

CCDA 2024–2025 Strategic Goal #3:
Increase Engagement with Business led by Black,
Indigenous, and People of Color, and other Marginalized
Communities

(Final Analysis)

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Summary and Overview:

California Commission on Disability Access (CCDA) was guided by three strategic goals in the 2024 and 2025 calendar years:

1. Develop 5 Year Strategic Plan for CCDA (2025 – 2030)
2. Increase Technical Assistance Outreach to the Business Community Across CA
3. Increase Engagement with Businesses Led by BIPOC (Black, Indigenous, and People of Color), and other marginalized communities.

The following report focuses on Strategic Goal #3 of the CCDA: increasing engagement with businesses led by Black, Indigenous, and People of Color (BIPOC) and other marginalized communities. To support this goal, CCDA conducted a data driven analysis using two primary sources: aggregated internal construction-related accessibility complaint data and United States (US) Census demographic data. By combining these datasets, CCDA identified regional trends, equity gaps, and opportunities for more targeted outreach. While the following analysis is centered on Strategic Goal #3, it is important to note that Strategic Goal #1, which focuses on developing a clear, organization-wide equity definition, is also in progress. Once completed, this definition will enhance and guide all outreach strategies over the 2025–2030 period. Through the following analysis, CCDA prioritized regions that not only reported high numbers of construction-related accessibility complaints but also had large BIPOC populations. Additionally, by examining the types of businesses most frequently involved in construction-related accessibility complaints, CCDA gained insights into industry-specific trends in access violations and their impact on these communities. The following report underscores how data can be used to enhance and focus outreach and technical assistance efforts ensuring that they are both data driven and equity informed. The report's analysis highlighted a key intersection: the regions most impacted by construction-related accessibility complaints also have large populations facing broader systemic inequalities. This insight directly influenced the strategies implemented under Strategic Goal #2, particularly in terms of tailoring technical assistance and outreach to address the needs of diverse communities. For example, CCDA hosted Listening Forums and Commission to Community engagement events in prioritized regions to gather input from communities but also focused the programming efforts to ensure that the impact is more localized and addresses the specific needs within the region. These events were designed to integrate language access services and culturally responsive programming, ensuring greater participation and inclusivity. By adopting an equity lens in these efforts, CCDA was able to more effectively serve BIPOC business communities, advancing its equity goals and broadening the reach and impact of technical assistance across the state.

Report and Analysis:

1. Introduction

The following report examines the intersection between disability access violations and the demographic makeup of California's communities, with a particular focus on areas where BIPOC populations may be disproportionately impacted. As part of CCDA's commitment to promoting disability access through dialogue and collaboration, this analysis links aggregated disability access complaint data with US Census demographic data to identify regional trends and equity gaps. In alignment with Strategic Goal #3, increasing engagement with businesses led by BIPOC and other marginalized communities, this report uses a data driven approach to prioritize regions with both high rates of accessibility violations and significant BIPOC populations. By cross-referencing these datasets, CCDA aims to strengthen its outreach and programming, tailoring resources and technical assistance to the communities that need them most. The five counties analyzed, Orange, Santa Clara, Sacramento, San Mateo, and Monterey, all serve as key focus areas for understanding how systemic inequalities and disability access barriers intersect. Insights drawn from this report's analysis also inform Strategic Goal #2 (technical assistance outreach) and are guided by the emerging equity framework being developed under Strategic Goal #1 (defining CCDA's equity principles). The following section clarifies the purpose and analytical intent of this report before describing the data methodology used to identify trends in accessibility violations and demographic composition.

2. Purpose of the analysis:

The purpose of the analysis is to explore how demographic and accessibility compliance data intersect to identify where systemic inequities may contribute to higher rates of disability access barriers. Specifically, the analysis connects two datasets, US Census demographic data and CCDA Legal Portal complaint data, to identify trends in disability access violations relative to BIPOC population concentrations. This connection allows CCDA to identify geographic areas where equity gaps are most pronounced and to prioritize those regions for outreach, education, and technical assistance. By grounding outreach in data, CCDA ensures that its efforts under Strategic Goal #3 are both evidence-based and aligned with the Commission's broader mission of promoting accessibility through collaboration and education rather than enforcement.

This analytical framework reflects CCDA's commitment to applying an equity lens to its data aggregation and reporting. Understanding where accessibility complaints overlap with larger demographic and socioeconomic trends allows CCDA to identify not only where access barriers occur but also why certain communities may be disproportionately impacted. This insight directly informs CCDA's strategies under Strategic Goal #2, ensuring that outreach is culturally and linguistically responsive and that resources are directed to communities with the greatest need. The next section

outlines the methodology used to conduct the following analysis and detailing the data sources, calculations, and criteria that guided the identification of high-impact regions. By clarifying how the data was collected and analyzed, CCDA ensures transparency and reinforces the integrity of its equity-centered approach.

To ensure consistency in the interpretation of equity and construction-related accessibility complaints, we refer to the definitions provided in Appendix 1. These definitions are aligned and set forth in California Civil Codes 55.3 and Government Code Sections 14985 et seq and form the basis for the equity framework applied in this analysis.

3. Methodology: Data Collection and Analysis Approach

The following section outlines the methodological approach used by CCDA to examine the intersection between construction-related accessibility compliant data and data from the US Census. This approach was intended to identify geographic and structural trends that may indicate where communities with higher concentrations of BIPOC residents experience greater impacts from accessibility barriers. This approach ensures that the analysis is data driven, transparent, and aligned with CCDA's equity commitments under Strategic Goal #3.

