



Pulaski County Public Schools

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Robert Graham, Superintendent ♦ robert.graham@pcva.us

October 30, 2025

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

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

Dear Senator Hashmi and Delegate Rasoul,

In fulfillment of the requirements established under House Bill 2278 (2025), Pulaski County Public Schools respectfully submits this Report on Accessibility Findings and Recommendations to the Virginia General Assembly. This report reflects the division's comprehensive review of facility accessibility and outlines actionable steps to promote equitable access across all schools and programs.

The Division Contact for this report is:

Jess A. Shull
Director of Operations
Pulaski County Public Schools

Sincerely,

Robert F. Graham
Superintendent
Pulaski County Public Schools

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HB 2278 Accessibility Review

1.0 Executive Summary

In accordance with Virginia House Bill 2278 (2025), Pulaski County Public Schools (PCPS) conducted a division-wide review of the physical accessibility of all school facilities, including buildings and associated grounds. The review addresses the following required areas:

1. Identification of physical accessibility challenges within school facilities and grounds;
2. Barriers to access for educational programming and student supports;
3. The division's plan to eliminate identified barriers; and
4. Ways in which state agencies may assist school divisions in advancing accessibility improvements.

This report affirms the following:

1. **Code Compliance:** All PCPS facilities were originally constructed in compliance with building codes and regulations in effect at the time of construction.
2. **Accessibility Standards:** All subsequent renovations, additions, and facility modifications have been completed in accordance with the Virginia Uniform Statewide Building Code (USBC) and the 2010 ADA Standards for Accessible Design applicable at the time of each project.
3. **Ongoing Review and Improvement:** PCPS maintains established annual review processes to monitor facility conditions and ensure continued progress toward full accessibility and equitable access for all students, staff, families, and community members.

2.0 Methodology of Review

Pulaski County Public Schools conducted a comprehensive evaluation of all school buildings, including grounds and athletic facilities, following 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 HB2278.

This process included collaboration among key stakeholders—representatives from Special Education, Facilities and Maintenance, and school administration—to ensure a complete and informed assessment of facility compliance. The review focused on two primary regulatory areas:

1. **Current Accessibility Codes and Standards:** All facilities were evaluated relative to the current

Virginia Uniform Statewide Building Code (USBC), including the Virginia Construction Code (VCC), Virginia Existing Building Code (VEBC), and ICC A117.1 accessibility provisions, as well as the 2010 ADA Standards for Accessible Design. This assessment ensured compliance for all alterations and new construction undertaken since each facility's original construction date.

2. Original Construction Codes and Ongoing Maintenance Requirements: The division verified that each building and its original structural components were constructed in accordance with the Virginia USBC and applicable state and federal codes in effect at the time of construction. Compliance with the Virginia Maintenance Code (VMC) was also reviewed to ensure continued safety, accessibility, and functionality.

3.0 Summary of Findings

Pulaski County Public Schools affirms that all division facilities were constructed in compliance with the codes and standards applicable at the time of their original construction. All subsequent renovations, additions, and modifications have adhered to the relevant editions of the USBC and ADA Standards for Accessible Design.

In alignment with the intent of House Bill 2278 to evaluate current accessibility conditions beyond historical compliance, this review identifies areas for ongoing improvement to promote inclusivity. PCPS remains committed to maintaining safe, compliant, and equitable learning environments that meet both state regulatory standards and community expectations.

4.0 Proactive Action Plan

PCPS incorporates accessibility enhancement into its annual Capital Improvement Plan (CIP) process. Each year, the division evaluates all facilities, with special attention to accessibility barriers that may limit individuals with disabilities from fully participating in school programs, services, and activities. This ensures that accessibility improvements are prioritized in funding recommendations and long-term infrastructure goals.

5.0 Conclusion

Pulaski County Public Schools is committed to fostering safe, accessible, and inclusive learning environments for all students, staff, and community members. This report confirms compliance with applicable codes and outlines a proactive plan for continued improvement.

To fulfill the objectives of House Bill 2278 (2025) and ensure equitable access across all public education facilities, PCPS respectfully requests consideration of targeted state funding to support accessibility initiatives. Sustainable progress requires that new mandates be paired with

dedicated financial resources, preventing unfunded local obligations.

PCPS looks forward to continued collaboration with the Virginia Department of Education, the Virginia Disability Commission, and other state agencies to advance accessibility efforts and ensure that all public school facilities within the Commonwealth are inclusive, compliant, and welcoming to every individual.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert F. Graham", with a long, sweeping horizontal line extending to the right.

Robert F. Graham

Superintendent

Pulaski County Public Schools