

From: [Karina Acosta](#)
To: CBSC@DGS
Subject: RE: California Building Standards Commission ATTN: Public Comments
Date: Thursday, May 14, 2026 1:28:33 PM
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To Whom It May Concern:

I respectfully submit the following concerns regarding the proposed changes to California Building Standards Code Title 24 and their impact on the childcare sector.

While safety is a shared priority, these proposed changes raise serious concerns for childcare providers, families, and communities across California. For many childcare operators, particularly small, community-based programs, the proposed reclassification and retrofit requirements would create significant financial hardship. Most providers are already operating on extremely thin margins and are not in a position to absorb substantial new construction, retrofit, or compliance costs. These additional burdens will inevitably reduce the availability of childcare spaces at a time when families are already struggling to find affordable, accessible care. Any policy that increases operating costs without realistic implementation pathways risks accelerating closures in an already fragile sector.

There is also a critical need for clearer and more specific classification language within the proposed code changes. Childcare facilities should be defined in a way that accurately reflects how programs actually operate. Current proposals risk applying standards that do not account for the unique structure, supervision models, and daily practices of licensed childcare settings.

In addition, existing childcare facilities should not be held to the same structural standards as new construction projects. Many providers operate in leased, shared, or repurposed buildings where full retrofitting is financially and physically impractical. I urge the Commission to include flexibility provisions and alternative compliance pathways for existing facilities so that providers can reasonably meet safety goals without being forced to close their doors.

It is also important to recognize that childcare centers already operate under some of the strictest oversight requirements in the state. Licensed programs must comply with

rigorous staff-to-child ratios, active supervision standards, emergency preparedness procedures, health and safety protocols, and regular inspections. These operational safeguards significantly reduce risk and should be considered when evaluating whether additional structural requirements would produce meaningful safety benefits.

I urge the Commission to recognize these existing safety practices and allow providers to meet the intent of the code through operational measures where structural modifications may not be necessary or effective.

Finally, if the State determines that additional requirements are necessary, dedicated funding support must be included as part of implementation. Small and community-based childcare providers cannot absorb significant retrofit or reclassification costs without state investment. Mandates without funding create an unsustainable burden and will lead to further program closures, reducing childcare access for working families throughout California.

California cannot afford to lose more childcare providers. I respectfully urge the Commission to adopt clearer classification language, provide flexibility for existing facilities, recognize the extensive safeguards already required of licensed childcare programs, and ensure that any new mandates are accompanied by meaningful financial support.

Thank you for your consideration.

Respectfully,



Karina Acosta

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