

From: [Jodi Gladstone](#)
To: CBSC@DGS
Subject: Title 24 Article
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Dear Members of the California Building Standards Commission,

We are writing on behalf of our small faith-based nursery school to express serious concerns regarding the proposed Title 24 changes and their impact on childcare providers across California.

Like many community-based programs, we operate with limited resources while working every day to provide a safe, nurturing environment for children and families. We fully support reasonable safety standards, but we are deeply concerned that the proposed changes could create financial and operational burdens that many small childcare centers simply cannot absorb.

Licensed childcare programs already operate under strict state oversight, including low staff-to-child ratios, active supervision, emergency preparedness requirements, and ongoing licensing compliance. Additional structural mandates that do not meaningfully improve safety may instead reduce childcare availability by forcing providers to limit enrollment, delay growth, or close altogether.

We respectfully urge the Commission to carefully consider the realities facing small and faith-based childcare providers and to address the following concerns before moving forward:

1. **Clearer Classification Language**
Providers need clear and consistent definitions for how childcare facilities are classified. The current ambiguity creates confusion, inconsistent enforcement, and uncertainty about costly reclassification requirements. Classification standards should reflect how childcare programs actually operate and allow providers to clearly understand what is expected before new regulations take effect.
2. **Flexibility for Existing Buildings**
Many childcare centers operate in older, leased, or repurposed buildings that were never originally designed as childcare facilities.

Applying new construction standards retroactively is often financially and physically unrealistic. Existing facilities need flexible compliance pathways that support continued operation rather than unintentionally forcing closures.

3. Recognition of Existing Safety Practices

Childcare providers already maintain rigorous safety practices through supervision, staffing ratios, emergency procedures, and California state Title 22 licensing requirements. We urge the Commission to recognize these operational safeguards and allow providers to meet the intent of safety standards through practical measures when structural modifications would provide little additional benefit.

4. Funding Support for Compliance

If these changes move forward, financial support must accompany them. Small, community-based childcare programs cannot absorb major retrofit or reclassification costs without assistance. Mandates without funding will place additional strain on an already fragile childcare sector and could accelerate closures throughout the state.

California families are already facing limited childcare availability. We respectfully ask the Commission to ensure that any new standards balance safety with practical implementation so that small childcare providers can continue serving their communities.

Thank you for your consideration and for your commitment to California's children and families.

Sincerely,

Jodi Gladstone



Facility #013423780

Jodi Gladstone M.A. Ed. ECE (she/her/hers) [why pronouns matter](#)
Director of Early Childhood Education
Beth El Nursery School
Jodi@bethelberkeley.org

