MEMORANDUM

TO: Vermont Learning Collaborative and Act 170 Regional Facilitators

FROM: Zoie Saunders, Secretary of Education

SUBJECT: Act 170 Merger Planning: Technical Assistance, Resources, and Recommended Approach

DATE: October 23, 2026

Purpose

As merger study committees begin their work under Act 170, the Vermont Agency of Education (AOE) is committed to providing timely data, technical expertise, and clear guidance to support the development of thoughtful, student-centered merger proposals.

Acts 73 and 170 are bipartisan pieces of legislation passed in the recognition that our current system is inequitable for students and unsustainable for taxpayers. The voluntary process set forth in Act 170 puts the responsibility on local communities to redesign the system to solve these problems. The merger process presents an opportunity to strengthen educational quality, expand opportunities for students, address longstanding inequities, and build a more sustainable education system. Achieving these goals requires committees to be clear about the current structures and financial conditions of today's districts and consider what could be possible through larger, more inclusive districts supported by the foundation formula.

The Agency recognizes that committees face complex questions about educational programming, staffing, facilities, transportation, and geography. These are legitimate considerations that must be carefully examined. However, the starting point for merger planning should be the educational opportunities we want every Vermont student to experience, rather than the limitations of existing organizational structures and budgets. Recall that the education transformation process began with a vision for our students at the center.

This memorandum provides a recommended approach for organizing committee discussions, identifies data and resources currently available, and outlines forthcoming technical assistance and the Agency's anticipated timeline.

A Recommended Approach to Merger Planning

The Agency encourages facilitators and merger committees to organize their work around three interconnected questions:

1. **What must every district provide?** Establish a shared understanding of federal requirements, Vermont's Education and District Quality Standards, and statewide expectations for student learning, access, and opportunity.
2. **What could our communities accomplish together?** Identify existing strengths, resources, and opportunities, alongside gaps and disparities, to envision an educational system that better serves all students.
3. **How do we best organize to achieve that vision for our region and the state?** Evaluate educational delivery, governance, staffing, facilities, transportation, and financial models in the context of the future foundation formula and long-term sustainability.

These questions establish a progression from educational expectations to organizational design and financial analysis. Committees will necessarily revisit each question as their work develops, but financial and governance decisions should be informed by a clear understanding of the educational system they are seeking to build.

Moving Forward with Available Information

Merger planning is an iterative process. Not every question can or should be resolved at the outset, and different phases of the work require different types of information.

Committees already have access to substantial statewide and local information about enrollment, student outcomes, educational programming, staffing, expenditures, and facilities that are publicly available on the Agency of Education website (we outline and link many of these resources below). These resources, combined with local knowledge, additional district-level data, and community engagement, provide a meaningful foundation for assessing existing conditions, identifying strengths and disparities, and developing a shared vision for a new district.

1. Establish a Common Understanding of Educational Quality and Requirements

Limited scale and inequitable funding often create challenges for districts in meeting federal and statewide requirements for educational delivery. As committees consider potential governance arrangements, it is important to begin with a shared understanding of these challenges and the requirements districts must meet, grounding conversations in why this work matters and centering students in every decision.

Before evaluating potential governance arrangements, committees should develop a shared understanding of the requirements and expectations that apply to all Vermont school districts.

This includes federal obligations related to serving students with disabilities, ensuring equitable access and protecting student rights, as well as Vermont's Education Quality Standards, District Quality Standards, graduation requirements, and other statewide expectations.

These standards establish a common foundation for evaluating both existing conditions and proposed district structures. Committees should examine where participating districts are meeting expectations, where gaps or disparities exist, and whether current organizational scale, staffing, and resources support consistent implementation.

Suggested reflection questions:

- What educational programs, services, and supports *must* be available to all students, regardless of where they live or which school they attend?
- Where are participating districts meeting or exceeding state expectations, and where are there gaps?
- How do differences in district scale, staffing, resources, and student needs affect the ability to meet these expectations?
- How might a larger, coordinated district strengthen educational quality, improve access to specialized services, or build capacity that individual districts cannot sustain independently?

