

Holy Redeemer Preschool Child Care Center Risk Reduction Plan

Mn Statute 245A.66

Program Name: Holy Redeemer Preschool License #: 1025092

Child care centers licensed under Minnesota Statutes, chapter 245A, and Minnesota Rules, chapter 9503, must develop a risk reduction plan that assesses and identifies risks to children served by the child care center. The license holder must establish procedures to minimize identified risks, train mandated reporters within the control of the license holder on the procedures, and annually review the procedures. [Minnesota Statutes, section 245A.66, subdivision 2]

- A. **Assessment of risks to children.** The risk reduction plan must include an assessment of risk to children the center serves or intends to serve and a statement of measures that will be taken to minimize the risk of harm presented to children. The assessment of risk to children the center serves or intends to serve must be based on the general vulnerability of children, physical plant, and environment, and must identify specific risks in each assessment area.
- (1) **Vulnerability of children** – Assessment and identification of risks presented by the vulnerability of children, including an evaluation of age, developmental functioning, and the physical and emotional health of children the program serves or intends to serve.
- a) Identification of age groups the program serves or intends to serve:
Holy Redeemer Preschool serves children that are ages 3, 4, and 5 years of age.
- b) Evaluation of the developmental functioning of children the program serves or intends to serve and identification of related risks to children:
All children are at risk because of their age and their developmental functioning categorically and need supervision to protect them from harm including but not limited to falls, burns, poisoning, suffocation, choking, traffic and pedestrian accidents and dislocations. The development of children is assessed in the areas of physical (lg and small motor), intellectual (cognitive), social and emotional and language. Parents receive a written notice of the assessment and notice of conferences offered bi-annually.
- c) Evaluation of the physical and emotional health of children the program serves or intends to serve and identification of related risks to children:

Risks to children exist in a variety of ways. These risks include but are not limited to exposure of disease, administration of medications in a group, nutritional needs, choking, falling, chemical exposures, unpredictable acts, emotional ups and downs, temper tantrums, aggressive acts in groups to self and others, separation from parents (ex following a parent out of the classroom, and/or inappropriate acts demonstrated by this age group of children.

General description of supervision, programming, and stated measures that will be taken to minimize the risks identified above:

Supervision is the key requirement in the prevention of accidents and injuries to children. Staff must meet the requirements to be able to access potential risks during operational hours and to be able to implement changes to supervision in order to avoid and prevent accidents and injuries to children. Staff must reduce the risk of harm to children at all times by making sure children are never left alone and that all children are within sight and sound of a trained staff. Children must also be sent home to an authorized adult as written on the Emergency Form in each child's file. Other actions may apply as well. This is not limited to these actions alone.

Reference to existing policies and procedures that minimize the risks identified above:

All policies and procedures carried out by staff are listed, signed and understood in the staff files. A renewal/orientation of these policies are understood at Staff Orientation.

(2) **Physical plant** - Assessment and identification of the risks presented by the physical plant where the licensed services are provided, including an evaluation of the condition and design of the facility and its outdoor space, bathrooms, storage areas and accessibility of medications and cleaning products that are harmful to children when children are not supervised, doors where finger pinching may occur, and the existence of areas that are difficult to supervise.

a) Evaluation and identification of the risks to children presented by the condition and design of the facility and its outdoor space:

Holy Redeemer Preschool is located inside of a private Catholic school that houses Preschool-8th grade. The building itself includes 18-20 classrooms, outdoor spaces including play and equipment spaces, 2 parking lots, gymnasium, 2 computer labs, a library, a Chapel, woodshop, cooking/art classroom, cafeteria, and various offices including a principal and vice

principal offices, a nurse office, music room, band room, Title 1 room and school aide room, teacher's lounge, etc. There are handicap accessibility into the building and numerous staircases to the upper level. Risks may include: hard to supervise areas, traffic and pedestrian accidents, harm to children by unauthorized people, slips, falls, etc.

