

MEMORANDUM

Date: November 21, 2025

To: The Honorable Chair, Senate Committee on Education and Health
and The Honorable Chair, House Committee on Education
Commonwealth of Virginia

Subject: Report of Accessibility Review Progress – 2025 Uncodified Acts, Chapter 566

Dear Chairs,

In accordance with 2025 Uncodified Acts, Chapter 566, Prince Edward 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 (complete, attached):** An organizational-level review of our current publicly visible compliance posture, policies, procedures, and high-level risks, aligned to ADA/Section 504.
- **Facility Assessments (in the process of procuring):** 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.

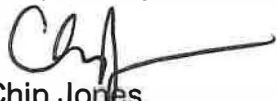
DELIVERABLES & SHARING PLAN

- Preliminary findings briefing: [GAP: Complete]
- Division-wide summary report with prioritized recommendations: [2026]
- Facility Assessment appendices (site-specific findings tables and maps): [2026]

We will publish the District's ADA Transition Plan online 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 Chip Jones at 434-315-2151. Thank you for your leadership in advancing accessibility and inclusion for Virginia's students and school communities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Chip Jones', with a long horizontal flourish extending to the right.

Chip Jones
Superintendent
Prince Edward County Public Schools

PRINCE EDWARD COUNTY PUBLIC SCHOOLS GAP ANALYSIS NOVEMBER 21, 2025



PIM | PRECISION
INFRASTRUCTURE
MANAGEMENT

Executive Summary

Background

This document provides a high-level assessment of Prince Edward County Public Schools (PECPS) Americans with Disabilities Act (ADA) compliance posture. Using PECPS's publicly available policies and website content, this review evaluates whether PECPS 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

Prince Edward County Public Schools demonstrates a strong, transparent commitment to accessibility and nondiscrimination through multiple published policies and resources. The District has established an ADA and web accessibility statement, accommodation guidance for 504 plans, a grievance procedure, and parental resources supporting students with disabilities.

However, while PECPS maintains Transition Services and a designated accessibility contact, it does not explicitly identify an ADA Coordinator or outline accessibility standards in procurement policies. Physical and event accessibility guidance also remains limited (publicly). Overall, PECPS shows solid compliance maturity with opportunities to strengthen governance clarity and operational consistency.

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

PECPS demonstrates strong compliance alignment, with clearly posted accessibility policies, grievance procedures, and Transition Services. The District's website features robust accessibility resources and parent support pages. Despite these strengths, opportunities remain to formalize coordinator roles, add procurement accessibility language, and expand operational guidance for physical and event accessibility.

Key Strengths

- **Accessibility Statement:** Published online with clear commitment to accessibility.
- **Accommodation Policy:** 504 Plans page outlines procedures for student accommodations.
- **Grievance Procedure:** Available online with contact information for submitting complaints.
- **Nondiscrimination Notice:** Posted publicly in compliance with state and federal law.
- **Assistance for Parents & Guardians:** Dedicated page offers resources and links for families of students with special needs.
- **Disability Council:** Special Education Advisory Committee established to guide district inclusion efforts.
- **Website Accessibility:** Passes basic checks with only two minor labeling issues noted.

Summary

Prince Edward County Schools has a clear compliance framework with excellent public visibility, demonstrating both awareness and implementation of ADA and Section 504 responsibilities.

Gaps & Unknowns

Overview

Despite strong policy foundations, PECPS lacks full clarity in governance and certain operational procedures. The absence of an explicitly named ADA Coordinator, limited procurement accessibility standards, and missing public guidance for physical and event accessibility create minor but notable compliance gaps.

Key Gaps

- **ADA Coordinator:** Accessibility contact identified, but role not formally titled ADA Coordinator. It is unclear if this role is also tasked with the management of PECPS's Title II requirements.
- **Procurement Accessibility Language:** No explicit mention of accessibility requirements in procurement policies.
- **Physical & Event Accessibility Guidance:** No posted procedures for ensuring accessible facilities or school events.

Unknowns

- Whether procurement teams verify vendor accessibility compliance during purchases.
- The extent of staff training on ADA and Section 504 policies.
- How often ADA self-evaluations or audits are conducted.
- Whether advisory committee recommendations are formally incorporated into District policy updates.

Summary

PECPS's ADA documentation and web accessibility are robust, but the District's next step should focus on solidifying oversight roles and ensuring accessibility standards are applied across operations, facilities, and procurement.

Key Risks

Overview

PECPS's risks are relatively low due to its established documentation. The primary vulnerabilities relate to governance clarity, procurement oversight, and physical accessibility documentation - factors that can result in gaps in service and external scrutiny.

Key Risks

- **Governance Risk:** ADA Title II responsibilities not fully communicated publicly.
- **Operational Risk:** Lack of procurement accessibility standards may allow inconsistent compliance.
- **Physical Access Risk:** Absence of published facility accessibility guidance may hinder inclusion consistency.
- **Digital Risk:** Minor website labeling issues may reduce accessibility for some users.
- **Reputational Risk:** Missing coordinator designation could appear as incomplete compliance despite strong efforts.

Summary

Clarifying coordinator roles, enhancing procurement practices, and documenting physical accessibility will close remaining compliance gaps and safeguard against potential legal or reputational risks.

Opportunities

Overview

PECPS can leverage its existing policies and web visibility to achieve full ADA and Section 504 maturity. With most compliance structures in place, the District's focus can shift toward optimization and long-term sustainability.

Key Opportunities

- **Establish a Public ADA Coordinator Role:** Improves clarity and accountability for compliance inquiries.
- **Integrate Accessibility in Procurement Practices:** Ensures consistent vendor compliance and alignment with Section 508.
- **Develop Accessibility Guidance for Events and Facilities:** Strengthens inclusive practices across schools.
- **Expand Training and Engagement:** Regular staff training and SEAC collaboration enhance awareness and ownership.
- **Maintain Web Accessibility Leadership:** Regular audits reinforce the district's digital inclusion commitment.
- **Publish Annual Accessibility Updates:** Increases transparency and public trust in continued ADA progress.

Summary

Formalizing coordinator responsibilities, embedding accessibility in procurement and event planning, and enhancing communication will position PECPS as a model District in ADA compliance and community inclusion.

Conclusion

Prince Edward County Public Schools demonstrates meaningful progress toward full ADA and Section 504 compliance through robust public documentation, accessible policies, and strong leadership in student support. Its proactive publication of accessibility statements, grievance procedures, and transition resources reflects genuine commitment to inclusion.

Moving forward, the District's focus should be on refining governance and integrating accessibility into procurement and event operations. Clarifying the ADA Coordinator role and expanding staff training will strengthen accountability and consistency.

With these refinements, PECPS can transition from compliance readiness to sustainable accessibility leadership—serving as a model for other school divisions committed to equitable education and inclusive community engagement.

Let's get started.