Data Sources

This report draws upon two primary sources: data from the CCDA Legal Portal and demographic data from the 2020 United States Census. The CCDA Legal Portal compiles information on construction-related accessibility complaints filed statewide. Each record includes the name and location of the business, ZIP code, and date of filing. For the purposes of this analysis, complaint data were aggregated by ZIP code and county to identify areas with the highest concentration of reported accessibility violations. Demographic data were obtained from the 2020 US Census Bureau datasets the number of individuals identified as “White alone, not Hispanic or Latino” was subtracted from the total county population. The resulting figure includes individuals who identify as Hispanic or Latino and individuals who identify as Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, or “Some Other Race.” Those identifying as two or more races were also included in the BIPOC category. Furthermore, because demographic data on business ownership by race or ethnicity are not available within the existing datasets, county-level population data were used as a proxy to approximate the demographic composition of local business owners. While this approach does not establish a direct measure of ownership demographics, it allows for an analysis of community-level trends and their potential relationship to accessibility compliance.

Analytical Approach

To identify possible equity gaps, the analysis cross-referenced CCDA Legal Portal complaint data with demographic data from the 2020 Census. By comparing the total number of accessibility complaints to the percentage of BIPOC residents in each county, the analysis sought to identify areas where accessibility barriers appear more prevalent in communities of color. Counties and ZIP codes were ranked by total complaint volume for the period 2022–2023. These rankings were then overlaid with demographic data to identify where high complaint volumes coincide with higher-than-average BIPOC population percentages. To further categorize the findings, CCDA developed a three-tier impact framework:

1. Level 1 (High Impact):
 - a. Among the top 10 counties in total complaint volume.
2. Level 2 (Moderate Impact):
 - a. Counties ranked 11–25 in complaint volume.
3. Level 3 (Baseline):
 - a. All other counties across the state, included to provide a broader demographic and equity context.

This impact-level approach allows CCDA to prioritize outreach and technical assistance in the areas where accessibility barriers are most concentrated and where targeted engagement could have the greatest benefit.

Recognizing the importance of understanding the types of businesses most frequently associated with accessibility complaints, CCDA also analyzed the “Top Defendants’ Businesses” dataset from its CCDA Legal Portal. The “Top Defendants’ Businesses” dataset categorizes complaints by business type, such as restaurants, retail establishments, or service providers, allowing the Commission to identify industry-specific trends. While this information does not include demographic details about business ownership, it provides valuable context about which sectors of the business community may face recurring accessibility challenges. This understanding supports the development of tailored outreach and education efforts designed to assist those sectors in improving compliance and accessibility outcomes.

Data Limitations

There are several limitations inherent in the available data. First, the 2020 U.S. Census provides demographic information about the general population but does not identify the racial or ethnic composition of business owners within each county. As a result, the analysis uses county-level demographic data as a proxy for understanding community composition. This approach assumes that areas with higher proportions of BIPOC residents also include a higher proportion of BIPOC-owned businesses, though this may not always be the case. CCDA Legal Portal likewise does not collect demographic information about business ownership or management. Consequently, the analysis cannot determine whether businesses owned by members of specific demographic groups are disproportionately represented among those receiving accessibility complaints. To partially address this limitation, CCDA incorporated an analysis of the business types most frequently cited in complaints. Understanding which industries, such as small retail, dining, or service-oriented businesses, are more frequently involved provides meaningful insight into the structural and operational contexts in which accessibility issues arise. By integrating this business-type analysis with geographic and demographic data, CCDA strengthens its equity-focused framework. The combined approach helps the Commission identify not only where accessibility challenges are concentrated but also the types of businesses most in need of technical assistance and educational resources. In turn, this insight allows CCDA to move from a purely geographic understanding of access barriers to a more holistic, programmatic approach that reflects the diverse experiences and needs of California's business and community landscapes.

Finally, it is important to acknowledge that the data represents a specific timeframe, complaints filed from 2022 through 2023, and that accessibility trends may evolve over time. Ongoing monitoring and analysis will allow CCDA to refine its understanding of how accessibility barriers affect California's diverse communities and to ensure that its outreach and technical assistance efforts remain current, responsive, and equity informed. Through this report's methodology, CCDA establishes a transparent, replicable, and inclusive approach to analyzing accessibility complaint data in conjunction with demographic and business-type information. The framework directly supports Strategic Goal #3, enhancing engagement with BIPOC and other marginalized business communities, and aligns with Strategic Goals #1 and #2, which emphasize the integration of equity principles and the expansion of technical assistance to California's business community.

The following section presents the demographic and complaint data used in this analysis. These data are presented in a factual manner to provide a foundation for subsequent interpretation and discussion in later sections.

4. Demographic and Complaint Data

To better understand the relationship between disability access violations and demographic trends, the following section presents county-level profiles for the five focus regions identified through CCDA's data analysis: Orange, Santa Clara, Sacramento, San Mateo, and Monterey Counties. Each county profile includes an overview of demographics, including BIPOC population percentages benchmarked against the California average, the volume and geographic distribution of construction-related accessibility complaints, and observations on how these trends intersect to inform CCDA's outreach priorities. By examining each county individually, CCDA can identify regional trends that highlight both challenges and potential areas for targeted engagement. These insights serve as the foundation for identifying broader statewide trends, which are outlined in the following sections.

