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To: CBSC@DGS
Subject: Fire Code for Licensed Child Care, Specifically Religious 501c3 Non Profits
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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.

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.

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.

*Ensuring that the religious 501c3 non-profit child care sector, who rarely qualifies for state or federal funding to use for any purpose, has access to state funds for required retrofits is essential. Child care centers who lease space or operate as part of a religious organization should not be discriminated against simply because of their religious affiliations. Access to funding OR exemption from cost ensuing repairs if a child care center is housed in a building owned or operated by religious 501c3 non profit **must** be addressed.*

Thank you for your consideration.

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