KW KING WILLIAM
COUNTY SCHOOLS

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DATE: October 29, 2025

TO: The Honorable Ghazala F. Hashmi, Chair
             Commonwealth of Virginia Senate Committee on Education and Health

             The Honorable Delegate Sam Rasoul, Chair
             Commonwealth of Virginia House Committee on Education

FROM: Tony Stone, Director of Operations

Dear Chairs,

In accordance with 2025 Uncodified Acts, Chapter 566, King William County Public Schools is conducting the required review of accessibility challenges across our school buildings and grounds, including athletic areas and playgrounds, and developing recommendations to address identified barriers. To fulfill this mandate, the Division has engaged **Precision Infrastructure Management (PIM)** for two concurrent efforts:

- GAP Analysis: An organizational-level review of our current publicly visible compliance posture, policies, procedures, and high-level risks, aligned to ADA/Section 504.
- Facility Assessments (Dec/Jan 2026): On-site, instrumented evaluations of representative schools and site features to document specific physical barriers (e.g., routes, entries, restrooms, classrooms, athletic facilities, and playground components).

These assessments will generate itemized findings with references to applicable standards and planning-grade cost ranges to support budgeting and scheduling.

Deliverables and Sharing Plan

- Preliminary findings briefing: [GAP: Dec 2025, Facilities: Dec 2025]
- Division-wide summary report with prioritized recommendations: [Jan 2026]
- Facility Assessment appendices (site-specific findings tables and maps): [Feb 2026]

We will submit and share the District's ADA Assessment Report with the Reports to the General Assembly (RGA) upon completion, together with our implementation roadmap. This schedule reflects current fieldwork availability and the need to validate findings with school operations and safety teams.

For questions, please contact Tony Stone at astone@kwcps.k12.va.us. Thank you for your leadership in advancing accessibility and inclusion for Virginia's students and school communities.

KING WILLIAM PUBLIC SCHOOLS
GAP ANALYSIS
OCTOBER 31, 2025

PIM | PRECISION INFRASTRUCTURE MANAGEMENT

Executive Summary

Background

This document provides a high-level assessment of King William County Public Schools' (KWCPS) Americans with Disabilities Act (ADA) compliance posture. Using the District's publicly available policies and website content, this analysis evaluates whether KWCPS has the essential elements of a comprehensive ADA program in place. The review builds on models applied in other Virginia School Districts and focuses on policy visibility, program structure, and accessibility implementation across both digital and physical environments.

Summary of Findings

King William County Public Schools (KWCPS) demonstrates growing awareness of accessibility and inclusion but lacks several foundational elements required for full ADA compliance. The District's Special Education Advisory Committee represents a meaningful step toward community engagement, yet key compliance documentation, such as an ADA statement, accessibility policy, and grievance procedures, remains absent from public view.

Overall, KWCPS appears early in its formal accessibility journey. The absence of published policies, coordinator designation, and a clear ADA Transition Plan limits transparency and exposes the District to potential legal and operational risks. With a coordinated strategy, however, the District can rapidly strengthen its posture and align with peer districts leading in accessibility governance.

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

KWCPS exhibits early-stage strengths centered around community inclusion and special education engagement.

Key Strengths

- **Disability Council/Steering Committee Established**: The District operates a Special Education Advisory Committee, offering a platform for parent and community collaboration on accessibility and inclusion topics.
- **Website Uses ARIA Attributes:** While accessibility testing noted several WCAG issues, the site includes a good amount of ARIA usage, showing initial awareness of digital inclusion practices.
- **Commitment to Strategic Inclusivity:** References to inclusivity within the 2023–2028 Strategic Plan indicate a cultural awareness of equitable access, even if formal ADA language is not yet published.

Summary

The District's advisory committee and available contact pathways provide a foundation to build an ADA-compliant system with improved visibility and coordination.

Gaps & Unknowns

Overview

Most required ADA and Section 504 components are missing or not publicly visible. This absence hinders transparency and limits the District's ability to demonstrate compliance.

Key Gaps

- **ADA Statement:** No public-facing ADA statement was found on the District website or sitemap.
- **Accessibility Statement:** No digital accessibility statement referencing WCAG or contact methods for reporting barriers.
- **Accommodation Policy:** No visible accommodation procedures or documentation for requesting modifications.
- **Grievance Procedure:** No publicly available grievance process for addressing accessibility concerns.
- **Nondiscrimination Notice:** While the strategic plan emphasizes inclusivity, it lacks a formalized Nondiscrimination Notice referencing Section 504 and ADA requirements.
- **Website Accessibility:** Homepage testing identified multiple accessibility issues with link text and color contrast. Manual testing is recommended for full WCAG evaluation.
- **Procurement Language:** No accessible procurement policy or mention of accessibility requirements in purchasing documentation was identified.

Unknowns

- A link to the state's planning resources exists, but there is no District-specific ADA Transition Plan.
- The Special Education contacts list does not specify a designated ADA Coordinator.
- Whether KWCPS conducts regular facility or website accessibility audits.
- Whether ADA/504 training is provided to staff or administrators.
- How accommodation requests are currently handled or tracked.
- Existence of any district-wide communication plan around accessibility.

Summary

Without published statements, coordinator identification, or policy frameworks, KWCPS cannot yet evidence ADA compliance readiness.

Key Risks

Overview

While King William County Public Schools has expressed an institutional commitment to inclusion, the lack of formal accessibility infrastructure presents several immediate and emerging risks. The District's absence of public policies, coordinator designation, and documented grievance or transition procedures limits accountability and increases exposure across multiple domains. These gaps not only elevate compliance risk but also affect operational efficiency, digital accessibility, and public confidence.

Key Risks

- **Legal Risk:** The absence of an ADA statement, grievance procedure, and coordinator designation leaves the District vulnerable to accessibility complaints.
- **Operational Risk:** Without a formal program structure or transition plan, accessibility efforts may remain fragmented across departments.
- **Digital Risk:** Website accessibility failures (contrast, link text) present compliance and usability challenges that could expose the District to OCR inquiries.
- **Governance Risk:** No designated ADA leadership structure limits accountability and may delay corrective actions.
- **Reputational Risk:** Lack of visible compliance documentation can create public perception gaps, even as the District works internally toward inclusion.

Summary

Legal and digital accessibility risks are the most pressing, while operational and governance vulnerabilities could compound those risks over time. Establishing a documented ADA program, with leadership accountability, transparent procedures, and public communication, will be essential to mitigating liability and reinforcing the District's reputation as a responsible, inclusive educational institution.

Opportunities

Overview

KWCPS can rapidly enhance its accessibility maturity by formalizing its existing values of inclusion into publicly visible policy and practice.

Key Opportunities

- Build upon the Special Education Advisory Committee to create a robust monitoring and maintenance program for accessibility work.
- Launch a "Commitment to Access" webpage highlighting accessibility initiatives and annual updates.
- Partner with state or regional ADA resources to develop a low-cost self-evaluation and transition plan.

Summary

With targeted leadership action and community engagement, the District can evolve from early-stage compliance to model status among Virginia school systems.

Conclusion

King William County Public Schools has taken positive steps toward accessibility. However, it currently lacks the structural and procedural components necessary to demonstrate compliance with accessibility laws.

By establishing a public-facing ADA program, including coordinator designation, published statements, grievance processes, and a transition plan, the District can transform intent into measurable compliance.

The foundation for success already exists: a culture of inclusion, strong community ties, and a willingness to improve. The next step is to codify this commitment through transparent governance and communication.

With focused leadership and collaboration, KWCPS can achieve full accessibility readiness and set a standard for equitable education in Virginia.

Let's get started.