



# ADA Self-Evaluation and Transition Plan

Adopted by the Early City Council

11/10/2025

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## 1.0 Executive Summary

### 1.1 Introduction

The Americans with Disabilities Act was passed in 1990 as a step towards the elimination of discrimination against individuals with disabilities. ADA Title II requires communities to establish self-evaluations and transition plans. Title II covers programs, activities, and services of government entities with a specific focus on protecting citizens from discrimination on the basis of disability. The goal of this act is to afford every individual the opportunity to benefit from the patronage of all Americans.

The City of Early (“City”) approved its first transition plan on 11/10/2025. This document will continue to guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Transition Plan is significant in that it establishes the City of Early’s ongoing commitment to the development and maintenance of policies, programs, and facilities that include all residents.

### 1.2 Federal Accessibility Requirements

The development of a transition plan is a requirement of the Federal Regulations implementing the Rehabilitation Act of 1973, which requires that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities. The Act, which became known as the “civil rights act” of persons with disabilities, states:

*No otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (Section 504)*

Subsequent to the enactment of the Rehabilitation Act of 1973, Congress passed the Americans with Disabilities Act on July 26, 1990 (“ADA”). Title II of the ADA prohibits disability discrimination by all public entities. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of the Rehabilitation Act. The legislative mandate, therefore, prohibits the City from, either directly or through contractual arrangements:

- Denying persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered others, even if the City offers permissibly separate or different activities.
- Selecting facility locations that have the effect of excluding or discriminating against persons with disabilities.

The City is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that apply to facilities and other physical holdings.

Details of the Americans with Disabilities Act of 1990 can be found in the ADA website [www.ada.gov](http://www.ada.gov).

Included in Title II are administrative requirements for all government entities employing more than fifty (50) people. These administrative requirements are:

- Completion of a self-evaluation;
- Development of an ADA grievance procedure;
- Designation of at least one person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the self-evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

### 1.3 State of Texas Accessibility Requirements

In addition to complying with ADA requirements, the City will also comply with the Texas Accessibility Standards, Elimination of Architectural Barriers as contained in the Texas Government Code, Chapter 469. Details can be found on the state website [www.statutes.legis.state.tx.us](http://www.statutes.legis.state.tx.us).

### 1.4 Declarations

#### **Compliance with the Americans with Disabilities Act**

In accordance with requirements of Title II of the ADA, the City will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

#### **Employment**

The City does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations circulated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

#### **Effective Communication**

The City will, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they may participate equally in the City's programs, services, and activities, including but not limited to, qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

### **Modifications to Policies and Procedures**

The City will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of the City's programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited.

Anyone who requires auxiliary aid or service for effective communication, or a modification of policies or procedures to allow participation in a program, service, or activity in the City should contact the ADA Coordinator at 325-643-5451 as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City is not accessible to persons with disabilities should be directed to the ADA Coordinator at 325-643-5451.

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

## **2.0 Compliance with ADA Title II Requirements**

This section makes reference to various parts of the Code of Federal Regulations (CFR), Section 35 as it pertains to ADA requirements that the City must comply with or address as part of the transition plan. The details of which can be found on the ADA website [www.ada.gov/reg2.html](http://www.ada.gov/reg2.html).

### **2.1 Notification**

Applicants, participants, beneficiaries, and other interested persons have been notified of their rights and the City's obligations under Title II of the ADA as required by 28 CFR §35.106. This notification appears on the City's internet home page <https://www.earlytx.net/469/Americans-with-Disabilities-Act> under the Government tab at the top of the page.

Moreover, the City's website ([www.earlytx.net](http://www.earlytx.net)) provides additional notifications along with Early's ADA Transition Plan and meeting agendas provide additional notifications.

## 2.2 Designation of Responsible Employee

The City has designated an employee to coordinate its efforts to comply with and carry out the City's ADA responsibilities in accordance with 28 CFR §35.107(a). The ADA coordinator has been designated to oversee compliance with the non-discrimination requirements and can be contacted at:

ADA coordinator  
Brenda Kilgo  
City Secretary  
960 Early Blvd.  
Early, TX 76802  
325-643-5451  
[bkilgo@earlytx.net](mailto:bkilgo@earlytx.net)

### 2.2.1 Training

The ADA Coordinator and members of the ADA Compliance Team will attend annual training to stay aware of changes in laws and rules associated with remaining ADA accessible in the community and within the operations of the City Government.

