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To: CBSC@DGS
Subject: public comment on code changes headed for the Intervening Supplement to the 2025 California Building Standards Code, Title 24.

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1. Clearer Classification Language

Ambiguity in how childcare facilities are classified creates confusion, inconsistent enforcement, and unexpected compliance costs. Providers need to plainly know what category their center falls into and what's required of them.

"I urge the Commission to adopt clearer, more specific classification language for childcare facilities. Current ambiguity leaves providers uncertain whether their program will be reclassified, which directly affects compliance costs and feasibility. Clear definitions that are aligned with how childcare centers actually operate are essential before any new requirements take effect."

2. Flexibility for Existing Buildings

Most licensed centers operate in buildings that were never purpose-built for childcare. Applying new construction standards retroactively to existing facilities isn't realistic and will push centers toward closure rather than compliance.

"Existing childcare facilities should not be held to the same structural standards as new construction. Many providers operate in leased or repurposed buildings where full retrofitting is financially and physically impractical. I urge the Commission to include flexibility provisions for existing facilities so that compliance pathways are realistic and do not force closures."

3. Recognize Existing Safety Practices

Childcare centers already operate under some of the strictest oversight in the state — low staff-to-child ratios, constant supervision, and required emergency procedures. New code requirements should account for these existing safeguards rather than treat childcare facilities as if they operate without them.

"Childcare programs already meet rigorous licensing standards, including staff-to-child ratios, active supervision, and emergency preparedness protocols. I urge the Commission to recognize these existing safety practices when evaluating new requirements, and to allow providers to meet the intent of the code through operational measures where structural changes would not produce a meaningful safety benefit."

4. Funding Support for Compliance

If the state determines these changes are necessary, the cost cannot fall entirely on providers, particularly small, community-based centers already operating on razor-thin margins.

Mandates without funding are a path to closure.

"If the Commission moves forward with new requirements, dedicated funding support must be part of the implementation. Small and community-based childcare providers cannot absorb significant retrofit or reclassification costs without state investment. Without funding alongside any new mandate, these changes will accelerate closures in an already fragile sector."

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