



The Commonwealth of Massachusetts

Department of Early Education and Care

Playground Safety	Field Operations Policy- Funded Programs
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POLICY STATEMENT

This policy serves to support providers in understanding and implementing the playground safety requirements included in the Compliance Requirements for Center-Based Funded Programs. Through this policy, EEC seeks to clarify playground surfacing, equipment, use zones, entrapments, active supervision during outdoor play, and general requirements for playground safety.

In accordance with the Consumer Product Safety Commission (CPSC) Public Playground Safety Handbook and Caring for Our Children (4th edition), the following policy offers guidance on the Funded Program Compliance Requirements that address surfacing, equipment, use zones, entrapments, supervision, and general standards for playground safety.

Compliance Requirement: The outdoor space shall be safe, adequately maintained, and free from hazards and immediate health risks.

In evaluating whether the outdoor play space is safe, programs should first assess whether the equipment used by children is designed for commercial or residential use. If the equipment was either donated or purchased second hand, assess whether it is structurally sound and take time to check for recalls. Product recalls are only effective in keeping children safe if caregivers are aware of them, so regular (monthly) product recall monitoring is necessary. If the equipment was designed and built by the program, it must comply with the CPSC's guidelines.

Equipment that has been identified by CPSC as being unsafe and not to be used by any age group due to the numbers of serious injuries, some fatal, includes:

- trampolines (except for therapeutic reasons);
- climbing ropes that are not secured at both ends;
- rope swings;
- heavy metal swings;
- multiple occupancy swings with the exception of tire swings; and
- swinging dual exercise rings and trapeze bars on long chains.

Compliance Requirement: The outdoor play space shall be appropriate for each age group and developmental level of children served and accessible to children with disabilities.

Playground equipment should be chosen based on the age group and the abilities of the children who will be using it. Most manufacturers provide information that includes the age range of the children that the

equipment had been designed for by attaching a sign or tag with the details onto the equipment. Since developmental appropriateness is an important element to consider in preventing injuries, if there is a question about the age range using the equipment, EEC staff may ask a program to provide evidence to show that the equipment is designed for the ages of the children using it. *Children who are not within the age ranges for the equipment should not be allowed to use it.* EEC suggests that programs review the list entitled “Age Appropriate Equipment” found in the Public Playground Safety Handbook. The list includes the types of equipment that are developmentally appropriate for the different age groups and can be a helpful tool in making the decision about what equipment to purchase for the playground.

Compliance Requirement: The outdoor play area shall be free from hazards including, but not limited to: entrapment hazards, a busy street, a parking lot, poisonous plants, water hazards, debris, broken glass, chipping, peeling or flaking paint, dangerous machinery or tools, and weather related and environmental hazards or small objects that could present a choking hazard to young children. Any such hazard shall be removed or fenced by a sturdy, permanently installed barrier which is at least four feet high or otherwise protected or removed, as appropriate.

Routine inspection and maintenance of a playground is an important part of providing a safe outdoor environment for children. Maintaining adequate fall zones with appropriate amounts of a surfacing material must be combined with regular, systematic inspection of the space and equipment to identify potential hazards that may lead to injury.

All playground equipment should be inspected daily, prior to use by children. In assessing the safety of playground equipment and outdoor play environments, staff should be trained on how to monitor the playground looking for broken equipment and other hazards such as glass, debris, loose branches, etc. In addition, staff should look for the types of hazards that may be caused by general wear and deterioration, including, but not limited to:

- missing or broken parts;
- protruding nuts and bolts;
- rust;
- sharp edges;
- splinters; and
- stability of all equipment (anchored and larger non-anchored)

Programs must be aware of hazards related to seasonal changes when designing and maintaining an outdoor space. During summer months, exposure to the sun can heat surfaces such as slides, platforms and steps creating hazards for burns. In the winter, surfacing materials freeze and lose their impact absorbing ability. In the spring and other times of the year, standing water and poor drainage may impact the usability of the play space. At all times of the year, the play environment should be monitored for hazardous plants such as poison ivy and mushrooms.

Compliance Requirement: All playground equipment shall be securely anchored and located within use zones that are covered with an adequate depth of an impact-absorbing material.

Climbing is one of the many gross motor skills that are encouraged on playground equipment, but if equipment is not properly anchored, climbing can be a dangerous activity resulting in injury. The manufacturer’s instructions for assembly and installation of playground equipment includes directions for safe and secure anchoring of equipment. It is recommended that anchoring of any equipment is completed in strict accordance with the manufacturer’s direction, in order to ensure the integrity and safety of the anchoring device. Program staff should be aware of the location and surface depth surrounding playground anchoring devices, so that they do not present a tripping hazard.

