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State Board of Education

December 17, 2025

To: **Jennifer Samuelson, Chair, Vermont State Board of Education**

From: **Small/Sparse School Committee - Tammy Kolbe (Chair), Brian Campion & Cynthia Stuart**

Re: **Work Accomplished by the Small/Sparse School Committee (Revised)**

This memorandum summarizes the work of the Vermont State Board of Education's Small/Sparse School Committee and proposes a framework for identifying schools as "small by necessity" and/or "sparse by necessity" for the Board's consideration. The next sections describe how the committee developed the framework, present the committee's recommended framework, and identify other implementation considerations.

Background and Process

Section 37 of Act 73 (2025) establishes support grants for small and sparse schools. Statute defines a *small school* as one with fewer than 100 pupils (based on two-year enrollment) and a school located in a *sparsely populated area* as one located in a city, town, or village with fewer than 55 people per square mile of land. However, Act 73 also stipulates that to be eligible for small and sparse support grants, a school must be small and/or sparse "by necessity."

Section 8 of Act 73 directs the Vermont State Board of Education (SBE) to submit, by December 1, 2025, a report to the House and Senate Committees on Education with proposed standards for schools to be considered "small by necessity" or "sparse by necessity." To accomplish this work, the SBE asked its Small/Sparse School Committee to propose definitions for the full Board's consideration, focused on developing working definitions of "by necessity" as it applies to schools that meet the statutory criteria for being small and/or located in a sparsely populated area.

In July 2025, the SBE constituted the special committee to develop a proposed framework for defining when a school is "small by necessity" and/or "sparse by necessity." The committee consisted of three members: Tammy Kolbe (chair), Cynthia Stuart, and Brian Campion. The committee met five times during the fall of 2025 and held one public listening session on November 7, 2025.

In developing its recommendations, the committee also carefully reviewed the policies and practices used by other states to define "necessary small" or "isolated" schools[1] and considered relevant research literature on the effects of small school size, geographic isolation, and student travel time on educational access and outcomes. In addition, the committee requested and reviewed information from the Vermont Agency of Education (AOE) on the state's existing population of schools that meet the statutory thresholds for small and/or sparse schools, including their geographic proximity to other schools within their districts and in

[1] See Attachments A and B for summaries of what the committee identified as policies and practices in other states.

neighboring districts; invited testimony from key constituents in the field; and considered public comment (written and verbal).[2]

General Framework

Since small (<100 students) and sparse (<55 persons per square mile) are already established thresholds in statute, the committee's definition of *"by necessity"* should determine whether a school that meets one or both statutory thresholds is small/sparse as a function of unavoidable geographic or demographic circumstances.

This suggests that we need definitions of "by necessity" that distinguished between:

- Schools that are small/sparse because of geography or isolation (funding-eligible), and
- Schools that are small/sparse due to local organizational decisions, preferences, or policy choices (funding ineligible).

With this framing, a starting point for defining a school as small or sparse *"by necessity"* is where the school *cannot reasonably increase enrollment or consolidate without creating undue hardship for students,* specifically in terms of *travel time*, *safety*, or *lack of feasible alternatives*.[3]

Possible Criteria

The committee operationalized the General Framework in terms of specific criteria that could be used to determine whether a school is small/sparse "by necessity."

"By necessity" means that a school meeting the statutory definitions of *small* or *sparsely populated* is unable to achieve greater enrollment or consolidate with another school without imposing undue educational, safety, or transportation hardship on students, as demonstrated by one or more of the following:

1. Consolidation would result in average one-way travel times exceeding 45 minutes for grades PreK–6 or 60 minutes for grades 7–12, or travel over terrain that is frequently impassable or unsafe.
2. There is no nearby school with sufficient capacity to absorb the students without significant additional capital investment.
3. Closure or consolidation would impose substantial increases in cost to the district or taxpayer due to tuitioning, transportation, or capital needs.
4. The population density and projected enrollment of the school's catchment area are such that the school cannot feasibly reach sustainable enrollment in the foreseeable future.

