



MEMORANDUM

DATE: October 10, 2025

TO: The Honorable Ghazala F. Hashmi, Chair, Senate Committee on Education and Health
The Honorable Sam Rasoul, Chair, House Committee on Education

FROM: LaTanya D. McDade, Ed.D., Superintendent of Schools

SUBJECT: Prince William County Public Schools HB2278 Accessibility Report

Pursuant to Chapter 566 of the 2025 Virginia Uncodified Acts (the “Act”)¹, I am pleased to share this report with you.

Within the Act you requested each Virginia School Division to review the extent to which (i) public elementary and secondary school buildings and grounds within the Prince William County Public School Division (“PWCS” or “School Division”) present accessibility challenges and barriers for individuals with disabilities, including challenges and barriers that may prevent such individuals from fully participating in school activities; (ii) challenges in access to programming and supports exist for individuals with disabilities at public elementary and secondary schools within our School Division; (iii) whether PWCS has begun or plans to address and eliminate all such challenges and barriers; and (iv) state agencies can assist PWCS with measures to address and eliminate such challenges and barriers and fully comply with all applicable state and federal laws. This report (“Report”) sets forth a summary of our assessments and recommendations.

In preparing this Report we consulted the methodology of the United States Government Accountability Office (GAO) in its June 2020 Report No. GAO20-448, titled “K-12 Education: School Districts Need Better Information to Help Improve Access for People with Disabilities”. Consistent with the methodology and disclaimers included within GAO20-448 we note the following:

(i) The GAO defines the term “barriers” as structural or physical features that may impede access for people with disabilities (the GAO, and our Report, utilizes the word “challenges” interchangeably with “barriers”). This Report does not evaluate or address

¹ House Bill 2278

whether PWCS or any of its individual schools or recreational facilities currently comply with relevant legal requirements. In practice, whether a particular physical feature actually limits access for a particular individual depends on the application of the appropriate legal standard and the specific nature of an individual's disability. The barriers acknowledged in our Report may indicate a potential impediment to physical access for persons with certain types of disabilities, but alone, they do not establish that any legal violation has occurred.²

(ii) The Americans With Disabilities Act of 1990 ("ADA") requires public school divisions to operate programs, services, and activities in a manner that, viewed in its entirety, is accessible to individuals with disabilities. Public entities have latitude as to how to comply with the ADA and are not necessarily required to alter or make structural changes to existing buildings or facilities. When selecting from among permissible methods, PWCS and other school divisions prioritize methods that offer programs, services, and activities in the most integrated setting appropriate.³

I. BACKGROUND

At the outset we wish to share with you information regarding the various school facilities owned, operated, and maintained by PWCS.

PWCS currently operates 99 individual public elementary and secondary schools and related recreational facilities (each referred to herein as a "school" or collectively as "schools"); of those, 33 were constructed prior to 1977⁴; 11 were constructed between 1997 and 1990, and 55 were constructed after 1990.⁵ PWCS has undertaken major renovations of 36 schools within the past 10 years. Over 90,000 students are educated by PWCS within these facilities. According to VDOE statistics for School Year 2024-2025, 12,962 of our students (14%) are individuals with a disability.⁶

² GAO20-448, p. 3

³ GAO20-448, p. 4

⁴ Since 1977 school divisions have been subject to the requirements of Section 504 of the Rehabilitation Act of 1973 (Section 504) which prohibits discrimination on the basis of disability by recipients of federal financial assistance.

⁵ July 26, 1990 is the effective date of the Americans With Disabilities Act of 1990 ("ADA"). Title II of the ADA, which prohibits public entities from discriminating against individuals with disabilities, became effective 18 months after July 26, 1990, per Title II, Section 205.

⁶ VDOE Fall Membership Build-A-Table, <https://www.doe.virginia.gov/data-policy-funding/data-reports/statistics-reports/enrollment-demographics>

Whenever PWCS develops plans for construction or renovation of a school, we are required to obtain a statement from a Virginia-licensed architect or engineer familiar with the project,⁷ confirming that the plans and specifications for the project comply with the regulations of the Virginia Board of Education⁸ (“VDOE Guidelines”) and the Virginia Uniform Statewide Building Code (“USBC”). The VDOE Guidelines and the USBC together establish minimum requirements and standards for accessibility.

PWCS implements a systematic inspection of its school facilities using industry standard practices, on an ongoing basis.⁹ We continuously review the condition of our schools using internal personnel as well as contracted consulting firms. Recently (2023-2024) we completed a two-year assessment on 99 school sites and prioritized modifications to be scheduled through the School Division’s CIP process.

II. EXISTING FACILITIES

After consulting the information and methodology within the U.S. Government Accountability Office (GAO) in its June 2020 report GAO20-448, and as a result of our own recent assessment, we are aware that certain constructed conditions exist—particularly in schools constructed prior to 1990—which may, depending on a specific individual’s needs, present accessibility challenges. With reference to the types of conditions most frequently observed by the school divisions that participated in the GAO’s 2020 survey (*refer to GAO20-448, Figure 2, p. 8*) those conditions generally fall in the following categories:

- 9) Parking: width/slope of parking spaces
- 9) Main building entrances: signage from accessible parking spaces to a building’s main entrance
- 9) Playground surfaces and equipment
- 9) Bathrooms: door widths, fixture heights; clearances
- 9) Athletic Fields: routes to/from (and within) playing field areas
- 9) Bleachers: means of access to bleachers for companion seating; means of access to portable bleachers
- 9) Auditoriums: slope of aisles; access to stages; spaces for wheelchair seating
- 9) Walkways: elevations, slopes, and surface deflections
- 9) Railings: heights, lengths, and directional orientation