General description of supervision, programming, and stated measures that will be taken to minimize the identified risks:

Staff will rotate and not cluster together during supervision. Staff will mentally note difficult to see areas and pay attention to those areas. Any and all areas or equipment used that is hidden or difficult to supervise are mentally noted and supervised by staff in rotations. Staff will position themselves according to the needs or equipment. Staff will visually check areas by rotating and not clustering together while supervising children in these play spaces. Supervision includes the walk to the playground area and also the walk back to the classroom. Procedures are not limited to these alone.

Reference to existing policies and procedures that minimize the identified risks:
Emergency and Accident Prevention policies on file.

- b) Evaluation and identification of the risks to children presented by bathrooms:
Bathrooms are maintained by HRS. Cleaning supplies, plungers, etc are locked in a cabinet. Risks to children may include wet floors, child to child touch, play in the water, etc. Risks are not limited to these alone.

General description of supervision, programming, and stated measures that will be taken to minimize the identified risks:

Staff will supervise shared areas and conduct daily inspections. Staff will inspect areas as used so that wet or unsanitary surfaces are wiped up and dry, cleaning supplies locked and put away, etc. Staff will supervise and position themselves when the bathroom is in use by preschool children. The outer bathroom door is left open to make supervision easier. Hand washing procedures are enforced by all participants in the bathroom areas. Not limited to this alone.

Reference to existing policies and procedures that minimize the identified risks:
Emergency and Accident Prevention procedures on file.

- c) Evaluation and identification of the risks to children presented by storage areas and accessibility of medications and cleaning products that are harmful to children:

Storage areas within view or reach of preschoolers include the rooms themselves, hallway and basement storage. These areas store, paint, cleaning supplies, medications, toys, etc. Some storage areas are shared spaces. These include but not limited to a snack and refrigerator room and a hallway closet.

Policies are outlined in the Allergy procedures created on an individual basis. Risks to children may include ingestion of chemicals, spills, poisoning, etc. These risks not limited to these alone.

General description of supervision, programming, and stated measures that will be taken to minimize the identified risks:

Chemicals are stored either out of the reach of children and/or in locked cabinets. Storage areas including the shared spaces are supervised by staff. These areas are locked and off limits to children. Cleaning products, etc are locked in a storage area. Medications used for allergies are stored in the room out of the reach of children or in a locked cabinet. Policies are outlined in the Allergy procedures created on an individual basis.

Reference to existing policies and procedures that minimize the identified risks:
Emergency and Accident Prevention policies on file.

- d) Evaluation and identification of the risks to children presented by doors where finger pinching may occur:

Upon entrance to the building itself, the doors are maintained and repaired according to HRS standards. There are a set of exterior doors and an interior door as entrance to Wee Care Preschool. There is also a variety of cabinet doors and closet doors in each classroom. There is a single door used for entry and exiting each bathroom. Risks include children getting their

fingers pinched, slammed or severed. These risks are not limited to these alone.

General description of supervision, programming, and stated measures that will be taken to minimize the identified risks:

The entrance doors (both sets) are supervised by preschool parents/guardians as they enter and exit the building itself. Also, the doors to each classroom are opened and remain opened until all the children are delivered to the classrooms by parents. Classroom doors are then closed. Staff opens and closes doors. Cabinet and cupboard doors in the classroom are supervised by staff and/or are locked and remain closed and locked until a staff member opens and closes them. Play equipment doors such as a kitchen play sets, etc are purchased in regards to standards regulated by their manufactures.

Reference to existing policies and procedures that minimize the identified risks:
Accident Prevention/Emergency policies and procedures are on file.

- e) Evaluation and identification of the risks to children presented by the existence of areas that are difficult to supervise:
Areas enclosed or unenclosed (ex tents, climbing enclosures, bathrooms, cubbies, corners, play areas outside including but not limited to sliding areas are to be staff supervised.

General description of supervision, programming, and stated measures that will be taken to minimize the identified risks:

Staff will inspect and use a rotational plan for hard to supervise areas. Staff will use frequent visibility checks as well. Bathrooms will be supervised by staff when in use by preschoolers. Constant supervision by staff will be used at all times when preschoolers are in attendance.

Reference to existing policies and procedures that minimize the identified risks:

General description of supervision, programming, and stated measures that will be taken to minimize the identified risks:

Staff supervision on field trips may include using the buddy system, name tags, frequent head counts, name to face counts, etc.