## 2.3 Self-Evaluation and Transition Plan

Title II of the ADA requires that the City conduct a self-evaluation of its services, policies, and practices and make modifications as necessary to comply with 28 CFR §35.105. A self-evaluation is an assessment of the City's current policies and practices, and identifies and corrects those policies and practices that are inconsistent with Title II requirements. The ADA Transition Plan identifies any barriers to accessibility that might be present. The ADA Transition Plan provides a schedule that indicates a projected time for a resolution and the department responsible for implementation. The City completed a self-evaluation in 2025 and will continue the process as outlined in this plan. This transition plan is a living document that will be updated periodically to reflect the ongoing assessment and resolution/response to public comments.

Updates will be provided as amendments to the plan, including additional annexes, and/or updates to the City's website  
<https://www.earlytx.net/469/Americans-with-Disabilities-Act>

## 2.4 Establishment of Grievance Procedure

The City has established a grievance procedure for resolving complaints of violations in accordance with 28 CFR §35.107(b). See Section 4.0 below.

# 3.0 ADA Self-Evaluation and Steps Taken

### 3.1 Self-Evaluation

The self-evaluation is the City's assessment of its current policies, practices, and procedures to determine compliance with the ADA. Early completed the first self-evaluation in October 2025. The City looked into having an outside contractor conduct the self-evaluation and transition plan; however, the cost was considered to be an undue financial burden that could delay funding for the removal of physical or programmatic barriers. The City instead conducted a true self-evaluation and updated the plan that provides information on the progress of ADA projects over the past five years and shows additional projects that are scheduled to be completed by the end of FY 2025. The City will continuously evaluate physical barriers (such as parking, path or travel to, throughout and between buildings and amenities, doors, and restrooms) and programmatic barriers (like building signage, customer communication and interaction, non-compliant sidewalks or curb ramps, emergency notifications, alarms, visible signals and participation opportunities for City sponsored events) with the assistance of representatives from various departments and third-party consultants.

Recognizing that the City has limited resources, staff will utilize a variety of criteria for prioritizing the removal of physical and programmatic barriers. These criteria may include, but not be limited to, the following:

- Quantity and frequency of public use
- Critical nature of the programs offered at the facility
- Public feedback obtained through the grievance process
- Funding, including annual budget, bonds, and grants
- Planning of future construction activity

### 3.2 Action Taken to Improve Access

As new City facilities have been constructed or existing buildings remodeled, the City has complied with State of Texas design requirements through review by the Texas Department of Licensing and Regulation (TDLR). The City has also enhanced pedestrian access via street-related capital improvement projects. Early has responded to a grievance for accessibility to the baseball and softball fields at the Early Baseball and Softball Park and McDonald Park. The City will continue these improvements to meet its overall accessibility goals.

Several areas with non-existent, barrier-free ramps and sidewalks have been identified and have either been installed or are scheduled to be installed utilizing funds from annual budgets and bonds (see Appendix B: Self-Evaluation and Plan of Action). An ongoing assessment of areas requiring the removal of barriers will continually be conducted by City staff and consultants. Transition projects will be made available on the City's website at <https://www.earlytx.net/469/Americans-with-Disabilities-Act>

## 4.0 Grievance Procedure

Under the Americans with Disabilities Act, users of City facilities and services have the right to file a grievance if they believe the City has not provided reasonable accommodation.

### Submitting a Grievance

Under the grievance procedures, a formal complaint must be filed within sixty (60) calendar days of the alleged occurrence. Any complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant, as well as, the location, date and description of the problem. Alternative means of filing complaints, such as personal interviews or tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible, but no later than sixty (60) business days after the alleged violation to:

City of Early  
Attn: Brenda Kilgo, ADA Coordinator  
960 Early Blvd.  
Early, TX 76802

**Email:**  
[bkilgo@earlytx.net](mailto:bkilgo@earlytx.net)

**Fax:**  
325-643-5452  
Attn: Brenda Kilgo, ADA Coordinator

The ADA Coordinator is required to acknowledge receipt of the grievance within ten (10) business days and offer the opportunity to discuss the complaint and possible resolutions.

Within twenty (20) business days of the acknowledgment, the ADA Coordinator or his/her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio. The response will explain the position of the City and offer options for substantive resolution of the complaint. If the response by the ADA Coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within ten (10) business days after receipt of the response to the City Administrator or his/her designee at:

City of Early  
Attn: Tony Aaron, City Administrator  
960 Early Blvd.  
Early, Texas 76802

**Email:**  
[taaron@earlytx.net](mailto:taaron@earlytx.net)

Within ten (10) business days after receipt of the appeal, the City Administrator or his/her designee will acknowledge receipt of the appeal from the complainant and offer to discuss with the complainant a possible resolution. Within ten (10) business days after the

Acknowledgment, the City Administrator or his/her designee will respond in writing and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or his/her designee, appeals to the City Administrator or his/her designee, and responses from these two offices will be retained by the City for at least three (3) years.