Specifically, a school already meeting the <100 students and/or <55 persons per square mile thresholds could qualify *"by necessity"* if any of the following conditions is true

1. **<u>Travel time or distance threshold</u>**

   Possible criteria:

   Average one-way student travel times exceeding:

   - 45 minutes for elementary students or 60 minutes for grades 7–12; or

[2] Written public comment received by the committee can be found at the committee's website, here: https://education.vermont.gov/state-board-public-comment-small-sparse-schools

[3] The proposed framing aligns with what courts and legislatures in other rural states have used (see Attachments A and B for additional information) and Vermont's demographic and geographic context.

- Road miles to the nearest school of the same grade span exceed 10–15 miles, depending on terrain.

Rationale:

- Vermont geography makes travel time the most sensitive and equity-relevant measure.
- Most rural states rely on travel time for necessity determinations. The suggested thresholds are consistent with existing research on the effects of travel time on student outcomes[4] and criteria that have been used in other states.
- The Committee received testimony that existing bus times for children exceed 60 minutes in many places in Vermont

2. <u>Safe transportation limitations</u>

Possible criteria:

A school qualifies if:

- Terrain, winter road conditions, unpaved routes, or mountain gaps create unsafe or unreliable transportation, as certified by the supervisory union or AOE. For example:
- Bus routes requiring travel over roads closed in winter
- Mountain passes that cause 60+ minute detours
- Only one road in/out of town ("single ingress") prone to closures

Rationale:

- Provides additional consideration for specific geography that can impact travel times and student safety.

3. <u>Lack of feasible consolidation options</u>

Possible criteria:

A school qualifies if:

1. Nearby schools – both within and outside the existing district boundary - lack capacity to absorb students and still meet the State's Educational Quality Standards, including class size minimums, or
2. Costs of renovation or addition at receiving schools[5] exceed projected savings from closure, or
3. Tuitioning out raises per-pupil costs or creates inequities in program access, especially students with disabilities who require special education services and other students whose learning needs cannot be met by nearby non-public schools.

[4] Long bus rides and early pickups have been linked in large-scale studies to attendance impacts and are theorized to affect achievement through sleep loss and reduced time for homework/extracurriculars**.** For example, see: Cordes, S. A., Rick, C., & Schwartz, A. E. (2022). *Do long bus rides drive down academic outcomes?* Educational Evaluation and Policy Analysis, 44**(**4), 689–716; Cordes, S.A., Rick, C., & Schwartz, A.E. (2022). Can school buses improve access for students without driving down academic outcomes? Brookings Institution; Killeen, K. M., & Sipple, J. W. (2000). *School consolidation and transportation policy: An empirical and institutional analysis* (ERIC Document Reproduction Service No. ED447979). ERIC.; Sanderson Edwards, D. (2024). Another one rides the bus: The impact of school transportation on student outcomes. *Education Finance and Policy, 19*(1), 1–33.

[5] Costs relative to savings should be amortized over the anticipated lifespan of the renovation or addition at a receiving school.

Rationale:

- Addresses the feasibility of consolidating students into nearby schools.
- These criteria are the most commonly used in state "necessary small school" calculations.

4. <u>Community population trajectory</u>

Possible criteria:

A school qualifies if:

- The census block or town catchment area is projected to remain below an enrollment that would support a viable larger school, even with consolidation.

Rationale:

- Provides flexibility in places where schools may temporarily fall below 100 students.
- Recognizes the state's interest in maintaining small schools in geographic areas where there may be future demographic and economic changes that would result in an increase in the number of students in a school.

