school would close in May, and that the community would have a vote concerning the annexation.

That opportunity was not given to our community. In the first of March, we learned of the February 27th meeting of the State Board of Education that included the subject of annexation of Keyes School.

If our Keyes community had known of that meeting, there are many of us that would have driven to OKC to attend it. Our community cares about the annexation, we want to decide, not have the State Board make the decision!

Boise City School is 15 miles from Keyes School and is in Cimarron County. Yarbrough School is 24 miles from Keyes School and is in Texas County.

The majority of the Keyes students have gone to Boise City and want the annexation with Boise City. We as tax payers want our tax money to go to Cimarron County not Texas County.

We would like for our Keyes school district to make the decision. We ask that you not listen to a few people that have misinformed you, as well as our community, but to communicate with all our Keyes School District!

Sincerely,

Loretta Hiner Arthaud

Connie Dye:

My name is Connie Dye, Keyes School Dist .I-11 's Treasurer and Minutes Clerk for over 30 years, and I would like to let you know my position on the closing of Keyes School. My grandparents homesteaded here and my Dad graduated from Keyes in 1939 and lived here until his death at 98 in 2018. All three of us graduated from Keyes as well as my husband and our two children. We are land owners in Cimarron County. My brother is a retired OU Physician in Oklahoma City, Dr. Jerry Vannatta, prior Dean of OU Medical School. We have had a lot of accomplished students graduate from Keyes, i.e. doctors, lawyers, farmers, bankers, etc. that makes Keyes proud of our School.

By the time my son was in high school we started football co-op with Boise City, and he played all four years. We enjoyed the co-op and it worked great. My concern is that most of our students have transferred to Boise City already which is only 15 miles. I would want my ad valorem tax money to support those students instead of splitting it to Texas County with Yarbrough.

It is sad that Keyes School had to close as our school has the best school facilities in the County and Yarborough. We have a new gym floor, large gym with all new seats, large auditorium with new auto, an elevated science lecture room along with science lab 3 islands; three kitchen islands, a Cafeteria building, and nice size classrooms. We brought the grade school over to the high school from a brand new building that had asbestoses which ruined that building. It would be great to use the Keyes facilities if possibly, but if not we should be annexed with Boise City. I know the some on the Board wanted to go to Yarbrough but I am sure the people of Keyes would vote for Boise City. It only makes sense. Thank you.

18013 N Cincinnati Ave
Skiatook, OK 74070

May 5, 2020

To Whom It May Concern,

Concerning the distribution of school funding that will become available at the closing of the Keyes School District in Cimarron County, we want to strongly urge you to consider allocating the funds to the Yarbrough School District, or, at least, divide the funds between the Boise City School District and the Yarbrough School District.

We are interested in the consolidation of Keyes School because we own property in the Keyes School District, so we are taxpayers/patrons for the district. We both grew up in Keyes, went to all twelve years of elementary and secondary school at the Keyes School, graduating in the classes of 1980 and 1981. We farm, raise cattle, raised and home educated our children in the Keyes community until 2014, when we moved away from Keyes. We did consider putting our oldest daughter into the public school when she entered high school, so we visited the Boise City, Keyes, Yarbrough, and Elkhart schools to consider our options. We ultimately decided to continue with our homeschool, but if we were in the position again to choose to send any of our children to a public school, we would earnestly desire a choice, based on our child's interests and personality. The Boise City School and the Yarbrough School are very different; thus, where one child might not be so successful at one school, that child might be very successful at the other.

In addition, the existing east side of the Keyes School District is a considerable geographical distance from Boise City. In fact, the Keyes School District consists of a tract of land in Texas County, so we think splitting the Keyes School District funds between Boise City School and Yarbrough School not only makes geographical sense, it also makes economic sense for that Texas County land, along with at least the eastern side of the existing Keyes School District to become part of the Yarbrough School District. The Boise City School District already expands all the way to the west and north ends of Cimarron County, and if the Felt School were ever to close, Boise City School would consist of the entire expanse of western Cimarron County.

The families in the existing Keyes School District need to be able to choose to send their children to Yarbrough School, without fighting to be let out of the Boise City School District, and the funding that is generated in eastern Cimarron County needs to go to the smaller and closer Yarbrough School District.

Thank you for your time and attention to this matter.

