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EXECUTIVE SUMMARY

Vermont is confronting a set of structural challenges in its public education system: declining enrollment, rising costs, persistent inequities in access to programs, and a governance structure that makes regional coordination difficult. Vermont's school buildings are the second oldest in the nation. In addition, Vermont funds services out of its public education fund that in other states are funded by non-education revenue sources. Act 73 was passed to respond to these pressures, directing the School District Redistricting Task Force to examine statewide consolidation options and propose new district configurations intended to improve equity, quality, and fiscal sustainability.

Over four months, the Task Force conducted a rigorous, data-driven review of Vermont's educational landscape, drawing on statewide fiscal and enrollment data, research from comparable rural states, public input from more than 5,000 Vermonters, and extensive deliberation among members. The Task Force did not find evidence that mergers of the scale contemplated in Act 73 would reliably lower costs, improve educational outcomes, or expand equity. Instead, the evidence pointed toward targeted, regional approaches that strengthen opportunity while respecting Vermont's rural geography, community identity, and limited statewide capacity for major structural change.

To follow the evidence and meet the intent of Act 73 the Task Force recommends a phased roadmap that advances three complementary strategies:

1. Cooperative Education Service Areas (CESAs)

Regional shared-service structures for special education, transportation coordination, staffing, purchasing, data systems, and other high-cost, low-scale areas that small districts cannot efficiently manage alone. Research from states with similar geography shows that cooperative services improve access and reduce duplication far more effectively than consolidation.

2. Strategic Voluntary Mergers

Mergers pursued only where communities identify a shared educational purpose and where feasibility studies show clear value. This approach avoids arbitrary size targets (e.g., 4,000–8,000 ADM) and instead emphasizes educational benefit, community priorities, and fiscal sustainability.

3. Comprehensive Regional High Schools

Regionally governed high schools designed to expand student opportunity—advanced coursework, world languages, technical education, mental health services, and extracurricular access—especially in small or rural districts that cannot sustainably provide these offerings alone.

The data reviewed by the Task Force consistently showed that Vermont's largest education cost drivers—health care, administering of special education, facilities, transportation, and agency capacity—are not solved by district size. Regional coordination, shared staffing, and

well-planned high school collaborations address these drivers more effectively than mandated structural change.

Public input underscored this conclusion. Vermonters expressed strong concerns about student wellbeing, loss of local control, transportation burdens, rural equity, and a process perceived as rushed or unclear. At the same time, they showed broad support for improving quality and expanding equitable access through collaboration rather than state-directed mergers.

The roadmap recommended by the Task Force provides:

- Immediate gains through shared services
- Long-term improvements through voluntary, community-driven mergers and regional high schools
- Protection of local identity alongside improved statewide coherence
- A feasible implementation path aligned with Vermont's geography, capacity, and public sentiment

This approach does not reject the intent of Act 73 — it advances this intent in realistic, evidence-based, and community-responsive ways.

CHALLENGES ACT 73 AIMS TO ADDRESS

Vermont's education system is facing a set of interconnected challenges that prompted the General Assembly to pass Act 73. Rising education costs, coupled with declining student enrollment, are placing increasing pressure on local budgets and straining the sustainability of school operations. These demographic and fiscal trends make it harder for many districts—particularly small and rural ones—to maintain program breadth, retain specialized staff, and deliver the full range of services students need. At the same time, frustration has grown with the complexity of the existing funding system and the impact of rising property taxes.

Vermont's highly decentralized governance structure limits the ability of districts to share resources, coordinate specialized services, or benefit from economies of scale. Persistent inequities in access to programs and opportunities remain, particularly for students in smaller and geographically isolated communities. Rural realities including mountainous terrain, long travel distances, and dispersed populations, make uniform statewide solutions difficult to design or implement.

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HOW THE TASK FORCE APPROACHED ITS WORK

Charge Under Act 73¹

Act 73 established the School District Redistricting Task Force and directed it to develop up to three statewide redistricting map proposals that considered geographic, demographic, fiscal, and operational factors. The charge required the Task Force to examine statewide consolidation options; consider the use of supervisory unions and supervisory districts; continue access to tuitioning; and, where practical, avoid separating districts. The work was intended to support improved equity, quality, and fiscal sustainability across the state.

Task Force Membership & Process

The Task Force consisted of eleven members—six legislators and five non-legislative members with extensive experience in Vermont's public education system. Over eight full-day meetings between August and November 2025, members reviewed data, developed scenarios, and explored governance models, supported by staff from relevant state agencies and an independent facilitator. Meetings were open, recorded, and accessible both in-person and virtually. Public input was gathered through comment at each meeting, written submissions, four public hearings, and input collected by the Commission on the Future of Public Education.

Legislative Members

- Senator Scott Beck
- Senator Martine Larocque Gulick, Co-Chair
- Senator Wendy Harrison
- Representative Edye Graning, Co-Chair
- Representative Rebecca Holcombe
- Representative Beth Quimby

Non Legislative Members

- Dr. Jay Badams
- Dr. Jen Botzojorns
- Kim Gleason
- Chris Locarno
- Dave Wolk

¹ Act No. 73. An act relating to transforming Vermont's education governance, quality, and finance systems.

https://legislature.vermont.gov/Documents/2026/Docs/ACTS/ACT073/ACT073%20As%20Enacted.pdf?_gl=1*pc93xn*_ga*MTEyNzIxNDU0My4xNjU4ODQ2NTc5*_ga_V9WQH77KLW*czE3NjQwMDI1MDkkbzk0JGcxJHQxNzY0MDAyNTE3JGo1MiRsMCRoMA

The Task Force grounded its work in a clear set of guiding principles designed to ensure that recommendations were evidence-based, feasible within Vermont's context, and aligned with the intent of Act 73. These principles emphasized pragmatism amid tight timelines and limited data; attentiveness to political and operational realities; reliance on fiscal, enrollment, and equity data rather than assumptions; respect for the lived experiences and local knowledge of Vermont communities; a commitment to avoiding unnecessary disruption; and the importance of designing governance structures capable of adapting to future demographic, fiscal, and policy changes. Together, these principles shaped the Task Force's deliberations and provided a consistent framework for evaluating trade-offs across cost, equity, quality, and local democratic engagement.

Guiding Principles

- 1. **Be pragmatic and focused:** Work within time and information constraints while prioritizing proposals with the highest likelihood of success.
- 2. **Acknowledge political realities:** Recognize the need for system stability and the disruptive effects of major structural shifts, while still advancing necessary improvements.
- 3. **Use data, not assumptions:** Analyze available fiscal, enrollment, and equity data to inform judgments and maintain transparency.
- 4. **Honor local knowledge:** Value the lived experience of Vermont communities and recognize the importance of local context in designing feasible governance models.
- 5. **Do no harm:** Build on what works rather than creating disruption for its own sake.
- 6. **Design for resilience:** Ensure that proposed structures can withstand future demographic, fiscal, and policy shifts.

Limitations & Constraints

The Task Force operated within a compressed four-month timeline and faced challenges obtaining complete and consistent data from the Agency of Education—particularly regarding facilities, staffing, special education delivery, and cost modeling. Vermont's varied local contexts, rural geography, and the complexity of the charge further limited the ability to fully model statewide redistricting scenarios. While the task force began its work in August, the bulk of this data was not made available to the Task Force until October 6th. Despite these constraints, the Task Force engaged deeply with the charge and worked toward evidence-informed recommendations aligned with Vermont's needs.

Areas of Deliberation and Differing Perspectives

Early in its process, the Task Force explored a wide range of potential redistricting models before narrowing its focus to two proposals for deeper analysis. Throughout these discussions, members contributed perspectives that reflected Vermont's varied communities, governance structures, and educational priorities.

One area of differing opinion centered on whether tuitioning is meant to ensure every student has access to a school or to support school choice. Some members viewed tuitioning as an expression of local control and community identity, while others raised concerns about affordability, stability, and fairness. They noted that access to public and approved independent schools varies widely, and that public dollars flowing to independent schools may leave rural public schools—already facing declining enrollment—more vulnerable. Others pointed to cases where tuition dollars support public schools and strengthen their enrollment and revenue.

