

**ARCHITECTURAL AND  
TRANSPORTATION BARRIERS  
COMPLIANCE BOARD**

**36 CFR Part 1191**

[Docket No. 98-2]

RIN 3014-AA21

**Americans with Disabilities Act (ADA)  
Accessibility Guidelines for Buildings  
and Facilities; Play Areas**

**AGENCY:** Architectural and  
Transportation Barriers Compliance  
Board.

**ACTION:** Amendment to advisory note.

**SUMMARY:** The Architectural and  
Transportation Barriers Compliance  
Board (Access Board) is amending an  
advisory note to the accessibility  
guidelines for play areas. The amended  
advisory note clarifies that play  
components that are attached to a  
composite play structure and can be  
approached from a platform or deck  
(e.g., climbers and overhead play  
components), are elevated play  
components. These play components  
are not considered ground level play  
components also, and do not count  
toward meeting the number of ground  
level play components that must be  
located on an accessible route.

**DATES:** The amendment is effective  
December 20, 2000.

**FOR FURTHER INFORMATION CONTACT:**  
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and Information Services, Architectural  
and Transportation Barriers Compliance  
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**SUPPLEMENTARY INFORMATION:**

**Availability of Copies and Electronic  
Access**

Single copies of this document may  
be obtained at no cost by calling the  
Access Board's automated publications  
order line (202) 272-5434, by pressing  
2 on the telephone keypad, then 1, and  
requesting publication S-42 (Play Areas  
Final Rule, Amended Appendix Note).  
Persons using a TTY should call (202)  
272-5449. Please record a name,  
address, telephone number and request  
publication S-42. This document is  
available in alternate formats upon

request. Persons who want a copy in an  
alternate format should specify the type  
of format (cassette tape, Braille, large  
print, or ASCII disk). This document is  
also available on the Board's Internet  
site ([http://www.access-board.gov/play/  
finalrule-aan.htm](http://www.access-board.gov/play/finalrule-aan.htm)).

**Background**

On October 18, 2000, the Access  
Board issued final accessibility  
guidelines for play areas. 65 FR 62498  
(October 18, 2000). The guidelines serve  
as the basis for enforceable standards to  
be adopted by the Department of Justice  
for new construction and alterations of  
play areas covered by the Americans  
with Disabilities Act. The guidelines  
distinguish between ground level and  
elevated play components, and provide  
that a minimum number of ground level  
and elevated play components must be  
located on an accessible route.

The appendix to the guidelines  
contains advisory notes to assist in  
understanding the guidelines. Advisory  
note A15.6.3 addresses elevated play  
components that are attached to a  
composite play structure. As originally  
issued, the advisory note used the  
example of a climber attached to a  
composite play structure. The advisory  
note stated that the climber may be  
considered either a ground level or  
elevated play component. The advisory  
note explained that if an accessible  
route is provided to the base of the  
climber and to the top of the climber,  
and the climber is counted toward  
meeting the number of elevated play  
components on an accessible route, the  
same climber cannot be counted toward  
meeting the number of ground level  
play components on an accessible route.  
The purpose of the advisory note was to  
clarify that such play components  
cannot be "double-counted" as both  
ground level and elevated play  
components. However, if climbers and  
other overhead play components that  
are attached to a composite play  
structure are counted as ground level  
play components, instead of elevated  
play components, it would result in  
significantly less access in play areas.  
Fewer ground level and elevated play  
components would have to be located  
on an accessible route; ramp access  
would be more limited; and there would  
be less diversity in the types of ground  
level play components provided. The  
advisory note was not intended to create  
a "loophole" for evading the guidelines.

The economic assessment, which  
analyzed the impact of the guidelines,  
counted climbers and overhead play  
components attached to a composite  
play structure as elevated play  
components. Play equipment  
manufacturers and operators, who have  
followed the guidelines on a voluntary  
basis prior to their adoption as  
enforceable standards by the  
Department of Justice, have counted  
climbers and overhead play components  
attached to a composite play structure  
as elevated play components.  
Accordingly, the amended advisory note  
states that play components that are  
attached to a composite play structure  
and can be approached from a platform  
or deck (e.g., climbers or overhead play  
components), are considered elevated  
play components. The amended  
advisory note further states that these  
play components are not considered  
ground level play components also, and  
do not count toward meeting the  
number of ground level play  
components that must be located on an  
accessible route.

**List of Subjects in 36 CFR Part 1191**

Buildings and facilities, Civil rights,  
Individuals with disabilities,  
Transportation.