5. <u>Closure or consolidation would impose substantial increases in cost</u>

Possible Criteria:

A school qualifies if closure or consolidation would create substantial, measurable increases the district's average per student expenditure, including but not limited to:

1. **Tuitioning Costs:**
   Reassigning students to non-public or public schools where tuition payments would lead to significantly higher per-pupil expenditures than continuing to operate the school.
2. **Transportation Costs:**
   Consolidation would require additional buses, longer routes, more driver hours, or substantial new operational transportation expenses, resulting in a sustained increase in district transportation costs.
3. **Capital Costs at Receiving Schools:**
   Accommodating reassigned students would necessitate major renovations, additions, safety upgrades, or new classrooms, and these capital expenses would exceed any projected savings from closure.
4. **New Facility Requirements:**
   Closure would require new school construction or major facility expansions elsewhere in the school's existing district or nearby district where students would be reassigned, imposing a material tax burden on the community.

Rationale:

- These conditions recognize the interest to taxpayers in controlling education spending.

Implementation Considerations

The Committee identified two additional considerations for implementation: 1) the entity responsible for determining whether a school meets the criteria for small/sparse "by necessity"; and 2) the frequency with which determinations will be made.

- **Determination**

  The Committee recommends that AOE be charged with the responsibility for determining whether a school qualifies as "small and/or sparse by necessity," rather than the local school district, to ensure consistency, transparency, and equity in how the criteria are applied statewide. Under this approach, districts would submit the documentation and data requested by AOE—such as information related to travel time, transportation safety, capacity of receiving schools, fiscal impacts of closure or consolidation, and local demographic conditions—and AOE would evaluate the submission using a standardized process and uniform evidentiary expectations.

  The specific criteria, documentation requirements, timeline for review, and data elements used by AOE to make this determination should be established in rule and incorporated into the State's Education Quality Standards (EQS), so that expectations are transparent, consistently applied, and can be updated over time as needed.

- **Timing for Designation**

  The Committee recommends that schools be designated as small/sparse by necessity annually, on a timeline that aligns with district budgeting and annual town meeting decisions, so that districts have a clear determination of eligibility in advance of developing and adopting budgets for the following school year and can plan responsibly based on whether the school will receive the small/sparse grant.

Attachment A: Selected States That Include a "By Necessity" Definition as a Qualifier for Their Supplemental Funding for Small or Geographically Isolated Schools[6]

State	Definition	Statutory / Regulatory Citation
California – Elementary	Necessary small elementary school – An elementary school (generally K–8, excluding grades 7–8 when they're configured as part of a junior high) with average daily attendance (ADA) of fewer than 97 pupils, maintained by a school district, that also meets specific distance and hardship conditions. A school qualifies if any one of the following is true: (1) At least 5 pupils would be required to travel more than 10 miles one way by the most direct route on maintained roads to reach the nearest other public elementary school; or (2) At least 15 pupils would have to travel more than 5 miles one way; or (3) In districts with total district ADA between 2,501 and 5,000, at least 15 pupils would have to travel more than 30 miles one way to the nearest other public elementary school. The statute also allows consideration of topography, road conditions, and other "unusual hardships" that may justify classification even when strict mileage criteria are not fully met.	Cal. Educ. Code § 42283
California – High School	Necessary small high school – A high school maintained by a district with fewer than 287 ADA that qualifies as "necessary small" when its enrollment and distance/time conditions fall in one of several statutorily defined bands. For example, for the smallest high schools (e.g., ADA less than 96), the school must be at least 15 miles from the nearest other public high school, and either at least 90% of the pupils would have to travel 20 miles or more one way, or at least 25% of the pupils would have to travel 30 miles or more one way to attend another high school. Higher ADA bands have slightly different distance and percentage thresholds, but the basic structure is: small size plus significant travel burdens to the nearest alternative. The statute also covers certain specialized high schools (e.g., juvenile court schools, continuation schools are generally excluded) and unified districts whose only comprehensive high school has ADA < 287 and is located in an area with low population density.	Cal. Educ. Code § 42285
Montana	Isolated school – A school may be designated "isolated" for funding purposes when its enrollment is very low and its students face substantial transportation hardships. The statute applies to districts operating an elementary school with fewer than 10 ANB or a high school with fewer than 25 ANB for two consecutive years. Such a district must apply to have the school classified as an isolated school and must document: (a) the distances pupils must travel to get to the current school and to any alternative school; (b) the conditions of roads and terrain (such as mountains, rivers, or other natural barriers) that would make transportation difficult or unsafe; (c) the distance to the nearest school that has adequate facilities to accept additional students; and (d) any "unusual hardships" that would be imposed on pupils and families if the school were closed and students transported elsewhere. The application is reviewed by county officials and then by the state superintendent, who ultimately decides whether the school will be classified as "isolated" for funding purposes.	Mont. Code Ann. § 20-9-302
Oregon	Remote small elementary schools and small high schools – Oregon provides additional funding weights to schools designated as "remote small elementary schools" or "small high schools." Under ORS 327.077, an elementary or high school may qualify if it: (1) meets specific average daily membership (ADMa) limits per grade span that classify it as "small"; (2) is located in a remote area, which is defined in part by the distance in road miles to the nearest school of the same type in the same district (funding is adjusted upward when the school is more than 8 miles by road from such a school); and (3) often must have been in place and qualified as a remote/small school as of certain historical dates (e.g., location not moved since January 1, 1995, and previously recognized as remote small). Some provisions also extend, under certain conditions, to charter schools that meet the same size and remoteness criteria.	Or. Rev. Stat. § 327.077

