



Department of Facilities and Planning

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November 1, 2025

Dear Committee Chairs:

In accordance with the *2025 Uncodified Acts, Chapter 566*, Suffolk Public Schools is conducting the required review of accessibility challenges across our schools and developing recommendations to address identified barriers.

To fulfill this legislative mandate, the Division has engaged Precision Infrastructure Management (PIM) to perform the following activities:

Scope of Work

- **Accessibility Gap Analysis (November 2025):**
A division-level assessment of Suffolk Public Schools' publicly visible compliance posture—including policies, procedures, and high-level risks—aligned with the administrative requirements of the Americans with Disabilities Act (ADA) and Section 504.
- **Recommendations to Improve Accessibility:**
Recommendations will address:
 - Programmatic spaces where services are provided, including facilities, playgrounds, and digital communications.
 - Administrative requirements under the Virginians with Disabilities Act and the ADA.
 - A compliance roadmap outlining strategies to assess, prioritize, and remediate identified physical and programmatic barriers.

Deliverables and Reporting Schedule

- **Preliminary Findings Briefings:**
 - Gap Analysis – November 2025.
 - Facilities Review – 2026-27 Budget Cycle or as funding becomes available.

Upon completion, Suffolk Public Schools will submit the final Gap Analysis, recommendations, and implementation roadmap through the **Reports to the General Assembly (RGA)**, in accordance with the requirements of Chapter 566. The timeline reflects funding, consultant availability and the need to validate findings with school operations and safety teams.

Thank you for your leadership and continued support in advancing accessibility and inclusion for Virginia's students and school communities.

Respectfully submitted,

F.T. Napier

Terry Napier
Director of Facilities and Planning

SUFFOLK CITY PUBLIC SCHOOLS GAP ANALYSIS OCTOBER 30, 2025



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Executive Summary

Background

This document provides a high-level assessment of Suffolk Public Schools (SPS) Americans with Disabilities Act (ADA) compliance posture. Using SPS's publicly available policies and website content, this review evaluates whether SPS has the essential elements of a comprehensive ADA/504 program in place. The analysis focuses on policy visibility, program structure, grievance and accommodation processes, and digital accessibility posture.

Summary of Findings

SPS demonstrates visible commitment to equity and nondiscrimination with public notices, Section 504 contacts, grievance materials, and an accessibility statement. The District provides clear points of contact and maintains multiple handbooks and forms that reference civil-rights protections and complaint options.

However, program elements are spread across multiple locations online, and the current web accessibility statement references WCAG 2.0 without a published conformance level or remediation roadmap. Basics scans and observed patterns indicate outstanding digital issues and the presence of a third-party overlay.

How to Read this Report

The following pages break down the findings in detail:

- **Strengths:** Identifies what the organization is doing well and the core components already in place.
- **Gaps & Unknowns:** Highlights areas where policies are missing, incomplete, or not publicly documented.
- **Key Risks:** Outlines the potential legal, digital, and transparency risks associated with current gaps.
- **Opportunities for Improvement:** Provides practical steps the organization can take to strengthen compliance and inclusion.
- **Conclusion:** Summarizes the overall compliance posture and next steps for the organization to move from compliance readiness to leadership.

Strengths

Overview

SPS maintains a visible civil-rights framework with accessible notices, published contacts, and multiple references to 504/ADA in division resources. Public-facing materials provide avenues to request help and file complaints. These elements, combined with a standing advisory committee, form a solid base for a more unified ADA program.

Key Strengths

- **Nondiscrimination & Notices.** SPS posts a comprehensive Non-Discrimination Policy and related notices, signaling division-wide commitment and scope of protections. Contact details for leadership and OCR resources are included in division materials.
- **504 Contacts & Procedures.** Section 504 information is published, including designated contacts and complaint/appeal routes.
- **Accessibility Statement.** SPS publishes a Website Accessibility Statement describing alignment to WCAG 2.0 and a commitment to accessible content.
- **Help & Assistance.** Civil-rights complaint processes and forms communicate multiple submission options (verbal, written, anonymous), improving access for community members.
- **Advisory Structure.** The Special Education Advisory Committee (SEAC) provides a formal channel for feedback and recommendations, supporting continuous improvement.

