



Department of Defense Education Activity REGULATION

NUMBER 4210.01

Date APR 21 2010

LOGISTICS DIVISION

SUBJECT: Playground Management Program

- References:
- (a) Secretary of Defense Memorandum, "Access for People with Disabilities," October 31, 2008
 - (b) United States Consumer Product Safety Commission, Publication 325, "Public Playground Safety Handbook"
 - (c) Part 1191 of title 36, Code of Federal Regulations
 - (d) U. S. Access Board Summary of Accessibility Guidelines for Play Areas, October 2005
 - (e) Standards F1487-07, F1292, F1951, F2223-04, and F2049, American Society for Testing and Materials

1. PURPOSE. This Regulation establishes policy and assigns responsibilities for the Department of Defense Education Activity (DoDEA) playground management and standards in accordance with References (a) through (e).

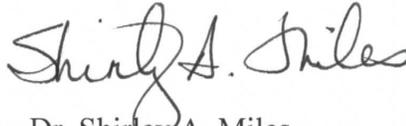
2. APPLICABILITY. This Regulation applies to the Office of the Director, DoDEA; the Director, Domestic Dependent Elementary and Secondary Schools, and Department of Defense Dependents Schools, Cuba (DDESS/DoDDS-Cuba); the Director, Department of Defense Dependents Schools, Europe (DoDDS-E); the Director, Department of Defense Dependents Schools, Pacific, and Domestic Dependent Elementary and Secondary Schools, Guam (DoDDS-P/DDESS-Guam), (hereafter collectively referred to as "DoDEA Area Directors"); and all DoDEA Area and District Superintendents, School Principals, Teachers, and Support Staff.

3. DEFINITIONS. See Glossary.

4. POLICY. It is DoDEA policy to promote student physical activity by providing safe, secure, stimulating, and accessible playground environments. As such, DoDEA is committed to establishing uniform playground management controls and practices in order to eliminate hazards, while providing challenging and enjoyable playground conditions to promote the motor skill, physical fitness, and personal and social development of all students.

5. RESPONSIBILITIES. See Enclosure 1.

6. EFFECTIVE DATE. This Regulation is effective immediately.



Dr. Shirley A. Miles
Director

Enclosures

1. Responsibilities
2. Playground Inspection and Comprehensive Maintenance Program
3. Playground Hazard/Work Priority Descriptions
Glossary

ENCLOSURE 1

RESPONSIBILITIES

1. DIRECTOR, DODEA. The Director, DoDEA, shall:

- a. Allocate funds for the playground management program.
- b. Provide assistance to all schools and offices to achieve compliance with the provisions of this Regulation and the referenced publications.
- c. Appoint a DoDEA Playground Program Manager with designated oversight for the development, application and accountability for policies, procedures and standards pertaining to playgrounds.

2. ASSOCIATE DIRECTOR FOR FINANCE AND BUSINESS OPERATIONS (AD(F&BO)), DODEA. The AD(F&BO), DoDEA, shall:

- a. Promote and enforce standard playground management practices within DoDEA.
- b. Ensure that the DoDEA Playground Program Manager becomes certified through the National Playground Safety Institute Certified Playground Safety Inspector Course and provides overall management and technical oversight of the DoDEA playground management program, including the triennial safety audit of playground assets.
- c. Develop and implement safety and occupational health programs in order to identify playground hazards, and incorporate corrective or programmatic measures in order to minimize or reduce injuries.
- d. Establish a DoDEA Playground Working Group (PWG), chaired by the DoDEA Playground Program Manager and consisting of representation from each Area facilities office, DoDEA Safety and Occupational Health Manager, and the DoDEA Health Education and Physical Education Instructional Systems Specialist. The PWG will develop recommended playground procedures and programs, in support of DoDEA policy requirements, including establishment of playground table of allowances, review and revision of playground education facilities specifications, development of playground replacement and upgrade strategies, and development of standard training requirements.