## **5.0 Emergency Management**

One of the most important goals of emergency management is helping people prepare for and respond to emergencies. Making local preparedness and response programs accessible to people with disabilities is a critical part of this responsibility.

### **5.1 Access to 9-1-1 Services**

The City partners with the City of Brownwood (PSAP) for all 9-1-1 services. City/PSAP provides direct access to 9-1-1 services via telephone typewriter and telecommunications device for the deaf (TTY/TDD). The system also has the text-to-9-1-1 capability.

### **5.2 Emergency Management**

The City of Early Emergency Management Coordinator (EMC) develops, maintains, and facilitates the all-hazard Emergency Management Plan as required by Local, State, and Federal statutes and laws. During all emergency planning (Mitigation, Preparedness, Response, and Recovery), the City is committed to be in compliance with the ADA requirements as outlined in Chapter 7 under Title II of the ADA. The EMC ensures that all parties with responsibilities under the Emergency Management Plan and related annexes are aware of ADA requirements and that all programs and third-party agreements are also in compliance with ADA. The Emergency Management Plan is regularly reviewed by the City, West Central Texas Council of Government, and the Texas Division of Emergency Management in order to qualify for the Emergency Management Planning Grant.

## **6.0 Conclusion**

Services and programs offered by the City to the public must be accessible for all citizens and reasonable accommodations must be made for those with disabilities. The process of

making City facilities and programs accessible to all individuals will be an ongoing one and the City will continue to review accessibility issues through self-evaluation, resolution of complaints, and by making reasonable modifications to programs.

The City has made progress towards improving accessibility as seen by the following actions:

- Designation of an ADA Coordinator
- Implementation of an ADA grievance procedure
- Conducting an ongoing self-assessment to identify issues needing to be resolved
- Complying with Federal and State requirements as facilities are modified or constructed
- Planning future improvements through the capital improvement program

It is imperative that the City partner with the community to work together to identify and resolve accessibility issues. In addition to the existing grievance process, feedback will be obtained from the community by publishing this document on the City's website.

The City encourages feedback from the public on this Self-Evaluation and Transition Plan. In addition, the City Council solicited comments as part of a public meeting on November 10, 2025. The City of Early will incorporate into future City Council meetings to receive input on major, updated self-evaluations and transition plans. Periodic updates may be made to the Plan without public hearings.

## **Appendix A – Contact Information**

### **ADA Coordinator:**

Brenda Kilgo  
960 Early Blvd.  
Early, TX 76802  
325-643-5451  
[bkilgo@earlytx.net](mailto:bkilgo@earlytx.net)

### **City Administrator**

Tony Aaron, City Administrator  
960 Early Blvd.  
Early, Texas 76802  
325-643-5451  
[taaron@earlytx.net](mailto:taaron@earlytx.net)

### **Mayor and City Council:**

Brenda Kilgo  
City Secretary  
960 Early Blvd  
Early, TX 76240  
325-643-5451  
[bkilgo@earlytx.net](mailto:bkilgo@earlytx.net)

### **United States Department of Justice – Civil Rights Division:**

[www.ada.gov](http://www.ada.gov)

## Appendix B – Self-Evaluation and Plan of Action

The City of Early's self-evaluation started in 2025, at which time the City listed issues with different barriers. Early made several improvements through the years before the plan. Moreover, the City incorporated ADA accessibility improvements while completing capital projects. The City also incorporated projects that were brought up by the public. The list below represents the current ADA transition project plan, along with improvements that have been made over the past five years (FY 2021 – FY 2025).

