



October 28, 2025

**Re: HB2278 Response**

To: Senator Ghazala F. Hashmi, Senate Committee on Education and Health,  
Via email [senatorhashmi@senate.virginia.gov](mailto:senatorhashmi@senate.virginia.gov)  
Delegate Sam Rasoul, House Committee on Education,  
Via email [DelSRasoul@house.virginia.org](mailto:DelSRasoul@house.virginia.org)

In accordance with Virginia House Bill 2278 (2025), Hampton City Schools (HCS) 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 supports;
- (iii) plans to eliminate barriers; and
- (iv) ways in which state agencies can assist.

**Statement of Compliance**

1. HCS facilities were constructed in compliance with the building codes in effect at the time of their original construction.
2. 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.
3. HCS maintains annual review processes to support our ongoing commitment to accessibility improvement.

**Methodology of Review**

HCS conducted a comprehensive, facility-by-facility review of all schools, including surrounding grounds and athletic facilities. The review followed the methodology outlined in the U.S. Government Accountability Office's June 2020 report, K-12 Education: School Districts Need Better Information to Improve Physical Accessibility of School Facilities (GAO-20-448), as recommended by the legislation.

We also consulted with key stakeholders, including the Special Education Department, design professionals, and facilities staff, to ensure a thorough assessment and confirm compliance with two primary 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. All facilities were assessed against current accessibility requirements for any alterations or new construction completed since their original build date.
- Original Construction Codes and the Virginia Maintenance Code (VMC) – Each school building's original construction was reviewed to confirm compliance with the USBC and other applicable state and federal codes in effect at the time of construction.

### **Summary of Findings**

Based on our detailed review, HCS affirms that all facilities comply with the relevant building codes in place at the time of their construction. Furthermore, all subsequent alterations and additions have been completed in accordance with the Virginia USBC and ADA standards applicable at the time of the work.

Consistent with the purpose of HB2278—to look beyond historical compliance and assess current conditions—this review identifies potential opportunities to further enhance accessibility for students, staff, families, and visitors.

### **Proactive Action Plan**

HCS is committed to continuous improvement in accessibility through its annual Capital Improvement Plan (CIP) process. Accessibility is a key consideration in CIP development and project prioritization. Each year, the CIP process evaluates all facilities, taking into account accessibility barriers that may impact the ability of individuals with disabilities to fully participate in school activities and programs.

### **Annual Capital Improvement Plan Inputs**

- Administrator requests (program access concerns and site-level observations)
- Facilities Department evaluations (facility condition and barrier assessments)
- Capital needs (lifecycle, project bundling, and cost considerations)
- Security evaluations (circulation, egress, and operational constraints)



### **Screening and Prioritization Criteria**

- Safety, accessibility, and student/staff impact
- Feasibility and alignment with available funding
- Development of planning-level scopes and order-of-magnitude cost estimates for CIP consideration

HCS reviews and updates this planning framework annually within the CIP cycle to reflect current conditions, stakeholder input, and available resources.

### **Conclusion**

Hampton City Schools is deeply committed to providing safe, inclusive, and accessible learning environments. This report confirms our compliance with all applicable codes and outlines a proactive plan for continued improvement.

To meet the objectives of HB2278 and ensure equitable access for all, HCS respectfully requests targeted funding from the Virginia General Assembly. Sustainable progress requires adequate resources to accompany new mandates and to prevent the creation of unfunded obligations.

HCS looks forward to partnering with state agencies to advance accessibility across all Virginia public schools.

***Daniel Bowling***

Dr. Daniel Bowling, Chief Operations Officer  
Hampton City Schools

Cc: Vijay Ramnarain, Virginia Department of Education