



25-LDM-14

May 28, 2026

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RE: Legislatively Determined Mandate
Local Government: Collection of Demographic Data.
(Senate Bill 515; Statutes 2025, Chapter 768)

Dear Director Stephenshaw and Executive Director Gmur:

Rural County Representatives of California (RCRC), a statewide association of California's rural counties, hereby requests to initiate a Joint Request for Legislatively Determined Mandate (LDM) pursuant to Government Code section 17573 regarding the above-captioned statute. The Department's bill analysis dated April 7, 2025 (attached) acknowledges that this statute "likely creates a significant state-reimbursable mandate," and we are looking forward to working with the Department to follow the process set forth in Section 17573 to develop a Joint Request for presentation to the Legislature.

By copy of this letter to the Commission on State Mandates, RCRC requests acknowledgement that the statute of limitations to file a test claim is tolled as of the date of this notice pursuant to Government Code section 17573, subdivision (b). While this matter is pending, RCRC or the Department shall notify the Commission of actions taken as set forth below, in accordance with subdivision (g) of Section 17573:

- Provide the Commission with a copy of any communications regarding development of a joint request under this section and a copy of a joint request when it is submitted to the Legislature.
- Notify the Commission of the date of (A) the Legislature's action on a joint request in the Budget Act, or (B) the Department's decision not to submit a joint request.

Please do not hesitate to contact us if you have any questions, or would like to schedule a meeting to discuss the next steps in the LDM process.

Very truly yours,

TAYLOR W. KAYATTA, Deputy General Counsel
Rural County Representatives of California

DEPARTMENT OF FINANCE BILL ANALYSIS

AMENDMENT DATE: 04/07/2025
POSITION: Oppose

BILL NUMBER: SB 515
AUTHOR: Richardson, Laura
RELATED BILLS: SB 189 (2022)

BILL SUMMARY: Local government: collection of demographic data.

This bill, by January 1, 2027, requires a city, county, or city and county collecting demographic data for persons hired for employment by the locality to include additional collection categories and tabulations for Black or African American groups.

FISCAL SUMMARY

The Department of Finance notes this bill likely creates a state-reimbursable mandate because it requires a new program or higher level of service to be provided by local agencies under the data collection requirements imposed by the bill.

Finance notes that the General Fund cost exposure resulting from the bill is unknown. Assuming one-time costs of \$10,000 for all 58 counties and 482 cities to update forms and create the processes needed to collect the required data, the cost would be at least \$5.4 million. Ongoing costs are unknown, but likely less significant than the upfront costs.

COMMENTS

Finance is opposed to this bill because it likely creates a significant state-reimbursable mandate and General Fund cost pressures by requiring cities and counties to collect additional demographic data about persons hired by the locality.

Current law pursuant to Chapter 48, Statutes of 2022 (SB 189), requires the State Controller's Office and the Department of Human Resources to include additional categories and tabulations for Black or African American groups when collecting public employee demographic data, including, but not limited to, African Americans who are descendants of persons who were enslaved, African Blacks, Caribbean Blacks, and other Blacks.

This bill imposes the above requirements on cities, counties, and cities and counties.

According to the author's office, the intent of this bill is to improve accuracy, comprehensiveness, and consistency of demographic data.

Code/Department Agency or Revenue Type	SO	(Fiscal Impact by Fiscal Year)						Fund Code
	LA	(Dollars in Thousands)						
	CO RV	PROP 98	FC	2026-2027 FC	2027-2028 FC	2028-2029 FC		
8885/Comm St Mndt	LA	No	C	5,000-10,000	C	100-500	C	100-500 0001

Analyst/Principal (713) Hill, Chris	Date	Program Budget Manager Calvert, Teresa	Date
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Department Deputy Director	Date
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Governor's Office:	By:	Date:	Position Approved _____
			Position Disapproved _____

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On June 3, 2026, I served the:

- **Current Mailing List dated June 3, 2026**
- **Notice of Receipt of Letter of Intent to Initiate a Joint Request for a Legislatively Determined Mandate and Tolling of the Statute of Limitations issued June 3, 2026**
- **Letter of Intent to Initiate a Joint Request for a Legislatively Determined Mandate filed by the Rural County Representatives of California (RCRC) on May 28, 2026**

Local Government: Collection of Demographic Data, 25-LDM-14
Statutes 2025, Chapter 768 (SB 515)
Rural County Representatives of California, Requester

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on June 3, 2026 at Sacramento, California.



Jill Magee
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 6/3/26

Claim Number: 25-LDM-14

Matter: Local Government: Collection of Demographic Data

Requester: Rural County Representatives of California

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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