

# Sustainable and Accessible School Services

**VSPMA 2025**

Precision Infrastructure Management



# AGENDA

## Accessibility Law in Virginia:

- The ADA/VDA
- VDA Updates
- Identifying a Strategy
- Developing a Plan
- Starting with a GAP Analysis
- Greenville County Public Schools Facility Findings

# Americans with Disabilities Act (ADA)

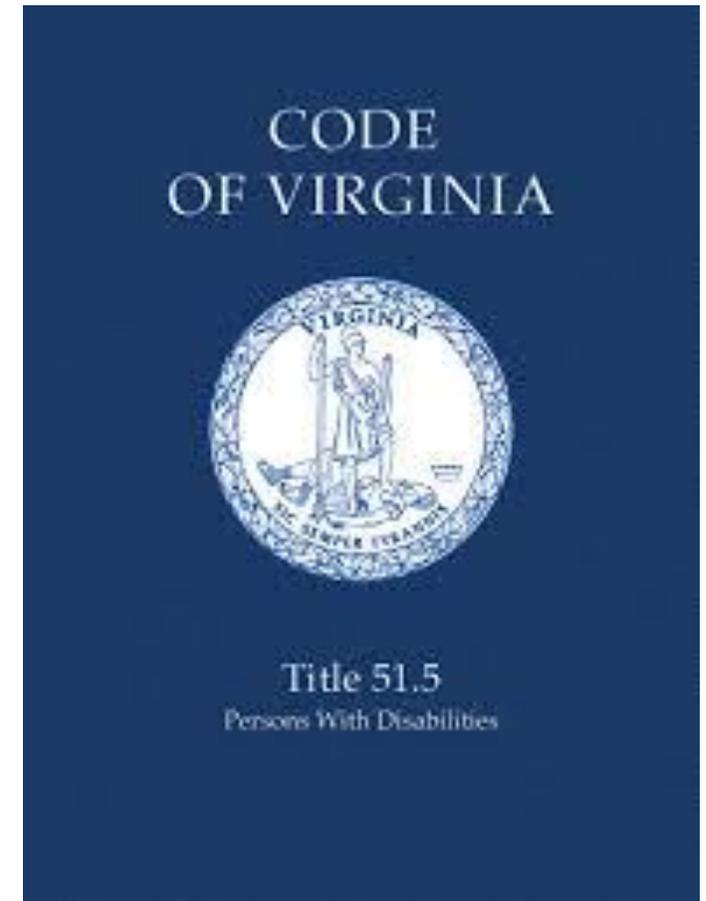
## Administrative Requirements

- Provide public notice re/ADA obligations.
- Identify and designate at least one staff member to serve as ADA Coordinator.
- Develop and implement grievance procedures.
- Develop and implement reasonable modification procedures.
- Ensure Effective Communication.



# Virginians with Disabilities Act (VDA)

The VDA (Va. Code § 51.5-1 et seq.) parallels the ADA, ensuring that Virginians with disabilities have equal access to employment, public services, public accommodations, and education.



# VDA/ADA - Updates

- **VDA:**
  - **Playgrounds:** Chapter 566 requires school districts to report accessibility compliance overview by November 1, 2025.
- **ADA/VDA:**
  - **Facilities:** ADA design standards for building accessibility.
  - **Digital Accessibility:** Expanded coverage includes websites, instructional materials, and online platforms, aligning with Section 508 and WCAG 2.1 AA standards.
  - **PROWAG:** (PROWAG). Promulgated into final rules for adoption by the United States Access Board in 2023.

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# VDA/ADA - Updates: Chapter 566

1. § 1. Each school board or division superintendent, in consultation with such other stakeholders as it deems appropriate, shall review the extent to which (i) public elementary and secondary school buildings and grounds in the local school division present accessibility challenges and barriers for individuals with disabilities, including challenges and barriers that may prevent such individuals from fully participating in school activities; (ii) challenges in access to programming and supports exist for individuals with disabilities at public elementary and secondary schools in the local school division; (iii) such schools have begun or plan to address and eliminate all such challenges and barriers; and (iv) state agencies can assist such schools to address and eliminate all such challenges and barriers and fully comply with all applicable state and federal laws. Each school board or division superintendent shall report the findings of such review and any associated recommendations to the Chairs of the Senate Committee on Education and Health and the House Committee on Education no later than November 1, 2025. [Chapter 566](#)



# VDA/ADA - Updates: Chapter 566

1. § 1. Each school board or division superintendent, in consultation with such other stakeholders as it deems appropriate, shall review the extent to which

