



STAFFORD COUNTY PUBLIC SCHOOLS

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VIA EMAIL: reportdocs@dlas.virginia.gov

October 29, 2025

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

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

Dear Senator Hashmi and Delegate Rasoul,

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

The Division Contact for this report is:
Jason D. Towery, Chief Facilities Officer
Stafford County Public Schools
31 Stafford Avenue
Stafford, VA 22554

Respectfully Submitted,

Daniel W. Smith, Ed. D.
Superintendent

Stafford County Public Schools – HB2278 Accessibility Report

Executive Summary

Stafford County Public Schools (Stafford Schools) tasked Moseley Architects PC with performing accessibility studies for all Stafford Schools' buildings. This comprehensive assessment visually evaluated the current conditions of the 37 Stafford Schools-owned facilities and sites, listed architectural accessibility challenges, and provided high-level solutions and associated rough cost estimates.

The intent of the study was to satisfy the requirements of Chapter 566 of the 2025 Virginia Uncodified Acts (the Act), which was enacted pursuant to House Bill 2278. The Act required each school division to review the extent to which:

- (i) public elementary and secondary school buildings and grounds in the local 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 in the local school division;
- (iii) such schools have begun or plan to address and eliminate all such challenges and barriers; and
- (iv) state agencies can assist such schools to address and eliminate all such challenges and barriers and fully comply with all applicable state and federal laws.

NOTE: “barriers” and “challenges” are used interchangeably in this report.

Methodology of Review

Stafford Schools' accessibility assessment team consulted the methodology outlined in the June 2020 Report No. GAO-20-448 of the United States Government Accountability Office titled, “K-12 Education: School Districts Need Better Information to Help Improve Access for People with Disabilities” as required in the Act.

As noted in GAO-20-448, the Americans with Disabilities Act (ADA) requires public school divisions to operate each program, service, or activity, so that when viewed in its entirety, it is accessible to people with disabilities. In doing so, not all public school facilities must necessarily be made completely physically accessible. Under Department of Justice regulations, public entities are provided latitude in how to ensure that their programs, services, and activities are accessible to people with disabilities; priority must be given to those methods that offer programs, services, or activities in the most integrated setting appropriate. (GAO-20-448, p. 4).

The assessment utilized the "ADA Checklist for Existing Facilities," based on the 2010 ADA Standards for Accessible Design, as the basis for evaluation of the division's facilities. This document was created by the Institute for Human Centered Design and the ADA National Network. The review focused on four core priority areas established by Title III of the ADA regulations:

<u>Priority</u>	<u>Focus Area</u>	<u>Includes:</u>
Priority 1	Approach and Entrance	Accessible routes from site arrival points to the building entrance, including parking, exterior accessible routes, and entrance conditions.
Priority 2	Access to Goods and Services	Equitable access within the building, including interior accessible routes, elevators, signage, doors, rooms, controls, assembly areas, and service counters.
Priority 3	Toilet Rooms	Toilet room accessibility, including signage, entrance, accessible route, lavatories, water closets, and grab bars.
Priority 4	Additional Access	Other accessibility barriers, such as drinking fountains, public telephones, and fire alarm systems.

The assessment team performed a visual comprehensive accessibility assessment of each facility between July 7 and August 8, 2025, specifically focusing on architectural and accessibility barriers for individuals in academic spaces. Operational obstacles were noted when observed.

Summary of Findings

Accessibility challenges were noted at every facility assessed in Stafford Schools. As noted in the GAO report, “barriers” are structural or physical features that ***may*** (emphasis added) impede access for individuals with disabilities. Their existence alone, however, does establish the existence of a legal violation. (GAO-20-448, p. 3) A rough order of magnitude (ROM) cost was provided for planning purposes for the recommended corrective work.

General assessment notes common across all facilities included the following:

(i) that building accessibility standards have changed over time, resulting in older buildings having more accessibility challenges than newer ones; Stafford Schools confirms that our facilities meet the building codes that applied at the time of their original construction. In addition, all later new construction, renovations, or additions have been carried out in accordance with applicable codes and standards in place at the time of each project.

(ii) challenges vary based on age; and

(iii) due to existing layouts, it may not be feasible or possible to correct/address all accessibility items without conducting a major renovation, which would require additional study and potentially interim solutions.

State Agency Support

The Act requires school divisions to review how state agencies may assist in addressing and eliminating accessibility challenges and barriers. Stafford Schools has several recommendations:

(i) The General Assembly could increase funding for school construction and renovation projects to allow schools to meet or exceed required accessibility levels;

(ii) The General Assembly could amend § 58.1-600 et seq. of the Code of Virginia to authorize the citizens of each locality to determine, via referendum, to allow an additional local sales and use tax at a rate not to exceed one percent, for capital projects involving the construction or renovation of schools; and

(iii) Section 22.1-138.3 of the Code of Virginia requires the Virginia Department of Education, in consultation with the Virginia Department of General Services, to develop and maintain a data collection tool, to assist school divisions with determining the relative age of its buildings and the amount of maintenance reserve funds that are necessary to restore each such building. The General Assembly could amend the aforementioned code section to require that the data collection tool assist school divisions with determining the amount of reserve funds necessary to remove accessibility barriers and challenges for individuals with disabilities.

Proactive Action Plan

Stafford Schools incorporates ongoing and continued efforts to improve accessibility into its existing processes, particularly the annual Capital Improvement Program (CIP) development. Amongst other components, this process evaluates facilities, considering accessibility challenges and barriers that affect the ability of individuals with disabilities to participate fully in school activities and programs.

Stafford Schools plans to utilize the data and recommendations to align accessibility projects with existing planned projects, such as repairs, renovations, and school replacements. Stafford Schools acknowledges the challenges found in the report and plans to:

- (i) correct low-cost issues with simple solutions where feasible;
- (ii) include accessibility improvements in current and upcoming repair and renovation projects; and
- (iii) facilitate studies for accessibility issues that are more challenging and require extensive solutions.

Conclusion

The Stafford Schools accessibility study documents identified challenges and potential opportunities to enhance further accessibility for students, staff, families, and visitors. Stafford Schools is committed to creating safe, inclusive, and accessible learning environments. The division plans to address the noted deficiencies by aligning them with existing capital improvement projects and future renovations. To achieve the goals of House Bill 2278 and guarantee equitable access for all, Stafford Schools respectfully requests targeted support and funding from the Virginia General Assembly. Sustainable progress requires resources to accompany new mandates, thereby preventing the creation of unfunded obligations for the local school division. Stafford Schools looks forward to collaborating with state agencies to advance accessibility initiatives throughout every public school in the Commonwealth.