Members also differed in how much implementation detail was necessary before recommending major structural changes. Some pushed for clarity around feasibility, staffing capacity, service delivery, transportation logistics, and cost implications. Others felt it was more important to set a broad structural direction, even if the detailed modeling would need to follow.

In early meetings, the Task Force discussed the natural alignment between Career and Technical Education (CTE) centers and the high schools they serve. A working group created a regional map based on existing CTE catchment areas, noting that each CTE already has a regional advisory board, its own budget, program advisory committees, and student services. The group saw these structures as evidence of existing, functional regional collaboration. The model was revised based on public testimony and Task Force feedback, adjusting boundaries to preserve school choice and align with local preferences for contiguous districts. Supporters of the CTE-based approach felt these existing systems warranted further study and offered a familiar, operationally aligned starting point.

As deliberations progressed, the Task Force narrowed its focus from four scenarios, including a single statewide district and a county-based model, to two proposals for deeper analysis:

- 1. A regional governance map organized around CTE centers, and
- 2. A combined proposal built around Cooperative Education Service Areas (CESAs), Voluntary Strategic Mergers, and Comprehensive Regional High Schools.

After extensive discussion, the Task Force voted 8–3 not to advance the regional CTE map, citing concerns about governing unit size, and limited evidence that forced mergers would increase access, decrease cost or improve quality. Supporters of the CTE-based map emphasized its grounding in existing regional relationships, its responsiveness to public input, and its potential to respect local patterns of collaboration.

The Task Force then voted 7–4 to advance the combined CESA–Strategic Merger–Regional High School proposal. Supporters highlighted its emphasis on locally driven cooperation, shared services, and implementation feasibility, while opponents questioned whether the approach fully met Act 73's consolidation expectations.

Despite these differing perspectives, members consistently agreed on key values: the need for stronger regional cooperation, reliance on evidence and data, equitable access to high-quality education, meaningful attention to community voices, and solutions that reflect the unique challenges and strengths of Vermont's rural geography. These shared insights ultimately shaped the proposal advanced in this report.

WHAT VERMONTERS TOLD US: PUBLIC INPUT HIGHLIGHTS

From the outset, the Task Force recognized that meaningful public input was essential to understanding how statewide redistricting could affect Vermont's students, families, and communities. Over a four-month process, public feedback was gathered through multiple channels, including:

- Four public hearings across the state, each offering in-person and virtual participation for over 700 people
- An online public comment portal, which received 463 written submissions (between July 7 and November 20, 2025)
- Online and paper surveys aligned with hearing activities
- A statewide survey of school board chairs conducted by the Vermont School Boards Association (VSBA)
- Data from the Commission on the Future of Public Education's statewide survey, completed by over 3,931 Vermonters

Public Hearing Locations & Dates

Oxbow High School, Bradford, VT October 10, 2025

Leland & Gray High School, Townshend, VT October 16, 2025

Rutland High School, Rutland, VT October 22, 2025

Winooski High School, Winooski, VT October 28, 2025

In total, more than **5,000 Vermonters** contributed input, representing at least 96 towns and 11 counties.

Who Participated & Who Was Missing

Participants included parents and caregivers, educators, school board members, administrators, and residents from operating, non-operating, unified, and independent/town academy districts. Survey responses suggest contributors were disproportionately people already engaged with their schools or local education issues. High "prefer not to answer" rates for demographic questions indicate both limited participation from historically marginalized groups and discomfort with sharing sensitive information. Paper surveys available at in-person hearings broadened access for some rural communities.

Despite multiple avenues for engagement, significant barriers limited participation from groups most dependent on public systems and most affected by structural changes. The compressed timeline, limited number of hearings, reliance on virtual tools, and lack of engagement supports (such as stipends, childcare, transportation assistance, or outreach through trusted community partners) made it difficult to reach: low-income families; residents with disabilities; people of color and other historically marginalized groups; students and younger Vermonters; and caregivers with inflexible work schedules or limited internet access.

Equitable engagement requires intentional outreach and trusted relationships, not just open invitations. When those most affected by transportation, school closures, special education

services, and access to programs are underrepresented, the risk of widening disparities grows. Their lived experience is essential to understanding how policies work on the ground and should guide interpretation of these findings.

Types of Feedback Received

Different engagement methods provided complementary perspectives. Public hearings captured personal stories and community-level concerns about belonging, stability, and identity, while surveys produced structured data on priorities, perceived benefits, and concerns. Written comments offered detailed reflections grounded in lived experience, and VSBA and Commission surveys provided system- and governance-level insights. Together, these sources offered a layered picture of Vermonters' hopes, questions, and concerns.

Vermont School Boards Association Survey Themes

The VSBA survey of school board chairs provided governance-level insights:

- 97% of all boards that responded have discussed redistricting
- Strengths: strong academics, community-centered schools, small class sizes, and flexible local programming
- Challenges: fiscal pressures, staffing shortages, transportation barriers, and inequities across regions
- Mixed views on consolidation: some anticipated expanded opportunities and shared staffing; others questioned whether larger districts would preserve community identity or deliver efficiencies
- Consensus: any successful system change requires clear data, state support, and transparent implementation

Note: Survey had a 50% response rate: Many districts are not represented in these results, including two of the state's most diverse school districts, Winooski and Burlington

Key Themes

Across hearings, surveys, written comments, and testimony, seven themes emerged consistently across the state.

1 – Student Wellbeing and Belonging – Vermonters expressed deep concern about students' mental health, social disconnection, and the need for stability and close relationships. Many worried that larger schools or longer commutes could reduce students' sense of belonging.

"Kids need a sense of belonging to learn."

2 – Loss of Local Control, School Choice, and Community Identity – Participants emphasized the importance of local governance and the role schools play in community vitality. Many feared losing local voice or access to existing school choice arrangements if redistricting were implemented.

"Local schools are the heart of our communities"

3 – **Need for Stability After Years of Change** – Communities described years of hard and intentional work to successfully implement mergers following Act 46 and urged policymakers not to impose additional structural changes without clear benefit. Even those open to reform stressed the need for stability before undertaking major transitions.

"Please hold harmless those districts that just completed Act 46 mergers."

4 – Transportation and Access Challenges – Transportation was one of the most frequently mentioned concerns. Rural families in particular worried about longer bus rides, limited access to extracurriculars, and safety implications of regionalizing schools.

"Students without transportation will have limited access to opportunities."

- 5 **Skepticism About Cost Savings or Efficiency –** Many questioned whether redistricting would meaningfully reduce costs or improve outcomes. Participants noted that major cost drivers—health care, transportation, special education, and aging facilities—lie largely outside the realm of district boundary configurations.
- 6 **Rural Equity and Access** Rural residents worried that consolidation could deepen inequities by concentrating opportunities in more populated areas and leaving small communities with fewer options. Many feared losing local access to educational programs and community institutions.
- 7 Desire for a Transparent, Evidence-Based Process Participants expressed frustration with what felt like a rushed or unclear process and called for more transparency, clearer data, and genuine local involvement before major changes proceed.

"Slow down – do it right the first time."

Public Priorities and Confidence Levels

Vermonters prioritized quality of education and equitable access as the most important goals. Cost savings, efficiency, governance coherence, and preserving local voice were also valued but ranked lower relative to direct impacts on students.

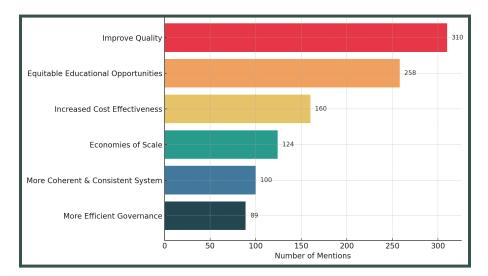


Figure 1. Overall priorities among six guiding criteria

Participants expressed low overall confidence that redistricting alone would deliver improvements across the six guiding criteria. Even participants supportive of certain structural changes expressed uncertainty about whether district reconfiguration would address Vermont's underlying challenges. This is aligned with the findings from the Commission on The Future of Public Education in Vermont's recent survey. The Commission notes that "Many believe that forced consolidation under state mandate will not produce cost savings or better outcomes, especially in rural Vermont."

