

October 9, 2025

The Honorable Ghazala Hashmi, Chair
Senate Education and Health Committee
201 North 9th Street
Virginia General Assembly Building
Richmond, VA 23219

The Honorable Sam Rasoul, Chair
Senate Education and Health Committee
201 North 9th Street
Virginia General Assembly Building
Richmond, VA 23219

Dear Senator Hasmi and Delegate Rasoul,

Montgomery County Public Schools respectfully submits its Report on Accessibility Findings and Recommendations as required by HB 2278.

The Division Contact for this report is:

Michael J. Brown, Ed.D
208 College Street
Christiansburg, VA 24073

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lois Graham", with a long horizontal flourish extending to the right.

Lois Graham, Ed.D
Acting Superintendent

Montgomery County Public Schools - HB 2278 Accessibility Report

Executive Summary:

In accordance with Virginia House Bill 2278 (2025), Montgomery County Public Schools (MCPS) has completed a comprehensive review of the physical accessibility of all school buildings and grounds for individuals with disabilities. As required, this review addresses: (i) physical accessibility challenges in school building and grounds; (ii) challenges in access to programming and support; (iii) the plan to eliminate barriers; and (iv) how state agencies can assist.

This report affirms that:

1. MCPS facilities were constructed in compliance with the building codes in effect at the time of their original construction
2. All subsequent renovations and additions meet current accessibility standards, including the Virginia Uniform Statewide Building Code (USBC) and the 2010 ADA Standards for Accessible Design
3. MCPS has annual processes that support our commitment to ongoing review and improvement.

Methodology of Review:

MCPS conducted a comprehensive review of all schools, including grounds and athletic facilities in the fall of 2025. Our review was guided by the methodology of the U.S. Government Accountability Office's June 2020 report (GAO-20-448), K-12 Education: School Districts Need Better Information to Improve Physical Accessibility of School Facilities," as recommended by the legislation. We also consulted with key stakeholders, including our special education Department, design professionals, facilities staff to ensure a thorough assessment and to determine compliance with the following regulations:

1. Current Virginia Uniform Statewide Building Code (USBC), including the Virginia Construction Code (VCC), the Virginia Existing Building Code (VEBC), and referenced ICC A117.1. In addition the 2010 ADA Standards for Accessible Design were consulted. MCPS assessed all facilities against current accessibility requirements for any alterations or new construction undertaken since their original design.

2. Original Construction Codes and the Virginia Maintenance Code (VMC), as applicable:
We confirmed that each school and its original components were constructed in compliance with the Virginia USBC and other applicable state and federal codes in effect at the time of construction.

Summary of Findings:

Based on our review, MCPS affirms that our facilities comply with the relevant building codes from their respective construction dates. Furthermore, all subsequent alterations or additions have been completed in adherence to the Virginia USBC and ADA standards in effect at their time of work.

Consistent with HB 2278's purpose to look beyond historical compliance and consider current conditions, our facilities were constructed according to the standards in effect at the time, and subsequent alterations are intended to comply with applicable code and ADA requirements. This planning review documents potential opportunities to enhance further accessibility for students, staff, families, and visitors.

Proactive Action Plan:

MCPS employs the following measures to ensure continued efforts to improve accessibility.

- **Facility Assessment:** MCPS has commissioned a facilities study to be conducted by ZMM Architects and Engineers. The facility assessment will be completed by February of 2026.
- **CIP Process:** The CIP process evaluates facilities, including consideration of accessibility challenges and barriers affecting individuals with disabilities ability to participate in school activities and programs fully. This process informs CIP planning and prioritizes projects for funding recommendations.

Annual Capital Improvement Plan Inputs:

- Administrator requests (program access concerns and site level observations)
- Facilities Department evaluations (facility condition and barrier observations)
- Capital needs (lifecycle, scope bundling, and cost considerations)
- Security evaluations (circulation, egress, and operational constraints)

Screening and Prioritization:

- Consider safety, accessibility, student / staff impact, feasibility, and funding alignment.
- Develop planning-level scopes and order of magnitude costs for CIP consideration.

MCPS reviews and updates this planning framework as needed within the CIP cycle to reflect current conditions, stakeholder input, and available resources.

Conclusion:

Montgomery County Public Schools is committed to creating a safe, inclusive, and accessible learning environment for all of students and stakeholders. This report confirms our compliance with applicable codes and outlines a plan for continued improvement.

To achieve the goals of HB 2278 and to ensure access for all, MCPS respectfully requests the following:

- Funding from the Virginia General Assembly: Funding from the Virginia General Assembly will assist with capital improvements, especially ones that will allow for greater access and improvements for all of our stakeholders as it relates to accessibility.

Sustainable progress requires resources to accompany new mandates and avoid the creation of unfunded obligations. We look forward to partnering with state agencies to advance accessibility across all public schools.