Based on CCDA's 2022 data, CCDA identified areas with top complaints in Bay Area Santa Clara County/Sunnyvale, California, Central Coast/Peninsula Monterey County/Salinas, California, and Southern California Orange County/Irvine, California areas. The identified locations were the targeted locations for CCDA's 2024 Listening Forums and Commission to Community events. These series of 2024 Listening Forums and Commission to Community events served as a hypothesis for CCDA to utilize to test various formats so 2025 Listening Forums and Commission to Community events will have a working programmatic framework. 2020 Census Data illustrates the targeted areas identified in CCDA's Top ZIP Codes have high BIPOC populations.

Table 1 compares each county's BIPOC percentage to the California statewide average BIPOC percentage, showing how much higher or lower each county is. To determine the relative size of a county's BIPOC population when compared to California as a whole, the BIPOC population of both California and each county were calculated. The BIPOC population of California is 65.31% of the population. This was subtracted from the BIPOC percentage of each county's population to determine how they differed from the state average. For example, Monterey's population is 72.65% BIPOC. Therefore, Monterey's BIPOC population average is 7.34% higher than the California average.

Table 1: BIPOC Data Comparison between Counties

County	Population	BIPOC Population	County BIPOC %	CA BIPOC % average	+/- CA average
Monterey	439,035	318,958	72.65	65.31	7.34
Orange	3,186,989	1,988,334	62.39	65.31	-2.92
Sacramento	1,585,055	934,784	58.97	65.31	-6.34
San Mateo	764,442	488,540	63.91	65.31	-1.4
Santa Clara	1,936,259	1,380,551	71.3	65.31	5.99

Table 2 illustrates complaint data to sort counties by impact level based on complaint volume rankings, not city population size.

Table 2: CCDA County ZIP Code Ranking and Number of Complaints Received

County ZIP Code Data Comparison		
County	Number of Complaints	ZIP Code Rank
Orange	665	2
Santa Clara	310	4
San Mateo	135	10
Monterey	55	14
Sacramento	53	15

Table 3 below combines the relevant demographic data, specifically BIPOC population percentage and its variance from the California average, with the amount of complaints and ranking ZIP codes by level of impact. In essence, *Table 3* is integrating complaint data to sort counties by impact level based on complaint volume rankings, not city population size. Additionally, *Table 2* below presents a comparison of select California counties based on two key factors:

1. Demographic representation: focusing on the percentage of the population that identifies as BIPOC benchmarked against the California statewide average.
2. Community engagement: measured by the volume of complaints reported per county, which are used to rank counties by level of reported community need or issue frequency.

To further assess and prioritize impact, the counties are grouped into three “Impact Levels” based on complaint volume for 2022 through 2023:

1. Level 1 (High Impact):
 - a. Among the top 10 counties in total complaint volume.
2. Level 2 (Moderate Impact):
 - a. Counties ranked 11–25 in complaint volume.
3. Level 3 (Baseline):
 - a. All other counties across the state, included to provide a broader demographic and equity context.

The statewide average BIPOC percentage is estimated at 65.31%, based on the reported \pm difference from each county. This benchmark provides a useful lens to determine whether a county has a higher or lower share of racially diverse populations compared to the state overall. *Table 3* outlines County Impact Level Data Comparison. To determine the relative size of a county’s BIPOC population when compared to California as a whole, the BIPOC population of both California and each county were calculated.

Table 3: County Impact Level Data Comparison

County Impact Level Data Comparison							
County	Population	BIPOC Population	BIPOC %	± CA Avg BIPOC %	Number of complaints	ZIP Code Rank	Level of Impact
Monterey	439,035	318,958	0.7265	0.0734	55	14	Level 2
Orange	3,186,989	1,988,334	0.6239	-0.0292	665	2	Level 1
Sacramento	1,585,055	934,784	0.5897	-0.0634	53	15	Level 2
San Mateo	764,442	488,540	0.6391	-0.014	135	10	Level 1
Santa Clara	1,936,259	1,380,551	0.713	0.0599	310	4	Level 1

The following subsection presents a profile for each county, offering an overview of demographics, including BIPOC population percentages benchmarked against the California average as well as the volume and geographic distribution of construction-related accessibility complaints. Additionally, it highlights how these trends intersect to guide CCDA's outreach efforts.

County Profiles:

Monterey County



Monterey County is located in Central California on the Pacific Coast, with a population of 439,035 people and a total area of 3,771 square miles. It has a total of 43 ZIP codes and 12 incorporated cities.

- Population: 439,035
- BIPOC % v. CA average: 0.0734
- Number of complaints and ZIP code rank: 55 complaints and 14
- Impact level: Level 2

Monterey County Top Defendants' Businesses

Rank	General Description of Business and Place of Public Accommodation Category	Number of Filings Received
1	A Small Grocery Store (Sales or Rental Establishments)	2
2	A Small Grocery Store (Sales or Rental Establishments)	2
3	A Local Laundromat (Service Establishments)	1
4	A Franchise Convenience Store (Sales or Rental Establishments)	1
5	A Local Laundromat (Service Establishments)	1
6	A Small Grocery Store (Sales or Rental Establishments)	1
7	A Small Liquor Store (Sales or Rental Establishments)	1
8	A Regional Gas Station (Service Establishments)	1
9	A Small Liquor Store (Sales or Rental Establishments)	1
10	A Franchise Hotel (Places of Lodging)	1
Total:		12

Orange County



Orange County is located in Southern California, with a population of 3,186,989 people and a total area of 948 square miles. It has a total of 17 ZIP codes and 34 incorporated cities.

