

6 distinct commenters provided a total of 11 comments.

- Other: 10
- Professional Support: 1

Action	
A/S	Comment was accepted and supports the proposed policy
A/C	Comment was accepted and resulted in changes to the proposed policy
N	Comment was not accepted

DATE	COMMENTER	COMMENTS	ACTION	RATIONALE
§126-172-1 General				
2019-01-23 11:28:57	Jim Nelson CEO Monroe Health Center Union WV	One thing that needs better planning when building new schools is the space for medical and mental health facilities. It is almost shameful to have the issues going on within our state, and these types of resources are becoming an integral need for our children.		
2019-02-11 14:56:21	Ben Ashley Director of Architectural Services School Building Authority Charleston WV	None		
§126-172-2 Incorporation By Reference				
2019-01-28 11:51:00	Jerry Milliken Coordinator WVDE Office of School Facilities Charleston WV	100.015 The county shall include a CORRECTIVE AND PREVENTIVE maintenance and capital improvement plan for existing facilities in accordance with the current SBA Guidelines and Procedures Handbook and WV Code 18-9D-15-(d) and 18-9D-16-(b)		
2019-02-11 14:56:21	Ben Ashley Director of Architectural Services School Building Authority Charleston WV	None		
2019-02-11 15:58:15	Greg Martin Architect Williamson Shriver Architects Charleston Wv	Section 404 - General Instruction Areas - Classification should be adjusted to read up to grade 5 since middle school is classified from grades 6-8. Section 403 - Pre Kindergarten / Kindergarten - Does the total design area designated contain the toilets and storage within the space or are those spaces considered outside of the designated square footage space for those rooms?		
§126-172-3 Severability				

2019-02-10 19:08:15	Ted A. Shriver, AIA, REFP President Williamson Shriver Architects, Inc. Charleston WV	In the last paragraph, reference is made to a "certified facility planner". Now that REFP have been removed some new definition should be provided to ensure proper experience for a planner.		
2019-02-10 19:52:21	Ted Shriver President Williamson Shriver Architects, Inc. Charleston WV	In the last paragraph, reference is made to a "certified facility planner". Now that REFP have been removed some new definition should be provided to ensure proper experience for a planner.		
2019-02-11 14:56:21	Ben Ashley Director of Architectural Services School Building Authority Charleston WV	None		

§Handbook on Planning School Facilities Comment

2019-02-10 19:08:15	Ted A. Shriver, AIA, REFP President Williamson Shriver Architects, Inc. Charleston WV	<p>100.0141 as noted above, "certified facility planner" needs defined.</p> <p>100.0142 Crime Prevention Through Environmental Design (CPTED) is a inexpensive way to design safe school facilities and should remain the Policy as an option to safe schools. This not to be confused with the old CEFFI organization.</p> <p>100.0142 F. needs indented.</p> <p>100.0142 F.2 Delete Junior High Schools and edit the grade configurations per the edit in 100.0131 A.2</p> <p>100.016 B. & C. The data for the feeder summary is in both text and in graph form. Having performed these in the last 2 cycles of CEFP planning are both formats necessary or used in different ways?</p> <p>100.016 E. Th data in this form is the same data on Form 132 except for the continued use. I would suggest it be combined in some fashion so the same data is not entered three (3) times.</p> <p>100.016</p>		
2019-02-10 19:52:21	Ted Shriver President Williamson Shriver Architects, Inc. Charleston WV	<p>100.0141 as noted above, "certified facility planner" needs defined.</p> <p>100.0142 Crime Prevention Through Environmental Design (CPTED) is a inexpensive way to design safe school facilities and should remain the Policy as an option to safe schools. This not to be confused with the old CEFFI organization.</p> <p>100.0142 F. needs indented.</p> <p>100.0142 F.2 Delete Junior High Schools and edit the grade configurations per the edit in 100.0131 A.2</p> <p>100.016 B. & C. The data for the feeder summary is in both text and in graph form. Having performed these in the last 2 cycles of CEFP planning are both formats necessary or used in different ways?</p>		

100.016 E. The data in this form is the same data on Form 132 except for the continued use. I would suggest it be combined in some fashion so the same data is not entered three (3) times.

100.016 last paragraph refers to 85% utilization. This was deleted in 100.0142 F.5.

100.017 B. CEF should be CEFP

100.018 D. refers to WVSBA and other locations its just SBA.

100.01 The existing language uses the term chief school administrator. I guess I have not noticed that before. Is that the superintendent?

202.022 refers to intermediate junior high schools.

205.01 3.C. struck 2005.02 but 4.ii did not.

205.02 I disagree in the striking of this recommendations as the WVSSAC does not publish such data. National Federation of High School Sports is a good resource but it does not make recommendations for elementary and middle schools.

2017.01 WV State Fire Code states which parts of NFPA are adopted in WV. Should this be stated differently as not to imply 101 as written. (See 1003.02)

403.01 Refers to 50 SF per child but Policy 2525 refers to free area.

403.05 D. Is this self contained toilet facility a part of the 50 sf. Other Policies contradict the sf.

500.01 C. refers to 85%

1100 Refers to ASHRAE 90.1-1999. We are at version 2007 now and current legislation may take to to 2010. Should this state per WV State Building Code? If so, delete the 30% statement.

WVDE P-1 From

I suggest the Line Items of construction use the Construction Specifications Institute (CSI) format.

References

13. B.O.C.O is obsolete once ICC was formed.

17. is a part of 16

West Virginia Building Code., Rules and Regulations of the West Virginia Fire Commission should be added.

2019-02-11
14:56:21
Ben Ashley
Director of
Architectural
Services
School Building
Authority
Charleston WV

Chapter 1, Section 100, Second Paragraph – “Ten-Year” Strike

In coordination with the intent and message of the current CEFP planning team, the phrase “and rewritten every ten years thereafter” should be struck. Each plan is a living, continually updating database of the current situation in each school system, and based on what we know now, rewriting every ten years would be unnecessary. We suggest changing the second sentence to say, “This plan is to be updated continually in coordination with all projects small and large, as well as reactive and preventative maintenance.”

Additionally, we also suggest striking the sentence that says, “Routine maintenance projects are not to be included in the CEFP unless state funding will be requested or utilized to implement them or if such projects are a part of the Major Improvement Plan (MIP).” The Dude Solutions software template houses all maintenance information that is used in the evaluation processes of Capital Forecast Direct, which is the data-driven decision-making assistance module.

