

July 29, 2026

DELIVERED VIA E-MAIL / RECEIPT REQUESTED:

Ms. Jennifer Moore – Licensing Inspector
Ms. Sherry Lumbard – Licensing Inspector
VIRGINIA DEPARTMENT OF EDUCATION
101 N 14th St
Richmond, VA 23219
jennifer.moore@doe.virginia.gov
sherry.lumbard@doe.virginia.gov

RE: SwimRVA's Final Compliance Plan

Dear Ms. Moore and Ms. Lumbard,

Enclosed please find SwimRVA's Final Compliance Plan that is being submitted for the Department of Education's review, consideration, and approval. SwimRVA is submitting this Final Compliance Plan in support of the organization's exemption from licensure as a single focus swimming camp pursuant to Virginia Code § 22.1-289.030(A)(1). The revised SwimRVA Swim Camp schedule set out in the enclosed Final Compliance Plan has been fully implemented and is being used for all of the remaining Swim Camps that SwimRVA will be conducting through the last day of Swim Camp on August 14, 2026. SwimRVA has advised the parents of all children attending SwimRVA's Swim Camps of the revised Swim Camp schedule set forth in the Final Compliance Plan. SwimRVA also intends to use this Final Compliance Plan for any Swim Camps that it conducts in the future following the end of the summer camp season on August 14, 2026.

As part of SwimRVA's Final Compliance Plan, I am also writing to confirm that SwimRVA has fully implemented the following action plan to track and ensure that no child attends SwimRVA's Swim Camps for more than 25 days in any three-month period commencing with enrollment:

1. SwimRVA is performing each week that Swim Camp is in session a review / audit of its registration system and generating a written report to verify that no child registered for Swim Camp is registered to attend more than 25 days in a three-month period commencing with the first day the child was enrolled. SwimRVA is performing this review / audit process at the beginning of each week Swim Camp is in session and this review / audit process will continue

moving forward. The review / audit process applies to all of SwimRVA's Swim Camps operated at SwimRVA's two facilities – SwimRVA – CSAC and SwimRVA – Meadowbrook.¹

2. SwimRVA has posted written notice of the 25 day limit on SwimRVA's website. See <https://swimrichmond.org/programs/camps/>

I am also writing to confirm that SwimRVA has also implemented the following action plan to ensure that no child under the age of six attends a SwimRVA Swim Camp:

1. SwimRVA Swim Camp is advertised for ages 6-12 in print and on the website and SwimRVA has posted on its website that "Children must be 6 years old on or before the first day of the camp week for which they are registered." See <https://swimrichmond.org/programs/camps/>
2. SwimRVA's online registration software, which must be used by a parent or guardian to register a child to attend a SwimRVA Swim Camp, limits registration to only children who are six years of age on the first day of their attending Swim Camp; and
3. SwimRVA is performing each week that Swim Camp is in session a review / audit of its registration system and generating a written report to verify that no child registered for Swim Camp is under the age of six on the first day of their attending Swim Camp. SwimRVA is performing this review / audit process at the beginning of each week Swim Camp is in session and this review / audit process will continue moving forward. The review / audit process applies to all of SwimRVA's Swim Camps operated at SwimRVA's two facilities – SwimRVA – CSAC and SwimRVA – Meadowbrook.

SwimRVA reserves its legal right to appeal the Department of Education's decision dated July 20, 2026 that SwimRVA did not meet an exemption identified in § 22.1-289.030 of the Code of Virginia.

SwimRVA appreciates its ongoing collaboration with the Department of Education (the "Department") and we look forward to continuing to work with the Department. Specifically, SwimRVA is open to the Department conducting an inspection to observe the full implementation of SwimRVA's Final Compliance Plan.

¹ SwimRVA is unable to conduct Swim Camps at its SwimRVA – North facility because of the fire that occurred on July 7, 2026 which destroyed the pool house at this facility.

Finally, if the Department or the Office of the Attorney General has any questions regarding SwimRVA's Final Compliance Plan, please contact SwimRVA's legal counsel – Courtney M. Paulk, Esq. and Andrew K. Clark, Esq. or me directly.

Very respectfully,



Adam Kennedy
Executive Director

Enclosure

cc: Abigail M. Gump, Esq. (w/enclosure) (via e-mail)
Courtney M. Paulk, Esq. (w/enclosure) (via e-mail)
Andrew K. Clark, Esq. (w/enclosure) (via e-mail)