- (i) public elementary and secondary school buildings and grounds in the local school division present accessibility challenges and barriers for individuals with disabilities, including challenges and barriers that may prevent such individuals from fully participating in school activities;

-Chapter 566



# VDA/ADA - Updates: Chapter 566

1. § 1. Each school board or division superintendent, in consultation with such other stakeholders as it deems appropriate, shall review the extent to which:

- (ii) challenges in access to programming and supports exist for individuals with disabilities at public elementary and secondary schools in the local school division;

- [Chapter 566](#)

# VDA/ADA - Updates: Chapter 566

1. § 1. Each school board or division superintendent, in consultation with such other stakeholders as it deems appropriate, shall review the extent to which

- (iii) such schools have begun or plan to address and eliminate all such challenges and barriers; and

-Chapter 566

# VDA/ADA - Updates: Chapter 566

1. § 1. Each school board or division superintendent, in consultation with such other stakeholders as it deems appropriate, shall review the extent to which
  - (iv) state agencies can assist such schools to address and eliminate all such challenges and barriers and fully comply with all applicable state and federal laws. Each school board or division superintendent shall report the findings of such review and any associated recommendations to the Chairs of the Senate Committee on Education and Health and the House Committee on Education no later than November 1, 2025.

## -Chapter 566



## VDA/ADA - Updates: Chapter 566

2. That, in conducting the review required pursuant to the first enactment of this act, each school board or division superintendent shall consult and may utilize the methodology of the U.S. Government Accountability Office as set forth in its [June 2020 report GAO20-448](#), K-12 Education: School Districts Need Better Information to Help Improve Access for People with Disabilities.

[-Chapter 566](#)

# VDA/ADA - Updates: § 51.5-44 A

- **Playgrounds:** Chapter 566 requires school districts to report accessibility compliance overview by November 1, 2025.
  - Places of public accommodation expanded to include playgrounds (§ 51.5-44 A)

# VDA/ADA - Updates: § 51.5-44 B

- **Playgrounds:** Chapter 566 requires school districts to report accessibility compliance overview by November 1, 2025.
  - Places of public accommodation expanded to include playgrounds (§ 51.5-44 A)
  - § 51.5-44 B requires that barriers to accessibility be removed “when the removal is readily achievable.”

# Readily Achievable

1. The nature and cost of the action needed to remove the barriers;
2. The overall financial resources of the place of public accommodation involved in the action; the number of persons employed at the place of public accommodation; the effect on expenses and resources; legitimate safety requirements that are necessary for safe operation, including crime prevention measures; or the impact otherwise of the action upon the operation of the place of public accommodation;
3. The geographic separateness and the administrative or fiscal relationship of the place of public accommodation in question to any parent corporation or entity;
4. If applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees or the number, type, and location of its facilities; and
5. If applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity.



# Readily Achievable

1. The nature and cost of the action needed to remove the barriers;

Nexus + Outcome + Cost

## Readily Achievable

2. The overall financial resources of the place of public accommodation involved in the action; the number of persons employed at the place of public accommodation; the effect on expenses and resources; legitimate safety requirements that are necessary for safe operation, including crime prevention measures; or the impact otherwise of the action upon the operation of the place of public accommodation;

Capacity + Disruption + Cost/Benefit

## Readily Achievable

3. The geographic separateness and the administrative or fiscal relationship of the place of public accommodation in question to any parent corporation or entity;

Availability + Relationship

## Readily Achievable

4. If applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees or the number, type, and location of its facilities; and

Capacity + Purpose

## Readily Achievable

5. If applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity.

Capacity + Purpose

# VDA/ADA - Updates: § 51.5-44 D

- **Playgrounds:** Chapter 566 requires school districts to report accessibility compliance overview by November 1, 2025.
  - Places of public accommodation expanded to include playgrounds (§ 51.5-44 A)
  - § 51.5-44 B requires that barriers to accessibility be removed “when the removal is readily achievable.”
  - § 51.5-44 D provides additional framework for undue burden:
    - *Nothing in this title shall be construed to require retrofitting of any public transit equipment or to require the retrofitting, renovation, or alteration of buildings or places to a degree more stringent than that required by the applicable building code in effect at the time the building permit for such building or place is issued.*

# Best Use of Resources

“undue burden”