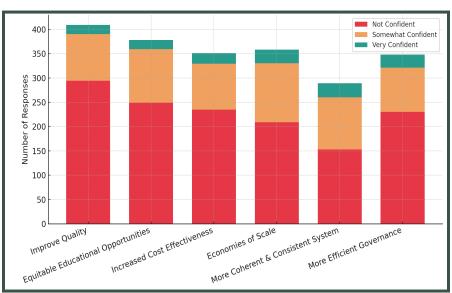


Figure 2. Confidence levels across six criteria (Aligned Order)

Implications

Public input revealed several patterns that can inform policymaking. Vermonters and education experts aligned on key points: consolidation alone will not address major cost drivers; structural changes must be grounded in evidence and transparency; and collaboration and shared services may expand opportunities without the disruption of forced consolidation.

At the same time, notable areas of misalignment surfaced. Policymakers often frame consolidation around system-level efficiency, while communities emphasize stability, identity, and student-level impacts. Many experts prioritize statewide equity, while rural residents view school choice as essential access. Policymakers focus on long-term structural outcomes, while the public is concerned with near-term disruptions for students and families.

Research shows that reforms lacking alignment between experts and communities struggle to gain legitimacy and are harder to implement². Durable change requires trust, shared understanding, and processes that honor local voice. Legitimacy matters, implementation depends on trust, and designing for those most affected strengthens the entire system. These insights underscore the importance of building capacity and collaboration over time rather than relying solely on top-down restructuring.

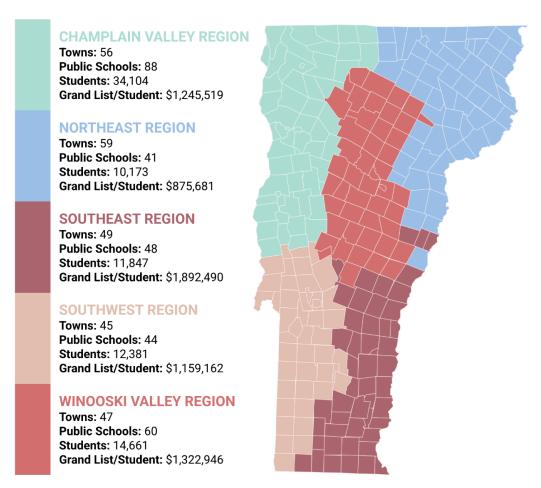
https://www.vanderbiltuniversitypress.com/9780826515414/the-next-form-of-democracy/?utm; Yankelovich, Daniel 1991. Coming to Public Judgement-Making Democracy Work in A Complex World https://archive.org/details/comingtopublicju0000yank?utm

² Giliberto Capano, Michael Howlett, Leslie A Pal, M Ramesh, Dealing with the challenges of legitimacy, values, and politics in policy advice, Policy and Society, Volume 42, Issue 3, September 2023, Pages 275–287, https://doi.org/10.1093/polsoc/puad026; Leighninger, Matt. 2006. The Next Form of Democracy: How Expert Rule Is Giving Way to Shared Governance — and Why Politics Will Never Be the Same. Vanderbilt University Press.

A MAP FOR THE FUTURE: VERMONT REGIONAL EDUCATION PARTNERSHIP OVERVIEW

This section presents a high-level summary of the Regional Education Partnership roadmap, highlighting its purpose, vision, and core design features. Additional detail—including citations, regional maps, governance materials, cost assumptions, and the complete technical submission—is available in *Appendix E: The Vermont Regional Education Partnership Model*.

Figure 3. Map of proposed cooperative education service areas



Purpose & Vision

Vermont is becoming increasingly unaffordable. Housing, health care, transportation, and food costs are rising faster than wages, and Vermonters are struggling to meet basic needs. Education cannot be insulated from these economic realities. Every sector must make every public dollar go as far as possible for what matters most — and in education, that means stability, opportunity, and fairness for students.

At the same time, Vermont is experiencing significant demographic and geographic shifts. All regions continue to lose population, and even our population centers are educating far fewer students than in past decades. Vermont's identity — and its economic resilience — are closely tied to its rural communities and schools. Strong schools are essential to attracting and retaining families, supporting local economies, and sustaining civic life. Effective policy must honor both community identity and the realities of a changing state.

The Task Force reviewed research, state data, cost modeling, and public input from more than 5,000 Vermonters. It found no peer-reviewed evidence that large, forced mergers of the scale contemplated by Act 73 reliably improve student outcomes, reduce costs, or increase equity. In contrast, the strongest evidence supports *shared service models*, targeted *voluntary* mergers, and *regional high school partnerships* that expand opportunities without destabilizing communities. For mergers involving tuitioning districts — which make up 60% of districts under 500 students — the Task Force found significant public concern and complex implications for cost, equity, and local school viability.

This proposal follows the evidence. It offers a phased, collaborative roadmap that targets real cost drivers, expands opportunity, and respects Vermont's geographic and community diversity through three core strategies: cooperative regional services, voluntary mergers where they strengthen educational opportunity, value, sustainability, and comprehensive regional high schools. Together, these components aim to improve equity, efficiency, and program access while safeguarding community identity and local voice.

Rationale

Throughout the state districts face increasing challenges, including declining enrollment, limited curricular offerings, and financial strain. The proposal argues that cooperative approaches and strategic consolidations can address these pressures by pooling resources, expanding access to specialized programs, and reducing duplication. The goal is not compulsory consolidation but voluntary, community-driven partnerships that produce sustainable, high-quality education for all students.

The roadmap is grounded in extensive analysis of district demographics, staffing, facilities, cost modeling, special education patterns, and program access, as well as peer-reviewed research on effective rural education structures. Analysis shows:

- Cost drivers not solved by district size: The Task Force found no evidence that
 mandated district-size targets would reduce Vermont's major cost drivers. District size is
 not linked to improvements in health care, special education, or facility expenses—the
 largest pressures on the education budget. Cooperative service models directly address
 these areas, which is why the Task Force prioritized them.
- **Immediate vs long-term benefits:** CESAs can produce immediate gains, while mergers and regional high-school models require longer-term planning.

- **Equity guardrails:** The regional designs intentionally avoid long commutes, "education deserts," and inequitable access.
- Alignment with Act 73: The roadmap responds to Act 73's charge to make intentional, evidence-based improvements that strengthen Vermont's public education system. The proposed plan enhances statewide coherence and builds regional capacity.
- Voluntary vs forced mergers: Research shows voluntary, purpose-driven
 mergers—centered on shared goals, phased transitions, and governance tied to local
 identity—are far more effective than mandated consolidation. Large, forced mergers
 often underestimate transition costs, destabilize staffing, erode trust, and do not reduce
 major cost drivers.
- Value of regional high schools: Regional high schools expand equitable access to programs that small high schools struggle to sustain, including world languages, advanced coursework, CTE integration, and specialized staffing. They improve opportunities without requiring elementary school closures.
- Limitations of large, mandated mergers: Studies of 4,000-8,000 ADM mergers show
 they often fail to reduce costs, produce uneven results, and can increase expenses
 during transition. Evidence suggests cooperative regional service models carry lower
 implementation risk. Some efficiencies are possible when very small districts
 consolidate under the right conditions.

Design Principles

- Address real costs now not potential savings years in the future
- Require districts to share services regionally to support lower cost and better quality
- Protect educational access for students most dependent on public systems
- Reflect Vermont's rural geography and transportation realities
- Respect the limits of state and local implementation capacity

Key Components

1. Cooperative Education Service Areas (CESAs)

- Encourages inter-district collaboration for shared services such as special education, technology, transportation, and professional development.
- Proposes regional frameworks for coordination to ensure equitable access and cost-efficiency.
- Highlights examples of successful cooperative models to illustrate benefits and scalability.
- Additional access to career ready programming in high schools and middle schools can come through the CESAs.

2. Strategic Voluntary Mergers

- Mergers based on educational value, community priorities, and fiscal sustainability not arbitrary size targets.
- Phased processes with feasibility studies, shared data, community engagement, and state support.
- Incentives for mergers that improve opportunity or address structural deficits.
- Preservation of local voice and identity.