The goal is not simply to document current compliance, but to identify the conditions and capacity necessary to deliver a high-quality education consistently across a larger district.

2. Build on Community Assets and Expand Student Opportunities

Act 170 establishes asset mapping as an important component of merger committee work. The Agency encourages committees to approach this exercise as more than an inventory of buildings, staffing, and existing programs.

Each participating community brings valuable strengths to a potential new district, including talented educators, successful instructional practices, facilities, partnerships, community organizations, cultural resources, and local knowledge. Students and

families also bring diverse experiences, perspectives, and strengths that should inform the design of future educational opportunities.

Asset mapping should identify these strengths while also examining differences in the educational experiences currently available to students. The purpose is not to preserve every existing arrangement, nor to assign value to communities based on their financial or physical resources. Rather, it is to understand how the collective assets of participating communities could be organized to provide greater benefits for students.

Suggested reflection questions:

- What are the strongest educational programs, services, practices, and community partnerships across participating districts?
- What opportunities are available to some students but not others, and what accounts for those differences?
- Where could sharing resources, expertise, facilities, or specialized services expand opportunities for students?
- How might a new district strengthen access to advanced coursework, career and technical education, special education, student supports, enrichment, and flexible learning pathways?
- What local strengths and community connections should be maintained or built upon in a new district?
- What would meaningful improvement look like for students and families across all participating communities?

Committees should use both quantitative data and qualitative information gathered through local engagement. Statewide data provide a common basis for comparison, while local knowledge helps explain conditions, identify assets, and develop workable solutions.

Equity should be assessed through the educational experiences and opportunities available to students along with the outcomes that those conditions support.

3. Design a Sustainable District Under the Future Funding and Governance Structure

Once committees have established a shared understanding of educational expectations, identified community assets, and considered opportunities for

improvement, they will be better positioned to evaluate governance configurations within the foundation formula.

Financial sustainability is an essential component of this work. However, analysis limited to current district budgets, staffing patterns, and expenditure structures will not provide a complete picture of what a new district could accomplish.

Act 170's merger process is taking place alongside significant changes to Vermont's education funding and governance systems. Committees should therefore evaluate potential district structures in the context of the future foundation formula, anticipated student needs, and opportunities to organize resources more effectively.

Suggested reflection questions:

- What educational programs, staffing, services, and supports would be necessary to deliver the proposed educational model?
- How might a larger district organize leadership, administration, specialized services, and operations more effectively?
- What opportunities exist to redirect resources toward instruction and student supports?
- How would the future foundation formula inform the resources available to a new district?
- What facilities, transportation, labor, debt, and transition costs must be considered?
- What assumptions remain uncertain, and how might different scenarios affect long-term sustainability?

Committees should distinguish between current expenditures, future operating assumptions, and one-time transition costs. Where assumptions are uncertain, scenario analysis can help identify risks, trade-offs, and decisions that will require further information.

The objective is to evaluate how a proposed district can organize and sustain itself under the new foundation formula in ways that strengthen educational quality, improve equity, and responsibly steward public investments.

Data and Resources Available Now

The Agency has made substantial data, reports, and planning resources publicly available, some of which we include below. This is not an exhaustive list of publicly available data, and we encourage stakeholders to review the Agency's Accountability & Data webpage. These resources provide a starting point for understanding existing conditions and evaluating opportunities across participating districts.

Committees are encouraged to begin using available statewide information along with local data to explore the reflection questions listed above.

Standardized District and Student Data

- Redistricting Taskforce Data Reports
- Vermont Education Dashboard
    - Organizational Data
    - Staff Information
    - Enrollment
    - Student Information
    - Student Characteristics
    - Chronic Absenteeism
    - Assessment
    - Course Enrollment
    - Exclusionary Discipline

These resources support analysis of enrollment, demographics, student outcomes, and differences across districts and schools.