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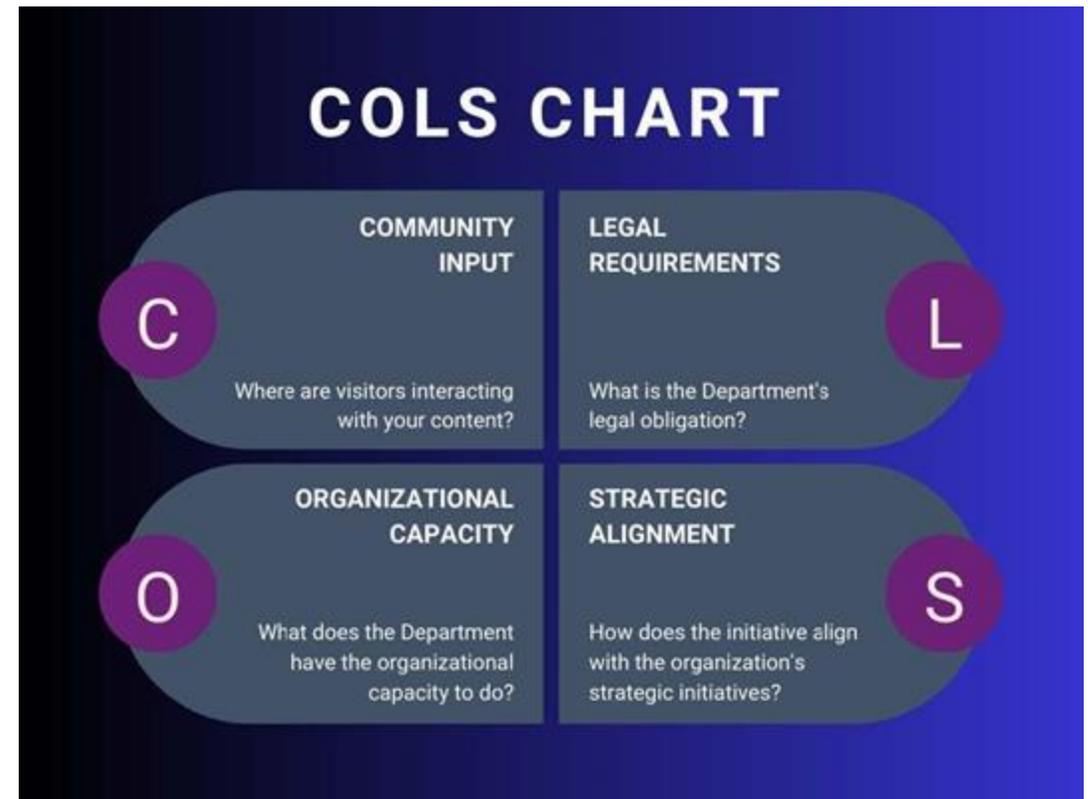
**PRECISION  
INFRASTRUCTURE  
MANAGEMENT**

# Undue Burden

- **Factor 1:** Is it necessary and effective?
- **Factor 2:** Can YOU pay for it?
- **Factor 3:** Can the AGENCY pay for it without breaking laws?
- **Factor 4:** Is the service essential and is the nexus clear (is it needed)?

# Undue Burden

- **Community Input:** Where are visitors interacting with your content? Who does your community tell you they need?
- **Legal Requirements:** What takes precedent? What must be done to ensure first safety and then compliance?
- **Organizational Capacity:** What does the organization have the capacity to do?
- **Strategic Alignment:** How does the initiative align with the administration's objectives and goals?



# Undue Burden

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- **Factor 4:** Is the service essential and is the nexus clear (is it needed)?

**Community Input/Legal Requirement**

**Organizational Capacity**

**Strategic Alignment**

**Community Input/Legal Requirement**



# Best Use of Resources

“best use of  
available  
resources”



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# Best Use of Resources

“maximum  
extent feasible”



