

From: [Sally Marquez](#)
To: [FeedBack, Rule, PED](#)
Cc: [Arellano, Immanuel, PED](#); [Frostad, Gregory, PED](#); [Romero, Arsenio, PED](#); [Casados, Anthony](#)
Subject: [EXTERNAL] CPR/AED
Date: Monday, June 5, 2023 1:00:01 PM

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Concerns:

1. Is PED prepared to determine what constitutes “certification”? There are multiple training agencies, some of them nationally recognized, some not as much. What is the standard and what is an approved certification agency?
2. To remain “current” with certification, an individual must be recertified every two years in CPR.
 - a. Will licensure expect those recertification certificates be sent to them every two-years in order to maintain licensure?
 - b. What if there’s a delay in submission of the certificate?
 - c. Will PED freeze their license until current?
 - d. How will the school know if one of their coaches has a frozen license?
3. The law doesn’t go into effect until July 1. Once that date hits, currently licensed coaches will need to get CPR certified, or they will not be in compliance. Is PED expecting to collect CPR certificates for all coaches statewide, even currently licensed coaches?

Solution:

It would make more sense to put the burden on schools to track CPR certification, similar to the concussion law. Once a coach receives his/her license from PED, they are now “licensed” as per the language in the law, and now the school must ensure they are also current with CPR certification before they’re eligible to coach. This can easily be applied to new coaches as well as current coaches. In coordination with PED, we could also then provide guidance to our schools on what is considered sufficient for “certification.”

This is a law that directly affects the member schools of the NMAA (165 high schools and 200 middle schools). The NMAA has experience informing schools of requirements specifically those in state statute. Allowing our schools to have more direct oversight of this rule will streamline the process and create less burdens on all parties involved and will still ensure the intent of the law is met.

Submitted by:
Sally Marquez
Executive Director of the NMAA

From: [NMATA President](#)
To: [FeedBack, Rule, PED](#)
Subject: [EXTERNAL] Rule Feedback for: SB450 Coaches CPR/AED
Date: Monday, June 19, 2023 5:14:20 PM

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Note: When submitting feedback, we kindly request that you specify which rule(s) you are submitting feedback for. This is especially helpful when the Department is accepting feedback for multiple proposed rules at the same time.

In reference to SB450 requiring CPR/ AED certification of all public school coaches. I highly recommend that hands on, in person certification be the requirement. This is essential to ensure proper training of coaches in this very important rule. An online course does not suffice.

Thank you for your time,