3. Comprehensive Regional High Schools

- Advocates for regionally governed high schools offering diverse pathways academic, technical, and experiential learning — tailored to 21st-century skills.
- Suggests shared facilities and faculty expertise to expand course offerings, advanced placement, and career-technical education.
- Promotes inclusive governance models to ensure representation from all participating districts.
- Recognizes the need for strategic investment of school construction aid.

Implementation Strategy

Effective implementation requires pacing, capacity, and clear expectations. The Task Force recommends a sequenced, multi-year plan designed to produce early wins while building toward long-term structural coherence.

Phase 1 — Regional Readiness & Shared Baseline (Year 1)

- Establish regional planning teams
- Map services, staffing, facilities, transportation patterns
- Identify immediate shared-service opportunities
- Provide technical and financial assistance for planning

Phase 2 — Early Action Through Cooperative Services (Years 1–2)

- Launch shared service pilots (e.g., special education staffing, data systems, transportation coordination)
- Begin regional staffing models where feasible
- Produce annual progress reports and implement mid-course corrections

Phase 3 — Community-Driven Structural Decisions (Years 2–4)

- Conduct feasibility studies for potential mergers or regional high school partnerships
- Support deep community engagement and transparent data-sharing
- Enable voluntary merger votes with targeted incentives

Phase 4 — Long-Term Integration & Continuous Improvement (Years 4+)

Expand successful cooperative models statewide

- Implement approved mergers and regional high school governance structures
- Evaluate implementation fidelity, program access, and cost trends
- Maintain an iterative, data-driven improvement cycle

This phased approach aligns with implementation science – start with shared capacity and early wins, support informed decision-making, and move toward structural integration where communities choose it.³

Expected Outcomes

- Enhanced student opportunity and program variety
- Improved operational efficiency, cost savings and fiscal sustainability
- Strengthened regional collaboration and community engagement
- A modernized educational infrastructure aligned with demographic and economic realities

The roadmap calls for collaboration rather than required consolidation. It strengthens Vermont's public education system through evidence-based strategies that expand opportunity, improve quality, and respect local identity. By focusing on cooperative services, strategic voluntary mergers, and comprehensive regional high schools, this approach offers a pragmatic, community-centered path toward a more equitable and sustainable future for all Vermont students.

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³ See Appendix D: Implementation Risks and Best Practices

DATA SUPPORTING THIS APPROACH

The roadmap advanced by the Task Force is grounded in extensive analysis of Vermont's educational landscape, including cost drivers, demographic trends, staffing challenges, capacity at the Agency of Education, special education, program access, geographic realities, and research from comparable rural states. Across all of the evidence reviewed, a clear conclusion emerged: Vermont's core cost pressures and opportunity gaps are not solved by district size alone. Instead, the data consistently pointed toward the strengths of cooperative service models, strategic voluntary mergers, and regionally governed high schools. The data also raised significant concerns about the feasibility and effectiveness of large, forced district consolidations. The key findings that shaped the Task Force's proposal are summarized below.

Cost Drivers

Across the data reviewed, Vermont's most significant education cost pressures are structural and statewide—not functions of district boundaries. Rising health care costs, increasing demand for mental health, behavioral, and special education services, and the substantial capital needs of aging or contaminated school facilities all exert upward pressure on spending regardless of governance structure. Rural geography adds transportation costs that consolidation cannot offset, while duplication and privatization, particularly in tuitioning and specialized placements, further strain the Education Fund. These pressures are compounded by long-standing capacity limitations at the Agency of Education, which limit the state's ability to provide consistent guidance, technical assistance, and oversight during major system change. Because these drivers operate independently of district configuration, shifting boundaries does little to meaningfully reduce them. For a detailed analysis, see *Appendix C: Cost Drivers in Education*.

Figure 4. Total proportion of education spending that is health insurance premiums paid by school districts and employees per year

| Table showing total proportion of Education Spending that is health insurance premiums paid by school districts and employees, by year | | | | |
|--|--------------------------------------|---|-------------------------------|-------------------------|
| | Education Spending in Billions | Health insurance premiums paid by school districts and employees | % of Education Spending | Source of data: |
| FY23 | \$1,917,168,186 | \$266,517,469 | 13.90% | JFO 5 yr web report |
| FY24 | \$2,078,429,521 | \$301,281,227 | 14.50% | JFO 5 yr web report |
| FY25 | \$2,309,900,000 | \$344,905,222 | 14.90% | July 30 closeout report |
| FY26* | \$2,430,399,971 | \$381,372,844 | 15.69% | FY26 budgeted |

Source: Vermont Education Health Initiative:

https://vehi.org/client_media/files/Board%20Docs/VEHI%20Annual%20Report%20for%20FY%2025%20Fi nal.pdf; JFO Education Spending Data (FY23 and FY 24)

https://ljfo.vermont.gov/custom_reports/5yr/2025_Conf_BigBill%20-%202024-08-26/default.php#govfunc5; FY 2026 Big Bill Conference Web Report

https://ljfo.vermont.gov/custom_reports/reports/BigBill/v1/FY%202026%20Big%20Bill%20Conference%2 <u>0Web%20Report%202025-09-02%201017am.html#govfu;</u> JFO Closeout Report https://ljfo.vermont.gov/assets/Meetings/Joint-Fiscal-Committee/2025-07-31/Fiscal-2025-Closeout-GF-E F-TF.pdf

Enrollment Decline, Excess Capacity, and Uneven Regional Trends

Vermont continues to experience long-term enrollment decline—especially in rural regions—leading to excess building capacity, difficulty sustaining full program offerings, and higher per-pupil costs. These trends are highly uneven: some areas have stabilized while others have seen steep decreases. As a result, uniform statewide consolidation targets, such as 4,000–8,000 students, do not reflect actual regional variation and may exacerbate inequities rather than resolve them.

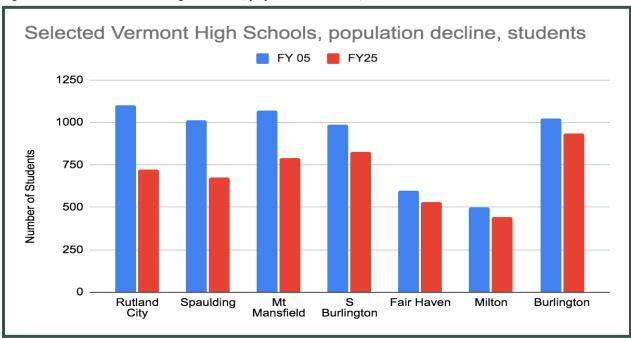


Figure 5. Selected Vermont high schools, population decline, students

Source: VSA Education Directory 2004-05 and 2024-25 VSA

Staffing Challenges and Uneven Access to Specialized Programs

Declining enrollment and geographic isolation amplify staffing shortages. Vermont schools—especially small and rural ones—struggle to recruit and retain special educators, behavior specialists, mental health providers, STEM and world language teachers, and instructors for advanced coursework. Cooperative service models offer a way to share specialized staff across districts, improving access to programs while reducing duplication and competition for scarce talent.

Figure 6. Staffing patterns: K12 teachers down 8% between FY20-25, but support staff numbers are increasing

Staffing patterns: K12 teachers down 8% between FY20-25, but support staff numbers are increasing

| Change from FY20 to FY25* | FTE Change | % Change |
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| Administrators | 112 | 12.1% |
| Principals or assistant principals | 19 | 4.5% |
| CTE directors/adult education specialists | 13 | 73.2% |
| Support staff | 814 | 22.1% |
| Behavior specialists | 95 | 108.3% |
| Behavior interventionists | 111 | 67.4% |
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- Number of K-12 classroom teachers has fallen in line with the decline in student enrollment (K12 teachers down 8%, students down 7%)
- Number of CTE directors has increased
- Number of Pre-K teachers has increased
- Numbers of support staff have increased significantly (22%)
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 - Weak implementation of Act 173 at state level
 - Possible shift of non-education costs to the Education Fund
- Number of special educators increases as the number of students identified as eligible for an IEP increases.
- Excludes increases in staffing in taxpayer-funded private schools.