Summary

SPS's strengths lie in foundational policies, published contacts, and operational materials that point users to help. These create a credible base to formalize a complete ADA program.

Gaps & Unknowns

Overview

While Suffolk's online posture includes several critical elements, public documentation remains fragmented. Some items are present but not centralized; others are referenced without district-level ADA framing or a cohesive program page.

Key Gaps

- **Unified ADA Hub.** There is no single, centralized ADA webpage consolidating grievance procedures, accommodation routes, ADA/Title II coordinator info, and progress updates.
- **Digital Accessibility Detail.** The statement cites WCAG 2.0 but does not publish a conformance level, roadmap, or remediation cadence.
- **Web Quality & Overlay.** A quick scan notes heading structure and contrast issues and confirms a third-party overlay—both indicating the need for native fixes over reliance on overlays.
- **ADA Branding/Role Clarity.** A district-level ADA/Title II Coordinator and ADA-specific grievance language are not clearly branded in one place for the public.

Unknowns

- Audit cadence for facilities, programs, or digital content (frequency, scope, and reporting).
- Training provided to administrators/staff on ADA/504 intake, documentation, and resolution.
- Tracking of requests, including consistent logs and outcome reporting across schools.

Summary

The most significant gap is the absence of a single, public ADA program page with clear ownership, procedures, and progress artifacts, plus more specific digital accessibility commitments and procurement hooks.

Key Risks

Overview

SPS's visible commitments reduce baseline risk, but dispersed documentation and missing unifying elements create vulnerabilities in proof, process, and continuity.

Key Risks

- **Title II Exposure.** Without a clearly posted ADA grievance process, ADA-specific ownership, and a consolidated ADA page, SPS may face challenges demonstrating compliance readiness and responding to complaints.
- **Digital Access Risk.** A WCAG 2.0 statement without stated conformance or roadmap, combined with noted issues and an overlay, leaves users facing barriers and the division open to accessibility claims.
- **Process Inconsistency.** When policies exist across multiple locations, intake and accommodations can vary by school, reducing equity and increasing error risk.
- **Reputation.** Virginia's increasing focus on digital and program access makes fragmented transparency appear like inaction, even when work is occurring behind the scenes.

Summary

SPS's compliance story is strong but under-documented. Clear ADA ownership, unified documentation, and measurable digital targets will materially lower risk.

Opportunities

Overview

SPS can translate its foundation of notices, contacts, and committees into a fully documented ADA program with clear governance, public reporting, and continuous improvement.

Key Opportunities

- **Create a Central ADA Webpage.** Aggregate ADA/504 information (coordinator(s), grievance routes, accommodation processes, alternative-format requests, status updates) in one accessible hub. Link it from the footer alongside Non-Discrimination and Accessibility pages.
- **Name an ADA/Title II Coordinator Publicly.** Publish role, contact, and scope; clarify district-level ADA ownership distinct from 504 to cover facilities, programs, and communications.
- **Upgrade the Web Statement.** Move to WCAG 2.1 AA, add a conformance target, feedback channel, and a remediation roadmap with ownership and review cadence.
- **Document Grievance Flow.** Post ADA-specific complaint steps with plain-language intake, timelines, and escalation; cross-link existing Civil Rights Complaint materials and forms.
- **Embed Accessibility in Procurement.** Add explicit accessibility language and vendor requirements to Purchasing to ensure future-proofing for web, software, and construction.
- **Publish Training & Audits.** Outline annual training for intake/recordkeeping and post periodic web/facility audit summaries to show measurable progress.
- **Reduce Overlay Reliance.** Address contrast/headings/structure natively and disclose testing cadence to improve real-world usability (and mitigate overlay drawbacks).

Summary

These steps transform existing components into a documented system that's discoverable, repeatable, and defensible.

Conclusion

SPS has the right building blocks, nondiscrimination notices, 504 information, complaint forms, an accessibility statement, and an advisory mechanism.

To move from intent to program maturity, SPS should unify ADA documentation, publish ADA ownership, elevate digital standards to WCAG 2.1 AA, and embed accessibility in procurement and training.

This shift will reduce legal and operational risk, improve user experience, and demonstrate sustained commitment to equitable access for students, families, and staff.



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Let's get started.

