

FIRST SUPPLEMENT TO MEMORANDUM 2026-40

**Terminology Relating to Persons with Disabilities
(Public Comments)**

This supplement¹ presents public comments received by the Commission related to Memorandum [2026-40](#).

<i>Exhibit</i>	<i>Exhibit page</i>
The Arc & United Cerebral Palsy California Collaboration (10/21/26)	1
State Council on Developmental Disabilities (10/22/26)	3

As with prior memoranda, a brief description of each commentator is below.

The Arc & United Cerebral Palsy California Collaboration

This comment was submitted by Greg deGiere, a Civil Rights Advocate with The Arc of California. According to its [website](#):

Since 1950, The Arc of California has been a leading statewide voice for the rights and full inclusion of people with intellectual and developmental disabilities and their families. As part of a national network of over 600 state and local chapters of The Arc, we collaborate with families, advocates, service providers, and allies to shape public policy, foster inclusive opportunities, and champion equity for all.

According to United Cerebral Palsy (UCP) of Sacramento and Northern California's [website](#):

UCP of Sacramento and Northern California is a leading provider of programs and services for children and adults with developmental disabilities.

By using evidence-based practices, UCP programs and services helps clients, and their families, to live a life with increased independence, productivity, and self-confidence.

California State Council on Developmental Disabilities

This comment was submitted by Aaron Carruthers, the Executive Director of California

¹ Any California Law Revision Commission document referred to in this memorandum can be obtained from the Commission. Recent materials can be downloaded from the Commission's [website](#). Other materials can be obtained by contacting the Commission's staff, through the website or otherwise.

The Commission welcomes written comments at any time during its study process. Any comments received will be a part of the public record and may be considered at a public meeting. However, comments that are received less than five business days prior to a Commission meeting may be presented without staff analysis.

State Council on Developmental Disabilities (SCDD). According to its [website](#):

The Council advocates, promotes and implements policies and practices that achieve self-determination, independence, productivity, and inclusion in all aspects of community life for Californians with developmental disabilities and their families.

PUBLIC COMMENT

The Arc & United Cerebral Palsy California Collaboration were co-sponsors of [AB 1906](#)² and the author of the letter, Mr. deGiere, participated in the study's working group. The letter is responsive to the Discussion draft and restates their support of the working group's consensus to replace "dependent adult" and "dependent person" with "adult with a disability as defined in Section []" and "person with a disability as defined in Section []."³ With regard to the Discussion Draft the letter states:

We continue to support the work group recommendation of adding the phrase "as defined in Section []" to code sections in which a new term replaces an existing term. While this would make the codes a bit more cumbersome, it would help clear up existing confusion about what exactly the term means in each particular case and avoid creating any new confusion.

The necessary exception would be in the code sections in which there is no existing definition. The Discussion Draft gets around this problem with language making it unmistakably clear that, as AB 1906 directs, neither the new terms nor anything else in the proposed legislation would change statutory meaning in any way.

We ask that the Discussion Draft note that, in the work group's last meeting, a majority of the members expressed a preference for the terms "adults with disabilities" and "persons with disabilities," adding "as defined in Section ____." Of the minority who expressed a different first choice, most picked "adults with disabilities" and "persons with disabilities" as their second choice. Asked by staff if any members opposed those terms, none said they opposed them.

We most strongly advocate eliminating in the Commission Recommendation, "The Commission preliminarily recommends no change to the phrases 'dependent person' and 'dependent adult.'" This would expose the commission in the Capitol and throughout the state as disregarding the community's expressed wishes and the law. We suggest instead, "The Commission recommends replacing the terms 'dependent adults' and 'dependent persons' with 'persons [or adults] with disabilities as defined in Section [the relevant section].'"⁴

SCDD also supports the same terminology, and states further:

² [2024 Cal. Stat. ch. 233](#) (AB 1906, Gipson).

³ EX 1. See also Memorandum [2026-40](#), EX 1-3.

⁴ EX 1.

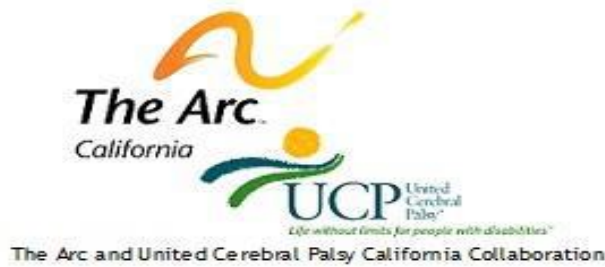
The language used in state law matters. Terms such as "dependent adult" can reinforce outdated assumptions about people with disabilities, particularly the assumption that disability necessarily means dependence on others. Many people with disabilities live independently, make their own decisions, and participate fully in their communities. The proposed terminology better recognizes these realities and aligns with the principles of independence, self-determination, and inclusion that guide SCDD's work.⁵

**Would the Commission like to incorporate these letters in the Discussion Draft?
Does the Commission have any questions about these public comments?**

Respectfully submitted,

Sarah Huchel
Chief Deputy Director

⁵ EX 3.