Sincerely,

Tim and Tisa Hanvey

Mary Tucker

As an educator with the Yarbrough school district for 16 years I implore you to consider combining the Keyes school district with the Yarbrough school district. I know Yarbrough is a very student oriented school. I have seen the successful and dedicated alumni that have been influenced by the faculty and school board. The a school board has always been excellent stewards of the State Funds. Please take your time to consider this vote and influence your fellow committee members to do the same. Thank you, Mary Louise Tucker

My name is Tiffany Adams and I am the President of the school board. I have been on the board for several years now and the President for over 2 years. I feel as one of our jobs of being on the board is to represent the kids that are going to our school. For years now, parents have moved their kids out of our district for various reasons. Some parents have chosen to homeschool and some have moved them to different neighboring schools. The few kids that are still at the school in Keyes have zero desire to be a part of the Boise City school district. We have such few choices in our area and I hate to lose yet one more choice. Keyes closing will leave two schools in Cimarron County. I do believe that at some point Felt will be closing as well so obviously when and if they do close, their district will obviously go to Boise City. This is just one of the reasons that I believe that at least half of our district needs to go to the Yarbrough School District. The Yarbrough district is having tougher times as well and if at least half of our district would go to them then it would help Yarbrough stay open longer. We are a large district and this would also allow the kids on the east end of the district to not be on the bus as long. Our area appears to be drying up and I believe that we need to maintain as many choices as we can. This is the United States of America and its all about choices and I am all about giving choices to the kids and parents in our area. Yarbrough has a better grade card, they are a smaller district with a very family like feeling, kids that are perhaps challenged will have a better opportunity of excelling in the Yarbrough District, kiddos will have a better chance of being able to participate in sports as well and being able to play even if they are not as talented. The taxes appear to be an issue for several of the people in the Keyes District but they obviously do not understand how taxes work within a district. I believe we are all better people when we all remember to help neighbors. We as a district that is closing need to help as many people as we can and by dividing the district in half we could help both Boise City and Yarbrough school districts. Both districts need to be allowed to bring their bus routes into this district as well. Thank you for your time.

Tiffany Adams

President of the Keyes School District



JOY HOFMEISTER
STATE SUPERINTENDENT *of* PUBLIC INSTRUCTION
OKLAHOMA STATE DEPARTMENT *of* EDUCATION

MEMORANDUM

TO: The Honorable Members of the State Board of Education
FROM: OSDE Office of Legal Services
DATE: February 27, 2020
SUBJECT: District Status Report – Keyes Public School

District Status Report

Information is being provided to the State Board of Education (“State Board”) regarding Keyes Public School (“Keyes” or “the District”), based on a review of federal and state laws and regulations for public school programs, including but not limited to the accreditation of public schools in Oklahoma. Issues of concern identified during the review are addressed by program area below. Before addressing program areas, an overview of the District is provided.

I. The District

Keyes Public School is an independent school district in Cimarron County, serving students in Pre-K through 12th grade. Keyes’ student information data appears to show a significant trajectory of declining enrollment over the past several years, evidenced by student enrollments as of October 1 of each year, the relevant reporting date. In recent years, as a result of the low enrollment, Keyes has not provided transportation for students and has entered cooperative agreements with neighboring districts for students to participate in sports.

School Year	October 1 Enrollment Count
2015-2016	83
2016-2017	85
2017-2018	55
2018-2019	25
2019-2020	13 ¹

¹ In January, 2020, the District served 5 students in the elementary school site and 5 at the high school. As of February 25, 2020, there are now 5 at the elementary and 4 at the high school; a total of 9 students in grades PK-12.

For the 2018-2019 Oklahoma School Report Card, the District’s results are as follows:

Indicator	Elementary School Grade	High School Grade
Academic Achievement	No Grade	No Grade
Academic Growth (Elementary sites only)	No Grade	
Graduation (High school sites only)		No Grade
English Language Proficiency	No Grade	No Grade
Chronic Absenteeism	B	No Grade
Postsecondary Opportunities (High school sites only)		No Grade
Overall	No Grade	No Grade

See 2018-2019 Oklahoma School Report Card, Keyes Public Schools, pursuant to 70 O.S. § 1210.545. For the 2018-2019 school year, there were a total of nine (9) students who completed an assessment for the Oklahoma School Testing Program, which is used to calculate performance on certain of the aforementioned indicators. Because the school only had nine (9) students, the District did not have the minimum number of students (the “N size”) to enable it to receive an Indicator grade(s) on the School Report Card.²

