



October 20, 2025

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

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

Dear Senator Hashmi and Delegate Rasoul:

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

The division's contact for this report is:

Dr. Jerry Simmons, Chief Operations Officer  
Portsmouth Public Schools  
2801 Turnpike Road  
Portsmouth, VA 23707

Respectfully,

Elie Bracy, III, Ed.D.  
Division Superintendent



## **Portsmouth Public Schools-HB2278 Accessibility Report**

### **Executive Summary**

In accordance with Virginia House Bill 2278 (2025), Portsmouth Public Schools (PPS) 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 buildings 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:

- All PPS facilities were constructed in compliance with the building codes in effect at the time of their original construction.
- 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.
- PPS has annual processes that support our commitment to ongoing review and improvement.

### **Methodology of Review**

PPS conducted a comprehensive, facility-by-facility review of all schools, including grounds and athletic facilities. The review followed 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, and parent groups, to ensure a thorough assessment and to determine compliance with two key sets of regulations:

- Current Virginia Uniform Statewide Building Code (USBC), including the Virginia Construction Code (VCC), the Virginia Existing Building Code (VEBC), and referenced ICC A117.1—as well as the 2010 ADA Standards for Accessible Design. We assessed all facilities against current accessibility requirements for any alterations or new construction undertaken since their original build date.
- Original Construction Codes and the Virginia Maintenance Code (VMC), as applicable: We confirm that each school building 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.

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## **Summary of Findings**

Based on a detailed review, PPS affirms that all facilities comply with the relevant building codes from their respective construction dates. Furthermore, all subsequent alterations or additions adhere to the Virginia USBC and ADA standards in effect at the time of the work.

Consistent with HB2278's purpose to look beyond historical compliance and consider current conditions, all facilities constructed are in accordance with the standards in effect at the time, and subsequent alterations comply with applicable codes and ADA requirements. In the PPS review, there are potential opportunities to enhance further accessibility for students, staff, families, and visitors.

## **Proactive Action Plan**

Ongoing and continued efforts to improve accessibility are a key consideration in existing processes for annual Capital Improvement Plan (CIP) development. Each year, 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 guides the CIP planning and priorities projects for funding recommendations.

## **Annual Capital Improvement Plan Inputs**

- PPS administrative team leads the process of requests (program access concerns and site-level observations)
- The Facilities Maintenance Department evaluations (review facility condition and barrier observations)
- Capital needs (lifecycle, scope bundling, and cost considerations)
- Security evaluations (circulation, egress, and operational constraints)

## **Screening & Prioritization**

- Safety, accessibility, student/staff impact, feasibility, and funding alignment.
- Develop planning-level scopes and order-of-magnitude costs for CIP consideration.
- PPS reviews and updates this planning framework annually within the CIP cycle to reflect current conditions, stakeholder input, and available resources.

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## **Conclusion**

Portsmouth Public Schools is committed to creating safe, inclusive, and accessible learning environments. This report confirms our compliance with applicable codes and outlines a strategic plan for continued improvement. To achieve the goals of HB2278 and ensure access for all, PPS respectfully requests targeted funding from the Virginia General Assembly. 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.