Source: Agency of Education dataset. A.5.

https://map.vermont.gov/education/redistricting-data-requests/?_gl=1*53ycfq*_ga*MTA0NDg1NjAzOC4x NzYyODgyNTQx*_ga_V9WQH77KLW*czE3NjQwMDk0MTckbzE2JGcxJHQxNzY0MDEwNzAxJGoxNCRsMC RoMA

Capacity at The Agency of Education

Vermont's ability to carry out major statewide reforms is constrained by long-standing capacity limitations at the Agency of Education. After a reduction of roughly 38 positions following the Great Recession, many responsibilities once centralized at the state level—curriculum development, policy guidance, technical assistance, implementation support, and compliance monitoring—shifted to individual districts. This has led to significant variation in practice, inconsistent expectations, and costly duplication as districts independently interpret requirements and design systems once developed centrally. At the same time, policy churn has left many initiatives—such as Act 173 implementation, proficiency-based learning, reserve fund rules, district quality standards, statewide finance modernization, a uniform school calendar, and integrated field reviews—incomplete or abandoned. These capacity gaps complicate any large governance redesign: without robust staffing, modernized data systems, and coordinated technical assistance, major redistricting efforts risk higher transition costs and increased burden on communities already facing staffing, enrollment, and fiscal pressures.

^{*}Table includes only selected subcategories of staff from each category. As a result, subcategory changes do not sum to category total changes

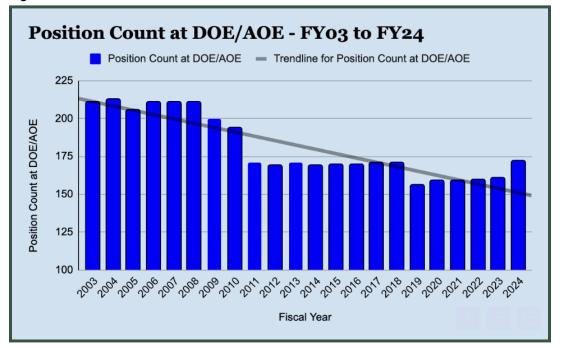


Figure 7. Position Count at DOE/AOE - FY03 to FY24

Source:

https://humanresources.vermont.gov/sites/humanresources/files/documents/DHR-Workforce_Report_0.pdf

Special Education

Special education data reveal significant variation across districts in identification rates, program models, contracted services, and the use of substantially separate placements. Small districts often lack the staffing and programmatic capacity to support students locally, leading to reliance on high-cost, out-of-district placements that are expensive and not always effective. Cooperative service regions (CESAs) enable districts to pool expertise, expand local program capacity, reduce reliance on costly placements, and improve consistency and quality across schools. This remains one of the strongest and most data-supported arguments for regional coordination.

Program Access and Equity Gaps Across Vermont

Students' access to academic and career pathways varies widely across the state. Data reviewed by the Task Force show uneven availability of advanced coursework (such as AP and dual enrollment), world language offerings, mental health and counseling supports, extracurricular and after-school programs, and CTE pathways. Regional high schools and shared-service structures offer the most reliable mechanisms for equalizing these opportunities by pooling staffing, aligning schedules, and coordinating regional pathway development.

Transportation and Geographic Realities

Transportation is one of the most significant logistical and cost challenges in rural Vermont. Data indicate that many students already face long bus rides, that expanding district size often increases rather than decreases travel time, and that long commutes limit access to extracurricular and after-school opportunities—especially for students from low-income families without access to private transportation. The evidence strongly supports regional coordination built around natural travel patterns, not large consolidated districts that overlook geographic constraints. Taken together, these findings point to a need for regional coordination, shared services, and strategic, community-driven restructuring rather than large, mandatory district mergers.

Evidence from Comparable Rural States

Research from states with similar geography—such as Maine, New Hampshire, and Wisconsin—shows that regional service models reliably reduce costs and improve access without forced consolidation. These states demonstrate that cooperative structures can lower costs through regional purchasing, staffing, and program sharing; expand student opportunities; preserve local governance; and provide coherence across small, rural districts. Vermont's district landscape more closely resembles these states than the large, county-based systems often referenced in consolidation research.

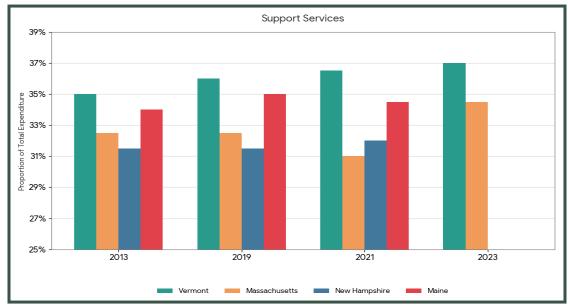


Figure 8. Percentage of expenditures devoted to support services by state each year

Source: Wallace, Carter; Krusoe, Leilani; & Schimelman, Brooke. (2014). Vermont Education Expenditures. A Vermont Legislative Research Report under the supervision of VLRS Director, Professor Anthony "Jack" Gierzynski.

Note: New Hampshire and Maine 2023 data were not included because no post-COVID data were available from either state.

CONCLUSION

Vermont's public education system is at a pivotal moment, facing rising costs, declining enrollment, and widening disparities in opportunity. After extensive analysis and significant public engagement, a majority of Task Force members reached the following conclusion. The most effective path forward is a phased, collaborative approach that builds regional capacity through cooperative services, supports voluntary mergers where they add educational value, and advances comprehensive regional high schools to expand opportunities for all students. This roadmap reflects Vermont's geography, honors community identity, and targets the real drivers of cost and inequity. It offers an actionable, evidence-based foundation for long-term improvement, and provides the Legislature with a clear direction for strengthening the quality, affordability, and resilience of Vermont's public education system.

ACKNOWLEDGMENTS

The Task Force would like to thank the many Vermont residents who took the time to submit written public comments, offer public testimony, attend public hearings or answer a survey. We heard you and your input informed our work.

The Task Force would also like to acknowledge Chrissy Gilhuly and Mariko Evans from the Agency of Administration for their dedication and many hours of support.

We also deeply appreciate the support of John Adams from the Agency of Digital Services, Toren Ballard from the Agency of Education, and Orca Media.

Finally, the Task Force would like to thank Susan McCormack and Dr. Nadia DuBose of The Creative Discourse Group for support with meeting facilitation, public engagement and analysis, and report writing.

APPENDICES

Appendix A: Definitions

This section defines key terms and structures relevant to Vermont's education governance system. Establishing a shared vocabulary ensures that analyses on cost, equity, capacity, and implementation are grounded in common understanding.

Governance Structure

A governance structure refers to the formal arrangement of authority, decision-making, and accountability within the education system. In Vermont, governance structures determine who makes decisions about schools, how budgets and policies are set, and how services are administered and shared across towns and regions. They include the network of school districts, supervisory unions, supervisory districts, and the State Board of Education, each with defined statutory roles and responsibilities. The structure of governance directly affects efficiency, equity, cost, transparency, and community voice.

Types of Governance Structures

School

A school is a building in which education occurs. For the purposes of the redistricting process, a school is either a public or approved independent school.

Public School

"Public school' means an elementary school or secondary school operated by a school district..." (16 V.S.A. § 11(a) (7)). Public schools operate under the governance of a publicly elected school board, must meet specific Education Quality Standards (EQS) and provide a minimum course of study as required by state law and the State Board of Education rules.

Approved Independent School

An Approved Independent School is a school other than a public school, which is approved by the State Board of Education to offer elementary or secondary education, provides a minimum course of study pursuant to 16 VSA §906, and substantially complies with all statutory and regulatory requirements for approved independent schools. An Approved Independent School is operated by a private entity under the governance of a private board of directors or trustees, and is supported primarily through tuition, charitable giving, and/or endowment income. "An approved independent school that intends to accept public tuition... agrees... to enroll any student who requires special education services..." (16 V.S.A. § 166)

Comprehensive High School

"Comprehensive high school' means a public or independent school other than a career technical center that provides secondary career technical education approved under section 16 V.S.A. § 1533." (16 V.S.A. § 1522(14))

School District

A school district is an independent municipal entity with the authority to raise taxes to provide education for resident children. Each district must ensure access to education by operating one or more schools, paying tuition for resident students to attend another public or approved independent school, operating certain grades and tuitioning others. Key characteristics of school districts include one publicly elected governing board, with proportional representation, one district-wide budget approved by the electorate, boundaries that may include one or more towns, and administrative support services are typically provided by a supervisory union unless the district operates as its own supervisory district.