[6] Note: This table does not represent a comprehensive scan of all states policies; instead, this represents the states where the Committee was able to identify relevant policies and practices.

State	Definition	Statutory / Regulatory Citation
Nebraska	Sparse and very sparse local systems – Nebraska does not label specific schools as "necessary small," but it classifies entire local systems into cost groupings called "sparse" and "very sparse" for funding purposes. Under these definitions, a very sparse local system typically must have: (1) very low density of formula students (e.g., fewer than 0.5 students per square mile in each county in which the district has a high school attendance center); (2) fewer than 1 formula student per square mile system-wide; and (3) long distances between high school attendance centers (often more than 15 miles). There are alternate ways to qualify as very sparse, such as having total district area exceeding a specified number of square miles (e.g., 450+) combined with low density and distance conditions. A sparse system has slightly less restrictive thresholds—still low student density and substantial road distances, but not as extreme.	Neb. Rev. Stat. § 79-1007.02
South Dakota	Sparse school district – Must meet all: (1) fall enrollment per square mile ≤ 0.50; (2) total fall enrollment ≤ 500; (3) area ≥ 400 square miles; (4) ≥15 miles between its secondary attendance center and that of an adjoining district; (5) operates a secondary attendance center; and (6) levies taxes at the statutory maximum.	S.D. Codified Laws §13-13-78
Colorado	Small attendance center – Enrollment <200 and ≥20 road miles from another attendance center of same type in the district; grandfather provisions apply.	Colo. Rev. Stat. §22-54-122
Washington	Remote and necessary small school plant – Must meet small school size criteria (e.g., <60 K–6; <20 in certain upper grades) and demonstrate remoteness, long travel times (~60+ min), unsafe or impracticable travel, intact permanent community, and lack of age-appropriate alternatives.	WAC 392-349-005/010/015
Utah	Necessarily existent small schools (NESS) – Size caps (≤160 ADM elem; ≤300–600 secondary depending on configuration) plus travel times >45 minutes (K–6) or >75 minutes (7–12). May also qualify due to cultural/economic disruption or infeasible consolidation costs.	Utah Code §53F-2-304; R277-445
Arkansas	Isolated school district – Must meet 4 of 5: ≥12 miles by paved road to nearest HS; transported student density <3/mi²; area ≥95 mi²; ≥35 bus miles; <50% bus routes paved.	Ark. Code §6-20-601/602
Wyoming	Isolated pupils / transportation – Districts must provide transportation or maintenance for isolated pupils where distances/conditions make daily travel impractical.	Wyo. Stat. §21-4-401
Idaho	Support units and exceptional transportation – Small/remote districts generate additional funding through support unit structure and reimbursement for extraordinary transportation costs.	Idaho Code Title 33, Ch. 10
North Dakota	School district size weighting factor; isolated schools – Smaller districts receive higher weights; isolated schools may receive additional payments.	N.D. Cent. Code §15.1-27-03.2; §15.1-27-15

