

From: [Playgroup Director](#)
To: CBSC@DGS
Subject: Title 24 changes
Date: Thursday, April 30, 2026 9:33:12 AM

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To whom it may concern,

I am the Director of Beverly Glen Playgroup, a preschool in west los angeles. I have concerns about the Title 24 changes and how they will impact child care facilities as this will be another big hit to an already strained industry.

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 affects compliance costs and feasibility. Clearer definitions that are aligned with how childcare centers actually operate are essential before any new requirements take effect.

Existing child care 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.

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.

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.

Sincerely,
Shadi Bakhtiari
Director
Beverly Glen Playgroup
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