Supervisory Union (SU)

A supervisory union is a collaborative administrative and educational service entity made up of multiple school districts that share a superintendent and certain support functions. It is not a municipality and does not have an elected board; instead, representatives from each member district's board compose its governing body. Key functions of an SU are business and finance, curriculum coordination, special education, payroll, technology, transportation, and federal grant management. SUs cannot own property or incur debt.

Supervisory District (SD)

A supervisory district is a single, unified district that performs all the functions of both a school district and a supervisory union. It has one school board, one superintendent, one budget, one tax rate, and one set of policies.

Interstate School Districts

In Vermont, two interstate districts jointly serve Vermont and New Hampshire students (one PK-12 and one 6-12). They operate under interstate compacts enacted by both state legislatures and Congress.

Types of School Choice in Vermont

School choice describes the range of policies and mechanisms that ensure all Vermont students have access to PreK-12 education and in some circumstances, allow students to attend a school other than the one they would typically attend based on residence.

Statewide Public High School Choice (Act 129 of 2012)

This policy allows students in districts that operate a public high school to apply for admission to another public high school anywhere in Vermont. Funding does not follow the student, by design, to expand access while avoiding destabilizing financial shifts between schools. As of 2017, 391 students participated; receiving schools tended to be larger, and participating students were less likely to be economically disadvantaged.

Tuition Payment (Districts Without Operating Schools)

Districts that do not operate schools at some or all grade levels must pay tuition for resident students to attend either a public or approved independent school (16 V.S.A. § 822). This

structure emerged historically to ensure access for students in small or geographically isolated towns, not to create a system of "choice."

Student Specific Arrangements

School District Boards that operate schools may approve tuition payment for individual students under unique circumstances (16 V.S.A. § 821(c) and 822(c)(1), allowing flexibility to meet specific student needs.

Intra-District School Choice

Larger, merged districts may allow families to choose among multiple schools operated within the district.

Designation (16 V.S.A. § 827)

Districts without operating schools may designate up to three approved public or independent high schools as their "public schools" for tuition purposes.

Appendix B: Status of Private and Independent Schools

The following is a brief summary of the changes in law that lead to the current regulation of independent schools as it relates to the tuitioning system, from the late 1980s to today. This is not an exhaustive analysis of every change that occurred in Vermont law related to the regulation of independent schools during the applicable time period. It is meant to serve as a high-level overview of major changes.

Prior to 1991, under 16 V.S.A. § 11(7), the term "public school" was defined as "elementary and high schools which are principally supported by public taxation or tuition payments derived from public funds...This definition shall not be construed to require any public school not managed by a school board to comply with provisions of law relating to teachers.

Subdivision (8) of the same section defined "private school" as "a school other than a public school, which provides a program of elementary or secondary education, or both." 1991 Acts and Resolves No. 24, Sec. 1 amended both definitions to the following:

- (7) "Public school" means an elementary or secondary school for which the governing board is publicly elected.
- (8) "Independent school (formerly private school)" means a school other than a public school which provides a program of elementary or secondary education, or both. An "independent school meeting public school standards" means an independent school in Vermont that applies to the State Board of Education for public school approval and meets the standards for public school approval.

Under the pre-1991 definition of public school, a private (independent) school that was "principally supported" by tuition would, by definition, be a public school and therefore subject to the same laws and requirements as public schools, except "provisions of law relating to teachers." Prior to approximately 1997, the 2000 rule series, which now contains Vermont's Education Quality Standards, was the Public School Approval Standards. Under the pre-1991 definition of public school, private schools principally supported by tuition would need to go through the public school approval process, with the exception of laws relating to teachers. The 2000 rule series has evolved over the years, from School Quality Standards in 1997 to Education Quality Standards in 2014. Thus, while the standards private schools principally supported by tuition were required to follow has changed over the years, so have the standards applicable to public schools.

Both pre-and post-1991 school districts were allowed to pay tuition to public and private/independent schools.

(1) While some pre-1991 private schools may have been required to follow all laws applicable to public schools (except laws related to teachers) because they were principally

supported by tuition payments, approved private schools that were NOT principally supported by tuition payments and therefore not subject to all the same laws as public schools were still eligible for tuition. The principal difference appears to be that "public schools" could charge full tuition while approved private schools were limited to charging the average announced tuition.

- (2) But both pre-and-post 1991 a private/independent school could charge more than the average announced tuition if the voters approved such tuition.
- (3) In the post-1991 change, independent schools could apply to the State Board for public school approval if they met the standards for public school approval (now akin to EQS) and if approved, charge full tuition (like a public school). In this post-1991 approval process, independent schools were not necessarily exempt from the laws applicable to teachers.
 - 1 See 16 V.S.A. §§ 821 and 822.
 - 2 See 16 V.S.A. §§ 823 and 824.
 - 3 See Id.

Prepared for the RedistrictingTask Force by Legislative Council

Appendix C: Cost Drivers in Education

Understanding Vermont's educational cost pressures requires looking beyond governance structures or district size. The largest and most persistent cost drivers arise from forces that are largely independent of school district configuration—such as health care inflation, aging and contaminated facilities, rising demand for regulated support services, the fiscal impact of privatization and duplication, and the limited capacity of the Agency of Education to provide coherent statewide guidance. These cost drivers shape what is financially possible for school districts and are essential context for evaluating any proposed changes under Act 73.

1. Health Care Costs

Health care is one of the largest and fastest-growing components of Vermont's education spending. Because employee health benefits are bargained at the state level and apply uniformly to all districts, these costs rise regardless of local governance structure. Declining enrollment amplifies the effect: when there are fewer students, rising personnel costs push per-pupil spending upward even if staffing levels remain stable.

Key Data Points

- Health care costs account for an increasingly large share of school budgets statewide; districts have limited ability to control these expenses
- Benefit structures are set through statewide bargaining, meaning district consolidation does not produce savings in this category
- As enrollment decreases, the fixed cost of employee benefits is spread across fewer students, increasing per-pupil spending even when staffing remains flat

Figure C-1. Total proportion of education spending that is health insurance premiums paid by school districts and employees per year

| Table showing total proportion of Education Spending that is health insurance premiums paid by school districts and employees, by year | | | | |
|--|--------------------------------------|--|-------------------------|-------------------------|
| | Education Spending in Billions | Health insurance premiums paid by school districts and employees | % of Education Spending | Source of data: |
| FY23 | \$1,917,168,186 | \$266,517,469 | 13.90% | JFO 5 yr web report |
| FY24 | \$2,078,429,521 | \$301,281,227 | 14.50% | JFO 5 yr web report |
| FY25 | \$2,309,900,000 | \$344,905,222 | 14.90% | July 30 closeout report |
| FY26* | \$2,430,399,971 | \$381,372,844 | 15.69% | FY26 budgeted |

Source: Vermont Education Health Initiative:

https://vehi.org/client_media/files/Board%20Docs/VEHI%20Annual%20Report%20for%20FY%2025%20Fi nal.pdf; JFO Education Spending Data (FY23 and FY 24)

https://ljfo.vermont.gov/custom_reports/5yr/2025_Conf_BigBill%20-%202024-08-26/default.php#govfunc5; FY 2026 Big Bill Conference Web Report

https://ljfo.vermont.gov/custom_reports/reports/BigBill/v1/FY%202026%20Big%20Bill%20Conference%20Web%20Report%202025-09-02%201017am.html#govfu; JFO Closeout Report

https://ljfo.vermont.gov/assets/Meetings/Joint-Fiscal-Committee/2025-07-31/Fiscal-2025-Closeout-GF-EF-TF.pdf