III. ADDRESSING KNOWN CHALLENGES

⁷ Code of Virginia §22.1-140; §22.1-138.E

⁸ Code of Virginia §22.1-138.A (see the VDOE *Guidelines for School Facilities in Virginia’s Public Schools* (2021))

⁹ Code of Virginia §22.1-138.1

PWCS plans to address or eliminate known accessibility barriers by various means and approaches:

(i) *Universal Design for New and Renovated Playgrounds.* In 2023 the Prince William County School Board updated its policy governing construction and renovation of school facilities. The updated policy requires that all playgrounds included in new schools shall employ universal design (meaning that the playgrounds shall be designed to be usable by all students, to the greatest extent possible, without the need for adaptation or specialized design.) Any school facility without a universal design playground must be upgraded to universal design whenever any such facility undergoes a major renovation.

(ii) *Planned Capital Renovations.* PWCS's current Capital Improvements Plan includes \$359,000,000 for major renovations, including accessibility upgrades for the renovated areas and ancillary facilities (such as restrooms, parking areas, etc.). PWCS collaborates with consultants and service professionals to ensure that all modifications and renovations comply with current Americans with Disabilities Act (ADA) standards that are incorporated into the USBC and VDOE Guidelines.

(iii) *Facilities Affecting Individuals with Sensory Processing Disabilities.* Since 2018, PWCS has undertaken multiple initiatives to enhance energy efficiency by upgrading lighting systems across its schools. These efforts include replacing outdated fluorescent fixtures, which may pose challenges for individuals with sensory processing disabilities with modern LED lighting and dimming controls. To date at least half of the 99 sites have received upgrades in classrooms and office spaces. Additionally, PWCS is committed to integrating natural light, softer energy-efficient lighting, and acoustic enhancements in the design of new buildings and major renovations to promote a more comfortable and inclusive environment in classrooms and shared spaces.

(iv) *Physical Barriers that may Affect Access to Programming and Supports.* PWCS is committed to providing a safe, inclusive, and accessible learning environment for students. Our Facilities personnel, working together with our Office of Special Education as well as internal ADA specialists, proactively evaluate and respond to individualized concerns regarding program access or support.

IV. RECOMMENDATIONS

A. We recommend that the General Assembly should increase funding within the School Construction Fund to promote and support construction or renovation projects that achieve levels of accessibility above and beyond minimum requirements of the VDOE Guidelines and USBC.

(i) In 2022 the General Assembly enacted Code of Virginia §22.1-138.3, which requires VDOE, in consultation with the Virginia Department of General Services, to develop and maintain a data collection tool to assist each school division with determining the relative age of each school building and the amount of maintenance reserve funds that are necessary to restore each building. The General Assembly could amend §22.1-138.3 to specifically require that the data entered into this tool be enhanced to include estimates of additional reserved funds that are necessary to bring all existing buildings and related facilities up to the most-current 2010 ADA Standards for Accessible Design.

(ii) The General Assembly may consider amending Code of Virginia Title 22, Chapter 9, Article 3 (Public School Building and Facilities Modernization), §22.1-141.1 (Standards for Buildings and Facilities) to add a statement of the General Assembly's intent that universal design be utilized in connection with the construction or renovation of public school buildings, and provide state funding to achieve that design mandate.

B. Code of Virginia §22.1-140 requires school construction plans to be reviewed by an individual or entity with professional expertise in building security and crime prevention through building design. The General Assembly could amend that statute to add a new requirement for plans to be reviewed by an individual or entity with professional expertise in universal design. These experts could be required to comment on the impact of security systems on accessibility, and vice versa (i.e., the impact of universal design features on security.) GAO20-448, at p. 34, notes that these design goals often conflict, and that school divisions may lack sufficient guidance as to how to use the design process to achieve both goals.

C. The Commonwealth of Virginia could employ a person within the Department of General Services, Division of Engineering and Buildings, whose job is to provide consultation to state agencies and to the Commonwealth's various school divisions regarding identification of accessibility barriers and challenges relating to state and local buildings, offer voluntary (nonbinding) assessments and recommendations, and to provide educational seminars and materials regarding the benefits of universal design implemented in construction or renovation of state and local public buildings.

V. CONCLUSION

In summary, Prince William County Public Schools (PWCS) has made significant strides in identifying and addressing facility accessibility barriers, guided by both federal and state standards and a commitment to universal design. Notable progress has been achieved through recent renovations, policy updates, and targeted initiatives—such as playground upgrades and sensory-friendly environments—though challenges remain, particularly in older facilities constructed prior to modern accessibility laws.

PWCS's ongoing efforts, including systematic inspections and collaboration with experts, demonstrate a proactive approach to fostering an inclusive educational environment for all students. Sustained investment, enhanced guidance, and continued partnership with state agencies will be essential to further advance accessibility.

Accordingly, PWCS urges the General Assembly to consider the recommendations outlined in this report: increasing targeted funding, amending relevant statutes to prioritize universal design, and expanding expert consultation resources. By working together, we can ensure that every student—regardless of ability—has equitable access to safe, supportive, and fully accessible school facilities.