- Population: 3,186,989
- BIPOC % v. CA average: -0.0292
- Number of complaints and ZIP code rank: 665 complaints and rank 2
- Impact level: Level 1

Orange County Top Defendants' Businesses

Rank	General Description of Business and Place of Public Accommodation Category	Number of Filings Received
1	A Franchise Hotel (Places of Lodging)	9
2	A Franchise Gas Station (Service Establishments)	6
3	A Franchise Gas Station (Service Establishments)	5
4	A Regional Gas Station (Service Establishments)	5
4	A Franchise Hotel (Places of Lodging)	5
5	A Franchise Coffee Shop (Establishments Serving Food or Drink)	5
6	A Franchise Fast Food Restaurant (Establishments Serving Food or Drink)	5
7	A National Auto Part Store (Sales or Rental Establishments)	4
8	A Franchise Hotel (Places of Lodging)	4
9	A Franchise Fast Food Restaurant (Establishments Serving Food or Drink)	4
Total:		52

Sacramento County



Sacramento County is located in Northern California, with a population of 1,585,055 people and a total area of 994 square miles. It has a total of 132 ZIP codes and 7 incorporated cities.

- Population: 1,585,055
- BIPOC % v. CA average: -0.0634
- Number of complaints and ZIP code rank: 53 complaints and rank 15
- Impact level: Level 2

Sacramento County Top Defendants' Businesses

Rank	General Description of Business and Place of Public Accommodation Category	Number of Filings Received
1	A Franchise Deli Restaurant (Establishments Serving Food or Drink)	3
2	A Franchise Juice Bar Shop (Establishments Serving Food or Drink)	2
3	A Franchise Frozen Yogurt Shop (Establishments Serving Food or Drink)	2
4	A National Grocery Store (Sales or Rental Establishments)	1
5	A Small Grocery Store (Sales or Rental Establishments)	1
6	A Citywide Sushi Restaurant (Establishments Serving Food or Drink)	1
7	A Local Bagel Shop (Establishments Serving Food or Drink)	1
8	A Regional Grocery Store (Sales or Rental Establishments)	1
9	A Family-Owned Sushi Restaurant (Establishments Serving Food or Drink)	1
10	A Franchise Pizza Restaurant (Establishments Serving Food or Drink)	1
Total:		14

San Mateo County



San Mateo County is located in Northern California on the Pacific Coast, with a population of 764,442 people and a total area of 744 square miles. It has a total of 63 ZIP codes and 20 incorporated cities.

- Population: 764,442
- BIPOC % v. CA average: -0.014
- Number of complaints and ZIP code rank: 135 complaints and rank 10
- Impact level: Level 1

San Mateo County Top Defendants' Businesses

Rank	General Description of Business and Place of Public Accommodation Category	Number of Filings Received
1	A Family-Owned Grocery Store (Sales or Rental Establishments)	2
2	A Small Vape Store (Sales or Rental Establishments)	2
3	A National Pharmacy and Retail Store (Sales or Rental Establishments)	2
4	A Local Laundromat (Service Establishments)	2
5	A Small Grocery Store (Sales or Rental Establishments)	1
6	A Small Liquor Store (Sales or Rental Establishments)	1
7	A Local Chiropractic Clinic (Service Establishments)	1
8	A Local Dealership (Service Establishments)	1
9	A Family-Owned Restaurant (Establishments Serving Food or Drink)	1
10	A Small Liquor Store (Sales or Rental Establishments)	1
Total:		14

Santa Clara County



Santa Clara County is located in Northern California, bordering coastal counties, with a population of 1,936,259 people and a total area of 1,304 square miles. It has a total of 199 ZIP codes and 15 incorporated cities.

- Population: 1,936,259
- BIPOC % v. CA average: 0.0599
- Number of complaints and ZIP code rank: 310 complaints and rank 4
- Impact level: Level 1

Santa Clara County Top Defendants' Businesses

Rank	General Description of Business and Place of Public Accommodation Category	Number of Filings Received
1	A Franchise Fast Food Restaurant (Establishments Serving Food or Drink)	6
2	A Franchise Beverage Shop (Establishments Serving Food or Drink)	3
3	A Local Dental Clinic (Service Establishments)	2
4	A National Gas Station (Service Establishments)	2
5	A Franchise Beverage Shop (Establishments Serving Food or Drink)	2
6	A Franchise Ice Cream Shop (Establishments Serving Food or Drink)	2
7	A Local Spa (Service Establishments)	2
8	A Family-Owned Steakhouse Restaurant (Establishments Serving Food or Drink)	2
9	A National Bagel Shop (Establishments Serving Food or Drink)	2
10	A Small Grocery Store (Sales or Rental Establishments)	2
Total:		25

Preliminary Analysis

This preliminary analysis explores the connection between BIPOC population concentrations and construction-related accessibility complaints across five focus counties: Monterey, Santa Clara, San Mateo, Orange, and Sacramento. By comparing county-level demographic data with complaint data from the CCDA Legal Portal, we identify initial trends that will guide future analysis and inform outreach strategies.

The proportion of BIPOC residents varies across these counties relative to the California state average. Monterey County has one of the highest percentages, with 72.65% of its population identifying as BIPOC, followed closely by Santa Clara County at 71.30%. San Mateo and Orange counties, at 63.91% and 62.39%, respectively, are closer to the state average, while Sacramento County, at 58.97%, is slightly below. However, when considering absolute population numbers, counties like Santa Clara and Orange, with larger populations, have significantly higher total numbers of BIPOC residents than smaller counties like Monterey and Sacramento. This underscores the importance of examining both the percentage of BIPOC residents and total population size to better understand potential equity gaps.