The use zone for each piece of equipment must extend a minimum of 6 feet in all directions from the perimeter of equipment. In order to determine the use zone for your equipment, the Public Playground Safety Handbook can be used as a guide especially as it relates to determining use zones for all types of swings. Use zones must be free of obstacles such as fences, buildings or other structures, other play equipment and tripping hazards such as tree roots. Two pieces of stationary equipment (not swings) that are located near one another can have overlapping use zones, if the fall height of the equipment is 30 inches or less and the equipment is at least 6 feet apart. If the fall height is greater than 30 inches, there must be at least 9 feet between the two pieces of equipment.

Fall height must be taken into consideration when choosing a surfacing material. In order to choose a proper surfacing, the fall height of each piece of equipment must be determined. To determine the fall height of equipment, measure the distance from the highest designated play surface to the protective surface beneath it. The Public Playground Safety Handbook can also be used as a guide in determining the fall height for each piece of equipment. In general, the fall height of play surfaces on equipment intended for toddlers should not be higher than 32 inches.

Compliance Requirement: All fences, structures, play equipment, and furnishings used by children shall be free from entrapment hazards.

Entrapment and entanglement are hazards that contribute to the number of serious injuries and deaths that occur on public playgrounds. Any opening in which a child's body, head, fingers, hair, clothing, or jewelry can get caught can present the potential for entrapment or entanglement, so awareness of how to identify and prevent these types of hazards is crucial to keeping children safe.

On average, a young child has a body/torso size that is smaller than their head size. This means that a child may be able to enter an opening that allows their torso to pass through, but may become entrapped when the size of the opening does not allow their head to pass through. Children may also place their heads through an opening and then turn their head into a position that does not allow the head to pass back out through the opening. Even when a child's feet are touching the ground, the child in these situations is at risk for serious injury or death from head entrapment.

Each program's environment should be assessed to determine if any of the equipment, furnishings or structures have entrapment areas that create a danger for the children using them. Measuring openings to determine if they fall within the following entrapment and entanglement criteria is an important step in identifying equipment that may not be safe. Openings of between 3½" and 9" can create a head entrapment hazard for children. Finger entrapment can occur when there are openings that are larger than 3/8 inch but smaller than 1 inch.

To reduce the risk of entanglement hazards, bolts should not extend more than two threads beyond the end of the nut and all hooks, including S-hooks and C-hooks, should be closed. While playing on equipment, children should not be wearing jewelry or clothing that has drawstrings, hoods, or other entanglements. Children should not be allowed to use ropes, scarves or other similar objects that have the potential to become entangled creating a strangulation hazard.

Compliance Requirement: All Providers shall exercise appropriate supervision of the children in their care in order to ensure their health and safety at all times. Such supervision shall include, but not be limited to, indoor and outdoor activities, mealtimes, naptime, transportation, field trips, and transitions between activities.

Supervision of the outdoor play space is key to minimizing injuries to children. A program's approach to playground safety issues should include how staff will supervise children as they use the space and how a safe playground environment will be maintained. Playground space should be organized in such a way as to allow staff to be able to see, access and supervise children, and monitor the use of all equipment at all times. Barriers to visual supervision within the playground space should be removed so that supervision of each child can occur.

All staff should be trained on active supervision of the outdoor play space to ensure that they follow practices that lessen the injuries to children. Supervision should include effective ways to respond to inappropriate play, aggression and bullying that may occur as children interact on the playground. Staff should be trained on how to transition children to and from the playground including the importance of doing name-to-face attendance to account for all children. Training should include ways to be actively involved in children's play and ways to use the outdoor space as an extension of the classroom including using planned activities that support children's development.

Providing access to a safe outdoor environment is the first step in ensuring safe and healthy outdoor activities for children. Programs that rely on public playgrounds such as parks or public schools must inspect the space and equipment to make sure that they are safe for children. In some cases, the equipment or parts of the equipment may not meet the requirements of this Policy and therefore, should not be used by the program. Alternate activities that do not rely on climbing structures or other playground equipment should be incorporated so that children have ample opportunities to participate in gross motor activities. It is important that any play area utilized by the program be accessible to children with disabilities and that there are activities that encourage integration with their peers.

Resources

Consumer Product Safety Commission Public Playground Safety Handbook
<https://www.cpsc.gov/s3fs-public/325.pdf>

Consumer Product Safety Commission Public Playground Safety Checklist
<https://www.cpsc.gov/safety-education/safety-guides/playgrounds/public-playground-safety-checklist>

National Program for Playground Safety
<https://www.playgroundsafety.org/>

Consumer Product Safety Commission Identifying and Controlling Lead Paint on Public Playground Equipment Executive Summary
<https://www.cpsc.gov/s3fs-public/cpscleadpaint.pdf>