Closed doors may prevent the risk of leaving the facility.

Staff supervision at all times during outdoor play.

Use of sidewalks in use while walking next to parking lots/ etc.

Supervision and use of policies not limited to those listed above.

Reference to existing policies and procedures that minimize the identified risks:

All policies including safety procedures on file.

B. Additional risk of harm factors to children. In addition to any program-specific risks identified under the assessment in Section A, the risk reduction plan must include a statement of measures that will be taken to minimize the risk of harm presented to children or refer to existing policies and procedures that minimize the risk of harm or injury to children including:

Identified risk of harm or injury to children	General description of supervision, programming, and stated measures that will be taken to minimize the identified risk, or reference to existing policies and procedures that minimize the risk of harm or injury to children.
Closing children's fingers in doors, including cabinet doors	General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: Cabinet doors remain locked. Staff only opens and closes these types of doors. Entrance and exit doors either remain open or are opened and closed by staff and/or parent and guardians entering and exiting the building. Increased supervision of all doors by staff. Staff can hold doors in the open position when appropriate.

	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p style="text-align: center;">All safety, accident prevention and emergency procedures on file</p>
<p>Leaving children in the community without supervision</p>	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk:</p> <p>Staff will do head counts frequently in the classroom. This may include but not limited to all fieldtrips or areas occupied by preschoolers. The buddy system and face to name counts will also be done. Staff will make sure children are in sight and hearing at all times.</p> <p>Reference to existing policies and procedures that minimize the identified risk:</p> <p style="text-align: center;">All safety, accident prevention and emergency procedures on file</p>
<p>Identified risk of harm or injury to children</p>	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk, or reference to existing policies and procedures that minimize the risk of harm or injury to children.</p>
<p>Children leaving the facility without supervision</p>	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: Children are not allowed to exit without a staff member and/or parent or guardian. Children stay in the classroom until dismissed to a parent/guardian as specified. Children are escorted and supervised by staff when MAT bus is used. Closed doors also are used to keep children in the classroom under supervision.</p>

	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p style="text-align: center;">All safety, accident prevention and emergency procedures on file</p>
<p>Caregiver dislocation of children's elbows</p>	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: Staff will lift a child by grasping them under the arms or armpits or around their bodies. Staff is instructed not to continue to lead a struggling child by a hand, never grab, drag, pull, yank, swing or lift children of any age by their arms or wrists. Always let the child hold onto the staff person's hand instead of the staff holding onto the child's hand.</p> <p>Reference to existing policies and procedures that minimize the identified risk:</p> <p style="text-align: center;">All safety, accident prevention and emergency procedures on file</p>
<p>Burns from hot food/beverages, whether served to children or consumed by caregivers, and devices used to warm food and beverages</p>	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: Staff will ensure all electrical cords are out of reach or have increased supervision when electrical cords are present. Staff will not drink hot beverages around children. Staff will ensure all foods and liquids served to children are at room temperature or at a safe temperature.</p>

	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p style="text-align: center;">All safety, accident prevention and emergency procedures on file</p>
Injuries from equipment, such as scissors and glue guns	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: Staff will keep adult scissors out of the reach of/sight of children along with hot glue guns. Large paper cutters, etc are in use in a room not occupied by preschoolers.</p>
	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p style="text-align: center;">All safety, accident prevention and emergency procedures on file</p>
Identified risk of harm or injury to children	<p>General description of supervision, programming, and stated measures that will be taken to minimize the risk of harm to children, or reference to policies and procedures developed and implemented to minimize the risk of harm or injury to children.</p>
Sunburn	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: Sunscreen is applied by parents only. Shade is used when appropriate or return to the classroom.</p>
	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p style="text-align: center;">See Health policy and all</p>

	<p>policies and procedures on file.</p>
Feeding children foods to which they are allergic	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: Children with allergies have an individual plan posted and stated in file. Staff is trained on all and any emergencies in regards to allergies.</p>
	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p>See individual allergy and life threatening allergy plans on file</p>
Children falling from changing tables	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: not applicable</p>
	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p>N/a</p>
Children accessing dangerous items or chemicals, or coming into contact with residue from harmful cleaning products	<p>General description of supervision, programming, and stated measures that will be taken to minimize the identified risk: All chemicals and cleaning products are kept and stored out of the reach of children and/or locked in a cabinet.</p>
	<p>Reference to existing policies and procedures that minimize the identified risk:</p> <p>All safety, accident prevention and emergency</p>

C. Accessibility of hazardous items. The accessibility of hazardous items to children is prohibited at all times when children are present.

