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I. **Purpose**
Automated external defibrillators (AED) enable responders to deliver early defibrillation to victims in the first critical moments after a sudden cardiac arrest. This program provides the requirements for the selection, placement, use, and maintenance of AEDs.

II. **Scope**
This program applies to schools and units with AEDs on Northwestern property, including in vehicles and leased spaces.

III. **Responsibilities**

A. **Environmental Health and Safety (EHS)**
   i. Administrative oversight of this program.
   ii. Review, audit, and revise this program, as necessary.
   iii. Adhere to the requirements of this program.
   iv. Provide consultation, guidance, and approval to schools and units to implement this program, including AED selection and location, which may include signage and a cabinet.
   v. Annually inspect permanently-located AEDs and report findings to AED Coordinators.
   vi. Maintain the database of AEDs and AED Coordinators and notify Northwestern Police Dispatch whenever there are changes to the AED inventory, and at least annually.

B. **Schools and Departments**
   i. Adhere to the requirements of this program when an AED is purchased, placed, or used within their areas of responsibility.
   ii. Provide resources, including financial resources, to purchase, install, inspect, and maintain their AED(s), and train employees.
   iii. Assign an AED Coordinator.

C. **AED Coordinator**
   i. Adhere to the requirements of this program.
   ii. Responsible for the day-to-day management of their AED(s), including monthly inspections, maintenance, and equipment replacement, in accordance with the manufacturer’s guidelines and this program.
   iii. Ensure their AED(s) remain registered with EHS and the manufacturer and periodically check for device recalls with the manufacturer and the U.S. Food and Drug Administration (FDA).
   iv. Must be certified and trained in the use and care of AEDs (see Section VI).
   v. Coordinate training of any anticipated users, if applicable.
   vi. Notify EHS of any substantial changes, including but not limited to:
      a. Removal, replacement, or relocation of an AED
      b. Department AED Coordinator changes (e.g., contact information)
      c. Notices received from manufacturers (e.g., recalls)
   vii. Consult with EHS, as necessary.
IV. Requirements

A. Physical fitness facilities
   i. An AED is required in Northwestern indoor and outdoor, owned or operated, physical fitness facilities (e.g., swimming pool, stadium, athletic field, stadium, soccer field, basketball court, volleyball court, baseball diamond, track and field facility, tennis court, or similar facility) that:
      a. Serve a population of more than 100 people, and
      b. Are supervised by one or more persons (other than maintenance or security personnel) who are employed by the University for the purpose of directly supervising the physical fitness activities.
   ii. The number of AEDs and placement must be in accordance with Illinois Department of Public Health (IDPH) Title 77, Chapter I, Subchapter f, Part 527, Section 527.600.
   iii. When an AED is required by this section and it becomes inoperable, the AED must be replaced or repaired within 10 days, and patrons must be notified when an operable AED is not on the premises.

B. Voluntary use
   School and unit facilities that do not meet the requirements of Section IV.A above may voluntarily purchase and install an AED in such facilities but are required to adhere to the requirements of this program, including designating an AED Coordinator, EHS approval, registration, inspections, and maintenance.

C. Special events
   i. During special events where an AED is required, a minimum of one trained user must be onsite for the duration of the event.
   ii. It is the responsibility of the special event sponsor to arrange for the trained AED user to be onsite.
   iii. The special event sponsor can have their own personnel trained attend the event or can arrange with the Northwestern school or department to have a trained AED user attend the event.

D. New, existing, relocated, and removed AEDs
   i. AEDs must be approved by the FDA and suitable for their intended location and use.
   ii. Schools and units must use the AED Approval Request Form to obtain EHS approval for any new, replacement, relocated, or removed AEDs.

E. Inspections and maintenance
   i. All AEDs subject to this program must be registered with the manufacturer.
   ii. AEDs must be inspected monthly using the AED Inspection Form and in accordance with manufacturer guidelines.
   iii. AEDs that do not pass inspection (e.g., expired pads or batteries, missing supplies, failed self-test) must be brought up to compliance as timely as possible.
   iv. AEDs that are not continuously maintained and remain non-compliant must be removed from service.
V. Post-AED Event Procedures
   A. When an AED is operated in a medical emergency, it must be removed from service until the unit:
      i. Event data has been downloaded and provided to EHS, if feasible,
      ii. Is decontaminated and carefully inspected and tested by a qualified person and determined in good working order with sufficient battery life, and
      iii. Supplies (e.g., pads) are replaced.
   B. Notify EHS and all building occupants when an AED is removed from service and when it is returned to service.
   C. EHS will consult with Risk Management for the storage of any event data, if acquired.
   D. Replace the AED if necessary, following the requirements of Section IV.D.

VI. Certification and Training
   A. When an AED is required by Section IV.A:
      i. A trained AED user must be available only during activities or events sponsored and conducted or supervised by a person or persons employed by Northwestern school or unit.
      ii. A physical fitness facility must ensure that there is a trained AED user on staff during staffed business hours and must ensure that appropriate numbers of facility staff and applicable supervisors are trained to avoid lapses in compliance.
   B. AED Coordinators, as well as any anticipated users, must be trained AED users, regardless of the AED being required by Section IV.A.
   C. A trained AED user is defined as a person who has successfully completed a course of instruction in accordance with the standards of a nationally recognized organization (e.g., American Red Cross or the American Heart Association) or a course of instruction in accordance with the rules adopted under 410 ILCS 4/1 to use an automated external defibrillator and to perform cardiovascular resuscitation (CPR), or who is licensed to practice medicine in all its branches in the State of Illinois.
   D. AED and CPR certification must be kept current and renewed every 2 years.
   E. Trained users must complete annual online bloodborne pathogen training.

VII. Recordkeeping
   A. AED maintenance and testing manuals must be kept with AEDs at all times.
   B. Schools and units must adhere to all regulatory recordkeeping requirements, including but not limited to:
      i. Training and certification records,
      ii. AED recall and manufacturer notices,
      iii. Monthly and annual inspections,
      iv. Service, warranty, and maintenance records, and
      v. Any other relevant documentation.
   C. Records must be maintained for at least 3 years, or longer if required by regulation.
VIII. Regulatory Authority
Northwestern will comply with the Occupational Safety and Health Administration’s (OSHA) standards and any other applicable codes and standards, including:

410 ILCS 4/1 – Automated External Defibrillator Act
210 ILCS 74 – Physical Fitness Facility Medical Emergency Preparedness Act
IDPH Title 77, Chapter I, Subchapter f, Part 527 – Physical Fitness Facility Medical Emergency Preparedness Code
OSHA – Automated External Defibrillators (AEDs)

IX. Contact
For questions, contact Environmental Health and Safety at ehs@northwestern.edu.