

California Building Standards Commission
Attention: Public Comments
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Sacramento, CA 95833
Email: cbsc@dgs.ca.gov

May 18, 2026

To the California Building Standards Commission,

I am writing to express concern regarding the proposed changes to California Building Code Title 24 as they relate to licensed child care facilities and Family Child Care Homes (FCCHs). While safety is a shared priority, it is critical that any code changes recognize the operational realities of child care programs and avoid unintentionally reducing access to care across California.

First, I urge the Commission to adopt clearer, more specific classification language for child care facilities and Family Child Care Homes. Current ambiguity leaves providers uncertain whether their program may be reclassified under new standards, creating confusion, inconsistent enforcement, and significant uncertainty around future compliance obligations. Clear definitions that reflect how child care programs actually operate are essential before any new requirements take effect. This is particularly important for Family Child Care Homes operating in residential settings that were never intended to function under commercial occupancy standards.

Second, existing child care facilities and licensed Family Child Care Homes should not be held to the same structural standards as new construction. Many providers operate in leased, shared-use, or repurposed buildings, while Family Child Care Homes operate directly out of private residences. Applying commercial-level retrofit expectations to homes is neither realistic nor financially feasible for most providers. These programs are often small businesses operated by a single provider serving their local community. Significant structural mandates could force providers to close rather than comply, especially in communities already experiencing severe child care shortages. I urge the Commission to include realistic flexibility provisions and alternative compliance pathways for existing facilities and homes so that providers are not displaced by unattainable requirements.

Third, child care programs already operate under extensive state oversight and rigorous licensing standards. Providers maintain low staff-to-child ratios, active supervision requirements, emergency preparedness procedures, and ongoing health and safety compliance. Family Child Care Homes additionally provide care in smaller group settings with continuous direct supervision and strong family engagement. These existing operational safeguards should be recognized when evaluating additional building code requirements. Providers should be allowed to meet the intent of safety standards through operational measures where structural modifications would not provide a meaningful additional safety benefit.

Finally, if the Commission determines that new requirements are necessary, dedicated funding support must be included as part of implementation. Many child care providers and Family Child Care Home operators are already operating on extremely narrow financial margins while serving working families in communities with limited care options. Mandates without financial support will accelerate closures and

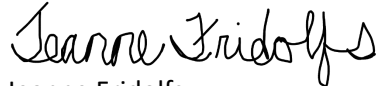
reduce child care availability statewide. Small and community-based providers cannot absorb substantial retrofit or reclassification costs without state investment.

Family Child Care Homes are a critical part of California's mixed-delivery system and are often the primary source of infant care, nontraditional-hour care, and culturally responsive care in many communities. Policies that unintentionally burden or eliminate these programs will disproportionately impact working families who already struggle to access affordable care.

California is already facing a child care accessibility crisis. Any regulatory changes must balance safety objectives with the urgent need to preserve existing licensed child care capacity. I respectfully urge the Commission to ensure that proposed Title 24 changes are clear, flexible, operationally informed, and adequately funded.

Thank you for your consideration and for the opportunity to provide public comment.

Sincerely,

A handwritten signature in black ink that reads "Jeanne Fridolfs". The signature is written in a cursive style with a large initial "J" and a long, sweeping tail on the "s".

Jeanne Fridolfs

Coordinator, Napa County Child Care and Development Planning Council

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