II. Accreditation

The Oklahoma Legislature, in recognizing its obligation to the children of the state and to ensure their opportunity to receive an excellent education, and recognizing obligations to taxpayers of the state, have established requirements for compliance with quality standards which the public schools must meet. See 70 O.S. § 3-104.3. These compliance requirements and quality standards are commonly referred to as the accreditation standards, governing the classification, inspection, supervision and accrediting of the public schools by and through the State Board. See 70 O.S. § 3-104(7); see also 70 O.S. §§ 3-104.3 and 3-104.4. Consistent with these requirements, the State Board has adopted administrative rules for accreditation of public schools, governing the operations, activities and supervision of public schools, as well as a school’s compliance with applicable regulations and statutory requirements. See Oklahoma Administrative Code 210:35-3-201. The regulations provide for the accreditation status of a school to be classified according to the following:

1. Accredited With No Deficiencies--All standards are being met.
2. Accredited With Deficiencies--A school site fails to meet one or more of the standards but the deficiency does not seriously detract from the quality of the school's educational program.
3. Accredited With Warning--A school site fails to meet one or more of the standards and the deficiency seriously detracts from the quality of the school's educational program.

² Oklahoma currently has an N size of 10, meaning a school must have at least ten students in an indicator to receive an indicator grade.

4. Accredited With Probation--A school site:
 - a. consistently fails to remove or make substantial progress towards removing all deficiencies noted the previous year; and/or,
 - b. consistently violates regulations; and/or,
 - c. deliberately and unnecessarily violates one or more of the regulations.
5. Nonaccredited--The school site is no longer recognized by the State Board of Education.³

A. Course Credits

As a part of the accreditation standards, each secondary school must offer and teach at least thirty-eight (38) units or their equivalent in academic subject competencies each year. *See Oklahoma Administrative Code 210:35-9-31(g)(3)*. The 2017-2018 and 2018-2019 Accreditation Compliance Reports for Keyes High School indicate that the school did not offer the minimum of 38 units of high school credit required pursuant to *Oklahoma Administrative Code 210:35-9-31(g)(3)*. *See Accreditation Reports, attached as Exhibit "A."*

The failure to offer the minimum required number of high school course offerings resulted in Keyes High School being assigned the 2018 accreditation status of "Accreditation with One Deficiency", and the continuing shortage of class offerings resulted in the 2019 accreditation status of "Accreditation with Warning."

It is the OSDE's understanding that the District continues to offer fewer than 38 units of high school credit during the 2019-2020 school year. In fact, the District may only offer approximately twenty-three (23) courses at the high school, which is the minimum number of units or competencies a student must complete in order to graduate. *See 70 O.S. § 11-103.6; OAC 210:35-9-31.*

III. Special Education

In 2018, the Oklahoma State Department of Education (the "OSDE") Office of Special Education Services investigated a complaint alleging that a 16-year-old student was being served under an out-of-date Individualized Education Program (IEP), and that the student was not being provided with the services to which they were entitled under the *Individuals with Disabilities Education Act* (IDEA).

The 2018 investigation concluded that Keyes Public School was in noncompliance with the requirements of the IDEA, specifically 34 C.F.R. § 300.101 ("Free Appropriate Public Education") and 34 C.F.R. § 300.324 ("Development, Review, and Revision of IEP"). *See OSDE Complaint, attached as Exhibit "B."* As a part of the District's corrective action, an assurance statement was signed, assuring that all IEP's are timely finalized and that all special education staff of the District are trained on IEP implementation timelines.

Despite the provided assurance statement, it appears that the District has failed to comply with the timelines and requirements of IDEA. To date, the District currently has three (3) children with disabilities and an IEP; however, two (2) of these are out of compliance with IDEA requirements. IDEA, and its corresponding federal regulations, require that a reevaluation of each child with a

³ Additionally, accreditation may not be maintained if a district does not provide financial support to meet the needs of students OAC 210:35-3-166.

disability occur at least once every 3 years, unless deemed unnecessary. *See* 34 CFR § 300.303. Upon review of District records, the last reevaluations conducted on two students was March 4, 2016 and January 17, 2017 such that without information in the file deeming the reevaluation unnecessary, the District is out of compliance.

IV. Alternative Education

A school district's alternative education program is annually rated using an Alternative Education Evaluation Rubric, to determine whether appropriate alternative education services are being offered to students as required by Oklahoma law. *See* 70 O.S. § 1210.568. The Alternative Education Evaluation Rubric lists 40 components of alternative education programs, with a possible rating for each of the 40 statements of "Noncompliant," "Minimally Compliant," "Effective," and "Highly Effective."

In 2017-2018, Keyes' alternative education program was rated "Noncompliant" in 2 alternative education components, and "Minimally Compliant" in 12 components. There were no Alternative Education components in which Keyes was rated as "Highly Effective."

Beginning in 2018-2019, the Alternative Education Evaluation Rubric changed format to eliminate "Minimally Compliant" status and provide for 3 levels of rating for each component rather than 4: "Noncompliant," "Effective," and "Highly Effective."