**Thurman M. Davis, Sr.,**  
*Chair, Architectural and Transportation  
Barriers Compliance Board.*

For the reasons set forth above, part  
1191 of Title 36 of the Code of Federal  
Regulations is amended as follows:

**PART 1191—AMERICANS WITH  
DISABILITIES ACT (ADA)  
ACCESSIBILITY**

**Guidelines for Buildings and Facilities**

1. The authority citation for 36 CFR  
part 1191 continues to read as follows:

**Authority:** 42 U.S.C. 12204.

**1191 Appendix A [Amended]**

2. In Part 1191, the appendix to  
Appendix A is amended by revising  
pages A22, A23 and A24 to read as  
follows:

**Appendix A to Part 1191—Americans  
with Disabilities Act (ADA)  
Accessibility Guidelines for Buildings  
and Facilities**

\* \* \* \*

BILLING CODE 8150-01-P

## APPENDIX

**A15.6.1 General.** This section is to be applied during the design, construction, and alteration of play areas for children ages 2 and over. Play areas are the portion of a site where play components are provided. This section does not apply to other portions of a site where elements such as sports fields, picnic areas, or other gathering areas are provided. Those areas are addressed by other sections of ADAAG. Play areas may be located on exterior sites or within a building. Where separate play areas are provided within a site for children in specified age groups (e.g., preschool (ages 2 to 5) and school age (ages 5 to 12)), each play area must comply with this section. Where play areas are provided for the same age group on a site but are geographically separated (e.g., one is located next to a picnic area and another is located next to a softball field), they are considered separate play areas and each play area must comply with this section.

**A15.6.2 Ground Level Play Components.** A ground level play component is a play component approached and exited at the ground level. Examples of ground level play components include spring rockers, swings, diggers, and stand alone slides. When distinguishing between the different types of ground level play components, consider the general experience provided by the play component. Examples of different types of experiences include, but are not limited to, rocking, swinging, climbing, spinning, and sliding. A spiral slide may provide a slightly different experience from a straight slide, but sliding is the general experience and therefore a spiral slide is not considered a different type of play component than a straight slide.

The number of ground level play components is not dependent on the number of children who can play on the play component. A large seesaw designed to accommodate ten children at once is considered one ground level play component.

Where a large play area includes two or more composite play structures designed for the same age group, the total number of elevated play

components on all the composite play structures must be added to determine the additional number and types of ground level play components that must be provided on an accessible route, and the type of accessible route (e.g., ramps or transfer systems) that must be provided to the elevated play components.

Ground level play components accessed by children with disabilities must be integrated in the play area. Designers should consider the optimal layout of ground level play components accessed by children with disabilities to foster interaction and socialization among all children. Grouping all ground level play components accessed by children with disabilities in one location is not considered integrated.

**A15.6.3 Elevated Play Components.** Elevated play components are approached above or below grade and are part of a composite play structure. A double or triple slide that is part of a composite play structure is one elevated play component. For purposes of this section, ramps, transfer systems, steps, decks, and roofs are not considered elevated play components. These elements are generally used to link other elements on a composite play structure. Although socialization and pretend play can occur on these elements, they are not primarily intended for play.

Some play components that are attached to a composite play structure can be approached or exited at the ground level or above grade from a platform or deck. For example, a climber attached to a composite play structure can be approached or exited at the ground level or above grade from a platform or deck on a composite play structure. Play components that are attached to a composite play structure and can be approached from a platform or deck (e.g., climbers and overhead play components), are considered elevated play components. These play components are not considered ground level play components also, and do not count toward the requirements in 15.6.2 regarding the number of ground level play components that must be located on an accessible route.

**A15.6.4 Accessible Routes.** Accessible routes within the boundary of the play area must comply with 15.6.4. Accessible routes connecting the play area to parking, drinking fountains, and other elements on a site must comply with 4.3. Accessible routes provide children who use wheelchairs or other mobility devices the opportunity to access play components. Accessible routes should coincide with the general circulation path used within the play area. Careful placement and consideration of the layout of accessible routes will enhance the ability of children with disabilities to socialize and interact with other children.

Where possible, designers and operators are encouraged to provide wider ground level accessible routes within the play area or consider designing the entire ground surface to be accessible. Providing more accessible spaces will enhance the integration of all children within the play area and provide access to more play components. A maximum slope of 1:16 is required for ground level ramps; however, a lesser slope will enhance access for those children who have difficulty negotiating the 1:16 maximum slope. Handrails are not required on ramps located within ground level use zones.

