



## Floyd County Public Schools

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April 6, 2026

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

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

Dear Senator Favola and Delegate Rasoul,

In accordance with Virginia House Bill 2278 (2025), Floyd County Public Schools (FCPS) 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) the plan to eliminate barriers; and (iv) how state agencies can assist.

FCPS conducted a comprehensive, facility-by-facility review of all schools, including grounds and athletic facilities, with help from staff at the Disability Resource Center of the New River Valley.

The attached report outlines their findings.

Please let me know if you have any questions or need additional information.

Sincerely,

Jessica Cromer, Ed.D.  
Division Superintendent

## **Floyd Co. Schools ADA Assessment: Floyd Co. High School, Floyd Co. Elementary School, Willis, Check, and Indian Valley Schools**

**Assessment conducted by:** Disability Resource Center of the New River Valley (Executive Director Allison Payne, Community Independence Advocates Jeremiah McInturf and Justine Clifton) in accordance to the 2010 ADA Standards for Accessible design

Floyd County School District ADA Survey utilizing ADA school building regulations and guidelines of Virginia's public schools. Floyd Co. Schools survey conducted reviews ADA compliance in accordance with Virginia schools, in strict adherence to federal ADA standards and all state regulations. Survey review will include key areas noted for compliance in the state of Virginia including physical infrastructure and accessibility. Areas included are parking, restrooms, classrooms, entrances, offices, and common areas.

### **2010 Standards for State and Local Government Facilities: TITLE II**

All state and local government facilities must follow the requirements of 2010 ADA Standards, including both the Title II Regulations at 28 CFR 35.151 and 2004 ADAAG at 36CFR part 1991. Start date of construction on or after March 15, 2012, newly constructed or altered state and local government facilities must comply with 2010 standards. Before that date, 1991 standards (without elevator exemption), the UFAS or 2010 standards may be used for projects when construction commences on or after September 15, 2010. Any construction that commences after January 26, 1992 shall be designed and constructed in such a manner that the facility or part of the facility is readily accessible.

#### **(1) Exception for structural impracticability include:**

- Full compliance with the requirements of this section is not required where a public entity can demonstrate that it is structurally impracticable to meet the requirements. Full compliance will be considered structurally impracticable only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features.
- If full compliance with this section would be structurally impracticable, compliance with this section is required to the extent that it is not structurally impracticable. In that case, any portion of the facility that can be made accessible shall be made accessible to the extent that it is not structurally impracticable.
- If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would be structurally impracticable, accessibility shall nonetheless be ensured to persons with other types of disabilities, (e.g., those who use crutches or who have sight, hearing, or mental impairments) in accordance with this section.

## **(2) Alterations:**

- Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.
- The path of travel requirements of § 35.151(b)(4) shall apply only to alterations undertaken solely for purposes other than to meet the program accessibility requirements of § 35.150.
- Alterations to historic properties shall comply, to the maximum extent feasible, with the provisions applicable to historic properties in the design standards specified in § 35.151(c).
- If it is not feasible to provide physical access to a historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods of access shall be provided pursuant to the requirements of § 35.150.

**(3) Path of travel.** An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration.

**(4) Primary function.** A “primary function” is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using the facility are carried out.

- Mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, and corridors are not areas containing a primary function. Restrooms are not areas containing a primary function unless the provision of restrooms is a primary purpose of the area, e.g., in highway rest stops.
- For the purposes of this section, alterations to windows, hardware, controls, electrical outlets, and signage shall not be deemed to be alterations that affect the usability of or access to an area containing a primary function.
- A “path of travel” includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility.

- An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements.
- For the purposes of this section, the term “path of travel” also includes the restrooms, telephones, and drinking fountains serving the altered area.