Item	Asset/Facility	Location	Description	Cost	Completion
1	City Hall	960 Early Blvd	Parking Lot Striping	\$5,000	2026-10-01
2	City Hall	960 Early Blvd	ADA Parking Signage	\$1,000	2026-10-01
3	City Hall	960 Early Blvd	Sidewalk and Ramp	\$5,000	2026-10-01
4	City Hall	960 Early Blvd	Front Door Threshold	\$1,000	2026-10-01
5	City Hall	960 Early Blvd	City Hall Office signage needed	\$500	2026-10-01
6	City Hall	960 Early Blvd	Bathrooms do not meet ADA	\$30,000	Undefined Plan
7	Police Dept	960 Early Blvd	Entry door to narrow	\$2,500	2027-10-01
8	Police Dept	960 Early Blvd	Vestibule door to narrow	\$2,500	2027-10-01
9	Police Dept	960 Early Blvd	Signage to offices needed	\$500	2027-10-01
10	Municipal Court	960 Early Blvd	Signage Needed	\$250	2027-10-01
11	Municipal Court	960 Early Blvd	ADA ramp to Dias	\$2,000	2027-10-01
12	EVEC	419 Garmon	Add additional ADA parking and a path with a ramp	\$15,000	2027-10-01
13	EVEC	419 Garmon	Remove landscaping from the ADA Path	\$100	2026-10-01
14	EVEC	419 Garmon	Office Signage	\$100	2026-10-01
15	EVEC	419 Garmon	Adjust the door closure on bathroom doors	\$100	2026-10-01
16	EVEC	419 Garmon	Add changing stations to bathrooms	\$700	2026-10-01
17	Business Complex	104 E Industrial	No ADA van parking	\$3,500	2026-10-01
18	Business Complex	104 E Industrial	Lacking ADA parking signage	\$500	2026-10-01
19	Business Complex	104 E Industrial	Add changing stations to bathrooms	\$700	2026-10-01
20	Business Complex	104 E Industrial	Office signage	\$1,500	2026-10-01
21	Early Fire Dept	1030 Early Blvd	Add ADA Parking	\$15,000	2026-10-01
22	Early Fire Dept	1030 Early Blvd	The west door threshold is too high	\$1,500	2026-10-01

23	Early Fire Dept	1030 Early Blvd	sidewalk and ramp west side	\$2,500	2026-10-01
24	Early Fire Dept	1030 Early Blvd	Office Signage	\$500	2026-10-01
25	Early Fire Dept	1030 Early Blvd	The bathroom is not ADA accessible	\$10,000	Undefined Plan
27	Early Fire Dept	1030 Early Blvd	No ADA accessibility to the Fire Marshal's Office	\$5,000	2027-10-01
28	Public Works	1030 Early Blvd	Clear obstructions from the pathway to restrooms.	\$100	2026-10-01
29	Public Works	1030 Early Blvd	Signage	\$500	2026-10-01
30	Public Works	1030 Early Blvd	Bathrooms are not ADA accessible	\$20,000	Undefined Plan
31	McDonald Park	101 Park Dr.	Sidewalk needed from the track to the pavilion, bathroom, and concession.	\$7,500	2026-10-01
32	McDonald Park	101 Park Dr.	Bathroom/Concession is not ADA accessible	\$300,000	Undefined Plan
34	Early City Park	199 Oak St.	Parks and Rec Shop is not ADA accessible	\$400,000	Undefined Plan
35	Early City Park	199 Oak St.	ADA pathway is not complete throughout the park.	\$75,000	2027-10-01
36	Early City Park	199 Oak St.	Lacking ADA accessibility to the ballfields and dugouts	\$10,000	2027-10-01
37	Early City Park	199 Oak St.	No ADA pathway to the bathrooms and concession stand.	\$20,000	Undefined Plan
38	Early City Park	199 Oak St.	Concession Stand not ADA accessible	\$400,000	Undefined Plan
39	Early TC Park	109 Kelcy Way	No ADA ramp at Kelcy and Buena Vista	\$7,500	2026-03-01
40	Early TC Park	109 Kelcy Way	Under Construction	\$0	2026-03-01
41	Early TC Boardwalk	109 Kelcy Way	Under Construction	\$0	2026-03-01
42	City of Early Processes	<a href="https://www.earlytx.net/469/Americans-with-Disabilities-Act">https://www.earlytx.net/469/Americans-with-Disabilities-Act</a>	See ADA Assessment and Transition Plan	\$100	2026-10-01
43	Website	earlytx.net	See Appendix C to the plan	\$100	2026-10-01
44	Early Police Dept Processes	960 Early Blvd	See Appendix D to this plan	\$100	2026-10-01
45	Early Municipal Court	960 Early Blvd	See Appendix D to this plan	\$1,000	2026-10-01

## **Appendix C – Website ADA Assessment and Transition Plan**

### **1. Ensure all non-text content has a descriptive alternative.**

We are currently reviewing and updating the alternative text for every photo on the website. This initiative began on February 12, 2025. We anticipate significant over the next 6 months. We will begin the process of updating and rebuilding our website over the next year.

