



# COUNTY OF SAN BENITO

## BOARD OF SUPERVISORS

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May 10, 2022

The Honorable Reginald Byron Jones-Sawyer Sr.  
Chair, Assembly Public Safety Committee  
1020 N Street, Room 111  
Sacramento, CA 95814

**Re: AB 1737 (Holden): Children's camps: local registration and inspections  
As amended April 20, 2022 – OPPOSE**

Dear Assembly Member Jones-Sawyer,

On behalf of the San Benito County Board of Supervisors, we must regretfully OPPOSE AB 1737 by Assembly Member Chris Holden. We commend the author's goal to create an oversight and enforcement structure for children's camps that ensures their safety and the well-being of children in their care. However, we believe AB 1737 falls short of that goal by placing this responsibility with local health departments that exist to protect communities from public health threats, including but not limited to infectious diseases, climate-related illness, and chronic diseases.

We encourage consideration of assigning responsibility for children's camps to an agency with appropriate experience in the oversight of entities with children in their care, such as the California Department of Social Services (CDSS). The CDSS Community Care Licensing Division's mission is to promote health, safety, and quality of life of each person in community care through the administration of an effective and collaborative regulatory enforcement system. This division licenses various facilities that provide care to children and vulnerable adults, including childcare facilities and children's residential facilities

In fact, some children's camps, such as YMCA programs, are currently licensed by CDSS as a childcare facility, yet have sought licensure as a recreational camp (day camp) during school breaks. Any discussions about the oversight responsibility for these camps should consider the current CDSS infrastructure, which already has three main components – prevention, compliance, and enforcement. Prevention reduces the predictable harm to children by providing an orientation prior to licensure, performing background checks, maintaining staffing requirements, health screenings, pre-licensure inspections, and providing information regarding laws and regulations. Compliance ensures childcare facilities operate in accordance with existing laws and is maintained through unannounced facility inspections, complaint investigations, issuing deficiency notices, consultations, education and support, and follow up. Lastly, enforcement is taken when the entity fails to protect the health, safety, and personal rights of children in care or is unwilling to maintain compliance with laws and regulations. This is done through civil penalties and/or administrative

legal actions such as denials of applications, probationary licenses, suspensions or revocation of a license, and licensee and employee exclusions.

The COVID-19 pandemic shined a light on the critical role local health departments play to protect our communities from public health threats. Responsibilities of local health departments include infectious disease control and prevention, food safety, environmental health, laboratory services, emergency preparedness, and chronic disease prevention and health promotion. Our current responsibilities and expertise do not include enforcing appropriate child supervision measures.

For these reasons and more, San Benito County respectfully opposes AB 1737. If you have any questions or concerns regarding our position, we ask that you reach out to our County Advocate, Michelle Rubalcava from Nielsen Merksamer Parrinnello Gross & Leoni, LLP at [mrubalcava@nmgovlaw.com](mailto:mrubalcava@nmgovlaw.com) or (916) 446-6752.

Respectfully,

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Bea Gonzales  
Chair of the Board of Supervisors  
Board of Supervisor, 5<sup>th</sup> District  
San Benito County

CC: The Honorable Chris Holden  
Members, Assembly Public Safety Committee