

**Texas Society of  
Architects**

Written Testimony:  
Discussion of School  
Safety Improvements  
Related to Design,  
Construction, and  
Renovation of School  
Facilities

**Chairman White, Chairman Lozano, and Members of the Committee,**

The Texas Society of Architects (TxA) wants to thank you for the work you are undertaking to study school safety and other issues related to acts of mass violence.

TxA is a state component of the American Institute of Architects (AIA) and is one of the nation's largest organizations for the architecture profession, with 7,500 members and 18 regional components across Texas. Architects bring particular interest and expertise in facilities design – and we recognize our role in working with others to shape the environments students and teachers experience in our schools. However, TxA members also understand that as critically important as design is to school safety, the physical building alone cannot “fix” the threat of mass violence, nor can any single design solution or physical improvement guarantee that a threat will not occur.

We also know the challenge of designing and building new schools and effectively retrofitting existing schools to ensure they are safe requires significant support and resources that go well beyond the architectural, engineering, and construction communities – and we are committed to working with each of you and other policymakers, stakeholders, and school communities to safeguard students and teachers – while keeping Texas schools positive places for learning and growth.

Texas schools face a number of challenges associated with the need to adapt school design to differing and evolving community concerns, support student health and safety, and create productive learning environments, all while respecting stretched school budgets. TxA is available to serve as a resource to members of the Legislature on facility related school safety issues, and we welcome the opportunity to provide the focused efforts, experience, and expertise of TxA members to help ensure safer schools as we all work to mitigate this threat to both safety and education.

Through this letter, we want to offer the committee a brief overview of the work TxA has undertaken beginning in 2018 when we created a School Safety Work Group to develop recommendations to help improve school safety following the Sante Fe school shooting tragedy. TxA's School Safety Work Group researched and developed an “Order of Magnitude” document to provide cost estimates and best practice considerations for design related facility improvements. TxA members provided testimony at legislative hearings and participated in the Governor’s Roundtable discussions on ways to improve school safety and security.

In 2019, TxA worked to support legislation to improve the safety and security of Texas schools and pass legislation that added a TxA member to the board of the Texas School Safety Center. TxA actively participated in the TEA rulemaking process to enact new safety and security standards required by SB 11 – and TxA and its members worked to provide technical support and guidance during the rulemaking process. While progress has

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been made on the approach to school safety in Texas, there is more work to be done. Our School Safety and Security Work Group has been formalized as a standing committee and is composed of leaders from top educational facility design firms of every size across Texas, serving urban, suburban, and rural school districts. TxA's work to improve school safety through the power of design continues – as do efforts to educate design professionals and school districts about the new school safety facilities standards and requirements.

TEA began the rulemaking process in 2020 to revise and update facilities standards for school construction projects and implement new standards for safety and security for Texas schools. As adopted, the rule requires a portion of each school construction project budget to be used for specified "construction-related" facility improvements to be made at each instructional facility on a school campus until all required safety and security upgrades have been fully implemented at all instructional facilities campus-wide. Physical improvements required for all projects based on the size of the construction budget include:

- exterior door numbering for all exterior doors;
- security cameras at all primary and secondary entrances; and
- visitor management for all primary entrances that must include an unobstructed line of sight of approaching visitors through physical or digital means, a physical barrier that prevents unassisted access to the facility by a visitor, and a location for a visitor check-in and check-out process.

TEA's recent rule also directs a school district or charter school to implement certain requirements specified in SB 11 to facilitate emergency communications response at each existing instructional facility:

- existing instructional facilities must have adequate technology and infrastructure to allow for emergency communications;
- classrooms in existing instructional facilities must have access to a landline telephone, cell phone, or other means to allow immediate contact with first responders; and
- campus site plans must be developed for each school facility and each campus that identify building layout and the location and type of exterior doors of each building.

We look forward to meeting with you in the coming weeks to share updates on the work TxA and its member architects are undertaking to identify recommendations that center on ways to improve access control and secured entry at older school facilities. Providing emergency funding to support priority physical improvements that can be implemented quickly to establish baseline standards for improving safety and security would be particularly important for smaller rural school districts, for districts with older facilities, and for districts that have been unable to pass bond proposals to support capital improvement projects for school facilities.

Due to the existing variety of campuses throughout our state, there is not a "one size fits all" solution for older campuses. For example, in older campus-style designs where students must travel between buildings and

parking is dispersed, it is almost impossible to develop and implement a set of standardized requirements that can effectively manage the flow of users and visitors and address the variety of conditions and layouts of all existing school buildings. However, implementing access control standards for newer, more compact school designs and establishing best practice standards for future designs can be easily managed by setting uniform standards for the design and construction of school facilities.

TxA believes the best course of action for continuing to make schools safer must include a combination of physical improvements and campus operational plans to ensure improvements are effective as well as appropriate. Efforts to address more basic needs of older existing school facilities through emergency appropriations should also be considered. To that end, TxA and its members are working to develop recommendations for:

- refinements for facility related “operational standards” that include best practice standards for testing and maintenance necessary to ensure the proper functioning of hardware and mechanical systems used to provide secured entry and access control;
- a set of baseline physical improvements that could be prioritized, funded through emergency appropriations, and implemented at existing school facilities more quickly; and
- updates on cost estimates for certain physical improvements included in the “Order of Magnitude” document developed by TxA’s School Safety and Security Work Group in 2019 to help policymakers and school districts estimate costs associated with addressing safety and security by updating school facilities.

TxA is committed to our continued work to promote best practice standards for the design and construction of school facilities and to support improved educational outcomes through better design and enhanced operational accountability and guidance. TxA’s primary goal, guided by the role architects play in ensuring the health safety and welfare in the built environment, is to provide the best guidance possible on how school districts and charter schools might improve school safety in existing facilities and in the design of new facilities, while maintaining open and positive learning environment.

Sincerely,  
Texas Society of Architects



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