**(5) Safe harbor.** If a public entity has constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.

**(6) Disproportionality.**

- Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20 % of the cost of the alteration to the primary function area.
- Costs that may be counted as expenditures required to provide an accessible path of travel may include:
- Costs associated with providing an accessible entrance and an accessible route to the altered area, for example, the cost of widening doorways or installing ramps.
- Costs associated with making restrooms accessible, such as installing grab bars, enlarging toilet stalls, insulating pipes, or installing accessible faucet controls.
- Costs associated with providing accessible telephones, such as relocating the telephone to an accessible height, installing amplification devices, or installing a text telephone (TTY); and
- Costs associated with relocating an inaccessible drinking fountain.

**(7) Duty to provide accessible features in the event of disproportionality.**

- When the cost of alterations necessary to make the path of travel to the altered area fully accessible is disproportionate to the cost of the overall alteration, the path of travel shall be made accessible to the extent that it can be made accessible without incurring disproportionate costs.
- In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access, in the following order—
- An accessible entrance.
- An accessible route to the altered area.
- At least one accessible restroom for each sex or a single unisex restroom.
- Accessible telephones.
- Accessible drinking fountain
- When possible, additional accessible elements such as parking, storage, and alarms.

#### **(8) Series of smaller alterations.**

- The obligation to provide an accessible path of travel may not be evaded by performing a series of small alterations to the area served by a single path of travel if those alterations could have been performed as a single undertaking.
- If an area containing a primary function has been altered without providing an accessible path of travel to that area, and subsequent alterations of that area, or a different area on the same path of travel, are undertaken within three years of the original alteration, the total cost of alterations to the primary function areas on that path of travel during the preceding three-year period shall be considered in determining whether the cost of making that path of travel accessible is disproportionate.
- Only alterations undertaken on or after March 15, 2011, shall be considered in determining if the cost of providing an accessible path of travel is disproportionate to the overall cost of the alterations.

#### **(9) Accessibility standards and compliance date.**

- If physical construction or alterations commence after July 26, 1992, but prior to the September 15, 2010, then new construction and alterations subject to this section must comply with either the UFAS or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided.
- If physical construction or alterations commence on or after September 15, 2010, and before March 15, 2012, then new construction and alterations subject to this section may comply with one of the following: the 2010 Standards, UFAS, or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided.
- If physical construction or alterations commence on or after March 15, 2012, then new construction and alterations subject to this section shall comply with the 2010 Standards.
- For the purposes of this section, ceremonial groundbreaking or razing of structures prior to site preparation do not commence physical construction or alterations.

#### **(10) Noncomplying new construction and alterations.**

- Newly constructed or altered facilities or elements covered by §§ 35.151(a) or (b) that were constructed or altered before March 15, 2012, and that do not comply with the 1991 Standards or with UFAS shall before March 15, 2012, be made

accessible in accordance with either the 1991 Standards, UFAS, or the 2010 Standards.

- Newly constructed or altered facilities or elements covered by §§ 35.151(a) or (b) that were constructed or altered before March 15, 2012 and that do not comply with the 1991 Standards or with UFAS shall, on or after March 15, 2012, be made accessible in accordance with the 2010 Standards.

## **Findings & Recommendations:**

**Parking Lots:** 208.2 Parking Minimum ADA Standards. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility. Virginia schools must follow Virginia Constructino Code (VCC) for accessible parking. A minimum of one accessible space per 25 total spaces, up to 100 spaces. For larger lots, roughly 2% must be accessible. One of every six accessible spaces must be van accessible.