The third paragraph also references a ten-year CEFP. We suggest striking "ten-year" from this particular location and all others in Section 100. Specifically, other locations that we suggest striking this language are in item B on page 4, the second paragraph on page 5, and various locations throughout section 100.013.

Chapter 1, Section 100, Sub-Section 100.0142 – F – Economies of Scale

As Item F states that Economies of scale (EOS) are established by the SBA, we recommend striking the listed guidelines in order for the SBA to amend these policies if necessary. We believe the sentence should read "Economies of Scale (EOS) shall be established by the SBA."

Over the next few months, the SBA is forming a policy revisions committee and will be looking at all aspects of our governing documents. The EOS section likely needs to be revisited as more than half of the requests for new elementary schools and just about all the middle and high schools do not meet EOS guidelines. There is a waiver process, but we receive a waiver request on almost all projects. While we wish to achieve economies of scale in our new school projects, we recommend that the SBA Policy Revision Committee (or the WVDE if it so desires) consider amending these guidelines.

NOTE: As the WVDE Policy 6200 appears to be a legislative rule, we believe its governance supersedes the SBA's Policy & Procedures Handbook as it is a procedural rule. We believe the hierarchical relationship between the two documents would "lock in" listed SBA guidelines that are included within Policy 6200 as provisions that would then supersede SBA Policy. In this particular section and in all sections throughout this document, we respectfully recommend striking any and all places where SBA policy is simply listed verbatim. This would bring clarity and allow our agency the flexibility to respond to legislative rules and industry demands.

Chapter 1, Section 100, after Sub-Section 100.020 – CEFP Amendment Process

At the very end of this section (Page 12, after sub-section 100.020), we recommend creating a 100.021 sub-section and moving to this place all language listed in chapter 12, section 1201 including subsection 1201.01 and items A through F. Section 1201 describes the requirements for a CEFP Amendment, including justification and public notification procedures, and moves to the Chapter specifically for planning. Organizationally, we believe this would be a more user-friendly approach as it lists all the CEFP requirements together. Furthermore, we believe section 1201 seems misplaced in its current location.

Chapter 1, Section 101, Sub-Section 101.03 – Ed. Spec. Approval

The second paragraph states that "Copies of educational specifications for any new facility shall be submitted to the WVDE and SBA for review with the Design Development submission." We believe this is far too late in the process as the Design Development phase represents the design firm being half of the way complete with the final construction documents. As stated in section 101.01, "A representative of the SBA will be appointed to the committee if SBA funds are utilized in the project" and the educational specifications are a part of the planning phase review by the SBA.

We would also respectfully ask in the case of a traditional school design that does not require any special approval by the superintendent or board for enhanced curricular offerings and/or additional square footage, does the WVDE need to review and approve Ed. Specs.? If not, we suggest changing this sentence to read "Copies of the educational specifications for any new facility shall be submitted to the SBA for review before the Schematic Design Submission." This is the current process with the SBA.

Chapter 1, Section 102

Similar to a previous comment, we recommend creating a Section 102 titled "Document Submission and Review" and moving to this place all language listed in Sub-Sections 1201.03 through 1201.06. We believe this creates a better flow of information in understanding the process.

Chapter 2, Section 202, Sub-Section 202.06-G – Flood Plain Verification

We recommend adding the statement after the last sentence: "When considering property at or adjacent to a flood plain, the county must obtain a Certificate of Compliance from the County Floodplain Manager be required to verify the Base Floor Elevation is above the 100-year flood plain and safe from potential hazards."

Chapter 2, Section 202, Sub-Section 202.06-H – Utilities Available

We recommend adding in cable/internet after telephone.

Chapter 3, Section 305 – Library / Learning Resource / Media Center

The prototypical chart within this section describes typical spaces built within many recent school construction projects. Some schools have elected to trade this traditional library space to support a STEM / Maker space program in lieu of the requirements of a traditional library. We would suggest giving more flexibility in the overall space square footage requirement and making “optional” areas such as separate Director’s office (305.03), Maintenance, Repair and Distribution Area (305.04), Equipment Storage Area (305.07), Periodical, Book and Newspaper Storage Area (305.08).

Chapter 4, Section 400, Sub-Section 400.01-A – Size of Elementary Schools

The minimum 110 square feet per pupil figure is in conflict with the SBA Form 166 – Maximum Gross Building Square Footage Allowance (<http://sba.wv.gov/resources/Documents/SBA166.pdf>) which sets a sliding scale of allowable square feet proportionate to the number of students the school will serve. Instead of providing a figure here in Policy 6200, we recommend the policy language be rewritten to say “Schools housing grades pre-k-5 shall follow the SBA’s Maximum Gross Building Square Footage Allowance unless factors such as educational planning or architectural design permit otherwise as determined...”

Chapter 5, Section 500, Sub-Section 500.01-A – Size of Middle Schools

Similar to the previous comment, the 120 square feet is in conflict with SBA Form 166. We recommend the policy language be rewritten to say “Middle schools shall follow the SBA’s Maximum Gross Building Square Footage Allowance unless factors such as educational planning or architectural design permit otherwise as determined...”

Chapter 5, Section 509, Sub-Section 509.01 – Middle School Gym & Seating Capacity / Size

We recommend two changes to this section:

1) A 5,400 square feet minimum is established in the size section, yet the design capacity sets a maximum of 5,390 (70 students x 77 square feet). We typically work through this by multiplying the junior high basketball court size with five feet of buffer around the perimeter (60 feet by 94 feet) which sets a 5,640 square feet floor dimension. We recommend setting the court size at 5,700 square feet independent of the spectator seating area calculation.

2) While “some spectator seating” is called for in 509.014, we respectfully ask that this be specifically defined as the relatively small amount of square footage has a huge impact on the project budget due the volume of space. We recommend stating language similar to the High School Auditorium (615.011-012) “Design to accommodate the student enrollment with a minimum seating of 250. Approximately 10 square feet will be needed for each seat provided.”

Chapter 6, Section 600, Sub-Section 600.03 – Size of High Schools

Similar to a previous comment, the 130 square feet is in conflict with SBA Form 166. We recommend the policy language be rewritten to say “High Schools shall follow the SBA’s Maximum Gross Building Square Footage Allowance unless factors such as educational planning or architectural design permit otherwise as determined...”

Chapter 6, Section 610, Sub-Section 610.01 – High School Gym & Seating Capacity / Size

Similar to a previous comment, we recommend two changes to this section:

1) A 7,000 square feet space requirement is established in the size section, yet the design capacity sets a maximum of 5,390 (70 students x 77 square feet). We typically work through this by multiplying the high school basketball court size with five feet of buffer around the perimeter (60 feet by 104 feet) which sets a 6,240 square feet floor dimension. We recommend setting the court size at 6,300 square feet independent of the spectator seating area calculation.

