

<b>ORP</b> <b>Office</b> <b>of Rules and</b> <b>Procedures</b>	<b>Department of Children and Family Services</b>	
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	<b>Key Words: 89 IAC 407, Day Care Centers, Playground Surfacing</b>	
	<b>Approved by:</b>	

### Interpretation

**Applicable To:** Licensed Day Care Centers

**Policy Citation:** 407.390(i)(2): The protective surface shall have a Critical Height value of at least the height of the highest accessible part of the equipment, unless rubber mats are used which have been manufactured specifically for this purpose and which comply with the requirements established by the Consumer Products Safety Commission or the American Society for Testing materials. See Appendix H for Critical Height values.

407 Appendix H: The surfacing material used under and around a particular piece of playground equipment should have a Critical Height value of at least the height of the highest accessible part of the equipment.

Acceptable surfacing materials are available in two basic types, unitary or loose-fill.

Loose-fill materials can also have acceptable shock absorbing properties. These materials include, but are not confined to, sand, gravel and shredded wood products. Loose-fill materials should not be installed over hard surfaces such as asphalt or concrete.

**Question:** Is a day care center licensee required to remove hard surfaces such as concrete or asphalt prior to laying down loose-fill materials under and around playground equipment?

**Discussion:** The Critical Height value of loose-fill material is based upon it being properly installed. For proper installation the material shall not be installed over a hard surface.

**Response:** A day care center must remove hard surfaces (asphalt, concrete) prior to laying

**loose-fill material under and around playground equipment.**

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