When we analyze complaint data in conjunction with demographic trends, a few key trends emerge. In general, counties with larger BIPOC populations tend to report higher volumes of accessibility complaints, though this relationship is not always straightforward. For example, Santa Clara County, which has both a high percentage of BIPOC residents and a high number of complaints, suggests a direct overlap between BIPOC population density and accessibility issues. Monterey County, despite having a similarly high percentage of BIPOC residents, reports fewer complaints, which may reflect other factors such as economic conditions, local enforcement practices, or differences in access to compliance resources. Orange County presents a unique case, where a large BIPOC population correlates with a high volume of complaints, despite the county's BIPOC percentage being slightly below the state average. These observations highlight that both relative (percentage) and absolute (total number) measures of BIPOC populations are important for understanding where systemic inequities and access barriers are most pronounced. To further refine this understanding, a ZIP Code-level analysis within each county reveals localized areas where accessibility barriers may be more acute. High-impact ZIP codes often correspond with densely populated BIPOC communities, pointing to potential disparities in accessibility resources and available technical assistance. Using this localized approach enables CCDA to move beyond broad county-level data, helping to identify specific neighborhoods where targeted outreach and support could have the greatest impact. Overall, this preliminary analysis establishes a foundational understanding for the next phases of the report. It emphasizes the need for targeted outreach and compliance strategies that integrate demographic considerations, ensuring that future efforts are both equitable and data informed. The next section, *Analysis and Key*

Findings will build upon these insights, exploring emerging trends, equity implications, and opportunities for targeted outreach on proactive compliance.

5. Analysis and Key Insights

This section interprets the demographic and complaint data presented in the previous section, *Demographic and Complaint Data* to highlight trends, patterns, and equity implications related to access compliance across five focus counties: Monterey, Santa Clara, San Mateo, Orange, and Sacramento. The analysis explores expands upon the preliminary analysis to better understand how accessibility compliance issues intersect with community demographics and business activity. The findings support CCDA's ongoing efforts to promote equitable access, informed outreach, and proactive compliance under Strategic Goal #3.

County-Level Analysis

Monterey County:

- BIPOC Percentage: 72.65% (+7.34 above state average)
- Complaint Rank: 14 → Level 2 (Moderate Impact)

Analysis:

Monterey County has one of the most diversified racial and ethnic populations among the counties analyzed. Although the complaint volume is moderate, this may indicate potential barriers to filing or awareness, rather than the absence of accessibility barriers. Language access, technological access, or local awareness of accessibility laws are all factors that may influence complaint rates.

Key Insight:

Monterey County should remain a priority for outreach and proactive compliance education. Enhanced community engagement, multilingual education, and collaboration with local chambers of commerce and small business associations can help improve understanding of accessibility requirements to promote equitable participation in compliance.

Santa Clara County:

- BIPOC Percentage: 71.30% (+5.99 above state average)
- Complaint Rank: 4 → Level 1 (High Impact)

Analysis:

Santa Clara County has a high level of demographic diversity and a significant number of accessibility complaints. This relationship suggests a dynamic business environment with both strong community engagement but persisting physical or procedural barriers to accessibility.

Key Insight:

Santa Clara County should remain a priority for outreach and proactive compliance education. Partnerships between local governments, business associations, and disability advocacy organizations can enhance awareness, help to alleviate common violations, and improve overall accessibility outcomes.

Orange County:

- BIPOC Percentage: 62.39% (–2.92 below state average)
- Complaint Rank: 2 → Level 1 (High Impact)

Analysis:

Orange County ranks second statewide in total complaints, indicating a high level of involvement in accessibility compliance. While the county's BIPOC percentage is slightly lower than the state average, the large population and vast commercial base add to the overall volume of complaints. This trend provides an opportunity to broaden proactive compliance programs across in key industries such as hospitality, retail, and service.

Key Insight:

Orange County continues to be a strategic focus for technical assistance and Certified Access Specialist (CASP) education efforts, with an emphasis on collaborating with local business networks and community organizations to promote voluntary compliance and prevent barriers for arising.

San Mateo County:

- BIPOC Percentage: 63.91% (–1.40 below state average)
- Complaint Rank: 10 → Level 1 (High Impact)

Analysis:

San Mateo County's complaint volume rank among the top ten in the state, with trends indicating that factors such as infrastructure age, density of small businesses, and economic pressures may contribute to ongoing accessibility concerns. The county's

cultural and linguistic diversity emphasizes the significance of inclusive engagement strategies.

Key Insight:

San Mateo County can benefit from ongoing community outreach, cross-sector collaboration, and culturally responsive engagement to promote equitable access and raise awareness of accessibility responsibilities and obligations among local businesses.

Sacramento County:

- BIPOC Percentage: 58.97% (–6.34 below state average)
- Complaint Rank: 15 → Level 2 (Moderate Impact)

Analysis:

Sacramento County reports a moderate level of accessibility complaints. As the state capital and a center of both public and private businesses, accessibility trends may be influenced by policy implementation, building age, and awareness of accessibility responsibilities and obligations.

Key Insight:

Sacramento provides a valuable environment for ongoing policy alignment, training, and public transparency. The county's engagement through Commission-hosted events encourages ongoing dialogue between the state, business community, and disability advocates.

Cross-County Trends and Equity Observations

The comparative analysis across the five focus counties, Monterey, Santa Clara, San Mateo, Orange, and Sacramento, demonstrates significant trends in accessibility compliance when viewed through demographic and socioeconomic perspectives. These cross-county trends highlight how factors such as racial and ethnic diversity, community engagement, business density, and local infrastructure conditions impact accessibility outcomes. The findings emphasize the importance of equity-informed strategies that adapt to local contexts while attaining statewide accessibility goals.