2) We respectfully ask that the “plus spectator seating” requirement (610.014) be defined similar to the comment above.

Chapter 11, Section 1100, Second & Third Paragraphs

In the last sentence of the second paragraph, we suggest striking “energy cost analysis” and changing it to the term “targeted Energy Usage Index (EUI)” which gives a more accurate apples-to-apples benchmark and disconnects variances in utility rates. We also suggest requiring a maximum design target EUI of 45 which is near an “EnergyStar” rating. This should have little to no

impact on the project budgets and will allow a county to responsibly save money on utilities. Given this directive, we believe the third paragraph can be struck in its entirety.

Chapter 11, Section 1100, Fifth & Sixth Paragraphs

In the last sentence of the fifth paragraph, the sentence should be restructured to read, "Schools using WVDE Policy 6200 shall be designed and built in compliance with the applicable West Virginia State Building Code at the time the project was funded either by the SBA or locally."

The sixth paragraph that begins with "Designers shall utilize current ASHRAE standards..." is redundant and unnecessary based on the previous paragraph. We recommend striking this paragraph in its entirety.

Chapter 11, Section 1100, Last Paragraph of this section on page 174

We recommend this paragraph be rewritten in the following manner...

"On all SBA or locally funded construction or renovation projects, designers shall provide an electronic copy of all sets of final architectural drawings and specifications in a non-editable format to the WVDE Office of School Facilities using the SBA's requirements as listed in the construction document submission phase guidelines. Specifications prepared by designers shall require that warranties and brochures be furnished to the county board by the installing contractor on all equipment. Record product data shall be submitted in electronic format.

Designers shall also provide to the WVDE Office of school Facilities, the SBA Staff, and the appropriate county personnel one electronic copy of the basic floor plan of the facility in PDF format that includes information such as room numbers, door location swings and door positions, accurate numbering, utility entrances and shut-off locations. This drawing will be used for HVAC training, fire evacuation plans, school access safety plans and floor plans for students."

Chapter 11, Section 1101, Sub-Section 1101.01, Item E

After consulting engineers of past SBA projects, it is recommended that a set temperature be the design criteria and not a range. This sets a true standard for renovation projects and gives clear direction to ESCO projects. We recommend Item E to say:

"E. Indoor Design Criteria,

1. Winter 70° F
2. Summer 72° F"

Chapter 11, Section 1101, Sub-Section 1101.02

At the end of Sub-Section 1101.02, we suggest adding the following sentences to the end of the paragraph. "HVAC systems shall be designed to be operational year-round. Systems should not be shut down when the building is unoccupied."

Chapter 11, Section 1101, Sub-Section 1101.03

We believe this paragraph should be struck. All schools now require air conditioning.

Chapter 11, Section 1101, Sub-Section 1101.051

No suggested change here, just a comment... this is difficult to enforce. The SBA's grant contracts expire after three years, which is about the time the two-year maintenance contracts begin. Without leverage to get the contractor to come back to the jobsite, the county or SBA may need to make a separate maintenance agreement contract with the county to ensure this is implemented properly.

Chapter 11, Section 1101, Sub-Section 1101.06

A note that says "THIS AREA NEEDS ADDITIONAL DISCUSSION" has been left there from the previous edition. We recommend providing additional direction from the code and clearing this language in question.

In addition to this language, we recommend the following sentence be added at the end of Sub-Section 1101.06. "The SBA may designate the necessity for a commissioning agent on complex renovations or new schools. The standards of services for

commissioning agents are set forth in SBA policy.”

Chapter 11, Section 1102, Sub-Section 1102.031, Item D

“Fluorescent” should be changed to L.E.D. and “as energy saving T-8 or better” should be struck.

Chapter 11, Section 1108, Sub-Section 1108.027

The term “hose bibs” is spelled correctly. Remove “please check spelling...”

Chapter 12 – General Notes

While it is convenient for all applicable regulatory codes and procedures to be listed, these may have been changed / updated / amended since the original date of creation. You may want to make a blanket statement saying this list is not inclusive and may not reference all governing codes and policies. It is the responsibility of the project architect or engineer to verify all codes are met.

In a previous note, it was suggested that Section 1201.01 be moved to the end of Chapter 1.

The West Virginia Public Health Laws and Rule (page 190) and the Federal Regulations (page 191) seem to be appropriate at the end of section 1200 in the listing of applicable regulatory codes, not confusingly in Section 1201.

We also recommend striking section 1201.02 in its entirety as it is repetitive and in conflict with the provisions of section 101.03.

In a previous note, it was suggested that Sections 1201.03 through 1201.06 be moved to a newly created section 102.

Chapter 12, Section 1202 – Descriptions of Document Submission Criteria

We believe the intent of this section is met in the SBA’s series of document submission forms 176 A-D. Similar to the reasons listed in the “NOTE” on page 2 of this document, we believe the detailed requirements are better suited in a procedural document – specifically the SBA’s Policy & Procedures Handbook. We respectfully recommend striking the entirety of Section 1202 and renumbering the subsequent sections.

Chapter 12, Section 1205 – SBA Certificate of Occupancy

Please strike “or SBA 139”. It is the intent of the next version of the SBA’s Policy & Procedures Handbook to not copy and include forms of other agencies as the agency’s own.

In the second paragraph, please strike “and the SBA” as the SBA’s Certificate of Occupancy will be retired in the next version of SBA policy revisions.

Chapter 12, Section 1206 – WVDE OSF Oversight

In Sub-Section 1206.02, the WVDE OSF may want to consider adding the phrase “completed in the last ten years” at the end of the sentence.

Sub-Section 1206.04 should be struck, and subsequent sub-sections renumbered as OEPA audits are no longer performed.

Appendices

Per the reasons described in the “NOTE” on page 2 of this document, the SBA Staff respectfully recommends that all the following appendices and forms be struck and removed from Policy 6200. It should be noted that none of these forms listed below are specifically referenced within the 12 chapters of Policy 6200.

- CEFP Amendment Annual Update (Page 206) – This is labeled incorrectly as an amendment and an annual update are two different things. The body of this form is copied verbatim from SBA Policy & Procedures Appendix C.
- Building Improvement Cost Summary (Page 207) – This is an SBA Form currently in force as SBA 147
- Building Utilization Worksheet (Page 209) – This is an SBA Form currently in force as SBA 156
- CEFP Executive Summary (Page 210) – This is labeled incorrectly as it should be called an Annual Update Executive Summary, however, the body of this form is represented as an SBA Form currently in force as SBA 162.