Where a stand alone slide is provided, an accessible route must connect the base of the stairs at the entry point, and the exit point of the slide. A ramp or transfer system to the top of the slide is not required. Where a sand box is provided, an accessible route must connect to the border of the sand box. Accessibility to the sand box would be enhanced by providing a transfer system into the sand or by providing a raised sand table with knee clearance complying with 15.6.6.3.

Elevated accessible routes must connect the entry and exit points of 50 percent of elevated play components. Ramps are preferred over transfer systems since not all children who use wheelchairs or other mobility devices may be able to use or may choose not to use transfer systems. Where ramps connect elevated play components, the maximum rise of any ramp run is limited to 12

inches. Where possible, designers and operators are encouraged to provide ramps with a lesser slope than the 1:12 maximum. Berms or sculpted dirt may be used to provide elevation and may be part of an accessible route to composite play structures.

Platform lifts complying with 4.11 and applicable State and local codes are permitted as a part of an accessible route. Because lifts must be independently operable, operators should carefully consider the appropriateness of their use in unsupervised settings.

**A15.6.5 Transfer Systems.** Transfer systems are a means of accessing composite play structures. Transfer systems generally include a transfer platform and a series of transfer steps. Children who use wheelchairs or other mobility devices transfer from their wheelchair or mobility devices onto the transfer platform and lift themselves up or down the transfer steps and scoot along the decks or platforms to access elevated play components. Some children may be unable or may choose not to use transfer systems. Where transfer systems are provided, consideration should be given to the distance between the transfer system and the elevated play components. Moving between a transfer platform and a series of transfer steps requires extensive exertion for some children. Designers should minimize the distance between the points where a child transfers from a wheelchair or mobility device and where the elevated play components are located. Where elevated play components are used to connect to another elevated play component in lieu of an accessible route, careful consideration should be used in the selection of the play components used for this purpose. Transfer supports are required on transfer platforms and transfer steps to assist children when transferring. Some examples of supports include a rope loop, a loop type handle, a slot in the edge of a flat horizontal or vertical member, poles or bars, or D rings on the corner posts.

**A15.6.6 Play Components.** Clear floor or ground spaces, maneuvering spaces, and accessible routes may overlap within play areas.

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A specific location has not been designated for the clear floor or ground spaces or maneuvering spaces, except swings, because each play component may require that the spaces be placed in a unique location. Where play components include a seat or entry point, designs that provide for an unobstructed transfer from a wheelchair or other mobility device are recommended. This will enhance the ability of children with disabilities to independently use the play component.

When designing play components with manipulative or interactive features, consider appropriate reach ranges for children seated in wheelchairs. The following table provides guidance on reach ranges for children seated in wheelchairs. These dimensions apply to either forward or side reaches. The reach ranges are appropriate for use with those play components that children seated in wheelchairs may access and reach. Where transfer systems provide access to elevated play components, the reach ranges are not appropriate.

Where a climber is located on a ground level accessible route, some of the climbing rings should be within the reach ranges. A careful balance of providing access to play components but not eliminating the challenge and nature of the activity is encouraged.

**A15.6.7 Ground Surfaces.** Ground surfaces along clear floor or ground spaces, maneuvering spaces, and accessible routes must comply with the ASTM F 1951 Standard Specification for Determination of Accessibility to Surface Systems Under and Around Playground Equipment. The ASTM F 1951 standard is available from the American Society for Testing and Materials (ASTM), 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, telephone (610) 832-9585. The ASTM F 1951 standard may be ordered online from ASTM (<http://www.astm.org>). The ASTM 1951 standard determines the accessibility of a surface by measuring the work required to propel a wheelchair across the surface. The standard includes tests of effort for both straight ahead and turning movement, using a force wheel on a rehabilitation wheelchair as the measuring device. To meet the standard, the force required must be less than that required to propel the wheelchair up a ramp with a 1:14 slope. When evaluating ground surfaces, operators should request information about compliance with the ASTM F 1951 standard.

Ground surfaces must be inspected and maintained regularly and frequently to ensure continued compliance with the ASTM F 1951 standard. The type of surface material selected and play area use levels will determine the frequency of inspection and maintenance activities.

**Children's Reach Ranges**

<b>Forward or Side Reach</b>	<b>Ages 3 and 4</b>	<b>Ages 5 through 8</b>	<b>Ages 9 through 12</b>
<b>High (maximum)</b>	36 in (915 mm)	40 in (1015 mm)	44 in (1120 mm)
<b>Low (minimum)</b>	20 in (510 mm)	18 in (455 mm)	16 in (405 mm)

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