### **2. Add transcripts & captions for video & audio content.**

All videos hosted on our website are equipped with closed captions and functioning audio. We will continue to ensure that all audio and video content includes transcripts and captions for enhanced accessibility.

### **3. Design content to adapt to different layout/format/screens**

Our commitment is to ensure that every webpage on the site is designed to adapt seamlessly to various devices, formats, and screen sizes, providing a consistent user experience across all platforms. We will begin the process of updating and rebuilding our website over the next year.

### **4. Ensure your content is easy to see, read, and hear.**

We are researching different software to implement an audio feature on the website that will allow content to be read aloud, ensuring that it is accessible to all users, regardless of their reading ability. We will begin the process of updating and rebuilding our website over the next year.

### **5. Use minimalist web design.**

We will prioritize a clean and minimalist design for the website, reducing clutter and enhancing user focus on essential content. We will begin the process of updating and rebuilding our website over the next year.

### **6. Provide tools to help users navigate your content.**

Our navigation structure is designed to be intuitive, with clear links and pathways that allow users to access information easily and efficiently. We will review links to ensure the pathways are with few links. We will begin the process of updating and rebuilding our website over the next year.

### **7. Ensure your web content is concise, readable, and understandable.**

We will strive to present information in a clear and straightforward manner, ensuring that all content is easy to read and understand while remaining informative. We will begin the process of updating and rebuilding our website over the next year.

### **8. Ensure consistent content layout and design across all pages.**

The layout and design across all pages of our website will be uniform, providing users with a cohesive and familiar browsing experience. We will begin the process of updating and rebuilding our website over the next year.

### **9. Using accessible fonts for people with dyslexia.**

We will investigate font options that are known to be beneficial for individuals with dyslexia. If our website software (CivicPlus) offers suitable fonts, we will implement them to enhance readability for all users. We will begin the process of updating and rebuilding our website over the next year.

## Appendix D – Police Department and Municipal Court ADA Assessment and Transition Plan

### Early Police Department

#### Program accessibility

- **Safe transport:** Should someone who is wheelchair bound need transport outside of a standard patrol car I believe we could utilize the city van for such transport.
- **Plan of Action:** Adopt a policy for the safe transport of person with disabilities by August 2026

#### Effective communication

- **Provide auxiliary aids:** I have researched certified sign language interpreters and located a company that the County Court at Law utilizes called Global Interpreting Network who can provide sign language interpreters as well as interpreters for many foreign languages. I also researched TTY/TTD devices and located models varying in price from approximately \$100 dollars up to \$800 dollars.
- **Plan of Action:** Develop a policy and contract with providers to provide this necessary service. Also purchase the necessary equipment for TTY/TTD. Complete this by October 2026
- **Modify policies:** The Early Police Department does not have a policy for communicating with the deaf or hard of hearing.
- **Plan of Action:** Draft, adopt, and implement a policy by August 2026

### Municipal Court

#### Communication and auxiliary aids

- **For people who are deaf or hard of hearing:**
- **Provide auxiliary aids:** I have researched certified sign language interpreters and located a company that the County Court at Law utilizes called Global Interpreting Network who can provide sign language interpreters as well as interpreters for many foreign languages. I also researched TTY/TTD devices and located models varying in price from approximately \$100 dollars up to \$800 dollars.
- **Plan of Action:** Develop a policy and contract with providers to provide this necessary service. Also, purchase the necessary equipment for TTY/TTD. Complete this by October 2026
- **For people with vision disabilities:**
- The Municipal Court does not have a policy for communicating written material to persons with vision disabilities:
- **Plan of Action:** Draft, adopt, and implement a policy by August 2026
- The Municipal Court does not have a policy for allowing service animals into public facilities and the courtroom.
- **Plan of Action:** Draft, adopt, and implement a policy by August 2026

## Appendix E – Early City Hall and Utility Billing Processes ADA Assessment and Transition Plan

### Early City Hall

#### **Effective communication**

- **Plan of Action:** Develop a policy and contract with providers to provide this necessary service to communicate with persons with disabilities during the day-to-day operations of City Hall. Complete this by October 2026
- **Modify policies:** The Early Police Department does not have a policy for communicating with the deaf or hard of hearing.
- **Plan of Action:** Draft, adopt, and implement a policy by August 2026

### Utility Billing

#### **Program accessibility**

- The Utility Billing Department does not have a policy for communicating with the deaf or hard of hearing.
- **Plan of Action:** Adopt a policy for communicating with persons with disabilities by August 2026