

## Accessibility Guidelines for Play Areas: An Overview

Under the Americans with Disabilities Act (ADA), the Access Board has developed guidelines for play areas that were previously made available for public comment. Presented here are highlights of the final version, which includes changes made as a result of the Board's review of public comments.



The guidelines for play areas add a new section (15.6) to the Board's ADA Accessibility Guidelines (ADAAG), which cover access to the built environment in new construction and alterations. This section addresses only those play areas that are *newly built* or *altered*. (Generally, existing facilities, while subject to certain ADA requirements, are not addressed by ADAAG except where altered). The guidelines provide scoping requirements, which indicate *what* is to be accessible, and technical requirements, which explain *how* to achieve access. The guidelines cover play areas provided at schools, parks, child care facilities (except those based in the operator's home, which are exempt), and other facilities subject to the ADA.

### How the guidelines were developed

ADAAG and amendments to it, like most Federal regulations, are developed through a public notice and comment process. Public notice and the opportunity to comment is provided through publication in the *Federal Register*. These guidelines were proposed for public comment in April 1998 and are based on recommendations from a regulatory negotiation committee the Board established for this purpose. Based on the comments received, the Board revised the guidelines and published them in the *Federal Register* in final form.

### Are these amendments enforceable at this time?

No. The ADA design standards are developed in a two step process. They are first published by the Access Board as a minimum guideline for the Department of Justice (DOJ). DOJ is responsible for adopting enforceable standards that are consistent with the Board's minimum guidelines. Currently, these final guidelines are not yet part of DOJ's enforceable standard. However, people may wish to consult the guidelines in the interim since the current enforceable standard does not specifically address play areas. (The absence of specific provisions in the current standards does *not* mean that play areas are exempt from the provision of access under the ADA; rather, it means that play areas are not held to a specific level of access under the current standard).

### Definitions

Several defined terms are key to understanding the guidelines. These include "play components," which are manufactured or natural elements used for play, socialization, or learning. Two types of play components are distinguished: ground level and elevated.



**Ground level play components** are those approached and exited at ground level, such as spring rockers, swings, and stand-alone climbers (left).

**Elevated play components** are approached above or below grade and are part of composite structures that provide a variety of play activities (right).



### Minimum Number

The guidelines require looking at play areas as a collection of individual play components to determine the minimum amount required to be accessible. Minimum requirements are based on the number of components provided for a play area.

### Ground Level Play Components (15.6.2)

There are two criteria for ground level play components which must be met, although the same accessible components can be used to satisfy both:

- access it required to at least one of each type provided
- the minimum number and variety is also determined by the number of elevated play components provided.

This second requirement recognizes that not all portions of elevated structures will be accessible. Access to ground level components is used to offset this. The number of elevated components provided sets the minimum number and variety of ground level components required according to a chart. This requirement does not apply where no elevated structures are provided or where greater access to elevated components is provided (ramp access to at least half of the total and to at least 3 different types).

| Play Components             |                                  |
|-----------------------------|----------------------------------|
| Number of Elevated Provided | Ground Level Components Required |
| 2 - 4                       | 1                                |
| 5 - 7                       | 2 (at least 2 types)             |
| 8 - 10                      | 3 (at least 3 types)             |

|         |                                                                                |
|---------|--------------------------------------------------------------------------------|
| 11 - 13 | 4 (at least 3 types)                                                           |
| 14 - 16 | 5 (at least 3 types)                                                           |
| 17 - 19 | 6 (at least 3 types)                                                           |
| 20 - 22 | 7 (at least 4 types)                                                           |
| 23 - 25 | 8 (at least 4 types)                                                           |
| over 25 | 8 plus 1 for each additional 3 over 25, or fraction thereof (at least 5 types) |

**Elevated Play Components (15.6.3)**

At least half the number of elevated play components provided are required to be accessible (by ramp or transfer platform).

***Example:** If a play area has 10 elevated play components, at least 5 must be accessible. In addition, at least 3 accessible ground level components are required, each of a different type.*

**Ramps (15.6.4) and Transfer Systems (15.6.5)**

The guidelines allow two methods of providing access to elevated play components: ramps and transfer systems. Design specifications are provided for each type. A transfer system provides a platform onto which children using wheelchairs can transfer (right). Transfer steps from the platform provide a means of access from the platform to play components. Generally, access can be provided by either method, although ramp access is required where play structures with 20 or more elevated play components are provided.



| Elevated Play Components |              |                                |
|--------------------------|--------------|--------------------------------|
| Total Provided           | Ramp Access  | Ramp or Transfer System Access |
| less than 20             | not required | 50% min.                       |
| 20 or more               | 25% min.     | 25% min.                       |

## Technical Requirements for Play Components (15.6.6)

The guidelines provide design criteria for play components considered essential for accessibility, including:

- space for wheelchair maneuvering to and from the play component
- wheelchair space at the play component
- height and clearances of play tables
- height of entry points or seats
- provision of transfer supports (such as a grippable edge or some other means of support)

Advisory (non-mandatory) information on reach ranges is provided.

| Forward or Side Reach | Ages 3 & 4 | Ages 5 - 8 | Ages 9 - 12 |
|-----------------------|------------|------------|-------------|
| High (maximum)        | 36"        | 40"        | 44"         |
| Low (minimum)         | 20"        | 18"        | 16"         |

## Accessible Surfaces (15.6.7)

The guidelines tackle the tricky issue of providing surfaces at play components that are soft enough to limit injury from falls but that are also firm and stable enough for wheelchair maneuvering. The guidelines rely on two standards from the [American Society for Testing and Materials](#) (ASTM). For wheelchair access, surfaces are required to be "firm, stable, and slip resistant" as specified in ADAAG and to meet the ASTM standard F1951-99, which is based on a measurement of the physical effort to maneuver a wheelchair across a surface. Accessible surfaces within the use zone (the ground level area beneath and immediately adjacent to a play structure) are also required to be "impact attenuating" in compliance with ASTM F 1292-99 requirements for drop testing.



### **Soft Contained Play Structures (15.6.8)**

Soft contained play structures are those fully enclosed play structures made of pliable materials such as plastic, netting and fabric. Typically, the play experience is provided largely within the structure and includes elements such as ball pools, slides, climbing nets, and crawl tubes. The guidelines require that an accessible route be provided to the entry points of each structure. Access can be achieved by ramp, transfer system, or platform lift.