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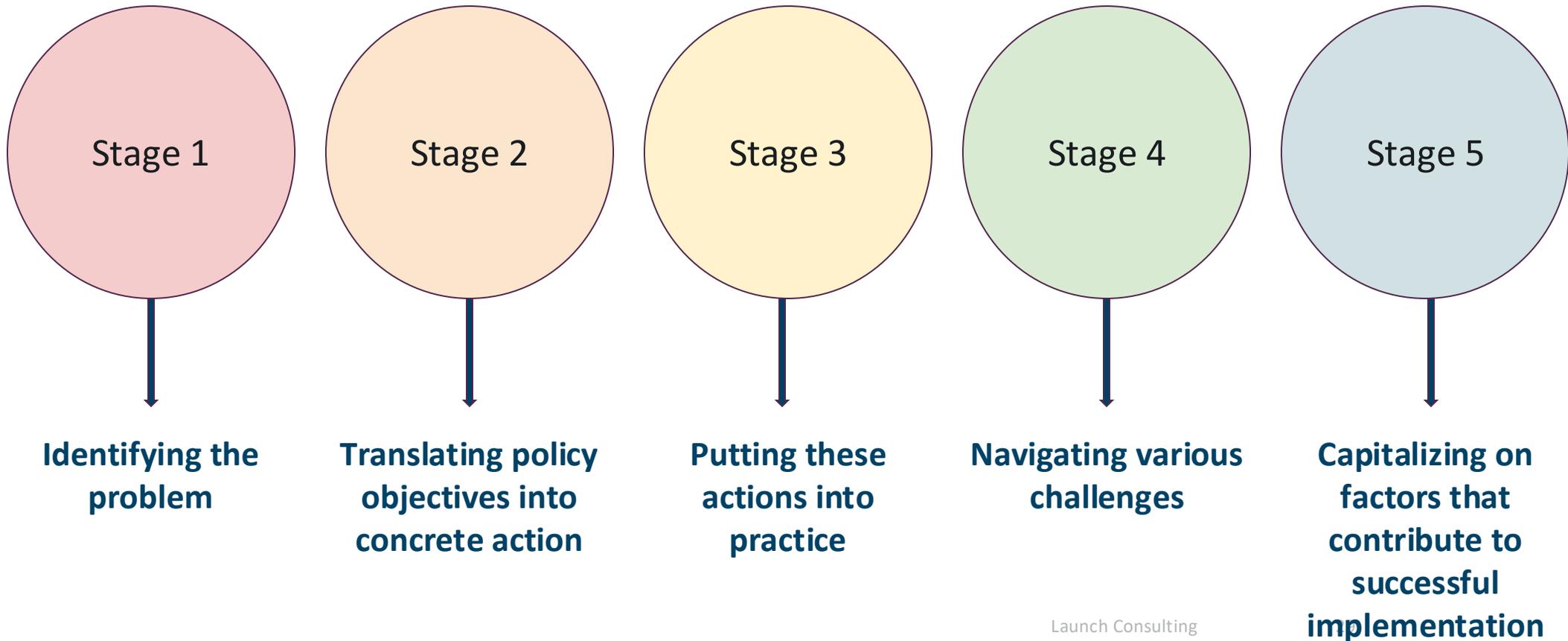
Whew!

So, how do we  
navigate this  
space?



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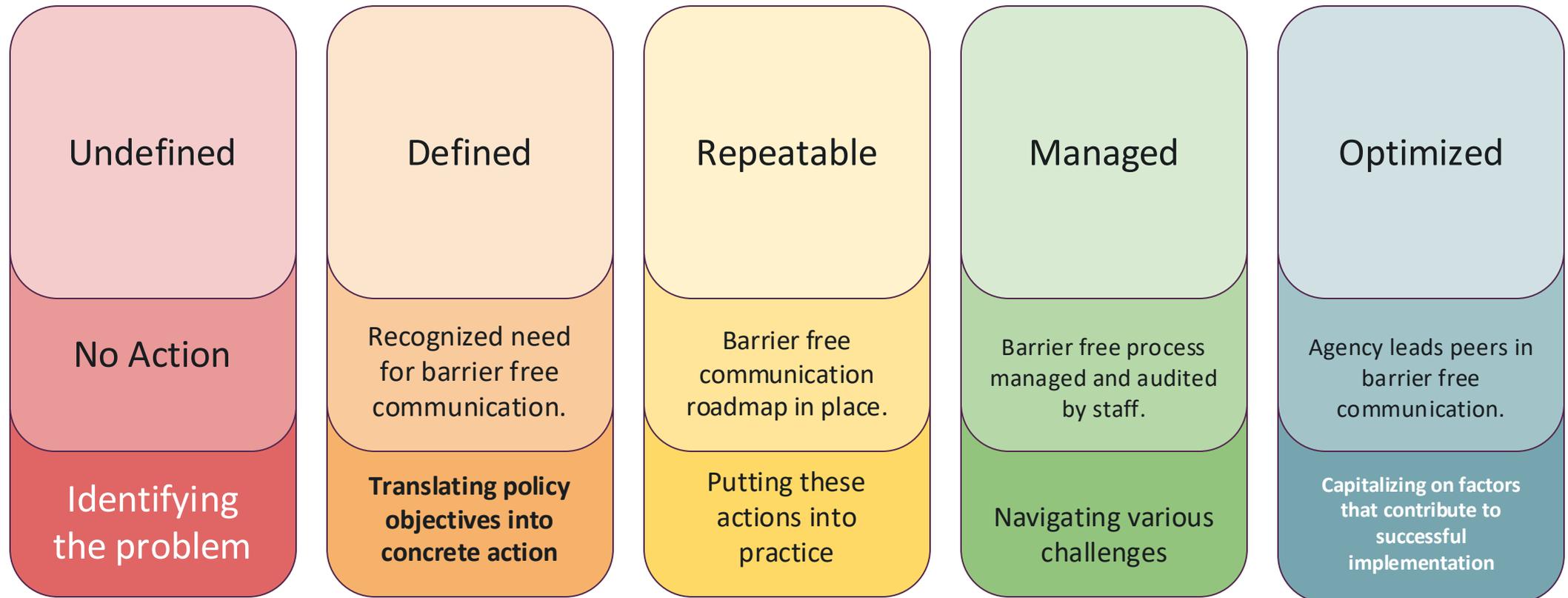
# How Are Policies Developed?