D. Orientation to the risk reduction plan. The license holder shall ensure that all mandated reporters, as defined in section 626.556, subdivision 3, who are under the control of the license holder, receive an orientation to the risk reduction plan prior to first providing unsupervised direct contact services, as defined in section 245C.02, subdivision 11, to children, not to exceed 14 days from the first supervised direct contact, and annually thereafter. Documentation of orientation to the risk reduction plan must be documented in each mandated reporter's personnel record.

E. Annual review of the risk reduction plan. The license holder must review the risk reduction plan annually. When conducting the review, the license holder must consider incidents that have occurred in the center since the last review, including the following:

(1) the assessment factors in the plan;

(2) the internal reviews conducted under Minnesota Statutes, section 245A.66, subdivision 1, if any;

(3) substantiated maltreatment findings, if any; and

(4) incidents that caused injury or harm to a child, if any, that occurred since the last review.

Following any change to the risk reduction plan, the license holder must inform mandated reporters, under the control of the license holder, of the changes in the risk reduction plan. The annual review of the risk reduction plan or changes in the plan must be documented in the center's administrative records.

Date risk reduction plan was initially completed: _____

Annual review of the risk reduction plan

Program Name: Wee Care Preschool License #: 1025092

The license holder must review the risk reduction plan annually. When conducting the review, the license holder must consider incidents that have occurred in the center since the last review, including:

- (1) A review of the assessment factors in the plan:

- (2) A review of the internal reviews conducted under Minnesota Statutes, section 245A.66, subdivision 1, if any:

- (3) A review of substantiated maltreatment findings, if any:

- (4) A review of incidents that caused injury or harm to a child since the last review, if any:

Based on the annual review, what changes were made to the risk reduction plan?

Name and title of person completing annual review: _____

Date of annual review: _____

Risk reduction for children and adolescents

Allergies

Children have received food to which they are allergic. The following may reduce the likelihood of children's exposure to such food:

- Create a protocol to ensure that children are not exposed to allergens and ensure that all staff people are trained on the protocol. Some providers have included the use of a different colored cup, plate, or placemat to aid in recognizing food allergens.
- Ensure that allergies are posted as required.
- Ensure that the facility is provided with current prescribed medications, such as Benadryl or an EpiPen[®]; if the child has been prescribed epinephrine for

Elbow injuries

Children have suffered elbow injuries at child care centers. The most common injury is referred to as "nursemaid's elbow," partial dislocation, or radial head subluxation. The most common cause of such an injury is staff persons lifting or pulling children by the wrist or hand. Examples of incidents involving children suffering "nursemaid's elbow" include the following:

- A staff person "yanked" a child by the hand when the child refused to walk with the staff person.
- A staff person pulled a child by the hand(s) when the child extended their hand(s) for assistance getting up from the floor or over a partition.
- A child dropped to the floor while a staff person held onto the child's hand.

In addition to increased awareness of this safety concern, the following might help prevent these injuries:

- Lift children by grasping them under their arms or around their bodies.
- Discontinue leading a struggling child by the hand.
- Never grab, drag, pull, yank, swing, lift, or restrict movement of children of any age by their arms or wrists; allow the child to hold onto the staff person's hand instead of the staff person holding onto the child's hand.

Severed/pinched fingertips

Children's fingers can be pinched in doors at child care centers. Children are at risk of their finger(s) being caught in a closing door; resulting injuries have included severing of a fingertip and permanent loss of a fingernail. There have also been incidents where children's fingers were pinched in cabinet doors. The following may reduce the likelihood of this type of incident from occurring:

- Delineate a visual "safety zone" around the door, showing an area where children should not stand or sit.
- Increase awareness and supervision by staff persons around doors.
- Use door protectors (light weight plastic that adheres to the door and frame and discourages a child from placing his/her fingers in the hinge side of the doorframe). These are not guaranteed to prevent an injury, but may reduce the severity of the injury.
- Secure doors in an open position, if appropriate.
- Remove any unnecessary doors.

