



children's institute



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RE: Public Comment SFM 04/24 – Adopt and Amend the 2025 edition of the California Building Code, Part 2, Title 24 – Protect Children’s Safety and Access to Services

On behalf of Children’s Institute, we appreciate the Office of the State Fire Marshall’s commitment to children’s safety and stakeholder engagement. Allowing community-based early childhood education providers like us to adhere to the building code as it existed in 2022—before the new class size limit—helps ensure every young child has access to high-quality early education and a healthy start to life regardless of income status.

Children’s Institute is one of the largest and oldest human service agencies serving approximately 30,000 Los Angeles County children and their families. We support children and families in achieving emotional well-being and educational success, which build pathways to economic mobility and lifelong health. Using a whole-family approach, our families discover strengths and develop skills that create enduring success at every stage of life. A cornerstone for the organization is our Early Head Start and Head Start programs, integrating a two-generation strategy with holistic wraparound supports for over 3,000 children and their families.

Existing school districts and community-based organizations must significantly expand services to address the severe shortage of quality infant-toddler care. Changing the Title 24 Fire and Building Code to move licensed child care facilities with more than five infants and toddlers into a new occupancy group (Group I-4 Occupancy) with increased requirements would limit services. For example, installing automatic fire sprinkler systems would incur significant, unfunded costs exceeding \$100K-\$200K per classroom and result in classroom closures, during which time families would not have access to reliable care. Moreover, to maximize



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federal funding we receive as an Early Head Start provider and sustain full-day, full-year services for working families, we must achieve full enrollment in our classrooms. Limiting the number of infants and toddlers to five per classroom is not a fiscally viable model for providers like us.

To be clear, children's safety is the top priority of licensed child care providers. We appreciate the agency's consideration of providers' concerns and support for providers like us to continue to respond to community and family needs. In partnership with fire, building, and licensing officials, we look forward to improving current safety regulations and developing solutions that enhance safety without eliminating access to child care.

Thank you for the opportunity to submit public comments.

Sincerely,

Terry Kim

Director of Government Relations & Advocacy