October 21, 2026

Richard Simpson, Chair, and Commissioners
California Law Revision Commission

Subject: Study I-200: Disability Terminology

Dear Mr. Simpson and Commissioners:

The Arc & United Cerebral Palsy California Collaboration strongly supports your staff's recommended Discussion Draft, with three caveats:

1. We continue to support the work group recommendation of adding the phrase "as defined in Section []" to code sections in which a new term replaces an existing term. While this would make the codes a bit more cumbersome, it would help clear up existing confusion about what exactly the term means in each particular case and avoid creating any new confusion.

The necessary exception would be in the code sections in which there is no existing definition. The Discussion Draft gets around this problem with language making it unmistakably clear that, as AB 1906 directs, neither the new terms nor anything else in the proposed legislation would change statutory meaning in any way.

2. We ask that the Discussion Draft note that, in the work group's last meeting, a majority of the members expressed a preference for the terms "adults with disabilities" and "persons with disabilities," adding "as defined in Section ____." Of the minority who expressed a different first choice, most picked "adults with disabilities" and "persons with disabilities" as their second choice. Asked by staff if any members opposed those terms, none said they opposed them.
3. We most strongly advocate eliminating in the Commission Recommendation, "The Commission preliminarily recommends no change to the phrases 'dependent person' and 'dependent adult.'" This would expose the commission in the Capitol and throughout the state as disregarding the community's expressed wishes and the law. We suggest instead, "The Commission recommends replacing the terms 'dependent adults' and 'dependent persons' with 'persons [or adults] with disabilities as defined in Section [the relevant section].'"

The Arc & United Cerebral Palsy California Collaboration
455 Capitol Mall, Suite 325, Sacramento, CA 95814
Greg@TheArcCA.org 916-223-7319

EX 4

The Discussion Draft notes that all of the comments in opposition to the work group's recommendations call for the commission to recommend retaining existing terms, and that this would fall short of the statutory mandate. The only lawful course of action would be to follow the AB 1906 requirement in its recommendations to the Legislature. If and when a bill is introduced containing the commission's recommendations, anyone of course will be free to oppose or seek amendments in the legislative process.

Please note that all comments from disability or older adult community groups and individuals support the work group recommendations. We urge you to stand with the community.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg deGiere". The signature is fluid and cursive, with the first name "Greg" being more prominent than the last name "deGiere".

Greg deGiere
Civil Rights Advocate
The Arc of California

October 22, 2026

California Law Revision Commission
Richard Simpson, Chair, and Commissioners
Sharon Reilly, Executive Director
Sarah Huchel, Chief Deputy Director
Steve Cohen, Attorney

RE: Study I-200, Terminology Relating to Persons with Disabilities (AB 1906)

Dear Chair Simpson, Commissioners, and Commission Staff:

The California State Council on Developmental Disabilities (SCDD) is charged through the Developmental Disabilities Assistance and Bill of Rights Act of 2000 to promote advocacy, capacity building, and systems change to improve self-determination, independence, productivity, and integration and inclusion in all facets of community life for people with intellectual and developmental disabilities (I/DD).

SCDD supports the proposed terminology, "adult with a disability as defined in section ____" and "person with a disability as defined in section ____," as replacements for the terms "dependent adult" and "dependent person" in California law.

The language used in state law matters. Terms such as "dependent adult" can reinforce outdated assumptions about people with disabilities, particularly the assumption that disability necessarily means dependence on others. Many people with disabilities live independently, make their own decisions, and participate fully in their communities. The proposed terminology better recognizes these realities and aligns with the principles of independence, self-determination, and inclusion that guide SCDD's work.

Beyond the importance of respectful language, terminology can have practical consequences. As recognized in AB 1906, the existing terms may create confusion among law enforcement, service providers, people with disabilities, and their families about who is entitled to certain legal protections. Clearer

terminology can help reduce this confusion and improve understanding of the protections available under California law.

SCDD also recognizes the importance of preserving existing statutory definitions, rights, and protections for all individuals covered by the affected laws. The proposed language, particularly its reference to the applicable statutory definition, offers a way to modernize terminology while maintaining the substantive protections established in law.

SCDD appreciates the Commission's work and the contributions of stakeholders, including people with disabilities, to this effort. The proposed terminology represents a meaningful improvement in how California law recognizes and describes people with disabilities.

If you have any questions, please feel free to reach out to SCDD's Deputy Director of Policy and Public Affairs, Christofer Arroyo (christofer.arroyo@scdd.ca.gov).

With appreciation,



Aaron Carruthers
Executive Director
CA State Council on Developmental Disabilities