Launch Consulting

# How Are Policies Developed?

## Communications



# Capturing Metrics

		Undefined	Defined	Repeatable	Managed	Optimized
3.1 4	<b>Communications</b>	No Action.	Recognized need for barrier free communication.	Barrier free communication roadmap in place.	Barrier free process managed and audited by staff.	Agency leads peers in barrier free communication.
3	<b>Knowledge and Skills</b>	No Action.	Recognized need for accessibility expertise.	Training roadmap in place.	Adherence to training is monitored.	Agency is seen as a knowledge source among peers.
2.7 1	<b>Support</b>	No Action.	Basic support is available.	Dedicated support is available (FAQs, chat, etc.)	Community input is used to improve support services.	All service gaps have been filled.
2.5 7	<b>Life Cycle</b>	No Action.	Some awareness of access needs in development process.	Processes implemented to ensure compliance throughout life cycle.	Regular audits are conducted to ensure effectiveness.	Agency is a thought leader in development.
3	<b>Procurement</b>	No Action.	Recognized need for access in procurement.	Relevant language included in most contracts.	Review and enforcement mechanisms in place.	Consistent use and application of access provisions.
2.4 2	<b>Governance</b>	No Action.	Need for governance is recognized.	End-to-end processes are implemented.	Performance is monitored with established KPIs..	Community input is critical to policy refreshes.
2.8 5	<b>Culture</b>	No Action.	Recognized need for organization-wide cultural programs.	Cultural programs created and deployed.	Staff are surveyed to identify opportunities to foster culture.	Strong cultural awareness, appreciation, sensitivity, and support available.