- SBA Maximum Class Sizes (Pages 211-212) – This is an SBA Form currently in force as SBA 167. However, given the nature of the information, this may need to be determined by the WVDE. I believe it is a compilation of all maximums listed at in the space descriptions of Policy 6200, however, as the document evolves, this convenient information may need to be struck by both the WVDE and SBA as it is potentially in conflict unless it is updated as the space descriptions are updated.
- Translating Educational Needs into Facility Needs (Page 213) – This is an SBA Form currently in force as SBA 147.
- SBA Educational Specifications (Pages 214-217) – This is copied verbatim from SBA Policy & Procedures Appendix I.
- Worksheet #1 – Summary of Spaces (Page 218) - This an SBA Form currently in force as SBA 142.
- Worksheet #2 – Subject Area Space Allocation (Pages 219-220) – This is an SBA Form currently in force as SBA 141.
- SBA Needs Executive Summary (Pages 221-223) – This is an old version of an SBA Form currently in force as SBA 120.
- SBA-WVDE Facility Classification Form (Page 224) – This is an SBA Form currently in force as SBA 116. Note: We recommend this have ownership from one agency so it either needs struck from Policy 6200 or SBA's Policy.
- Example Feeder School Summary Report (Page 225-226) – This is an old/incomplete version of an SBA Form currently in force as SBA 132.
- MIP Annual Update Form (Pages 227-228) – This is an SBA Form currently in force as SBA 145 a and b.
- SBA Project Executive Summary Major Improvement Plan (Pages 229-232) – This is an old version of an SBA Form currently in force as SBA 165.
- WVDE & SBA Application for Project Approval (Page 233) – To my knowledge, this form is not used.
- Instruction for SBA Form 123 (Page 234) – This is another missing part of the incomplete form listed on pages 225-226.
- SBA Certificate of Completion for Multiple Prime Projects (Page 235) – This is an SBA Form currently in force as SBA 139.
- Evaluation Instrument – Previous Ten Year CEFPP (Page 236-237) – This is an SBA Form currently in force as SBA 149.

Asbestos Containing Materials in Schools Regulation – Pages 238-240

This unnumbered policy section is listed at the end of the Appendices. It appears to be language copied verbatim from 40 CFR Part 763. This particular section is listed in Chapter 12 – Regulatory and Policy Procedures under Federal Regulations that are applicable to school construction projects. Therefore, these three pages appear to have the ability to be struck from this policy document.

From: [Tommy Young](#)
To: [Veronica Barron](#)
Cc: [Heather Hutchens](#); [Sherry Sadler](#)
Subject: FW: Comment on changes to Policy 6200, The Most Glaring Omission: Measurement of Daylight and Glare
Date: Thursday, February 14, 2019 8:22:24 AM
Attachments: [image001.jpg](#)

Additional comments for 6200!

Tommy Young

Executive Director
Office of School Facilities and School Transportation



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From: Lawrence T. Beckerle <lawrencetbeckerle@yahoo.com>
Sent: Tuesday, February 5, 2019 3:23 PM
To: Heather Hutchens <hhutchens@k12.wv.us>
Cc: Tommy Young <tommy.young@k12.wv.us>
Subject: Comment on changes to Policy 6200, The Most Glaring Omission: Measurement of Daylight and Glare

Greetings to Heather L. Hutchens and Tommy Young,

The proposed changes are long overdue. However, there are some serious omissions. This e-mail is about the most serious omission. There is no standard or suggestion for how to measure for daylight and glare. At the present time the most accurate measure of daylight and glare before construction begins is LM-83-12. It costs only \$25 to get a copy of LM-83-12. LM-83-12 was developed by the Daylight Metrics Committee of the Illumination Engineering Society.

Section 207 is for Fire Protection. Section 208 is for Safety and Cleanliness. Section 210 could be used for Daylight and Glare.

If you have any questions, please respond to this e-mail or write to me at

Lawrence T. Beckerle
PO Box 118

Craigsville, WV 26205

The following papers further explain the need for daylighting in schools:

Lawrence T. Beckerle: More Daylight is Needed in Schools (Gazette Opinion) January 15, 2019

Lawrence T. Beckerle: Is This Classroom Designed as Well as the Old Chicken Coop? (Gazette Mail) September 2, 2018

Heschong Mahone Group: first paper on how Daylighting affected student test scores and learning was published in 1999.

VELUX Group: Daylight Boosts Academic Performance. May 24, 2016

Patricia Plympton, Susan Conway, Kytra Epstein: Daylighting: Improving Students Performance and Health at a Price Schools Can Afford

Presented at the American Solar Energy Society Conference, June 16, 2000. NREL National Renewable Energy Laboratory

From: [Tommy Young](#)
To: [Veronica Barron](#)
Cc: [Heather Hutchens](#); [Sherry Sadler](#)
Subject: FW: comment on proposed changes to policy 6200, Advanced Buildings New Constuction Guide
Date: Thursday, February 14, 2019 8:21:47 AM
Attachments: [image001.jpg](#)

Additional comments for 6200!

Tommy Young

Executive Director

Office of School Facilities and School Transportation



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f | l | x |

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From: Lawrence T. Beckerle <lawrencetbeckerle@yahoo.com>
Sent: Wednesday, February 6, 2019 3:46 PM
To: Tommy Young <tommy.young@k12.wv.us>; Heather Hutchens <hhutchens@k12.wv.us>
Subject: comment on proposed changes to policy 6200, Advanced Buildings New Constuction Guide

Greetings Tommy Young and Heather L. Hutchens,

Some attempt should be made to bring school construction in West Virginia up to national standards. Below is a description of a standard that several large organizations agree on. It includes advanced daylighting. The below has borrowed some from LM-83-12. LM-83-12 is the most complete for measuring daylight and glare, before construction begins. It can also be used to help determine what changes are needed during remodeling and/or reroofing phase of an older building.

Lawrence T. Beckerle
PO Box 118
Craigsville, WV 26205

Architecture 2030 Endorses NBI's Advanced Buildings New Construction Guide to meet the 2030 Challenge

New Buildings Institute (NBI) and Architecture 2030 are excited to announce that Architecture 2030 has endorsed a prescriptive path to meet the current 2030 Challenge goal based on NBI's Advanced Buildings® New Construction Guide. With this path, design teams now have another tool when seeking to meet the 2030 Challenge.