- Floyd Co. High School-99 total/3accessible  
Recommendation: 1 additional accessible space; ensure min. 1 van accessible
- Floyd Co. Elementary School-79 total/1 accessible/1 pull up  
Recommendation: 1 additional accessible space; ensure min. 1 van accessible
- Indian Valley-26 total/2 accessible  
Compliant
- Willis-20 total/0 accessible, teachers 65 total/2 accessible  
Recommendation: 1 additional accessible
- Check-82 total/2 accessible, no van  
Recommendation: 1 additional accessible space; ensure min. 1 van accessible

Overall Recommendation: Ensure that all schools are in compliance with 2010 ADA standards (1 accessible per 25, 1 van per six accessible spaces), (1 van accessible space recommended if possible at each school)

## **Bathrooms (All Schools Overall Recommendations) :**

- Ensure all doors to accessible stall are able to be closed with a closed fist
- Replace paper turn style paper towel holders with push down or automatic
- Recommend slide style closures on doors, not turn style (inaccessible)
- Ensure accessible height for all paper towel holders and soap dispensers (no higher than 48 inches above finished floor, min. height of 15 inches)
- Ensure hangers in girls restrooms on back of doors are accessible height (no higher than 48 inches above finished floor, min. height of 15 inches)
- Ensure no sharp or abrasive edges or surfaces under lavatories or sinks
- Ensure all accessible stalls are in working order
- Ensure all wheelchair accessible stalls are at least 60 inches wide with min. depth of 56 inches for wall mounted toilets or 59 inches for floor mounted toilets. Also provide 32 inch clear opening and outward swing
- Ensure lights have accessible height between 15 and 48 inches above finished floor. Recommended height for all student accessibility would be 40-44 inches.
- Ensure grab bars in all accessible stalls

Overall Recommendations: All bathrooms need grab bars in every accessible stall, working order accessible stalls, non-turn style paper towel holders (recommend push or automatic), slide style closures on doors, and appropriate height paper towel and soap dispensers (15in.-48in. height)

**Doors & Doorways:** ADA compliance for door widths in schools requires that doors are along an accessible route and provide a minimum clear opening width of 32 inches. Minimum door width is 32 inches, while 36 inch doors are used in newer construction and ensure compliance. Clear height of door opening must be 80 inches. Thresholds should not exceed  $\frac{1}{2}$  inch of height and those higher than  $\frac{1}{4}$  inch must be beveled. Ensure no more than 5 lbs. of force to open doorways.

- Floyd Co. High School-All doorways between 34-39 in. width  
Recommendation: compliant
- Floyd Co. Elementary School-All doorways between 32-39in. wide (note: kindergarten 32 in. width)  
Recommendation: Ensure enough clearance for child's wheelchair accessibility in Kindergarten section
- Indian Valley-All doorways approximately 35 in. wide  
Recommendation: compliant
- Willis-All doorways 35-39 in. wide  
Recommendation: compliant

- Check-All doorways 34-39 in. wide  
Recommendation: compliant

Overall Recommendations: Ensure enough clearance for child's wheelchair in kindergarten section of building, all other doorways were within compliance (Note: kindergarten door width smaller, ensure wheelchair accessibility)

### **Corridors, Pathways, and Accessible Routes:**

- Floyd Co. High School- ample spacing between corridors and pathways, ample spacing between cafeteria tables, pathways clear of obstructions  
Recommendation: compliant
- Floyd Co. Elementary School- ample spacing between corridors and pathways, ample spacing between cafeteria tables, pathways clear of obstructions, playground unlevel and mulched  
Recommendation: compliant (recommend alternate material such as rubber or alternative to mulch, playground unlevel)
- Indian Valley- ample spacing between corridors and pathways, ample spacing between cafeteria tables, pathways clear of obstructions  
Recommendation: compliant
- Check- ample spacing between corridors and pathways, ample spacing between cafeteria tables, pathways clear of obstructions  
Recommendation: compliant
- Willis- ample spacing between corridors and pathways, ample spacing between cafeteria tables, pathways clear of obstructions  
Recommendation: compliant

Overall Recommendations: Ensure all pathways are free and clear of obstructions, recommended to look into alternative options for playground materials such as rubber, rubber tiles, or engineered wood fiber. PIP (poured in place) rubber is considered best for accessibility and extremely durable for high traffic area such as playgrounds and parks. Synthetic turf is option, however, does require maintenance. Engineered wood fiber is ADA compliant but does require consistent maintenance to ensure it remains accessible. Mulch can be difficult to maintain in order to ensure safety and accessibility. Also, ensure that all pathways on outside of the building are maintained regularly to avoid hazards. It is strongly recommended to try as often as possible to create a level pathway for safety

and accessibility. Regardless of material used, ensure that all pathways are as level as possible and well maintained to avoid fall risks.