3. DIRECTOR, DDESS/DODDS-CUBA; DIRECTOR, DODDS-E; DIRECTOR, DODDS-P/DDESS-GUAM. The DoDEA Area Directors shall:

- a. Develop and implement an Area playground management program in accordance with this Regulation and Secretary of Defense Memorandum (Reference (a)), United States Consumer

Product Safety Commission Publication 325 (Reference (b)), part 1191 of title 36, Code of Federal Regulations (Reference (c)), U.S. Access Board Summary of Accessibility Guidelines for Playground Areas (Reference (d)), and standards F1487-07, F1292, F1951, F2223-04, and F2049, American Society for Testing and Materials (Reference (e)).

b. Appoint an Area playground manager. The Area playground manager, representing the respective facilities branch, will serve as the Area playground working group member. Each Area playground manager will become certified through the National Playground Safety Institute Certified Playground Safety Inspector Course. Area playground managers will perform random playground inspections within assigned districts in order to identify playground deficiencies, develop 5-year plans to modernize playground assets, review scopes of work for playground projects, and implement comprehensive playground maintenance programs.

c. Ensure that a comprehensive inspection and maintenance program has been developed and implemented for all playgrounds, as outlined in Enclosure 2.

d. Ensure that the Area playground manager and Area safety and occupational health manager jointly collaborate in order to resolve playground safety issues.

e. Ensure that Area safety and occupational health managers or district safety and security officers thoroughly investigate all serious playground accidents involving permanent disability or death, as reflected on DoDEA Form 4801, Accident/Injury Report, and noted as a category 1 (death) or category 2 (permanent disability) accident.

f. Ensure that playground deficiencies have been identified and corrective action formulated, and 5-year plans developed and implemented.

g. Ensure that playground equipment is purchased from an International Playground Equipment Manufacturers Association certified playground equipment manufacturer. Playground equipment installers must be certified in playground installation from either the manufacturer of the specific equipment being installed, or by the International Playground Contractor's Association, and must install playground equipment in accordance with manufacturer specifications and Consumer Product Safety Commission (CPSC)/American Society for Testing and Materials (ASTM) guidelines and provide written verification of compliance. As an alternative, Headquarters DoDEA has developed a playground contract process, through the Norfolk Engineer District, which is available for use by the Area Offices for design and installation of playgrounds.

4. DODEA SUPERINTENDENTS. The DoDEA District Superintendents shall:

a. Develop and implement a District Playground Management Program in accordance with this Regulation and the referenced publications.

b. Ensure that District-procured playground equipment is purchased from an International Playground Equipment Manufacturers Association certified playground equipment manufacturer. Playground equipment installers must be certified in playground installation from either the

manufacturer of the specific equipment being installed, or by the International Playground Contractor's Association, and must install playground equipment in accordance with manufacturer specifications and CPSC/ASTM guidelines and provide written verification of compliance. As an alternative, DoDEA Headquarters has developed a playground contract process, through the Norfolk Engineer District, which is available for use by the Area Offices for design and installation of playgrounds.

c. Ensure that all playground injuries are reported to DoDEA Headquarters via the Accident/Injury Reports (AIRs) Online, and that category 1 and 2 accidents are thoroughly investigated.

5. DODEA PRINCIPALS. The DoDEA Principals shall:

a. Develop and implement a school Playground Management Program in accordance with this Regulation and the referenced publications.

b. Ensure that playground injury prevention strategies are established, including the prompt removal from service of broken or dysfunctional equipment and subsequent submission of a request for repairs.

c. Ensure adequate adult monitoring and supervision of students during all periods of scheduled playground activities throughout the school day.

d. Ensure that all playground injuries are reported to DoDEA Headquarters via the AIRs online reporting process.

e. Provide direction and guidance to the school-based Supervisory Management Services Specialist (SMSS), where assigned. Principals may delegate playground management duties to the SMSS. If school size does not warrant assignment of an SMSS, playground management duties must be performed by the principal or a qualified designee. In all cases, the principal remains responsible for the proper performance of these duties.

6. SMSS. The SMSS, or qualified designee, shall:

a. Ensure that the daily playground inspection is conducted and documented. Keep school principal informed of hazardous playground conditions and monitor completion of corrective actions.

b. Submit appropriate work requests for repair or removal of broken or dysfunctional playground equipment. Track work order status through completion.

c. Monitor playground accidents and ensure that playground accident reports are submitted in accordance with DoDEA Regulation 4800.1, DoDEA Safety Program. Keep principal informed of accidents and associated reporting.

d. Assist Area/district offices in the planning process for new playground equipment.

e. Maintain playground inspection and maintenance records and retain any manufacturer's literature associated with new equipment installation for the entire lifespan of the equipment.