Sexual contact between children

Sexual contact can occur between children at child care centers and at children's residential facilities. The following may reduce the likelihood of such incidents:

- Increase awareness and supervision by staff people in child care centers, including awareness of children who are playing in obstructed view areas such as climbers, play houses and tents as well as discussions about appropriate boundaries with children.
- Increase awareness and supervision by staff people in children's residential facilities, including increased awareness of where children are at all times, especially in areas that are difficult to supervise, such as bedrooms, hallways and bathrooms. Develop plans to address supervision for children with histories of engaging in inappropriate sexual behavior and discuss appropriate boundaries with all children receiving services.

Rough handling

Rough handling of children in child care centers by staff people also has been reported. The following may reduce the likelihood of such incidents:

- Provide training to the staff persons on acceptable methods of behavior guidance as required by Minnesota Rules part 9503.0055.
- Discuss with parents or guardians methods of behavior guidance they have used successfully with their child.
- Develop a behavior plan when a child engages in persistent unacceptable behavior and provide training to staff persons on the implementation of the behavior plan as required by Minnesota Rules part 9503.0055 subpart 2

Risk reduction plans

Thorough development, training and implementation of a child care center risk reduction plan required by Minnesota Statutes, section 245A.66, subdivision 2, may help reduce the likelihood of incidents of known risk to children including:

- Closing children's fingers in doors
- Leaving children in the community without supervision
- Children leaving the facility without supervision
- Dislocation of children's elbows
- Burns
- Injuries from equipment
- Food allergies
- Children falling from changing tables.

Playground equipment

Children have been injured on playground equipment. The following may reduce the likelihood of playground injuries:

- Ensure surfaces around playground equipment are covered with material such as wood chips, mulch, sand, pea gravel or safety-tested rubber-like material.
- Ensure that protective surfacing extends at least six feet in all directions from play equipment.
- Ensure play structures are spaced an adequate distance apart.
- Check for dangerous hardware or sharp edges on equipment.
- Check equipment and playgrounds regularly to ensure they are safe and in good condition. Dirt or grass surfaces below playground equipment do not adequately protect children if they fall.

Ensure that the playground equipment is age-appropriate for the children using the equipment. Children who are allowed to play on playground equipment designed for older children are at greater risk of injuries from falls.

Further information from the U.S. Consumer Product Safety Commission regarding playground equipment is available in the [Public Playground Safety Handbook \(PDF\) \(https://www.cpsc.gov/s3fs-public/325.pdf\)](https://www.cpsc.gov/s3fs-public/325.pdf). The U.S. Consumer Product Safety Commission also warns that [children's climbing equipment should not be used indoors on wood or cement floors \(PDF\) \(https://www.cpsc.gov/s3fs-public/5119_0.pdf\)](https://www.cpsc.gov/s3fs-public/5119_0.pdf) even if covered by carpet. Carpet does not provide adequate protection to prevent injuries.

Internal reviews

Minnesota Statutes, section 245A.66, states that providers must establish and maintain policies and procedures to ensure that an internal review is completed (except for family child care settings and foster care for children in the license holder's residence) within 30 calendar days and that corrective action is taken if necessary to protect the health and safety of children in care when the facility has reason to know that an internal or external report of alleged or suspected maltreatment has been made.

The review must include an evaluation of whether related policies and procedures were followed before, during and after the incident; whether the policies and procedures were adequate; whether there is a need for additional staff training; whether the report is similar to past events with the children or the services involved; and whether there is a need for corrective action by the license holder to protect the health and safety of the children in care.

Risk reduction for children and adolescents

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- Ensure that allergies are posted as required.
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- A staff person "yanked" a child by the hand when the child refused to walk with the staff person.
- A staff person pulled a child by the hand(s) when the child extended their hand(s) for assistance getting up from the floor or over a partition.
- A child dropped to the floor while a staff person held onto the child's hand.