The New Construction Guide has also been incorporated as the prescriptive path to comply with the energy prerequisites for both USGBC's LEED v4 and the Northeast Collaborative for High Performance Schools standard. The Guide has also been adopted as the basis for the prescriptive path for complying with the energy code in the City of Boulder, Colorado, currently the most stringent in the country.

Architecture 2030 issued the 2030 Challenge in 2006 to focus the building sector on energy reductions through the setting of achievable targets. The Challenge's final goal is that all new buildings and major renovations be carbon neutral by 2030. With its series of targets aimed at reducing the use of fossil fuels, the 2030 Challenge has been adopted and is being implemented by 80% of the top 10 and 70% of the top 20 architecture/engineering/planning firms in the U.S. The current 2030 Challenge target calls for all new buildings, developments and major renovations to be designed to meet a fossil-fuel, GHG-emitting, energy-consumption performance standard of 70% below the regional (or country) average/median for their relevant building type.

Established in 1997, New Buildings Institute (NBI) has been a driving force in advancing energy efficiency research, practices and code stringency. Most notably, the 2012 International Energy Conservation Code (IECC) was based largely on NBI's Core Performance Guide—a prescriptive approach to high performance commercial buildings. NBI also advocates for measuring building energy performance in occupancy rather than relying on modeled predictions to assess efficiency levels, and the organization has become a clearinghouse on zero-net energy policies and practices.

The Advanced Buildings New Construction Guide is NBI's prescriptive design guide for small commercial buildings. It is a whole-building design guide that combines design guidance with tens of thousands of building energy simulation models to offer a pre-assembled integrated design package that delivers

significant savings over the latest versions of ASHRAE Standard 90.1 and the International Energy Conservation Code. A series of increasingly stringent tiers allows the Guide to deliver savings in a national landscape where states and local jurisdictions have energy codes with drastically different levels of stringency while also providing greater levels of energy efficiency to projects seeking higher performance.

Combining the New Construction Guide's inherent flexibility with limited onsite renewable energy, NBI's pathway to meeting the current 2030 Challenge target offers various options. Each is based on an aggressive energy efficiency strategy such as advanced daylighting, superinsulation, advanced lighting design or advanced HVAC system selection. This allows design teams to choose the strategy that best suits the needs of each individual project.

Learn more in NBI's Factsheet, [New Construction Guide and the 2030 Challenge](#)

From: [Tommy Young](#)
To: [Veronica Barron](#)
Cc: [Heather Hutchens](#); [Sherry Sadler](#)
Subject: FW: 2-11-19 comments on proposed changes to Policy 6200
Date: Thursday, February 14, 2019 8:21:10 AM
Attachments: [image001.jpg](#)

Additional comments for 6200!

Tommy Young

Executive Director

Office of School Facilities and School Transportation



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From: LawrenceT Beckerle <lawrencetbeckerle@yahoo.com>
Sent: Monday, February 11, 2019 1:40 PM
To: Heather Hutchens <hhutchens@k12.wv.us>; Tommy Young <tommy.young@k12.wv.us>
Subject: 2-11-19 comments on proposed changes to Policy 6200

Greetings to Heather L. Hutchens and Tommy Young,

First a word of thanks for taking on the responsibility of reviewing comments.

Possible spelling errors

Section 304 on page 30, third line

Where it says "mist be" it should probably says "must be".

Chapter 5 on page 68, beginning of last paragraph

Where it says "A mile level education facility" it probably should say "A middle level education facility".

When talking about education reform or considering a change in regulations, it is important to consider what the top needs of students are. There is so much to be concerned about, that the most pressing needs can get lost in the details. Below is an unpublished editorial. The first

two needs were covered in more detail in previous editorials. The other three are tougher to solve.

Thank you for taking the time to read my comments.

Lawrence T. Beckerle

PO Box 118

Craigsville, WV 26205

What do students need the most?
Beckerle

By Lawrence T.

1.) Students need two to three hours of sunlight per day.

That is the current estimate based on eye development research by Ian Morgan. Without adequate sunlight between ages 3 to about 25, the eyes do not develop fully. According to the book, *Embrace the Sun*, sunlight is needed for the skin to produce vitamin D and a number of other substances that the body needs to fight off disease and otherwise remain healthy.

Consider that students no longer hunt birds, rabbits or squirrels in the early morning and then take their rifles to school. Nor do they go fishing after school. Teachers do not take students outdoors for a class as was common before air conditioning. Activities like these helped students in the past to get more sunlight.

2.) Students need daylight in the classroom.

After about an hour of no daylight, students will tend to go into a rest to sleep mode or even "I don't care." or "Don't bother me." Some students will rebel against no daylight treatment by acting up. A study by the Hescong Mahone Group published in 1999 was the first to document how much difference in learning and test scores could result from better daylighting.

Numerous studies have shown that employees (including teachers) are happier and more productive when there is good quality and quantity of daylight in the workplace.

3.) Students need a sense of ownership.

This is especially true for students who are at risk. At risk in this context is mostly concerned with students who when they leave school do not know: Who will pick them up. Who will feed them. Where will they sleep that night.

A school garden can provide a sense of ownership. So can a greenhouse, but a greenhouse can be expensive to heat. The NRCS (Natural Resources Conservation Service) provides grant money to build high tunnels (unheated greenhouses).

“Growing and preparing fruit and vegetables on school grounds educates children’s sense of taste, touch, and smell.” *The Third Teacher: 79 Ways You Can Use Design to Transform Teaching and Learning.*

4.) Students need a sense of belonging.

Community schools are often essential to provide the sense of belonging that helps to prevent students from choosing unhealthy modes of belonging, such as joining gangs, drinking to excess, doing drugs, or going on a shoplifting spree with friends.

People in Chicago, Illinois organized hunger strikes to keep officials there from closing community schools.

5.) Students need to see science in action.

Science in action encourages students to walk and otherwise move to see what is going on. Moving helps their brains to become more engaged and learn.

Consider how much time students spend sitting on a bus and in the classroom. Students don’t even walk to and from the bus stop. If a parent is not there to pick up a student, the school bus driver will take the student back to school.

If the school boards consider the needs of students, do their choices make any sense? For example. The new Clendenin Elementary is proposed for a site five miles from town

For a second example, consider what is happening in Nicholas County. The school board insists that the Richwood Community School be built at the westernmost edge of Richwood. Many people in Richwood want the school to be built at the Collins site, which is near the walking center of Richwood. Nearby is the Main Street site. These sites have up to an hour and 40 minutes more sunlight per day than the school board choice, because a mountain prevents the early morning sun from reaching their site.