How the sticker price of Vermont health insurance compares to other states Monthly premiums by state and year for the "benchmark" insurance plan available through the federal and state-based individual Affordable Care Act marketplaces. Other states 800 600 400 200 2018 2019 2020 2022 2023 2024 2021 Benchmark" premiums are the second-lowest silver premium for 40-year-old individuals on the health insurance marketplace. Chart: Erin Petenko • Source: KFF • Get the data • Created with Datawrapper

Figure C-2. How the sticker price of Vermont health insurance compares to other states

Source: Kaiser Family Foundation's Average Monthly Marketplace Premiums by Metal Tier dataset <a href="https://www.kff.org/affordable-care-act/state-indicator/average-marketplace-premiums-by-metal-tier/?activeTab=graph¤tTimeframe=2&startTimeframe=8&selectedRows=%7B%22states%22:%7B%22all%22:%7B%7D%7D,%22wrapups%22:%7B%22united-states%22:%7B%7D%7D%7D&sortModel=%7B%22colld%22:%22Location%22.%22sort%22:%22asc%22%7D

2. Construction and Maintenance of Facilities

Vermont's school infrastructure is aging, uneven in quality, and costly to maintain. Many buildings require significant capital investment to remain safe, accessible, and functional. PCB and other environmental contamination has added substantial new financial pressure. Deferred maintenance has accumulated due to decades without a state school construction aid program. These costs are driven by building conditions, not governance configuration.

Key Data Points

- Vermont has had no operational school construction aid program for more than a decade; Act 73 creates a new program beginning July 2026, but it has not yet been funded or implemented
- PCB remediation and other safety mandates are generating significant unplanned capital costs
- Many districts operate schools well below capacity, increasing per-pupil building costs
- Consolidation may reduce facilities costs only if communities choose to close or repurpose buildings—cost savings are not automatic or immediate
- Even when redistricting reduces the number of buildings, remaining facilities still require ongoing capital investment, including heating, maintenance, and compliance upgrades

Figure C-3. One year change in costs related to school facilities (maintenance and construction)

| One-year change in costs related to school facilities (maintenance and construction) | | | |
|--|-----------------------|---------------------------|--|
| Driver | % increase, FY25-FY26 | \$ increase, FY25-FY26 | |
| Operations and Maintenance of Plant (Includes School Construction) | 27.10% | \$27.6 million | |

Source: Vermont Agency of Education School Facilities Assessment Reports

https://outside.vermont.gov/agency/aoe/schoolfacilitiesassessment/_layouts/15/start.aspx?_gl=1*9bhlj 6*_ga*MTM4MTIxOTMxNy4xNzUzNjMwNzE4*_ga_V9WQH77KLW*czE3NjQwMDg4ODQkbzE1NiRnMSR0 MTc2NDAwOTI5OCRgMzYkbDAkaDA.#/SitePages/Home.aspx

3. Support Services (Mental Health, Social Supports, and Special Education)

The need for support services has increased, particularly in mental health, behavioral health, and special education. These needs require specialized personnel - psychologists, speech-language pathologists, behavior specialists, etc. - whose availability is limited statewide. Rising student needs and workforce shortages drive costs upward for every district, no matter its size or structure. In Vermont, payment for much of the social services provided in schools comes out of the Education Fund as opposed to other states that pay for these services out of other funding sources such as their Health and Human Services budget. Additionally, changing identification criteria in Act 173, without fully implementing the needed changes in Multi-Tiered Systems of Support (MTSS) and Universal instruction Vermont now identifies more students as eligible for Individual Education Plans (IEPs).

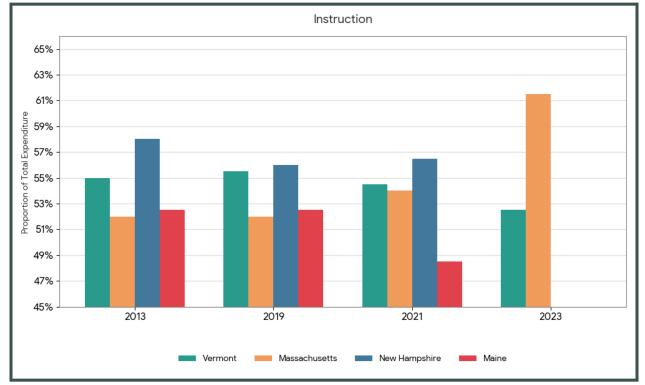


Figure C-4. Percentage of expenditures devoted to instruction by state each year

Source: Wallace, Carter; Krusoe, Leilani; & Schimelman, Brooke. (2014). Vermont Education Expenditures. A Vermont Legislative Research Report under the supervision of VLRS Director, Professor Anthony "Jack" Gierzynski.

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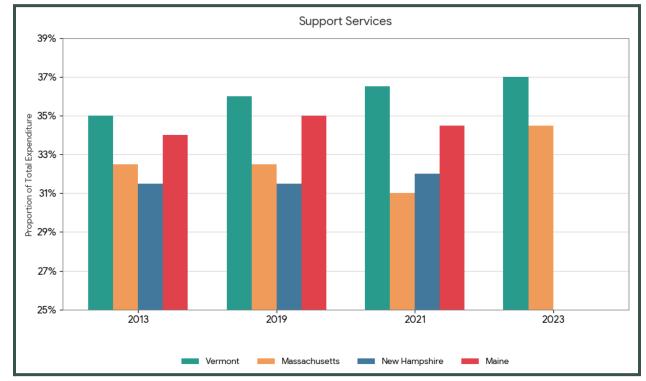


Figure C-5. Percentage of expenditures devoted to support services by state each year

Source: Wallace, Carter; Krusoe, Leilani; & Schimelman, Brooke. (2014). Vermont Education Expenditures. A Vermont Legislative Research Report under the supervision of VLRS Director, Professor Anthony "Jack" Gierzynski.

Note: New Hampshire and Maine 2023 data were not included because no post-COVID data were available from either state.

Key Data Points

- Special education needs have grown across the state, and small districts struggle to provide consistent, high-quality services without shared staffing
- High-cost, out-of-district placements rise when districts cannot staff specialized programs locally
- Mental health needs, intensified since the pandemic, require specialized professionals who are difficult to recruit and retain

Figure C-6. Staffing patterns: K12 teachers down 8% between FY20-25, but support staff numbers are increasing

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| Change from FY20 to FY25* | FTE Change | % Change |
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- Number of K-12 classroom teachers has <u>fallen</u> in line with the decline in student enrollment (K12 teachers down 8%, students down 7%)
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 - Weak implementation of Act 173 at state level
 - Possible shift of non-education costs to the Education Fund
- Number of special educators increases as the number of students identified as eligible for an IEP increases.
- Excludes increases in staffing in taxpayer-funded private schools.

Source: Agency of Education data A.5.

https://map.vermont.gov/education/redistricting-data-requests/?_gl=1*53ycfq*_ga*MTA0NDg1NjAzOC4x NzYyODgyNTQx*_ga_V9WQH77KLW*czE3NjQwMDk0MTckbzE2JGcxJHQxNzY0MDEwNzAxJGoxNCRsMC RoMA

4. Transportation

Long bus routes, sparse populations, and rugged terrain drive transportation costs upward in nearly all rural regions. Larger or merged districts do not automatically reduce those costs; in fact, in rural settings they often increase both route length and cost, because students may be farther from centrally located schools and bus utilization falls.

Key Data Points

- A national study found that "school bus transportation costs for rural districts are 40% more per student than a city or suburban district." (<u>ScienceDirect</u>)
- Rural geography increases transportation costs, especially for special education routes and vocational access
- Research on rural school consolidation reports that "despite widespread school and school district consolidation, transportation costs have increased, and transportation costs per child are greater in rural than urban school districts." (<u>Academia</u>)
- States report that transportation costs per student rose by 33% between 2008 and 2018, reaching an average of \$1,152 per student transported—before accounting for increased commute distance, staffing shortages and rising fuel/maintenance costs (<u>files.eric.ed.gov</u>)

^{*}Table includes only selected subcategories of staff from each category. As a result, subcategory changes do not sum to category total changes.