Educational Quality and Student Opportunity

- AOE Recommendations to the State Board for Graduation Requirements
- Class Size Minimums working definitions and FAQs (we also have 2024-2025 baseline data to share upon request for planning purposes)
- DQS/EQS Beta report and published quality scales

These resources help committees identify existing strengths, gaps, and opportunities to strengthen educational programs and services.

Financial and Operational Analysis

- FY27 LTWADM (includes ADM by district and other student demographic data)
- Per Pupil Spending Data (FY27 Spending per LTWADM is available, but not yet published)

- District Financial reports (cash flow, LTWADM and other data points) (through FY 2027)

These resources establish a common understanding of current financial conditions and provide inputs for future scenario planning.

Facilities, Transportation, and Staffing

- District Building Tool with an additional merger committee layer being explored with the Agency of Digital Services
- Teacher and Staff FTE Report FY2020-FY2026
- School Facilities Dashboard (data based on 2023 Facilities Condition Assessment. Districts will be updating this data in 2027 and districts have detailed information available on their school facilities to support planning).

These resources can inform analysis of facilities, staffing capacity, and potential organizational efficiencies.

Additional reporting and data resources are being developed or updated, including enhanced federal reporting at the supervisory union, district, and school levels; grand list information from the Department of Taxes; and transportation survey data.

Data availability follows established reporting and validation cycles. For example, certain enrollment and financial measures for the 2026–2027 school year will not be available until late December 2026 or early January 2027. Existing historical data can support preliminary analysis in the meantime.

Not every data element must be available before committees can undertake meaningful educational and asset-based analysis. Data trends have remained largely consistent over the past several years, providing a clear direction for action. Facilitators should help committees distinguish information that is essential to begin planning from information needed to test emerging proposals or finalize recommendations.

Forthcoming Technical Assistance and Decision-Support Tools

Additional tools will be developed with input from merger committees and will be important as committees move toward validating specific organizational configurations and testing financial sustainability. Educational analysis, asset mapping, and community engagement are foundational steps that will inform and strengthen the effective use of these tools.

Quality Evaluation Framework: October–December 2026

The Agency is working with the State Board of Education to develop a clear, consistent, and transparent framework for evaluating proposed district mergers under Section 13(c) of Act 170.

The framework will translate statewide educational expectations into measurable criteria across three interconnected dimensions:

1. **Educational Quality:** Whether the proposed district has the programming, staffing, resources, and organizational capacity necessary to provide strong educational experiences and outcomes.
2. **Equity and Opportunity:** Whether students have equitable access to rigorous learning opportunities, programs, supports, and resources across participating communities.
3. **Financial Sustainability:** Whether the proposed district can sustain high-quality educational opportunities through responsible resource allocation, effective operations, and long-term planning.

The Agency and State Board have identified four guiding principles: consistent criteria from planning through evaluation; attention to quality, equity, and sustainability; transparency; and clear treatment of variation across proposed districts.

The framework is intended to provide committees with clear expectations as they develop proposals, rather than introducing evaluation criteria after proposals have been submitted.

The Agency and State Board of Education are working toward a goal of publishing the framework in December 2026.

Expanded District Merger Tools: February–March 2027

Through a competitive procurement process, the Agency has selected a partner with expertise in education finance, district improvement, equity analysis, organizational planning, and change management.

This partnership will support development of:

- Quality evaluation rubrics and an equity index
- Financial and staffing planning tools

- Integrated scenario-planning resources to assess educational, operational, and financial alternatives

These tools will help committees evaluate potential configurations, understand trade-offs, and connect educational goals to resource decisions. They will complement, rather than replace, local analysis and decision-making. The tools will be aligned to the quality framework approved by the State Board of Education.

The Agency anticipates publishing these tools by late February or early March 2027, with resources designed to be accessible to committees and the broader public.