If a small city is going to attract new businesses and tourists, it needs an active and interesting main street. Putting the new Richwood Community School on the Main Street site would help to achieve both goals. If designed as a community center of learning, it would help bring 21st century jobs to Richwood. Job creation should be a consideration in school board choices.

As an Adjunct Professor for the Summersville Campus of Glenville State College, Mr. Beckerle taught biology, forestry and environmental technology classes.

From: [Tommy Young](#)
To: [Veronica Barron](#)
Cc: [Heather Hutchens](#); [Sherry Sadler](#)
Subject: FW: SBA Comments on WVDE Policy 6200
Date: Thursday, February 14, 2019 8:21:33 AM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[SBA Comments WVDE Policy 6200.pdf](#)
[image004.jpg](#)

Veronica, after discussing the process with Heather I am forwarding several comments I saved in my policy 6200 file. To my understanding we will need to be ready for the march board meeting so we can discuss more later. Thank you so much for your guidance!

Tommy Young

Executive Director

Office of School Facilities and School Transportation



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From: Ashley, Benjamin S <Benjamin.S.Ashley@wv.gov>
Sent: Monday, February 11, 2019 2:59 PM
To: Heather Hutchens <hhutchens@k12.wv.us>; Tommy Young <tommy.young@k12.wv.us>
Cc: Roach, David L <David.L.Roach@wv.gov>; Bradley, Angela L <Angela.L.Bradley@wv.gov>
Subject: SBA Comments on WVDE Policy 6200

Ms. Hutchens,

Attached is a letter detailing the SBA's comments and recommendations for the proposed revisions to WVDE Policy 6200. We sincerely thank you and your team for your hard work in editing this policy. If you have any questions or comments, please do not hesitate to contact us.

Thanks,
Ben

Ben Ashley, MBA, Assoc. AIA

Director of Architectural Services

School Building Authority of West Virginia

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Charleston, WV 25311-2306

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David L. Roach, Executive Director

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February 11, 2019

Heather Hutchens, General Counsel
Office of Legal Services
West Virginia Department of Education
Capitol Building 6, Room 362
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

Dear Ms. Hutchens,

On behalf of the School Building Authority, I respectfully submit to you the following public comments on West Virginia Board of Education Policy 6200 – Handbook on Planning School Facilities. As this policy is the principle instrument for the planning and design of new school facilities in our state and a document that we rely heavily on to achieve our agency’s mission, we sincerely appreciate the dedication of you and your team to amend this handbook with the diligence and thoroughness that it requires.

The staff of the SBA has vetted many aspects of this document and our comments and suggestions are summarized below:

Chapter 1, Section 100, Second Paragraph – “Ten-Year” Strike

In coordination with the intent and message of the current CEFPP planning team, the phrase “and rewritten every ten years thereafter” should be struck. Each plan is a living, continually updating database of the current situation in each school system, and based on what we know now, rewriting every ten years would be unnecessary. We suggest changing the second sentence to say, “This plan is to be updated continually in coordination with all projects small and large, as well as reactive and preventative maintenance.”

Additionally, we also suggest striking the sentence that says, “Routine maintenance projects are not to be included in the CEFPP unless state funding will be requested or utilized to implement them or if such projects are a part of the Major Improvement Plan (MIP).” The *Dude Solutions* software template houses all maintenance information that is used in the evaluation processes of *Capital Forecast Direct*, which is the data-driven decision-making assistance module.

The third paragraph also references a ten-year CEFPP. We suggest striking “ten-year” from this particular location and all others in Section 100. Specifically, other locations that we suggest striking this language are in item B on page 4, the second paragraph on page 5, and various locations throughout section 100.013.

Chapter 1, Section 100, Sub-Section 100.0142 – F – Economies of Scale

As Item F states that Economies of scale (EOS) are established by the SBA, we recommend striking the listed guidelines in order for the SBA to amend these policies if necessary. We believe the sentence should read “Economies of Scale (EOS) shall be established by the SBA.”

Over the next few months, the SBA is forming a policy revisions committee and will be looking at all aspects of our governing documents. The EOS section likely needs to be revisited as more than half of the requests for new elementary schools and just about all the middle and high schools do not meet EOS guidelines. There is a waiver process, but we receive a waiver request on almost all projects. While we wish to achieve economies of scale in our new school projects, we recommend that the SBA Policy Revision Committee (or the WVDE if it so desires) consider amending these guidelines.

NOTE: As the WVDE Policy 6200 appears to be a legislative rule, we believe its governance supersedes the SBA's Policy & Procedures Handbook as it is a procedural rule. We believe the hierarchical relationship between the two documents would "lock in" listed SBA guidelines that are included within Policy 6200 as provisions that would then supersede SBA Policy. In this particular section and in all sections throughout this document, we respectfully recommend striking **any and all** places where SBA policy is simply listed verbatim. This would bring clarity and allow our agency the flexibility to respond to legislative rules and industry demands.

Chapter 1, Section 100, after Sub-Section 100.020 – CEFP Amendment Process

At the very end of this section (Page 12, after sub-section 100.020), we recommend creating a 100.021 sub-section and moving to this place all language listed in chapter 12, section 1201 including subsection 1201.01 and items A through F. Section 1201 describes the requirements for a CEFP Amendment, including justification and public notification procedures, and moves to the Chapter specifically for planning. Organizationally, we believe this would be a more user-friendly approach as it lists all the CEFP requirements together. Furthermore, we believe section 1201 seems misplaced in its current location.

Chapter 1, Section 101, Sub-Section 101.03 – Ed. Spec. Approval

The second paragraph states that "Copies of educational specifications for any new facility shall be submitted to the WVDE and SBA for review with the Design Development submission." We believe this is far too late in the process as the Design Development phase represents the design firm being half of the way complete with the final construction documents. As stated in section 101.01, "A representative of the SBA will be appointed to the committee if SBA funds are utilized in the project" and the educational specifications are a part of the planning phase review by the SBA.

We would also respectfully ask in the case of a traditional school design that does not require any special approval by the superintendent or board for enhanced curricular offerings and/or additional square footage, does the WVDE need to review and approve Ed. Specs.? If not, we suggest changing this sentence to read "Copies of the educational specifications for any new facility shall be submitted to the SBA for review before the Schematic Design Submission." This is the current process with the SBA.

Chapter 1, Section 102

Similar to a previous comment, we recommend creating a Section 102 titled "Document Submission and Review" and moving to this place all language listed in Sub-Sections 1201.03 through 1201.06. We believe this creates a better flow of information in understanding the process.

