

## Standards for Playground Use Zone Safety

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
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	4. Key Word: Playground Use Zone Safety	

### PROGRAM INSTRUCTION:

**TO:** Head Start and Early Head Start Grantees and Delegate Agencies

**SUBJECT:** Standards for Playground Use Zone Safety

### INSTRUCTION:

The purpose of this Program Instruction is to address the Head Start Program Performance Standards requiring grantees and delegate agencies to provide for the maintenance, repair, safety, and security of facilities, materials, and equipment as well as to maintain playground surfaces that minimize the risk of injury to children. The information clarifies program practices that presumptively comply with the Federal safety requirements at 45 CFR §§ 1304.53 (a)(7) and 1304.53 (a)(10)(x).

All Head Start grantees and delegate agencies are expected to comply with applicable State, Tribal, or local codes governing playground equipment and surfaces where children are present. Public school or public playgrounds used by Head Start programs must comply with all safety requirements prescribed by applicable local laws. In those cases where there is no applicable code, regulation, or requirement, in order to comply with 45 CFR §§1304.53 (a)(7) and 1304.53 (a)(10)(x), grantees and delegate agencies are expected to meet the minimum specifications described in the Consumer Product Safety Commission (CPSC) **Handbook for Public Playground Safety**, (Chapter 4.5) as such describes the minimum requirements of various surfacing materials to avoid risk of injury to children.

We urge Head Start programs to take immediate action to comply with the standards for playground surfaces specified in the CPSC Handbook in those cases where there are not already local safety standards and to be mindful of potential liability for children's injuries. For those jurisdictions not already covered by State, Tribal, or local law, beginning in January 2008 we will monitor compliance against the minimum standards for playground surfaces specified in the **Handbook for Public Playground Safety**.

### BACKGROUND:

Head Start program regulations at 45 CFR 1304.53 (a)(7) require Head Start grantees and delegates to "provide for the maintenance, repair, safety, and security of all Early Head Start

and Head Start facilities, materials, and equipment” and 45 CFR 1304.53 (a)(10)(x) requires grantees and delegates to “select, layout, and maintain playground equipment and surfaces to minimize the risk of injury to children.” The Office of Head Start has long recognized the potential hazards associated with the use of playground equipment, especially injuries resulting from falls from such equipment. Based on review of monitoring review reports, it appears there is significant variance among grantees related to the actions taken to avoid injuries to children associated with falls from playground equipment.

Playgrounds are an important part of children’s educational experience and should be safe and secure. Unfortunately, according to the Consumer Product Safety Commission, annually more than 200, 000 children are treated in hospital emergency rooms for injuries sustained from falls to the ground from playground equipment. Because many children’s injuries are preventable through the proper use of protective surfacing under and around outdoor play equipment, the Office of Head Start believes an increased emphasis on the importance of protective surfacing is critical.

The CPSC has conducted studies and developed recommendations about standards for appropriate playground surfaces which will minimize child injuries. The surface material beneath and around playground equipment (the “use zone”) can be a major factor underlying the injury potential of a fall. Falls onto shock absorbing surfaces are less likely to cause serious injury than are falls onto hard surfaces. In particular, head injuries from falls are potentially life threatening and the more shock absorbing a surface is, the greater likelihood the risk of severe injuries can be avoided.

You will note the CPSC Handbook (available on-line at <http://www.cpsc.gov/cpsc/pub/pubs/325.pdf>) identifies the required depth of various injury protecting surfaces in direct relation to the critical height of the playground equipment children use. For example, a depth of 6 inches of uncompressed re-engineered wood chips should be maintained for use zones under any equipment from which a child could fall seven feet. While the CPSC describes and provides for surface maintenance of all playground equipment for all children, equipment should be adapted for use by very young children in accordance with age appropriate use and safety.

The CPSC Handbook provides a safety inspection check list which we encourage grantees and delegate agencies to use on a regular basis. While Head Start regulations at 45 CFR 1304.53 (a)(10) require grantees and delegates to conduct annual safety inspections, we encourage Head Start programs to make frequent regular inspections of playground areas to ensure that children are adequately supervised and prevented from leaving play areas, that equipment is in good repair, and that surfaces are clear of debris and protect children against injuries from scrapes or punctures.

Among the terms used in the CPSC Handbook that we recommend programs gain familiarity with are the following:

**Critical Height:** The fall height below which a life threatening head injury would not be expected to occur.

**Infill:** Material(s) used in a protective barrier to prevent a user from passing through the barrier, e.g., vertical bars, lattice, solid panel, etc.

**Loose-Fill Surfacing Material:** A material used for protective surfacing in the use zone that consists of loose particles such as sand, gravel, wood fibers, or shredded rubber.

**Protective Surfacing:** Surfacing material in the use zone that conforms to the recommendations in section 4.5 of the CPSC Handbook for Public Playground Safety.

**Unitary Surfacing Material:** A manufactured material used for protective surfacing in the use zone that may be rubber tiles, mats, or combination of rubber-like materials held in place by a binder that may be poured in place at the playground site and cures to form a unitary shock absorbing surface.

**Use Zone:** The surface under and around a piece of equipment onto which a child falling from or exiting from the equipment would be expected to land.

Finally, please note the Office of Head Start maintains a toll-free help line for all facilities related consultation and we encourage you to call for additional guidance and support. You may call 800-303-0705 for this assistance.



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TO: EXECUTIVE /PROGRAM /SITE DIRECTORS

FR: LOUKISHA SMART PENNIX, DIRECTOR CHILDREN SERVICES DIVISION *L. Smart-Pennix*

RE: PLAYGROUND SURFACES AND OUTDOOR EQUIPMENT

DT: FEBRUARY 13, 2009

CC: DELEGATE AGENCY GOVERNING BOARD

The Department of Family and Support Services is providing additional guidance on Playground Surfaces and Outdoor Equipment. The following guidance should assist you in effectively monitoring these areas.

Head Start Performance Standards state:

**1304.53 (a) (10) (x)**

**(x) The selection, layout and maintenance of playground equipment and surfaces minimize the possibility of injury to children.**

One of the most important aspects of a safe play area is the surface of the playground area below the equipment. The leading cause of most injuries to children is falls from the equipment to the ground. Loose fill surfacing is mandatory. There are several types of "loose fill" surfacing material: Sand, gravel, and wood fiber.

Following is a table from the Consumer Product Safety Commission (CPSC) **Handbook for Public Playground Safety**.

Inches of	(Loose Fill Material)	Protects to	Fall Height (feet)
9	Sand		4
9	Pea Gravel		5
9	Wood Chips		10



Over time, loose fill will compress at 25% due to weathering and use. If the playground will require 9 inches of wood chips you should initially use 12 inches. Areas under swings and slides are especially susceptible. Frequent maintenance (according to your scheduled facility checklist) and monitoring must occur to prevent levels from dropping below the minimum depth.

It is recommended that you use equipment manufactured and constructed of materials for the usage of playgrounds and has a record of demonstrated durability. Review equipment certified by the CPSC. Outdoor play equipment must be safe in design and in good repair. Broken, loose, or cracked, equipment should not remain in the playground area but repaired or removed immediately to prevent injury.

The CPSC handbook is available on-line for further reference at; <http://www.cpsc.gov/cpscpub/pubs/325.pdf>) identifies the required depth of various injury protecting surfaces in direct relation to the critical height of the playground equipment children use along with recommended outdoor playground equipment.

If you have additional, questions please contact Earline Alexander at [earline.alexander@cityofchicago.org](mailto:earline.alexander@cityofchicago.org), or telephone 312-743-1578.