### **Entrances and Exits (All schools recommendations):**

- Ensure accessibility of at least 60% of entrances
- Ensure all doors are easy to open with one hand without tight grasp
- Ensure level landings at top and bottom of all ramps.
- Ensure all entrances and exits are clearly marked
  
- Floyd Co. High School-High thresholds (Entrance 3, G4), entrance to Alternative Education building inaccessible, multiple thresholds over height requirements, all exits/entrances clearly marked
  
- Floyd Co. Elementary School-maintenance/employee badge non-working at all doorways (non-working at playground entrance), all exits/entrances clearly marked
  
- Indian Valley-2 inch rise at entrance (trip hazard), rarely used entrances no steps or ramps, all exits/entrances clearly marked
  
- Check-Front entrance inaccessible (doorbell for side door accessible use), door #3 signage “handicap entrance”, all entrances/exits clearly
  
- Willis-6 inch drop at entrance door (hazard), all entrances/exits clearly marked

Overall Recommendations: Ensure ADA compliance for thresholds. In VA compliant thresholds must not exceed maximum height of  $\frac{1}{2}$  inch. Any threshold higher than  $\frac{1}{4}$  inch needs to be beveled with a slope no steeper than 1:2. In older or existing school facilities, maximum height of  $\frac{3}{4}$  inches is acceptable if beveled on both sides. For all exterior doors, ensure the transition is smooth to allow access for students, teachers, and parents using wheelchairs or mobility devices. Ensure a threshold ramp at any threshold exceeding these limits. There were pretty significant drops at some of the entrances which create fall risks, as well as inaccessibility. Alterations to these entrances are recommended. Also, ensure all doors are able to be opened without a tight grip. Make sure any landing that has a drop off is clearly marked as a safety hazard until alterations have been made. It is highly recommended for any school in the district that does not have an accessible front entrance looks into alternative options for a front entrance. Ideally, front entrances to public buildings such as a school would be accessible for all. ADA compliant entrances in Virginia need to ensure safety and independence for all individuals throughout the Commonwealth. This would include individuals with impairments such as mobility and vision. (Refer to ADA standards for Accessible Design and VA Uniform Building Code-VCC). Also ensure proper hardware on all doors.

### **Ramps: (Any Schools with ramps Recommendations)**

- Ensure all ramps have a slope no steeper than 1:12
- Per ADA and Virginia building code, minimum clear width of 36 inches recommended for wheelchair ramps (31 inch too narrow for accessibility)
- Ensure landings 5x5 at top and bottom of ramp
- Ensure handrails provided on both sides of any ramp with rise greater than 6 inches or horizontal run greater than 72 inches
- Ensure all handrails are positioned 34 to 38 inches high, and include 12 inch horizontal extensions at top and bottom
- Ensure adequate landings at top and bottom of all ramps
- For any ramp 6 ft. or longer, handrails are required on both sides
- In elementary schools (primarily for use by children), a lower second handrail is recommended with maximum height of 28 inches

Overall Recommendations: \*\*\*Note: Highly recommended to also check with local municipality, as they may have specific local codes or exceptions\*\*\*

- Extremely steep slope at **Floyd Co. High school** between Entrance #3 and “new gym”; recommend adapting to ensure compliance
- Extremely steep slope at **Floyd Co. Elementary school B2**; recommend adapting to ensure compliance
- Hallway ramps at **Indian Valley** (88.5x31/20ft.7x88.5); recommend evaluation to ensure compliance