ENCLOSURE 2

PLAYGROUND INSPECTION AND COMPREHENSIVE MAINTENANCE PROGRAM

The DoDEA Playground Inspection and Comprehensive Maintenance Program includes a multi-faceted approach and consists of the following minimal components:

1. DAILY SAFETY INSPECTION. School personnel shall perform a daily safety inspection for all playground equipment and play areas on days in which school is in session. The primary focus of the daily inspection is to visually check for surfacing problems, vandalism, trash and debris, and obvious hazards. A sample Daily Playground Inspection Form is provided in order to document inspection results. Completed Daily Playground Inspection Forms will be forwarded to the SMSS or school principal, as appropriate, for review and follow-up action.

2. QUARTERLY PREVENTIVE MAINTENANCE INSPECTION. Quarterly preventive maintenance inspections shall be performed by qualified maintenance staff to check for potential problems due to age, usage, and environmental impacts. This inspection is more detailed than the daily inspection and requires a physical examination of system components. A site-specific inspection form shall be developed for each playground. The form shall be annotated by maintenance staff and forwarded to the SMSS or school principal for review and follow-up action, if required. A sample inspection form is provided in order to document inspection results.

3. ANNUAL INSPECTION/ROUTINE MAINTENANCE. On an annual basis, qualified maintenance staff shall thoroughly inspect all playground components for damage or wear. Routine maintenance services should also be performed at this time. This inspection addresses the structural integrity of the playground and must be performed by experienced personnel. Items that should be addressed at this time include excessive wear, deterioration, and potential hazards. Problems requiring remedial work shall be identified during the inspection and repaired as soon as possible. All follow-on repairs and equipment replacement shall be completed in accordance with the manufacturer's instructions. An annual inspection may be substituted for one quarterly preventative maintenance inspection during which this inspection was conducted. A customized inspection form shall be developed for each specific playground, based on specific playground components. The form shall be annotated by the supporting maintenance personnel and results provided to the school SMSS or principal for review and follow-up action, if required. A sample inspection form is provided.

4. TRIENNIAL SAFETY AUDIT. On a three year cycle, each DoDEA playground facility will undergo an in-depth safety audit by a certified playground safety inspector, via a DoDEA Headquarters funded and managed contract. The audit will assess existing conditions in order to

determine compliance with current playground standards. Recommended improvements, including cost projections, will also be developed for capital planning purposes.

5. SAFETY SPOT CHECKS. Area and/or district facilities staff members will perform safety spots checks on a random basis to ensure compliance with the DoDEA policies.

Appendixes

1. Sample Daily Playground Safety Inspection Form
2. Sample Quarterly/Annual Playground Inspection Form

APPENDIX 1 TO ENCLOSURE 2

SAMPLE DAILY PLAYGROUND SAFETY INSPECTION FORM

School: _____ Location: _____
 Inspected by: _____ Date/time: _____
 SMSS/Principal review: _____ Date: _____

Item inspected	Hazard Identified	Priority Code	Corrective Action Taken
Graffiti or vandalism			
Damaged or missing fencing and gates			
Trash or debris in play areas			
Animal waste/insect nests			
Damaged benches or trash cans			
Missing or damaged equipment or components			
Damaged sidewalk or pathway			
Tripping hazards, exposed or damaged concrete			
Loose fill material improperly distributed			
Loose rubber mats or uneven synthetic materials			
Equipment not firmly anchored to ground (soccer goals, etc.)			
Sharp points, edges or corners			
Protruding bolts or nuts			
Loose handrails and guard rails			
Unauthorized modifications such as ropes, string or planks			
Standing water			
Rotted, splintered, or damaged wooden components			
Over-hanging tree limbs			
Missing end caps and plugs			

Item Inspected	Hazard Identified	Priority Code	Corrective Action Taken
Peeling or chipped paint			
Other			
Other			

Note: Hazardous equipment shall be immediately removed from service. Yellow caution tape and temporary snow fencing, with warning signs, are minimum requirements.