Chapter 2, Section 202, Sub-Section 202.06-G – Flood Plain Verification

We recommend adding the statement after the last sentence: "When considering property at or adjacent to a flood plain, the county must obtain a Certificate of Compliance from the County Floodplain Manager be required to verify the Base Floor Elevation is above the 100-year flood plain and safe from potential hazards."

Chapter 2, Section 202, Sub-Section 202.06-H – Utilities Available

We recommend adding in cable/internet after telephone.

Chapter 3, Section 305 – Library / Learning Resource / Media Center

The prototypical chart within this section describes typical spaces built within many recent school construction projects. Some schools have elected to trade this traditional library space to support a STEM / Maker space program in lieu of the requirements of a traditional library. We would suggest giving more flexibility in the overall space square footage requirement and making “optional” areas such as separate Director’s office (305.03), Maintenance, Repair and Distribution Area (305.04), Equipment Storage Area (305.07), Periodical, Book and Newspaper Storage Area (305.08).

Chapter 4, Section 400, Sub-Section 400.01-A – Size of Elementary Schools

The minimum 110 square feet per pupil figure is in conflict with the SBA Form 166 – Maximum Gross Building Square Footage Allowance (<http://sba.wv.gov/resources/Documents/SBA166.pdf>) which sets a sliding scale of allowable square feet proportionate to the number of students the school will serve. Instead of providing a figure here in Policy 6200, we recommend the policy language be rewritten to say “Schools housing grades pre-k-5 shall follow the SBA’s Maximum Gross Building Square Footage Allowance unless factors such as educational planning or architectural design permit otherwise as determined...”

Chapter 5, Section 500, Sub-Section 500.01-A – Size of Middle Schools

Similar to the previous comment, the 120 square feet is in conflict with SBA Form 166. We recommend the policy language be rewritten to say “Middle schools shall follow the SBA’s Maximum Gross Building Square Footage Allowance unless factors such as educational planning or architectural design permit otherwise as determined...”

Chapter 5, Section 509, Sub-Section 509.01 – Middle School Gym & Seating Capacity / Size

We recommend two changes to this section:

1) A 5,400 square feet minimum is established in the size section, yet the design capacity sets a maximum of 5,390 (70 students x 77 square feet). We typically work through this by multiplying the junior high basketball court size with five feet of buffer around the perimeter (60 feet by 94 feet) which sets a 5,640 square feet floor dimension. We recommend setting the court size at 5,700 square feet independent of the spectator seating area calculation.

2) While “some spectator seating” is called for in 509.014, we respectfully ask that this be specifically defined as the relatively small amount of square footage has a huge impact on the project budget due the volume of space. We recommend stating language similar to the High School Auditorium (615.011-012) “Design to accommodate the student enrollment with a minimum seating of 250. Approximately 10 square feet will be needed for each seat provided.”

Chapter 6, Section 600, Sub-Section 600.03 – Size of High Schools

Similar to a previous comment, the 130 square feet is in conflict with SBA Form 166. We recommend the policy language be rewritten to say “High Schools shall follow the SBA’s Maximum Gross Building Square Footage Allowance unless factors such as educational planning or architectural design permit otherwise as determined...”

Chapter 6, Section 610, Sub-Section 610.01 – High School Gym & Seating Capacity / Size

Similar to a previous comment, we recommend two changes to this section:

1) A 7,000 square feet space requirement is established in the size section, yet the design capacity sets a maximum of 5,390 (70 students x 77 square feet). We typically work through this by multiplying the high school basketball court size with five feet of buffer around the perimeter (60 feet by 104 feet) which sets a 6,240 square feet floor dimension. We recommend setting the court size at 6,300 square feet independent of the spectator seating area calculation.

2) We respectfully ask that the “plus spectator seating” requirement (610.014) be defined similar to the comment above.

Chapter 11, Section 1100, Second & Third Paragraphs

In the last sentence of the second paragraph, we suggest striking “energy cost analysis” and changing it to the term “targeted Energy Usage Index (EUI)” which gives a more accurate apples-to-apples benchmark and disconnects variances in utility rates. We also suggest requiring a maximum design target EUI of 45 which is near an “EnergyStar” rating. This should have little to no impact on the project budgets and will allow a county to responsibly save money on utilities. Given this directive, we believe the third paragraph can be struck in its entirety.

Chapter 11, Section 1100, Fifth & Sixth Paragraphs

In the last sentence of the fifth paragraph, the sentence should be restructured to read, “Schools using WVDE Policy 6200 shall be designed and built in compliance with the applicable West Virginia State Building Code at the time the project was funded either by the SBA or locally.”

The sixth paragraph that begins with “Designers shall utilize current ASHRAE standards...” is redundant and unnecessary based on the previous paragraph. We recommend striking this paragraph in its entirety.

Chapter 11, Section 1100, Last Paragraph of this section on page 174

We recommend this paragraph be rewritten in the following manner...

“On all SBA or locally funded construction or renovation projects, designers shall provide an electronic copy of all sets of final architectural drawings and specifications in a non-editable format to the WVDE Office of School Facilities using the SBA’s requirements as listed in the construction document submission phase guidelines. Specifications prepared by designers shall require that warranties and brochures be furnished to the county board by the installing contractor on all equipment. Record product data shall be submitted in electronic format.

Designers shall also provide to the WVDE Office of school Facilities, the SBA Staff, and the appropriate county personnel one electronic copy of the basic floor plan of the facility in PDF format that includes information such as room numbers, door location swings and door positions, accurate numbering, utility entrances and shut-off locations. This drawing will be used for HVAC training, fire evacuation plans, school access safety plans and floor plans for students.”

Chapter 11, Section 1101, Sub-Section 1101.01, Item E

After consulting engineers of past SBA projects, it is recommended that a set temperature be the design criteria and not a range. This sets a true standard for renovation projects and gives clear direction to ESCO projects. We recommend Item E to say:

“E. Indoor Design Criteria,

1. Winter 70° F
2. Summer 72° F”

Chapter 11, Section 1101, Sub-Section 1101.02

At the end of Sub-Section 1101.02, we suggest adding the following sentences to the end of the paragraph. “HVAC systems shall be designed to be operational year-round. Systems should not be shut down when the building is unoccupied.”

Chapter 11, Section 1101, Sub-Section 1101.03

We believe this paragraph should be struck. All schools now require air conditioning.

Chapter 11, Section 1101, Sub-Section 1101.051

No suggested change here, just a comment... this is difficult to enforce. The SBA's grant contracts expire after three years, which is about the time the two-year maintenance contracts begin. Without leverage to get the contractor to come back to the jobsite, the county or SBA may need to make a separate maintenance agreement contract with the county to ensure this is implemented properly.

