

From: [Kellie Gillespie](#)
To: CBSC@DGS
Subject: Possible Fire Sprinkler Requirement
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To the California Building Standards Board,

I would like to submit my comments on the upcoming proposal regarding the requirement for fire sprinklers in Child Care Centers serving children under the age of three. I have owned and operated a center since 1986 and have always complied with and passed fire regulations and requirements. There are a few areas I would like to address.

Currently the classification language is not clear for Child Care facilities. Clear definitions that are aligned with how CCC actually operate are essential before any new requirements take effect.

There needs to be flexibility for existing buildings, applying new construction standards retroactively to existing facilities isn't realistic and will pushh center toward closure. 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 even if those facilities change ownership, so that pathways are realistic and do not force closures.

Child Care Facilities already meet rigorous licensing standards in adult to child ratios, active supervision and emergency preparedness and 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 strict unreal changes would not produce a meaningful safety benefit.

If the Commission moves forward the new requirements, dedicated funding must be part of the implementations. Small and community based child care providers cannot absorb the significant retrofit or reclassification costs without State investment. Without funding alongside any new mandate these charges will accelerate on an already fragiles sector.

The overall cost of operating a facility for infants and toddlers is almost a zero margin profit because of the low ratio requirements, which are necessary to ensure quality care for these young children. I offer these services as they are needed for families to work and support their families and most of these families continue to move into my preschool program and after school program that have better profit margins. It is difficult to operate these programs, staffing, equipment, and all the licensing requirements are not easy but these programs are vital to the families we provide care to and closures will have a deep impact in the future.

Thank you for your time in reading my comments, I hope everything I've said helps in the decisions that lay ahead.

Sincerely,
Kellie Gillespie
Owner
Kellie's Academy for Kids Child Development Center