New York State Children’s Camps Fact Sheet  
Bunk Bed Guardrail Requirements  
September 29, 2004

**Background:**

Since June 19, 2000, the United States Consumer Product Safety Commission (CPSC) has required all new bunk beds that are manufactured for non-institutional use to have guardrails that comply with CPSC Safety Standard for Bunk Beds.

A review of the children’s camps injury reports submitted to the Department of Health has shown that falls from bunk beds have resulted in serious injuries to campers of all age groups at camps in New York State. While the CPSC design standards are effective at preventing injuries from falls, the standards do not apply to bunk beds manufactured prior to June 19, 2000 or to those manufactured for institutional use.

In order to provide for the safety of the campers and staff, section 7-2.16(b) of Subpart 7-2 of the State Sanitary Code pertaining to the operation of a Children’s Camp in New York State, was amended during 2004 to require the upper bed of bunk beds be provided with adequate guardrails. Guardrails that are manufactured and maintained in accordance with the CPSC Safety Standard for Bunk Beds are considered to be in compliance. All other bunk beds used by campers and staff will require the operator of the children’s camp to complete an evaluation of the upper bed to determine compliance with the following requirements. The beds that do not meet these requirements will need to be retrofitted with acceptable guardrails or replaced with beds that comply with this requirement or the CPSC Safety Standard for Bunk Beds by May 2005.

**Definitions:**

*Foundation* is the base or support on which a mattress or, when provided, a box spring rests.

*Guardrail* is a rail or guard on the side of a bed to prevent an occupant from falling or rolling out of the bed.

*End structure* means an upright unit at the head or foot of the bed that spans the width of the bed.

**Requirements:**

- Upper bunk beds shall have a guardrail on each side of the bed. When a bed is secured against a wall that spans the length of the bed with no gap between the wall and bed frame and the bed cannot be removed from the wall without use of tools, an equivalent level of safety is provided by installation of a guardrail only on the non-wall side of the bed.
• The upper edge of the guardrails shall be no less than 5 inches above the top surface of the mattress.

• Guardrails may terminate before reaching the bed's end structures as follows:

1) The opening between a guardrail and the end structure at the head of a bed shall be no more than 15 inches. An opening between 3½ and 9 inches should be avoided because of the danger of entrapment.

2) The maximum permissible opening size between a guardrail and the end structure at the foot of the bed to allow access to the bed from a side ladder is based on the bed occupant's age as follows:

<table>
<thead>
<tr>
<th>Occupant age*</th>
<th>Permissible Opening Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 years old</td>
<td>No more than 22 inches</td>
</tr>
<tr>
<td>7 years old</td>
<td>No more than 23 inches</td>
</tr>
<tr>
<td>8 years old</td>
<td>No more than 24 inches</td>
</tr>
<tr>
<td>over 8 years old</td>
<td>Cannot exceed 25 inches</td>
</tr>
</tbody>
</table>

* The CPSC recommends that children under 6 years old should not use the upper bed in a bunk bed.

3) When a bed is not accessed from a side ladder, to prevent the danger of entrapment, an opening between the guardrail and end structures should be less than 3½ inches or greater than 9 inches.

• Guardrails for bunk beds, which are not secured against a wall, should span the entire length of the bed on the side that does not have the access ladder.

• To prevent entrapment and strangulation, openings between each guardrail and between the guardrails and the bed foundation or frame shall not be more that 3½ inches as illustrated in the attached diagram.

• Guardrails must be structurally sound and attached so that they cannot be removed without the use of tools or by intentionally releasing a fastening device.

• Ladders, if provided, shall be structurally sound and are to be securely attached to the bunk beds.

• Mattress foundations must be securely placed or fastened to prevent dislodgment.
Note: Guardrail requirements apply to both sides of the bed when the bed is not secured against a wall.