In addition to increased awareness of this safety concern, the following might help prevent these injuries:

- Lift children by grasping them under their arms or around their bodies.
- Discontinue leading a struggling child by the hand.
- Never grab, drag, pull, yank, swing, lift, or restrict movement of children of any age by their arms or wrists; allow the child to hold onto the staff person's hand instead of the staff person holding onto the child's hand.

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- Delineate a visual "safety zone" around the door, showing an area where children should not stand or sit.
- Increase awareness and supervision by staff persons around doors.
- Use door protectors (light weight plastic that adheres to the door and frame and discourages a child from placing his/her fingers in the hinge side of the doorframe). These are not guaranteed to prevent an injury, but may reduce the severity of the injury.
- Secure doors in an open position, if appropriate.
- Remove any unnecessary doors.

Sexual contact between children

Sexual contact can occur between children at child care centers and at children's residential facilities. The following may reduce the likelihood of such incidents:

- Increase awareness and supervision by staff people in child care centers, including awareness of children who are playing in obstructed view areas such as climbers, play houses and tents as well as discussions about appropriate boundaries with children.
- Increase awareness and supervision by staff people in children's residential facilities, including increased awareness of where children are at all times, especially in areas that are difficult to supervise, such as bedrooms, hallways and bathrooms. Develop plans to address supervision for children with histories of engaging in inappropriate sexual behavior and discuss appropriate boundaries with all children receiving services.

Rough handling

Rough handling of children in child care centers by staff people also has been reported. The following may reduce the likelihood of such incidents:

- Provide training to the staff persons on acceptable methods of behavior guidance as required by Minnesota Rules part 9503.0055.
- Discuss with parents or guardians methods of behavior guidance they have used successfully with their child.
- Develop a behavior plan when a child engages in persistent unacceptable behavior and provide training to staff persons on the implementation of the behavior plan as required by Minnesota Rules part 9503.0055 subpart 2

Risk reduction plans

Thorough development, training and implementation of a child care center risk reduction plan required by Minnesota Statutes, section 245A.66, subdivision 2, may help reduce the likelihood of incidents of known risk to children including:

- Closing children's fingers in doors
- Leaving children in the community without supervision
- Children leaving the facility without supervision
- Dislocation of children's elbows
- Burns
- Injuries from equipment
- Food allergies
- Children falling from changing tables.

Playground equipment

Children have been injured on playground equipment. The following may reduce the likelihood of playground injuries:

- Ensure surfaces around playground equipment are covered with material such as wood chips, mulch, sand, pea gravel or safety-tested rubber-like material.
- Ensure that protective surfacing extends at least six feet in all directions from play equipment.
- Ensure play structures are spaced an adequate distance apart.
- Check for dangerous hardware or sharp edges on equipment.
- Check equipment and playgrounds regularly to ensure they are safe and in good condition. Dirt or grass surfaces below playground equipment do not adequately protect children if they fall.

Ensure that the playground equipment is age-appropriate for the children using the equipment. Children who are allowed to play on playground equipment designed for older children are at greater risk of injuries from falls.

Further information from the U.S. Consumer Product Safety Commission regarding playground equipment is available in the **Public Playground Safety Handbook (PDF)** (<https://www.cpsc.gov/s3fs-public/325.pdf>). The U.S. Consumer Product Safety Commission also warns that **children's climbing equipment should not be used indoors on wood or cement floors (PDF)** (https://www.cpsc.gov/s3fs-public/5119_0.pdf) even if covered by carpet. Carpet does not provide adequate protection to prevent injuries.

Internal reviews

Minnesota Statutes, section 245A.66, states that providers must establish and maintain policies and procedures to ensure that an internal review is completed (except for family child care settings and foster care for children in the license holder's residence) within 30 calendar days and that corrective action is taken if necessary to protect the health and safety of children in care when the facility has reason to know that an internal or external report of alleged or suspected maltreatment has been made.

The review must include an evaluation of whether related policies and procedures were followed before, during and after the incident; whether the policies and procedures were adequate; whether there is a need for additional staff training; whether the report is similar to past events with the children or the services involved; and whether there is a need for corrective action by the license holder to protect the health and safety of the children in care.