APPENDIX 2 TO ENCLOSURE 2

SAMPLE QUARTERLY/ANNUAL PLAYGROUND INSPECTION FORM

School: _____
 Inspector: _____

Date/time of inspection: _____
 SMSS/Principal: _____

Item Inspected	Priority Code	Inspector Comments	Date Repairs Completed
Vandalism/graffiti			
Trash/debris/animal waste and insect nests			
Fencing and gates			
Site drainage			
Site furnishings			
Overhead trees/branches			
Signage			
Peeling/chipped paint			
Sidewalks and borders			
Foundations or footers			
Protective surfacing			
Structural components			
End caps and/or plugs			
Clamps/fasteners/joints/welds/s-hooks			
Missing hardware			
Platforms, guardrails, decks and protective barriers			
Handrails, grips and rungs			
Ramps, stairways, rung and step ladders			
Swings and seesaws			
Climbers			

Item Inspected	Priority Code	Inspector comments	Date Repairs Completed
Balance beams			
Horizontal ladders and rings			
Track rides, log rolls, seesaws and rockers			
Slides			
Rockers			
Composite structure			
Sandboxes			
Other			
Other			
Other			

Priority Codes (see Enclosure 3 for additional details):

1. Emergency condition observed that requires immediate equipment isolation and follow-up emergency repairs or equipment removal.
2. Urgent condition observed that requires priority repair work and close monitoring.
3. Routine repairs or preventive maintenance required.
4. No deficiency observed, follow-up action not required.

ENCLOSURE 3PLAYGROUND HAZARD/WORK PRIORITY DESCRIPTIONS

PRIORITY	DESCRIPTION	EXAMPLES	ACTION REQUIRED
1 – EMERGENCY	Existing hazard that could result in permanent disability or loss of life if not immediately addressed.	<ul style="list-style-type: none"> ▪ Exposed concrete foundation or footer. ▪ Lack of fall protection surfacing material. ▪ Missing components, such as handrails, guardrails, steps, protective barriers and rungs. ▪ Equipment not properly anchored. ▪ Sharp points or edges, or crushing, pinching or shear points. ▪ Open S-hooks or protruding bolts. ▪ Merry-go-round with open platform seating. 	<ul style="list-style-type: none"> ▪ Notify SMSS or principal. ▪ Close the piece of equipment and restrict student access. ▪ Submit an emergency work request. ▪ Notify the district/Area engineer. ▪ Submit Serious Incident Report (SIR), when required due to vandalism or graffiti.

PRIORITY	DESCRIPTION	EXAMPLES	ACTION REQUIRED
2 – URGENT	Existing condition that could result in serious injury or would become an emergency hazard if not timely addressed.	<ul style="list-style-type: none"> ▪ Worn or cracked swing seats or hangars. ▪ Visible cracks, bending, warping or rusting. ▪ Worn bearings, deformed hooks or rings. ▪ Loose bolts, nuts, or fastening devices and other hardware. 	<ul style="list-style-type: none"> ▪ Notify SMSS or principal. ▪ Initiate temporary repairs such as tightening loose bolts. Restrict equipment use as necessary. ▪ Submit an urgent work request. ▪ Notify district/Area engineer office SIR, when required due to vandalism or graffiti.
3 – ROUTINE	Existing condition that could result in minor injury or does not comply with existing standards.	<ul style="list-style-type: none"> ▪ Displaced loose-fill surfacing materials. ▪ Litter and debris. ▪ Damaged/missing site amenities. ▪ Missing/damaged signs. ▪ Chipped or peeling paint. ▪ Graffiti. 	<ul style="list-style-type: none"> ▪ Notify SMSS or principal. ▪ Initiate corrective action such as removal of litter and debris or raking and fluffing of surface materials. ▪ Submit a routine work request ▪ Notify district/Area engineer office as necessary. ▪ SIR, when required due to vandalism or graffiti.
4 – NONE	No observable deficiency.	<ul style="list-style-type: none"> ▪ N/A 	<ul style="list-style-type: none"> ▪ N/A

GLOSSARY

PART I. ABBREVIATIONS AND ACRONYMS

AIR	Accident/Injury Report
ATSM	American Society for Testing and Materials
CPSC	Consumer Product Safety Commission
IPEMA	International Playground Equipment Manufacturers Association
NPCAI	International Playground Contractor's Association
PWG	Playground Working Group
SIR	Serious Incident Report
SMSS	Supervisory Management Services Specialist

PART II. DEFINITIONS

ASTM. An international standards organization that develops and publishes voluntary consensus technical standards.

CPSC. An independent agency of the United States federal government created to protect against unreasonable risks of injuries associated with consumer products.

IPEMA. A non-profit trade association that provides third party product certification services.

NPCAI. A world-wide partnership formed to contribute to the advancement of the playground building industry.