High BIPOC Percentage and High Complaint Volume (e.g., Santa Clara County):

Counties that have high demographic diversity and a high volume of complaints often reflect communities with strong civic participation and awareness of accessibility rights, yet physical or procedural barriers remain. To address recurring compliance challenge, these sectors require targeted, equity-focused resource allocation as well as increased collaboration across governments, disability advocates, and business networks.

High BIPOC Percentage and Moderate Complaint Volume (e.g., Monterey County): Counties with diverse populations but moderate complaint activity may experience barriers to reporting violations, limited access to compliance resources, or a lack of awareness about accessibility obligations. These dynamics highlight the importance of multilingual education, trustworthy community connections, and open communication channels for ensuring equitable participation in compliance and obligations.

Lower BIPOC Percentage and High Complaint Volume (e.g., Orange and San Mateo Counties):

In counties with lower demographic diversity but high complaint volume, accessibility barriers may be linked to economic and infrastructural factors like commercial density, business turnover, or the age of the built environment, rather than just demographic variables alone. In these circumstances, localized data analysis might guide proactive interventions aimed at high-risk industries or geographic areas with recurring compliance issues.

Overall, these findings demonstrate the importance of considering both community composition and local factors in understanding accessibility compliance and equity outcomes. The data suggests that while demographic diversity, particularly within BIPOC communities, is a significant factor in identifying areas for concern that it is also critical to account for socioeconomic conditions, local infrastructure, and the level of awareness within each community. These factors can all influence the frequency and nature of accessibility complaints as well as the capacity of communities to address them. A comprehensive and nuanced understanding of these dynamics is essential for CCDA's ongoing efforts to promote equitable access. By integrating both demographic data and local contextual factors into outreach and compliance strategies, CCDA can ensure that its programming is tailored to the specific needs of diverse communities, particularly those that have historically been underserved or marginalized. In this regard, a more detailed, ZIP Code level analysis will provide deeper insights into where accessibility barriers and compliance gaps are most common, enabling more targeted outreach. Ultimately, these findings emphasize the need for data driven, equity focused strategies that foster collaboration with local stakeholders, enhance community awareness, and ensure that outreach efforts are inclusive, effective and responsive to the needs of each community.

Table 4 summarizes key cross-county findings and recommendations for equity, complaint distribution, community awareness, and data monitoring. The table summarizes how demographic and business trends impact accessibility compliance and outlines ways for improving equitable access and proactive compliance across counties.

Table 4: CCDA Key Findings and Recommendations

CCDA Key Findings and Recommendations		
Focus Area	Findings	Recommendations
Equity and Demographics	Counties with large and diverse populations exhibit varying accessibility trends, ranging from underreporting to elevated complaint activity.	Integrate demographic indicators into outreach and compliance planning to ensure equitable access to state and local resources.
Complaint Concentration	High complaint volumes in diverse or economically dense counties indicate persistent accessibility challenges.	Prioritize targeted technical assistance and Certified Access Specialist (CASp) engagement to address identified barriers.
Community Awareness	Certain communities may have limited awareness of accessibility rights, obligations, or available compliance support programs.	Expand culturally and linguistically inclusive outreach, education campaigns, and partnerships with local organizations.
Data and Monitoring	Existing datasets may not fully capture all accessibility barriers or localized disparities.	Continue to enhance data collection and conduct ZIP Code-level analyses to identify emerging trends and address inequities.

6. Equity and Inclusion Framework

Equity is a foundational principle guiding the work of CCDA and supports how the Commission approaches accessibility, outreach, and collaboration across the state. In alignment with Government Code Section 14985, CCDA defines equity as fair and just access to opportunities, resources, and services so that all Californians, regardless of race, ethnicity, language, disability, or socioeconomic status. Equity is not an abstract concept within the Commission’s operations; it is a practical framework that shapes how CCDA designs programs, analyzes data, and delivers technical assistance. Under Strategic Goal #1, CCDA is developing a formal definition of equity as part of its 2025–2030 Five-Year Strategic Plan. This definition will serve as the foundation for all Commission activities and ensure that equity is embedded throughout the organization’s work, from data collection and analysis to community engagement and outreach. The emerging framework positions equity as both a process and an outcome, emphasizing inclusion, participation, and fairness in all CCDA initiatives. By establishing a shared understanding of equity, CCDA seeks to standardize how the principle is applied internally and externally, guiding resource allocation, program design, and stakeholder engagement.

By incorporating demographic data into accessibility analyses, particularly data identifying the proportion of residents in regions who identify as BIPOC, CCDA is able to identify areas where access barriers may overlap with broader systemic inequities. This process ensures that resources are directed to communities that have historically faced compounded barriers to accessibility, including limited English proficiency, economic disadvantage, or geographic isolation. Equity is also integrated into CCDA's operational model, which emphasizes collaboration and education over enforcement. As a nonregulatory body, CCDA advances accessibility through partnerships with the business community, disability advocates, and local governments rather than through disciplinary measures. This approach aligns with federal accessibility standards while maintaining California's state-specific emphasis on education and capacity building. Through this framework, CCDA ensures that compliance with disability access requirements is pursued through cooperation, transparency, and support; principles that advance both accessibility and equity.

Furthermore, equity serves as the connective thread across all three of CCDA's 2024–2025 Strategic Goals. Strategic Goal #1 establishes the formal equity definition; Strategic Goal #2 applies equity principles through expanded and accessible technical assistance; and Strategic Goal #3 operationalizes equity by engaging directly with BIPOC and marginalized business communities. Collectively, these goals ensure that CCDA's commitment to accessibility is both inclusive and data driven. As CCDA finalizes its equity framework and integrates it into the 2025–2030 Strategic Plan, equity will continue to guide how the Commission evaluates success, measures impact and prioritizes engagement. This framework allows CCDA to move beyond identifying accessibility barriers toward addressing the underlying inequities that perpetuate them. By centering equity in its mission, CCDA strengthens its ability to promote accessibility that is meaningful, sustainable, and reflective of California's diverse population.