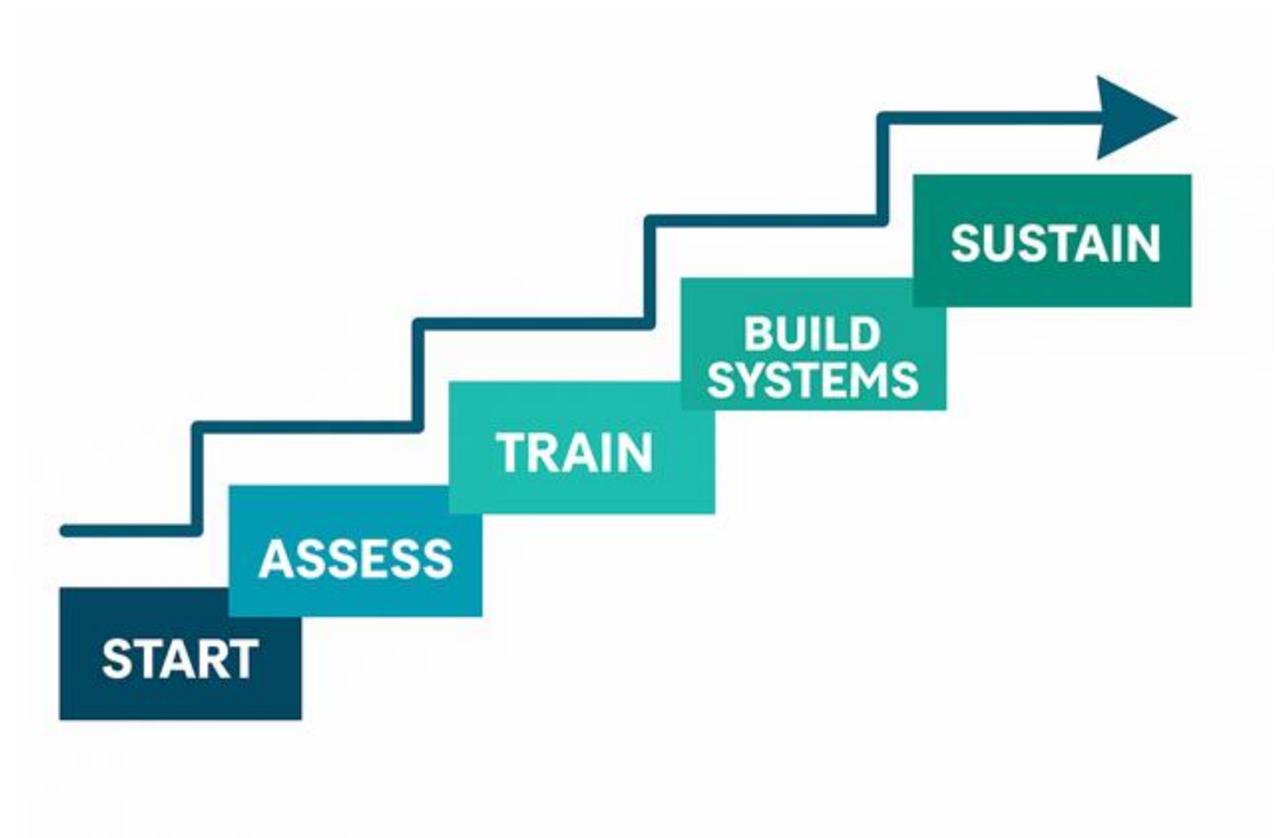
# Year-Over-Year Improvement

		Undefined	Defined	Repeatable	Managed	Optimized
4	<b>Communications</b>	No Action.	Recognized need for barrier free communication.	Barrier free communication roadmap in place.	Barrier free process managed and audited by staff.	Agency leads peers in barrier free communication.
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3.5	<b>Procurement</b>	No Action.	Recognized need for access in procurement.	Relevant language included in most contracts.	Review and enforcement mechanisms in place.	Consistent use and application of access provisions.
4.1	<b>Governance</b>	No Action.	Need for governance is recognized.	End-to-end processes are implemented.	Performance is monitored with established KPIs..	Community input is critical to policy refreshes.
3.2	<b>Culture</b>	No Action.	Recognized need for organization-wide cultural programs.	Cultural programs created and deployed.	Staff are surveyed to identify opportunities to foster culture.	St ap su

+5%

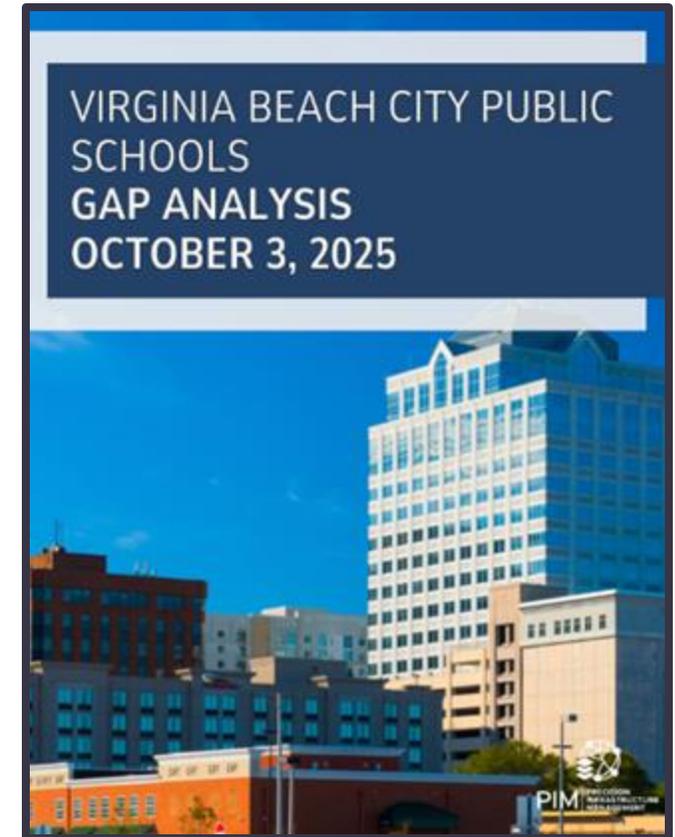
# What a Plan Looks Like

From Firefighting to Framework



# Start: GAP Analysis

- **Administrative Compliance:** ADA Coordinator, grievance & modification procedures, and public notices.
- **Digital Accessibility:** Websites, documents, and tools tested against WCAG 2.1 AA / Section 508 standards.
- **Facilities & Transition Planning:** Barrier inventories, phasing, and capital project integration.
- **Program & Communication Access:** Effective communication, accommodations, and accessible events.
- **Governance & Continuous Improvement:** Policies, training, monitoring, and accountability culture.