5. Duplication and Privatization

Vermont's unique mix of operating and non-operating districts, tuitioning, and a growing reliance on private special education placements creates cost pressures that are not addressed through district consolidation. Duplication also occurs when small supervisory unions must replicate administrative functions that larger systems can share. Privatization—both in tuitioning and in special education—can increase per-pupil spending, and result in inequitable access to educational opportunities where additional tuition costs are required to be paid by the family of the student to enable attendance at some independent schools (i.e. "topping up tuition").

Key Data Points

- Tuitioning districts send public dollars to public and approved independent schools
- Reliance on private special education placements to therapeutic schools is a major cost driver due to high tuition rates and transportation needs
- Supervisory unions maintain duplicative administrative structures, which often includes business operations, HR, curriculum leadership, and compliance functions
- These duplications persist regardless of district boundaries unless service-sharing or consolidation is structured intentionally

Figure C-7. Descriptive statistics on tuition paid FY09 to FY24, by sector

| Type of School | Tuition Paid in FY24 | % Change, FY09-FY24 |
|----------------|----------------------|---------------------|
| VT Non-Public | \$63,380,204 | 87.38% |
| VT Public | \$55,446,336 | 34.32% |
| CTE | \$43,963,204 | 42.12% |
| NonVT | \$14,739,411 | 38.91% |

Source: Vermont Agency of Education

https://map.vermont.gov/education/redistricting-data-requests/?_gl=1*53ycfq*_ga*MTA0NDg1NjAzOC4xNzYyODgyNTQx*_ga_V9WQH77KLW*czE3NjQwMDk0MTckbzE2JGcxJHQxNzY0MDEwNzAxJGoxNCRsMCRoMA, A.3.

6. Agency Capacity Challenges

The ability of the state to oversee, coordinate, and support major structural change is itself a significant cost driver. Following significant staffing reductions during the Great Recession, the Agency of Education (AOE) no longer maintains the centralized capacity it once had for curriculum development, model policies, legal interpretation, statewide technical assistance, or consistent compliance monitoring. As documented in the <u>VSBA Task Force on Collaboration to Benefit All Students</u> report, districts now routinely shoulder responsibilities that were previously performed once at the state level, including professional development, implementation planning, policy interpretation, data analysis, and compliance support. This can result in duplication, inconsistency, and higher local costs funded through property taxes. Act 73 directs the state to rebuild AOE's staffing, data systems, and implementation infrastructure to manage sweeping reforms, including new district boundaries, statewide calendars, construction aid, updated

Education Quality Standards, and expanded reporting requirements. However, even with new investment, rebuilding statewide capacity will take time, and gaps during the transition can increase costs, reduce implementation fidelity, and strain local systems already operating at the edge of feasibility.

Key Points

- AOE currently lacks the staffing, expertise, and modernized technical infrastructure needed to support large-scale governance transitions. Pre-recession staffing reductions were never restored, leaving the Agency with responsibilities that exceed its capacity
- Work once performed by the AOE (such as curriculum development support, model policy creation, legal interpretation, and implementation guidance) is now duplicated across dozens of districts and associations. This duplication increases property-tax-funded local costs and produces wide variation in practice
- The Agency must simultaneously develop and administer a new State Aid for School Construction Program by 2026, significantly increasing administrative demands before its core capacity has been rebuilt. Major new responsibilities are being added while foundational functions remain under-resourced
- Limited state capacity creates unclear and inconsistent guidance, raising costs as districts navigate uncertainty. Districts report conflicting interpretations—especially in special education, flexible pathways, and Act 173—across Agency offices.
- Outdated or incomplete state data systems require districts to submit duplicative reports and manual workarounds, adding administrative burden and cost. The underdeveloped eFinance platform is one example of how system limitations elevate local workload
- Implementation science shows that insufficient state-level coaching, oversight, and technical support reduces fidelity and increases long-term costs. When districts interpret reforms differently—or must hire consultants to fill gaps—inefficiencies compound across the system
- When major reforms overlap, state capacity becomes a bottleneck that can delay or weaken intended benefits. Without strong statewide support, implementation costs increase and inequitable outcomes become more likely.

Many of Vermont's most significant education cost drivers lie outside the control of individual districts and are not substantially affected by redistricting or consolidation. Health care, aging facilities, rising support-service needs, privatization pressures, and limited state capacity all exert upward pressure on spending regardless of governance structure. Recognizing these underlying forces is essential for crafting policy responses that are both realistic and equitable. These cost drivers also underscore why the Task Force's recommendations emphasize shared services, regional collaboration, and phased implementation, rather than assuming that structural consolidation alone can resolve Vermont's fiscal challenges.

Appendix D: Implementation Risks and Best Practices

Act 73 envisioned major structural changes to Vermont's education system, including the creation of substantially larger, reconfigured school districts. Decades of research in implementation science—much of it derived from health care and K–12 innovation—shows that the success of large-scale reforms depends on the quality of implementation. When preparation, capacity, and sequencing are insufficient, even well-designed policies fail to deliver desired outcomes and may unintentionally cause long-lasting harm to students and communities.

Because Act 73 originally contemplated rapid, top-down consolidation, it is critical to understand the implementation risks associated with this approach and the conditions necessary for any major school governance change to succeed.

Six Research-Based Implementation Risks—And What They Mean for Vermont

Implementation science identifies several recurrent pitfalls in complex system reforms. Below, each risk is explained alongside its implications for forced mergers and for cooperative service models (CESAs).

- 1. Rushing Phases (Skipping Exploration and Preparation)
 - Research: Rushed implementation leads to low fidelity, staff overload, and failed reforms. (Wiley Online Library)
- 2. Underbuilt Implementation Drivers (Unclear Authority, Weak Data Systems, No Coaching)

Reforms flounder when core "drivers"—clear authority, coaching, data systems, communication structures—are not established first. (FPG Implementation Center)

- 3. Poor Fidelity-Adaptation Balance (Too Rigid or Too Vague)
 - Overly rigid models create resistance; overly vague models create incoherence and inequity. (<u>BioMed Central</u>)
- 4. Lack of Implementation Metrics
 - Systems without dashboards cannot identify emerging problems early, leading to delayed interventions and disappointing outcomes. (*PubMed*)
- Weak Spread Mechanics (Lack of Champions, Networks, and Peer Learning)
 Successful reforms rely on champions, cross-site learning networks, and peer support.
 Without these, innovations stall or revert. (PubMed)
- 6. Bundling Too Many Policy Shifts at Once
 - Research shows that when multiple large reforms roll out simultaneously, leaders cannot implement any of them with high quality. Capacity becomes overwhelmed, and it becomes impossible to diagnose which change is driving which effect. (PubMed)

Each of these initiatives requires planning, communication, data systems alignment, community engagement, and local capacity to implement. Stacking them on top of a forced statewide merger significantly heightens the risk of failure across all reforms.

What Vermont Can Learn from This Research

Implementation science makes one point unmistakably clear. Mandated, statewide district consolidation—implemented quickly and without adequate preparation—carries significantly higher risks than the phased, cooperative roadmap advanced by the Task Force.

In contrast, cooperative services, voluntary mergers, and regional high schools:

- Align with Vermont's implementation capacity,
- Can be phased and adapted to local context,
- Build on existing regional relationships,
- Reduce disruption, and
- Produce more reliable, equitable outcomes for students.

This research base is a central reason the Task Force advanced a collaborative, staged roadmap rather than a single, statewide consolidation plan.

Appendix E: The Vermont Regional Education Partnership Model

An informal working group of Task Force members, including two former superintendents, developed a detailed technical plan titled <u>The Vermont Regional Education Partnership Model</u>, elaborating on the regional education partnership redistricting proposal adopted by the Task Force.

The full document includes regional maps, governance schematics, draft functional responsibilities, cost assumptions, statutory crosswalks, and illustrative implementation materials. It is provided separately as Supplemental Appendix E⁴

https://aoa.vermont.gov/sites/aoa/files/Appendix%20E_%20The%20Vermont%20Regional%20Education%20Partnership%20Model_UPDATED%2012.2.25%20v.%202.pdf

⁴ Full link to Appendix E: