



California Building Standards Commission
Attention: Public Comments
2525 Natomas Park Dr., Ste. 130
Sacramento, CA 95833
Email: cbsc@dgs.ca.gov

May 18, 2026

Dear California Building Standards Commission,

The California Child Care Resource and Referral Network is a 45 year old statewide, nonprofit, membership organization of State funded Child Care Resource & Referral agencies in California. Our mission is to advance and advocate for an equitable early childhood support system for all California families by working at the intersection of research, programs, and policy in partnership with member Child Care Resource & Referral agencies and human service organizations.

Child safety and high-quality child care are of the utmost importance to families and children who use child care, and child care operators strive to provide high quality care. Licensed centers already run highly supervised environments with strict ratios and established emergency procedures. In a state where licensed care is only available for 26% of children with working families, we seek partnerships and solutions that ensure safety while maintaining the ability of child care programs to continue operating.

The California Child Care Resource & Referral Network appreciates the opportunity to submit comments regarding the code changes headed for the Intervening Supplement to the 2025 Building Standards Code, Title 24.

Through our work with Child Care Resource & Referral agencies, who work directly with child care center operators and potential child care center operators in their service areas, we have been informed about the problems associated with changes to the 2019 Title 24 building and fire codes for child care center operators. We urge you to support the Child Care Center Workgroup proposals that will help to improve clarity for current child care center operators, future child care center operators and local fire officials in California.

We respectfully submit that four areas need the most attention:

1. Clearer Classification Language

We urge the Commission to adopt clearer, more specific classification language for child care 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 child care centers actually operate are essential before any new requirements take effect.

2. Flexibility for Existing Buildings

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. We urge the Commission to include flexibility provisions for existing facilities so that compliance pathways are realistic and do not force closures.

3. Recognize Existing Safety Practices

Child care programs already meet rigorous licensing standards, including staff-to-child ratios, active supervision, and emergency preparedness protocols. We 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.

4. Funding Support for Compliance

If the Commission moves forward with new requirements, dedicated funding support must be part of the implementation. Small and community-based child care 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.

We respectfully request that the Child Care Center Workgroup's recommendations, including proposed changes to Chapter 1 and 4 of Title 22 be considered.

We appreciate your consideration of these important recommendations. Thank you for your ongoing dedication to this work.

Thank you,



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