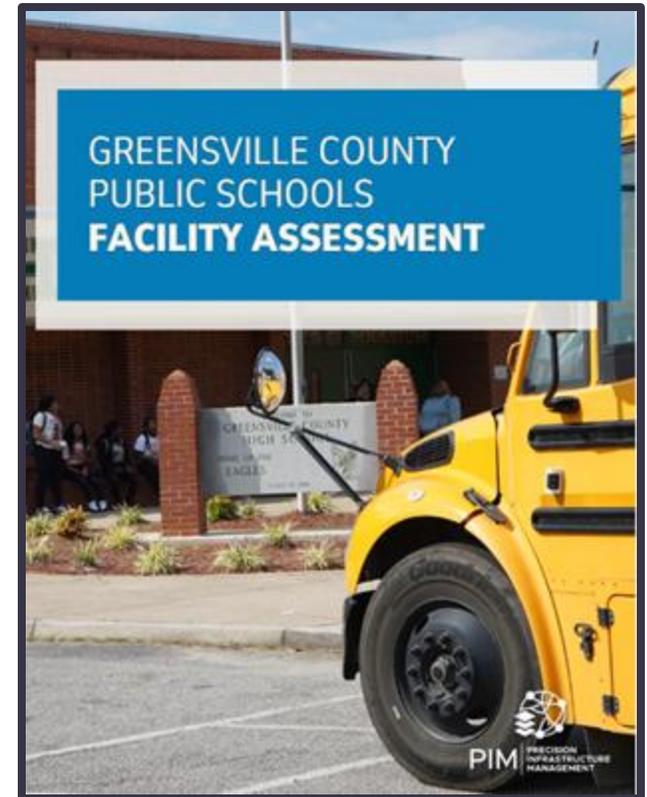


# Greenville County Public Schools Findings

**Scope: 7 facilities, 895 total ADA barriers identified**

## **Top Barrier Categories:**

- Accessible Routes (36%)
- Toilet and Bathing Rooms (25%)
- Doors and Gates (19%)
- Signs and Alarms (7%)
- Counters, Surfaces, and Fountains (5%)
- Remaining Barriers (8%)



# Accessible Routes

## Accessibility Impact

- Prevents students, staff, and visitors with mobility impairments from safely navigating between school buildings, parking, and play areas.
- Creates safety risks, such as tipping or slipping, for wheelchair and walker users.
- Can force students to take longer or unsafe routes, reducing inclusion and independence.

*Greenville County High School - 403 Harding St Emporia, VA 23847*

Accessible Routes: South Entrance (Accessible)

**Finding: 17**

The perpendicular curb ramp is not nearly compliant.

The curb ramp has running and cross slopes that exceed the maximum allowable requirements. The flared sides have excessive slope. The floor or ground surface contains changes in level or gaps that exceed the allowable maximum requirements.

2010 ADAS Section 406.1  
Curb ramps on accessible routes shall comply with 406.405.2 through 405.5, and 405.10.

Citation:	As Built:	Budgeting Range:
2010 ADAS Section: 406.1	11% slope; 2.5% cross slope; 12% flare slope; VHDs and signs of ponding	\$1,000 - \$3,600.00

**Recommendation:**  
Rebuild curb ramp to compliant accessible standards.

**Barrier Priority:**  
Important (2): Should be completed as soon as possible. (Includes Findings that would remove barriers to the greatest number of people to your goods and services)



36%

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# Toilets and Bathing Rooms

## Accessibility Impact:

- Compromises privacy for people with disabilities.
- Can block maneuvering space if left open, restricting wheelchair access.
- Makes it harder for users with limited mobility or dexterity to manage the door independently.

**E.W. Wyatt Middle School - 206 Stagles Lake Rd Emporia, VA 23847**

Entry level: Men's restroom (C Wing)

**Finding: 65**

The compartment door is not self closing.

The water closet compartment shall be equipped with a door that has an automatic-closing device.