7. Strategic Application: Outreach and Listening Forums

Building upon the principles established in the *Equity and Inclusion Framework* section, CCDA applied its data findings and equity goals through direct community engagement during the 2024–2025 program years. Guided by Strategic Goal #3, the Commission launched a series of Listening Forums and Commission to Community events across the state in various regions. These initiatives were designed to ensure that the insights gathered from data analysis translated into tangible outreach, education, and relationship building with communities that are most impacted by accessibility barriers. The Listening Forums and Commission to Community events were a central mechanism for implementing CCDA's equity-centered outreach model. Using demographic and complaint data from the CCDA Legal Portal and the US Census, the Commission identified five focus counties; Monterey, Santa Clara, Orange,

San Mateo, and Sacramento, where high accessibility complaint volumes overlapped with large BIPOC populations. These areas were prioritized for engagement because they represent communities with the highest potential for impact.

Each Listening Forum and Commission to Community event provided an accessible and inclusive environment for dialogue between CCDA representatives, business owners, disability advocates, and community members. The events were structured to ensure full participation by offering American Sign Language (ASL) interpretation, Communication Access Real-time Translation (CART), and translated materials in languages reflective of local populations. This intentional inclusion of accessibility and language services exemplified CCDA's commitment to ensuring that engagement efforts uphold the same standards of access that the Commission promotes statewide. The findings from this analysis informed CCDA's 2024–2025 Listening Forums and Commission to Community initiatives. These engagements operationalized CCDA's equity framework and data insights by connecting directly with communities most impacted by accessibility barriers.

Each county forum had a distinct focus shaped by local needs and data trends:

- **Monterey County – Small Business Focus**
CCDA collaborated with local city-level entities and chambers of commerce at the event to discuss the specific challenges that small and rural businesses face with meeting accessibility requirements. The feedback emphasized the importance of simplified compliance guidance and more localized training resources, in collaboration with the local chambers of commerce.
- **Santa Clara County – ADA Compliance Guidance at the City Level**
With high BIPOC representation and elevated complaint levels, the Santa Clara forum prioritized on compliance education and collaboration among business owners, local agencies, and disability organizations to improve proactive compliance. The forum presented in collaboration with the Pacific ADA Center and the City of Sunnyvale, covered the fundamental concept of ADA compliance and provided practical assistance and information.
- **Orange County – Technical Assistance and Support**
Orange County's session focused on technical assistance, including discussions about accessibility assessments and the role of the Certified Access Specialist (CAsp) program. The forum brought together experts from the Division of the State Architect (DSA), local Certified Access Specialists (CAsp), and disability advocates to discuss best practices for built environment access compliance. Participants and attendees sought ongoing engagement as well as follow-up resources.

- **San Mateo County – Community Voices and Collaboration**
This forum elevated community perspectives, by facilitation open dialogue between the local chambers of commerce, state-level officials, and residents with disabilities. The event reintroduced the in-person “Voices of the Customer” approach, bringing together local business owners and community stakeholders to discuss accessibility concerns. The event was held in collaboration with the Center for Independence of Individuals with Disabilities (CID) and the San Mateo Area Chamber of Commerce, demonstrating CCDA’s commitment to inclusive cross-sector relationships. Discussions centered on the need for culturally relevant outreach and increased public awareness of access obligations and requirements.
- **Sacramento County – Commission Engagement and Policy Alignment**
The Sacramento forum functioned as both an interaction and discussion session. The second 2025 forum was held during the Commission’s regular Full Commission meeting in Sacramento and titled “Commission to Community.” This innovative format allowed commissioners to interact directly with the public participants on business accessibility topics in real time, increasing transparency and accountability for relevant CCDA initiatives. A follow-up discussion was held later in the year, also in Sacramento, to continue the engagement from June. This event, the final 2025 forum, expanded the community dialogue and allowed for continuous input and relationship building.

Table 4 in the *Analysis and Key Findings* section summarizes cross-county insights and recommendations related to equity considerations, complaint distribution, community awareness, and data monitoring. The table summarizes how demographic and business trends impact accessibility compliance and outlines strategies to enhance equitable access and promote proactive compliance across counties.

Through these engagements, CCDA collected both quantitative and qualitative insights that are now shaping the development of its 2025–2030 Strategic Plan. Participants identified recurring themes, including the need for greater awareness of accessibility requirements, the importance of culturally and linguistically appropriate outreach materials, and the value of continued collaboration with community-based organizations. The Listening Forums and Commission to Community events also reinforced the interconnected nature of CCDA’s strategic goals. The equity framework developed under Strategic Goal #1 guided the design and accessibility of each event, while the technical assistance strategies advanced under Strategic Goal #2 ensured that outreach content was relevant, actionable, and informed by participant feedback. Through these engagements, CCDA advanced a proactive model of access compliance: one grounded in partnership, education, and trust-building. By aligning data analysis with community dialogue, CCDA continues to foster equitable access outcomes across California’s business and disability communities.

