

ORP Office of Rules and Procedures	Department of Children and Family Services	
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	Approved by:	

Interpretation

Applicable To: **Licensing Standards for Day Care Centers**

Policy Citation: 407.390(I): Protective surfaces (wood mulch, bark mulch, wood chips, sand, gravel, rubber mats, etc.) shall be provided in areas where climbing, sliding, swinging or other equipment from which a child might fall is located.

- 1) The protective surface shall extend at least six feet beyond the perimeter of the equipment, except for swings.
 - A) For single-axis (traditional) swings, the protective surface shall extend both forward and backward a distance of at least two times the height measured from the supporting bar.
 - B) For tire swings which rotate, the protective surface shall extend six feet beyond the farthest reach of the tire in all directions.

- 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.

- 3) The surface material shall be properly drained to prevent the growth of molds and bacteria.

- 4) When resilient materials become packed, they shall be raked and/or turned to restore resilience.

407 Appendix H: Critical Height is a term used to describe the shock absorbing performance of a surfacing material and is used in this Part as an approximation of the maximum fall height from which a life-threatening head injury would not be expected to occur.

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.

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.

Many vendors are unlikely to have information on the shock absorbing performance of loose-fill materials. For that reason the U.S. Consumer Product Safety Commission has conducted tests to determine the relative shock absorbing properties of some loose-fill materials commonly used as surfaces under and around playground equipment.

Question: Can APlay Turf®, a synthetic, loose-fill material be used as a protective surface under playground equipment?

Discussion: APlay Turf® complies with the Consumer Products Safety Commission and the American Society for Testing Materials standards for impact absorption. APlay Turf® has a critical height value of twelve feet according to the manufacturer's specifications.

Subsection 407.390(I) and Appendix H give guidelines for determining safe protective surfaces for playgrounds. Protective surfaces that have a manufacturer's guarantee that they meet the Consumer Products Safety Commission and the American Society for Testing Materials standards for impact absorption are safe and acceptable surfaces. The manufacturer's guarantee should include a statement regarding the critical height value of the surface and that should be at least the height of the highest accessible part of the equipment.

All types of protective surfaces are not mentioned in subsection 407.390(I) or Appendix H, therefore, the guidelines stated should be used in approving various protective surfaces.

Response: APlay Turf® is an acceptable material to be used as a protective surface under play ground equipment.