OKLAHOMA STATE
DEPARTMENT *of* EDUCATION

November 5, 2026

To: Dr. Theodore Murray

Re: Graduation Requirements for New-to-Oklahoma Students

Dr. Murray,

You recently inquired regarding graduation requirements for students who transfer to Oklahoma from outside of the state. Specifically, you asked whether the 2030 graduation requirements apply to those students and, if so, what exceptions may be available if the school to which the student has transferred does not have adequate courses available to meet the current graduation requirements.

As a threshold matter, 70 O.S. § 11-103.6(D) ("college and career") and § 11-103.6(E) ("core curriculum") specifically state that the graduation pathways outlined in those subsections "shall be unavailable as a diploma pathway to students not enrolled in a public high school accredited by the State Board of Education prior to the 2025-2026 school year." Therefore, any student who is new to Oklahoma, and/or new to an Oklahoma public school (*e.g.*, leaves a private high school and enters a public high school after the 2025-2026 school year) must utilize the 2030 graduation requirements outline in 70 O.S. § 11-103.6(C).

The question thus becomes how a school might provide for, as an example, a student who moves to Oklahoma in his or her senior year to a school which does not have available classes which meet the requirements. This seems to be of particular concern with regard to the required fourth math.

The statutes contemplate this situation in 70 O.S. § 11-103.6f. That provisions allows for a district board of education "to make exceptions on an individual student basis to the high school graduation requirements" but only in cases in which the student has "transfer[red] into an Oklahoma school district from out of state after the junior year of high school[.]" Furthermore, exceptions are available only if requiring the student to meet the graduation requirements would "extend[] the date of graduation." In other words, a school district is not permitted to make exceptions to the graduation requirements for matters only of convenience or a desire to utilize one of pathways outlined in Sections (D) and/or (E) of 70 O.S. § 11-103.6.

As such, exceptions are only available in a narrowly prescribed set of circumstances in which the following are all met:

1. The student transfers from out of state;
2. The student transfers in the senior year of high school;
3. The student cannot meet the graduation requirements; and
4. Requiring the student to meet graduation requirements would result in the student's being unable to graduate on time.

It should be noted that provided exemptions from graduation requirements is the exception—not the rule—and should be utilized only when other options are completely unavailable. Furthermore, each district which allows exceptions to graduation requirements has statutory reporting duties which are also outlined in 70 O.S. § 11-103.6f(B). That provision requires school districts to notify the State Department of Education in writing on or before July 1 of each year the number of students granted exceptions as well as the reason for those exceptions.

School districts should make every effort to utilize other available options. These can include approved online/correspondence courses, approved career tech courses, and approved nonstandard courses. Because all students who are currently in the 9th grade and younger are required to utilize the 2030 graduation requirements, districts should also make every effort to ensure that available courses meet those requirements.

In short, OSDE cannot, and should not, provide blanket guidance regarding exceptions to the 2030 graduation requirements. The onus is on individual school districts to evaluate, on a case-by-case basis, the need for exceptions. Finally, because 70 O.S. § 11-103.6f only contemplates exception for students who move to Oklahoma from another state, it does not appear as though exceptions are available for students who transfer to an Oklahoma public high school from a private school or from homeschool. Therefore, those students likely must meet the 2030 requirements.

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