### **Elevators: (Any Schools with elevators Recommendations)**

- Ensure all elevators have accessible call buttons and controls at accessible height (15-48 inches from floor)
- Ensure auditory and visual indication of floor levels

Overall Recommendations: Ensure braille on all elevator signage

### **Signage: (All Schools Recommendations)**

- Ensure signage is placed at all accessible entrances and key locations
- Ensure signs have high contrast, no glare, and large text for visually impaired accessibility
- Ensure braille and tactile signs are at all restrooms and elevators

Overall Recommendations: There was signage at some locations, but not all. It is recommended to ensure that braille/tactile signs are at all accessible entrances, restrooms, and elevators throughout the school system. ADA signs should use the term “accessible” and not “handicapped”. Handicapped is considered outdated and

focuses on limitations of individuals with disabilities. On all signage for restrooms, parking, classrooms, etc. use the terminology accessible. Using the term accessible helps to promote an inclusive and respectful environment in the schools for students, teachers, and parents.

### **Additional Elements : (All Schools Recommendations)**

#### Drinking Elements:

- Water fountains compliant throughout

#### Telephones:

- All schools had new phone systems with newer features (asked about hearing impaired technology and staff was unsure)-ensure staff is aware of accessible features such as hearing impaired features on phones, also features such as screen readers, tactile pads, or high contrast display settings for visual impairment
- Ensure all phones have controls no higher than 48 inches and are operable with one hand

#### Emergency Alarms:

- Maintenance stated that fire and emergency alarm testing is done within standards; compliant

#### Defibrillator (AEDs):

- Should be mounted with operating controls no higher than 4 ft (48 inches above finished floor (54 inches acceptable for side-reach access, 48in. standard)
- Ensure highly visible, accessible, and unlocked
- VA SB1453 requires AEDs in all public schools with determining placement and maintenance plans
- Place in high traffic or high risk areas (gyms or athletic fields)

#### Seating and Tables:

- Ensure all tables have sufficient knee clearance (at least 27 inches high, 30 inches wide, and 19 inches deep)
- Ensure enough clearance for wheelchair users in any common area tables (ex: conference rooms, teachers' lounge, offices, etc.)
- All schools cafeterias were compliant and allowed appropriate spacing between tables for wheelchair users and had ample room at the ends of tables for wheelchair users

Overall Recommendations: Obtain manual for newly installed phone systems and train on capabilities for any staff who may need to use them with vision or hearing impairment. Make sure that countertops and surfaces in common spaces such as office, teachers' lounge, libraries, etc. are a height that is accessible. For student areas, surfaces are recommended at 26-30 inches. ADA compliant accessible countertops are recommended at a maximum of 34 inches from floor and have knee space below for wheelchair access. In areas with longer countertops (60+ inches), recommended at least a section should be 34 inch ADA compliant height. Also note that the "visitors" station where you obtain name badges needs to be compliant

height or an adjustable station for greater accessibility. The station was not accessible to individual with disabilities or adult shorter in stature. Defibrillator noted at an extreme height. Ensure this emergency item is accessible in case of cardiac emergencies.

### **Maintenance and Ongoing Compliance: (All Schools Recommendations)**

#### Regular Maintenance:

- Ensure all safety features are regularly inspected and maintained
- Ensure any obstructions are promptly removed from accessible routes and areas

#### Staff Training:

- Ensure all staff members are trained on ADA requirements on assisting individuals with disabilities
- Ensure there is a procedure in place for addressing and resolving any accessibility issues for students, teachers, and visitors

#### Feedback and Continuous Improvement:

- Ensure process in place for obtaining feedback from any facility users regarding accessibility
- Ensure accessibility improvements and updates are made regularly based on standards that change and feedback

#### **\*\*\*Note\*\*\***

**Recommended checking in with local municipality with any additional questions, as they may have specific local codes or exceptions**