Chapter 11, Section 1101, Sub-Section 1101.06

A note that says "THIS AREA NEEDS ADDITIONAL DISCUSSION" has been left there from the previous edition. We recommend providing additional direction from the code and clearing this language in question.

In addition to this language, we recommend the following sentence be added at the end of Sub-Section 1101.06. "The SBA may designate the necessity for a commissioning agent on complex renovations or new schools. The standards of services for commissioning agents are set forth in SBA policy."

Chapter 11, Section 1102, Sub-Section 1102.031, Item D

"Fluorescent" should be changed to L.E.D. and "as energy saving T-8 or better" should be struck.

Chapter 11, Section 1108, Sub-Section 1108.027

The term "hose bibs" is spelled correctly. Remove "please check spelling..."

Chapter 12 – General Notes

While it is convenient for all applicable regulatory codes and procedures to be listed, these may have been changed / updated / amended since the original date of creation. You may want to make a blanket statement saying this list is not inclusive and may not reference all governing codes and policies. It is the responsibility of the project architect or engineer to verify all codes are met.

In a previous note, it was suggested that Section 1201.01 be moved to the end of Chapter 1.

The West Virginia Public Health Laws and Rule (page 190) and the Federal Regulations (page 191) seem to be appropriate at the end of section 1200 in the listing of applicable regulatory codes, not confusingly in Section 1201.

We also recommend striking section 1201.02 in its entirety as it is repetitive and in conflict with the provisions of section 101.03.

In a previous note, it was suggested that Sections 1201.03 through 1201.06 be moved to a newly created section 102.

Chapter 12, Section 1202 – Descriptions of Document Submission Criteria

We believe the intent of this section is met in the SBA's series of document submission forms 176 A-D. Similar to the reasons listed in the "NOTE" on page 2 of this document, we believe the detailed requirements are better suited in a procedural document – specifically the SBA's Policy & Procedures Handbook. We respectfully recommend striking the entirety of Section 1202 and renumbering the subsequent sections.

Chapter 12, Section 1205 – SBA Certificate of Occupancy

Please strike "or SBA 139". It is the intent of the next version of the SBA's Policy & Procedures Handbook to not copy and include forms of other agencies as the agency's own.

In the second paragraph, please strike “and the SBA” as the SBA’s Certificate of Occupancy will be retired in the next version of SBA policy revisions.

Chapter 12, Section 1206 – WVDE OSF Oversight

In Sub-Section 1206.02, the WVDE OSF may want to consider adding the phrase “completed in the last ten years” at the end of the sentence.

Sub-Section 1206.04 should be struck, and subsequent sub-sections renumbered as OEPA audits are no longer performed.

Appendices

Per the reasons described in the “NOTE” on page 2 of this document, the SBA Staff respectfully recommends that all the following appendices and forms be struck and removed from Policy 6200. It should be noted that none of these forms listed below are specifically referenced within the 12 chapters of Policy 6200.

- CEFPA Amendment Annual Update (Page 206) – This is labeled incorrectly as an amendment and an annual update are two different things. The body of this form is copied verbatim from SBA Policy & Procedures Appendix C.
- Building Improvement Cost Summary (Page 207) – This is an SBA Form currently in force as SBA 147
- Building Utilization Worksheet (Page 209) – This is an SBA Form currently in force as SBA 156
- CEFPA Executive Summary (Page 210) – This is labeled incorrectly as it should be called an Annual Update Executive Summary, however, the body of this form is represented as an SBA Form currently in force as SBA 162.
- SBA Maximum Class Sizes (Pages 211-212) – This is an SBA Form currently in force as SBA 167. However, given the nature of the information, this may need to be determined by the WVDE. I believe it is a compilation of all maximums listed at in the space descriptions of Policy 6200, however, as the document evolves, this convenient information may need to be struck by both the WVDE and SBA as it is potentially in conflict unless it is updated as the space descriptions are updated.
- Translating Educational Needs into Facility Needs (Page 213) – This is an SBA Form currently in force as SBA 147.
- SBA Educational Specifications (Pages 214-217) – This is copied verbatim from SBA Policy & Procedures Appendix I.
- Worksheet #1 – Summary of Spaces (Page 218) - This an SBA Form currently in force as SBA 142.
- Worksheet #2 – Subject Area Space Allocation (Pages 219-220) – This is an SBA Form currently in force as SBA 141.
- SBA Needs Executive Summary (Pages 221-223) – This is an old version of an SBA Form currently in force as SBA 120.
- SBA-WVDE Facility Classification Form (Page 224) – This is an SBA Form currently in force as SBA 116. Note: We recommend this have ownership from one agency so it either needs struck from Policy 6200 or SBA’s Policy.
- Example Feeder School Summary Report (Page 225-226) – This is an old/incomplete version of an SBA Form currently in force as SBA 132.
- MIP Annual Update Form (Pages 227-228) – This is an SBA Form currently in force as SBA 145 a and b.
- SBA Project Executive Summary Major Improvement Plan (Pages 229-232) – This is an old version of an SBA Form currently in force as SBA 165.

- WVDE & SBA Application for Project Approval (Page 233) – To my knowledge, this form is not used.
- Instruction for SBA Form 123 (Page 234) – This is another missing part of the incomplete form listed on pages 225-226.
- SBA Certificate of Completion for Multiple Prime Projects (Page 235) – This is an SBA Form currently in force as SBA 139.
- Evaluation Instrument – Previous Ten Year CEFPP (Page 236-237) – This is an SBA Form currently in force as SBA 149.

Asbestos Containing Materials in Schools Regulation – Pages 238-240

This unnumbered policy section is listed at the end of the Appendices. It appears to be language copied verbatim from 40 CFR Part 763. This particular section is listed in Chapter 12 – Regulatory and Policy Procedures under Federal Regulations that are applicable to school construction projects. Therefore, these three pages appear to have the ability to be struck from this policy document.

##

This concludes the SBA Staff's comments and suggestions to the West Virginia Board of Education Policy 6200 – Handbook on Planning School Facilities. Should you or any member of your review team have questions regarding any of our noted items, please feel free to reach out for clarification and/or discussion. As the serviceability of this document is of paramount importance to the mission of the SBA, we will prioritize our time for you should you need additional feedback from us. Again, thank you for the dedication and hard work that you have put into this document.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Ashley', with a large, sweeping flourish underneath.

Ben Ashley, MBA, Assoc. AIA
Director of Architectural Services
School Building Authority of West Virginia