Roles, Responsibilities, and Coordination

Successful implementation of Act 170 requires coordinated effort among merger committees, regional facilitators, local education leaders, the Agency, and the State Board of Education. Each has an important and distinct role.

Vermont Learning Collaborative and regional facilitators are responsible for facilitating the merger study process, supporting productive committee discussions, coordinating local engagement, and helping committees organize and advance their work.

Merger study committees are responsible for acting as resident experts of their districts to examine local conditions, identify assets and opportunities, evaluate potential district configurations, and determine whether to recommend formation of a new unified union school district.

The Agency of Education has a broader, ongoing statutory responsibility to ensure a substantially equal education for every child. Additionally, under Section 13(b)(7) of Act 170, the Agency makes staff available to provide technical assistance as requested by facilitators. Under Section 13(c), the Secretary reviews the report and proposed articles of agreement of a committee recommending formation of a new district and submits a recommendation to the State Board.

The State Board of Education retains its independent statutory responsibility to consider merger proposals and take the actions required under Act 170.

The Agency's technical assistance is intended to support well-informed local analysis and a transparent statewide evaluation process. It does not replace the judgment and responsibilities of merger committees, nor does the Secretary's recommendation predetermine the State Board's decision.

Coordinating Technical Assistance Requests

To make effective use of Agency resources and ensure consistent statewide support, facilitators should coordinate requests for additional information or technical assistance through the established facilitation process.

Requests should identify:

- The specific planning question or technical issue to be addressed
- The information or resources already available to the committee
- The additional information or expertise being requested
- How the requested assistance will support the committee's analysis or decision-making

The Agency will work with VTLC to distinguish requests that can be addressed through existing resources from those requiring additional data, technical analysis, or tools under development.

This approach will help prioritize assistance, avoid duplication, and maintain clear accountability for the respective responsibilities established under Act 170.

Anticipated Timeline and Next Steps

The Agency anticipates the following major milestones:

Timing	AOE Activity
October–November 2026	Develop the quality evaluation framework with the State Board; provide existing data and guidance
December 2026	Publish the quality evaluation framework
December 2026–January 2027	Make updated reporting data available as collection and validation are completed
February–March 2027	Publish expanded merger planning, financial, staffing, and scenario-analysis tools
Fall 2027	Conduct comprehensive evaluations of submitted merger proposals and provide recommendations to the State Board

Recommended Committee Priorities for Fall 2026

The Agency encourages facilitators to support committees in making substantive progress during October, November, and December.

This work should include:

1. **Establishing a shared understanding of educational expectations**, including federal requirements, Vermont's Education and District Quality Standards, and statewide expectations for student learning and opportunity.
2. **Reviewing existing statewide and local data** to identify educational strengths, student needs, differences in opportunity, and areas requiring further analysis.
3. **Beginning comprehensive asset mapping**, including educational programs, staffing expertise, facilities, community partnerships, and other resources across participating districts.
4. **Engaging educators, families, students, and community partners** to understand existing strengths, aspirations, and opportunities for improvement.
5. **Identifying opportunities for larger, more inclusive districts**, including expanded educational programming, shared services, stronger student supports, and more effective use of resources.
6. **Documenting specific questions and assumptions** that will require additional data, technical assistance, or financial modeling as the work progresses.

Moving Forward

The work ahead is challenging, but it is also an opportunity to rethink how Vermont organizes public education to better serve students and communities.

Successful merger planning requires more than combining existing districts or reconciling their current budgets. It requires a shared vision of educational quality, an honest assessment of current opportunities and gaps, recognition of the strengths each community brings, and a thoughtful approach to organizing resources for the future.

The Agency encourages committees to approach this work with curiosity, collaboration, and a willingness to consider possibilities beyond current organizational boundaries. By beginning with students, building on community assets, and connecting educational goals to responsible financial planning, Vermont can develop proposals that advance educational opportunity and strengthen the long-term sustainability of public education.