In 2018, Keyes' alternative education program was assigned a general rating of "Noncompliant," and received "Noncompliant" ratings for 25 specific components. There were no Alternative Education program components in which Keyes was rated as "Highly Effective." (The 2020 Alternative Education Evaluation Rubric for Keyes has not yet been completed.)

V. Annexation

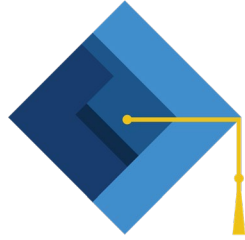
Oklahoma law provides that a school district may be annexed to one or more other districts either through a local election held with the approval of the boards of education of the affect districts, or through "mandatory annexation by the State Board of Education." *See* 70 O.S. § 7-101. Pursuant to this statute, the Board is authorized to promulgate rules and regulations regarding procedures to accomplish mandatory annexation. *See* 70 O.S. § 7-101.1. At Oklahoma Administrative Code ("OAC") 210:1-3-2, administrative rules provide that mandatory annexation will be considered by the Board in the following situations:

1. When a school district has been declared academically at-risk under the statewide system of accountability pursuant to 70 O.S. §§ 1210.541-545;
2. When a school district is non-accredited by the Board;
3. When a district fails to open or maintain a school, except when situations beyond the control of the district cause a normal delay.
See OAC 210:1-3-2.

Currently, evidenced by its significantly low student enrollment and less than minimal course offerings, nearly causing students to not have the opportunity to graduate, the District is on a trajectory – if not already – to fail to open or maintain school, be declared academically at risk and lose accreditation.

VI. Recommendation

In light of the foregoing, the OSDE recommends that the accreditation status of Keyes public schools be classified as “Accredited with Probation.” Additionally, barring an extraordinary change in the District’s student enrollment and course offerings, the OSDE recommends that Keyes Public Schools be mandatorily annexed, effective June 30, 2020. Pursuant to applicable laws and regulations, the OSDE recommends that appropriate notifications be provided to the District of the proposed annexation, as well as to neighboring school districts, and that a hearing be set on the proposed annexation as early as March 25, 2020.



OKLAHOMA STATE DEPARTMENT OF
EDUCATION
— CHAMPION EXCELLENCE —

Keyes Public Schools

2018-2019 School Report Cards

Indicator	Elementary School Grade	High School Grade
Academic Achievement	No Grade	No Grade
Academic Growth (Elementary sites only)	No Grade	N/A
Graduation (High school sites only)	N/A	No Grade
English Language Proficiency	No Grade	No Grade
Chronic Absenteeism	B	No Grade
Postsecondary Opportunities (High school sites only)	N/A	No Grade
Overall	No Grade	No Grade

Enrollment

- 2015 – 83 students
- 2017 – 55 students
- 2019 -13 students
- February 24, 2020 – 9 students

Accreditation

- Legislature, vis-à-vis the State Board, to ensure:
 - Meet the needs of all students
 - Provide equitable educational opportunities to receive an excellent education
 - Obligations to taxpayers
- Laws and regulations
 - Schoolboards
 - Administration
 - Finances
 - Personnel

70 O.S. § § 3-104 & 3-104.4; OAC 210, Chapter 35

Non-compliance

- Courses and Credits
 - State: 23 credits for graduation
 - State: 38 units or their equivalent must be offered
 - Keyes Public School: 23 *offered*
 - Repeat accreditation deficiencies in 2018 and 2019
 - Current accreditation status: Warning

70 O.S. § 11-103.6; OAC 210:359-31

Non-Compliance

- Special Education
 - 2018 complaint investigation – non-compliance *Individuals with Disabilities Education Act (IDEA)*
 - Current: outdated/expired evaluations and Individualized Education Program (IEP)
- Alternative Education
 - 2017-2018: 14 areas of “Noncompliant” and “Minimally Compliant”
 - 2018-2019: 25 areas of “Noncompliant”

Conclusion

- 84% drop in enrollment in 4 years
- 9 current students across 12 grades
- Non-compliance
 - Course offerings and opportunities for students
 - Civil rights – educationally disadvantaged students (special education and alternative education)

Annexation

Board shall consider annexation in the following situations:

- District academically at-risk
- District is non-accredited
- District fails to open or maintain a school

-70 O.S. § 7-101.1; OAC 210:1-3-2

Recommendations

- ~~Accredited with Warning~~
- Accredited with Probation
- Annexation, effective June 30, 2020
 - Notice to Keyes Public Schools
 - Consolidation Fund
 - Severance