2010 ADAS Section 604.8.1.2  
Toilet compartment doors, including door hardware, shall comply with 404 except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. Doors shall be located in the front partition or in the side wall or partition farthest from the water closet. Where located in the front partition, the door opening shall be 4 inches (100 mm) maximum from the side wall or partition farthest from the water closet. Where located in the side wall or partition, the door opening shall be 4 inches (100 mm) maximum from the front partition. The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the minimum required compartment area.

Citation:	As Built:	Budgeting Range:
2010 ADAS Section: 604.8.1.2	Not self closing; missing inside handle	\$25 - \$250.00

**Recommendation:**  
Repair or replace self-closing hardware; install handle.

**Barrier Priority:**  
Moderate (3): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes: Findings that have a high financial impact on the entry in relationship to the degree of access provided)

The image shows a photograph of a toilet compartment door on the left and a technical diagram of a door on the right. The diagram includes labels for 'Door Opening at Point of Exit', 'Clearance', 'Door Hardware', and 'Door Swing'. A green callout box with a black border is overlaid on the diagram, containing the text '25%'.

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# Doors and Gates

## Accessibility Impact:

- Prevents independent entry for people with mobility or strength limitations.
- Limits access to programs and services inside.
- Can create safety risks if the door closes too fast or hits users.

Accessible route: Main entrance

**Finding: 4**

The door is equipped with a door closer and returns to a closed position too quickly.

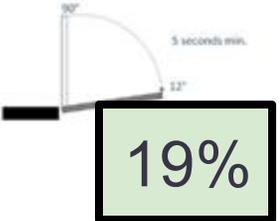
Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum.

2010 ADAS Section 404.2.8.1  
Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum.

Citation:	As Built:	Budgeting Range:
2010 ADAS Section: 404.2.8.1	2 doors: 1-2 seconds	\$0 - \$1,000.00

**Recommendation:**  
Adjust or replace door closer.

**Barrier Priority:**  
High (1): Should be completed immediately. (Includes: Findings that have little or no cost, were in violation of the codes at the time of construction, or pose an imminent safety threat)



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# Signs and Alarms

## Accessibility Impact:

- Becomes unreadable when the door is open, preventing independent identification by people who are blind or have low vision.
- Creates safety risks if users must stand in the swing path of the door to read the sign.

Greenville County Elementary School - 1101 Sussex Dr Emporia, VA 23847

Ground level: Gymnasium

**Finding: 23**

The room identification sign is noncompliant.

Wall signs identifying permanent rooms and spaces of a building shall be in a horizontal format, characters raised 1/32 inch minimum and shall be sans serif uppercase characters a minimum of 1/8 inch and a maximum of 2 inches high.

Characters and their background shall have a non-glare finish. Characters shall contrast with background with either light characters on a dark background or dark characters on a light background.

Signs with raised characters or Braille shall be located 48 inches minimum above the finish ground surface, measured from the baseline of the lowest tactile character and 60 inches maximum above the finish floor or ground surface, measured from the baseline of the highest tactile character.

2010 ADAS Section 216.2  
Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.

2010 ADAS Section 703.1  
Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided.

Citation:	As Built:	Budgeting Range:
2010 ADAS Section: 216.2, 703.1	Reflective finish; missing raised characters and braille; within door swing	\$25 - \$60.00

**Recommendation:**  
Install compliant signage.

**Barrier Priority:**  
Important (2): Should be completed as soon as possible. (Includes: Findings that would remove the greatest number of people to your goods and services)



7%



# Counters, Surfaces, and Fountains

## Accessibility Impact:

- Creates a tripping or collision hazard for people who are blind or have low vision.
- Can cause injuries or restrict safe passage in hallways and common areas.
- May require relocation, recessing, or cane-detectable barriers to achieve compliance.

*E.W. Wyatt Middle School - 206 Stagles Lake Rd Emporia, VA 23847*

Entry level: Circulating route

**Finding: 17**

The drinking fountain projects from the wall into the pedestrian way with its leading edge above 27 inches from the floor.

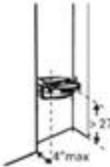
Objects may protrude no more than 4 inches into circulation route when located between 27 and 80 inches above the floor. All drinking fountains shall be positioned so as not to encroach into pedestrian ways.

2010 ADAS Section 307.2  
Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

Citation:	As Built:	Budgeting Range:
2010 ADAS Section: 307.2	19" projection at 28"	\$0 - \$500.00

**Recommendation:**  
Relocate to detectable height or provide cane detection.

**Barrier Priority:**  
Important (2): Should be completed as soon as possible. (Includes: Findings that would remove barriers to the greatest number of people to your goods and services)



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Q&A

Questions?



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