8. Conclusion

Overall, by integrating aggregated internal construction-related accessibility complaint data with U.S. Census demographic data, CCDA identified regional trends, equity gaps, and opportunities for targeted outreach across five counties: Orange, Santa Clara, Sacramento, San Mateo, and Monterey. Collectively, these analyses illustrate how accessibility barriers intersect with demographic composition, community resources, and localized conditions, highlighting areas where systemic inequities may contribute to differing levels of reporting, awareness, and compliance. These findings reinforce that accessibility compliance is both a legal obligation and equity imperative. Variations in complaint activity, business density, and community engagement demonstrate the need for sustained, data driven strategies that prioritize proactive education, inclusive outreach, and strong collaboration among state, local, and community partners. As CCDA advances Strategic Goal #3, promoting equitable access and supporting proactive compliance, these insights guide policy development, stakeholder engagement, and program design. CCDA's ongoing refinement of data collection, ZIP Code level monitoring, and evaluation processes will be critical for identifying emerging disparities and directing resources to high impact areas. Through strengthening these efforts, CCDA can help ensure that all Californians, regardless of geography, demographic background, or community context, have equitable access to public spaces, services, and opportunities.

9. Appendix

1. Purpose and Scope

This Appendix provides definitions that are essential for consistent interpretation of equity and construction-related accessibility complaints. The definitions outlined herein are derived from and aligned with the relevant provisions set forth in California Civil Code Section 55.3 and Government Code Section 14985 et seq. These definitions form the foundation of the equity framework applied throughout the report's analysis. The purpose of including these definitions is to ensure clarity and uniformity in the application of the terms. All terms and references in this report shall be understood in the context of the definitions set forth in Appendix A shall serve as the authoritative guide for interpreting and applying these provisions.

2. Definitions:

a. Complaint Definition:

Pursuant to California Civil Code Section 55.3 "Complaint" means a civil complaint that is filed or is to be filed with a court and is sent to or served upon a defendant on the basis of one or more construction-related accessibility claims, as defined in this section. "Construction-related accessibility claim" means any claim of a violation of any construction-related accessibility standard, as defined by paragraph (6) of subdivision (a) of Section 55.52, with respect to a place of public accommodation. "Construction-related accessibility claim" does not include a claim of interference with housing within the meaning of paragraph (2) of subdivision (b) of Section 54.1, or any claim of interference caused by something other than the construction-related accessibility condition of the property, including, but not limited to, the conduct of any person.

b. Equity Definition:

Equity is defined as the active and intentional development of systems, policies, and practices to guarantee that people with disabilities have equal access to opportunities, services, and resources. It entails identifying and addressing barriers that disproportionately affect people with disabilities, providing tailored support as needed, and cultivating an inclusive environment that meets the diverse needs of all individuals, regardless of their physical, sensory, or cognitive differences. The goal of equity is to understand and remove barriers faced that various individuals or groups encounter.

CCDA Purview:

CCDA functions within a specific purview to promote disability access through collaboration and dialogue between the business community, disability community, and all levels of government. CCDA is not a state entity that enforces or regulates laws. Rather, CCDA is an informative resource. The Commission gathers construction-related accessibility claims and compiles reports to inform the state legislature. The data gathered by CCDA informs of its programs and outreach efforts, which are overseen by a 17-member commission.

Alignment with Government Code 14985:

Before defining or expanding equity goals, CCDA conducted an internal review to ensure alignment with its statutory purpose as defined in Government Code 14985. Government Code 14985 establishes CCDA's role as a non-regulatory body tasked with promoting disability access through collaboration, education, and information sharing among the business community, disability community, and all levels of government. CCDA's current equity definition, which focuses on identifying and addressing barriers disproportionately affecting people with disabilities, directly supports this purpose. Rather than altering the Commission's mission, the equity lens enhances it by ensuring that outreach and technical assistance are tailored, inclusive, and responsive to diverse disability experiences across California.

Additionally, while CCDA remains aware of evolving federal equity guidance, any future adoption of such frameworks will be carefully assessed to ensure that they complement and do not conflict with CCDA's legislatively defined role in California. The equity strategies CCDA pursues are purposefully grounded in its state-defined mission and are designed to promote access while respecting the statutory framework under which the Commission operates.

CCDA's Equity Lens in Action:

In its efforts, CCDA implemented an equity-centered approach to disability access compliance that extends beyond meeting minimum legal requirements. This approach emphasized creating environments in which all individuals could fully participate. It takes ongoing efforts to identify and remove systemic barriers, advocate for the most inclusive solutions, and ensure that all people are treated with dignity and respect in every environment they enter whether physical, digital, or social.

For example, in implementing CCDA Strategic Goal #3: Increase Engagement with Businesses Led by BIPOC and other marginalized communities among other objectives, CCDA prioritized regions with both a high number of accessibility violations as well as significant BIPOC populations, who often face systemic barriers to access. By focusing outreach efforts on locations where accessibility challenges and equity concerns intersect, CCDA was able to maximize the impact and relevance of its technical assistance. The analysis of demographic trends alongside accessibility enabled CCDA to adjust its outreach efforts by providing language access services and culturally responsive programming to meet the needs of diverse communities. This method enhanced equity while simultaneously improving CCDA's technical assistance endeavors under Strategic Goal #2. While this example focuses on CCDA Strategic Goal #3, it is important to highlight that the ongoing creation of a clear CCDA equity definition, as a part of CCDA Strategic Goal #1, will continue to shape and inform all CCDA outreach strategies from 2025 to 2030. In essence, equity within CCDA's purview is promoting fairness and justice in disability access by actively removing barriers and personalizing support to the needs of people with disabilities. CCDA fulfills its mission by using data driven insights and collaborative efforts to promote inclusive environments, thereby improving access and participation for all Californians.