Attachment B: Synthesis of Criteria Used in State Funding Formula

1. Travel Time (Most Common)

Reflects student experience and safety, not just distance. Used explicitly in: Utah, Washington, Montana, Wyoming, and implicitly in others.

Examples include:

- Minimum one-way bus time to nearest same-grade school
- Thresholds often around:
    - 45 minutes (elementary)
    - 60–75 minutes (secondary)
- Adjustments for poor roads, steep grades, or winter conditions

2. Road Miles / Distance to Nearest School

Measures isolation and lack of consolidation options. Used in: California, Colorado, South Dakota, Arkansas, Nebraska, Oregon (and possibly more states).

Common thresholds:

- 10–20 road miles to nearest comparable school
- Sometimes higher (e.g., 30 miles) in larger districts
- Distances measured by maintained roads, not straight-line miles

3. Terrain, Topography, and Road Conditions

Distance alone underestimates real travel burdens in mountainous or rural states. Used in: California (hardship clause), Montana, Washington, Wyoming, Arkansas.

Considerations include:

- Mountain passes
- Unmaintained roads / Class 4 roads
- Icy or unsafe winter conditions
- Rivers, lakes, or bridges prone to closure
- Single-ingress roads (one way in/out)

4. Seasonal Inaccessibility / Weather-Related Barriers

Predictable seasonal barriers make consolidation impractical. Used in: Washington, Wyoming, Montana, Alaska.

Examples:

- Roads closed in winter
- Frequent mudslides, washouts, or avalanche zones
- Limited daylight in winter making long travel unsafe

5. Transportation Feasibility & Cost

Some communities cannot be served efficiently with standard transportation systems. Used in: Wyoming, Montana, Idaho, Washington.

States consider:

- Whether daily bus transportation is physically feasible
- Whether transportation costs would exceed savings from consolidation
- Whether route length would violate state maximum ride-time rules

6. Capacity or Suitability of Receiving Schools

Consolidation may not be physically or programmatically possible. Used in: California, Utah, Montana, Washington.

Factors assessed:

- Whether nearby schools have space for additional students
- Whether they'd need major capital improvements to absorb students
- Whether receiving schools provide equivalent educational programs
- Whether facilities could handle special programs (SPED, CTE)

7. Community Disruption / Social or Cultural Impact

Closure may have disproportionate community or cultural effects. Implicitly considered in many rural-state policies. Used explicitly in: Utah, Washington

Examples:

- Schools serving distinct cultural or Indigenous communities
- Settlements with long distances to population centers
- Maintaining community viability in remote towns

8. Geographic Barriers to Consolidation

Some districts cannot logically reorganize due to physical geography. Used in: Arkansas, Montana, Washington, Wyoming, Oregon, Alaska.

Common barriers include:

- Large district land areas
- Sparse transportation networks
- Multiple natural features (mountains, lakes, rivers) separating communities
- Split communities (e.g., only connected via highways closed seasonally)

9. Demonstrated Hardship / Case-by-Case Review

Allows flexibility for unusual cases. Some states have a hardship clause for unique circumstances. Explicit in: California, Montana, Washington, Utah, Wyoming.

Examples:

- Extreme commute hardships
- Unique terrain constraints
- Family hardship (e.g., single access roads; hazardous livestock roads)