



March 9, 2026

Senator Hanna M. Gallo
Chairwoman, Senate Committee on Education
State House
82 Smith Street
Providence, RI 02903

Re: Statement of Opposition to Senate Bill 2213

Madam Chairwoman and Members of the Committee,

On behalf of Riddell, the leading manufacturer of football helmets and protective equipment and a company that has helped shape the safety standards of the sport of football for nearly a century, we respectfully submit this statement in opposition to Senate Bill 2213 (“SB 2213”).

Since 1929, Riddell has been at the forefront of football helmet innovation and player safety, investing extensively in scientific research, engineering, and product development to better understand and mitigate head impacts in the game of football. Riddell’s best in class equipment is worn by athletes at every level of the game—from youth leagues to high school, collegiate programs, and professional football—and our work has long been guided by collaboration with medical experts, engineers, athletic organizations, and standards bodies dedicated to improving athlete protection.

Indeed, we share the legislature’s goal of protecting athletes—especially young athletes—from head injuries and concussions; however, we are concerned that SB 2213 unintentionally promotes equipment solutions that are not supported by consistent scientific evidence and that are in direct conflict with established safety standards governing football protective equipment. Given these uncertainties, the first of its kind legislation is premature and could impose substantial financial burdens on schools and athletic programs without delivering the intended safety benefits. For these reasons, and those discussed herein, we respectfully urge lawmakers to reconsider adopting a mandate at this stage and instead pursue evidence-based policies grounded in established safety standards and the evolving scientific understanding of concussion prevention—policies that will better serve athletes and avoid unintended consequences that could undermine their safety.

The Efficacy of Soft-Shell Helmet Covers

Our central concern relates to the efficacy of external helmet padding devices commonly referred to as soft-shell helmet covers. While these products are often marketed as concussion-reduction technologies, they have not been scientifically validated as an effective method for preventing concussions or reducing head impacts in football. Specifically, the current body of independent research does not demonstrate any safety benefits and, in most cases, shows no measurable impact on concussion risk or head-impact severity. Importantly, while some laboratory testing has shown modest impact



attenuation under controlled conditions, those reductions have not translated into measurable decreases in concussions or on-field head impacts in science backed studies.¹

By way of example, a study of more than 2,600 Wisconsin high school football players² found no statistically significant difference in concussion rates between athletes who wore Guardian Helmet covers during practice and those who did not. Researchers documented nearly identical concussion rates among the two groups, concluding that helmet covers did not reduce concussion risk under real-world playing conditions. (See <https://bjsm.bmj.com/content/59/4/257>).

Additionally, a study conducted by researchers from Ball State University and Syracuse University examining concussion data surrounding the NFL's Guardian Cap practice mandate found no reduction in overall concussion rates following the mandate. In fact, researchers observed that concussions during games among positions required to wear the helmet covers increased relative to pre-mandate seasons, estimating roughly 36 additional concussions per season. The authors suggested that a "false sense of security" during practice may lead to riskier play behaviors, potentially producing unintended consequences for athlete safety. (See [Concussed: Unintended Consequences of the Guardian Cap Mandate in the NFL - Rubenstein - Southern Economic Journal - Wiley Online Library](#)).

Ultimately, the studies we highlighted above as well as those found on the attachment hereto demonstrate an important distinction: laboratory impact reductions do not necessarily correlate with meaningful injury prevention during play. As a result, we believe much more research must be done before mandates are imposed.

Football Helmet Standards and Soft-Shell Helmet Cover Implications

Football helmets sold and used in organized play in the United States must first be certified to meet performance standards established by the National Operating Committee on Standards for Athletic Equipment (NOCSAE). NOCSAE is the nationally recognized independent standards-setting body responsible for developing performance benchmarks for football helmets and other athletic protective equipment. These standards are developed by a multidisciplinary board that includes experts in biomechanics, medicine, engineering, athletics, and public health.

By way of background, football helmets are tested and certified as a complete system exactly as manufactured. Per NOCSAE, any aftermarket modification—including the addition of external shell attachments such as soft-shell helmet covers—changes the tested configuration of the helmet. NOCSAE has stated, "the addition of an item to a helmet previously certified without that item creates a new, untested model." As a result, adding a soft-shell helmet cover (or any third-party attachment that was not part of the helmet's original certified design, for that matter), serves to void and invalidate the helmet's certification. In practical terms, any addition to a helmet that was not designed and certified with that component, means the helmet will no longer meet the conditions under which it received NOCSAE certification.³

State legislation that effectively encourages or mandates the use of soft-shell helmet covers would therefore place schools and athletic programs in the difficult position of using helmets in a configuration that falls outside the nationally recognized certification framework governing football helmet safety. Simply put, mandating soft-shell helmet covers to football helmets would be mandating the use of decertified football helmets.

¹ Attached to this Statement are links to various scientific studies (see "Independent Research/Studies") that support these positions.

² Per Riddell data, 2,619 athletes play football in the State of Rhode Island.

³ We have also attached Riddell's position regarding aftermarket accessories/helmet add-ons.



NOCSAE Youth Helmet Standard

In February 2025, NOCSAE announced that it had voted to finalize the world's first performance standard for youth football helmets. The new youth standard is the result of more than 10 years of scientific research, testing and analysis led and funded by NOCSAE to establish sufficient data and youth-specific testing criteria. NOCSAE's new youth football helmet standard is designed to limit helmet mass and ensure proper weight distribution relative to developing neck and cervical musculature. (See <https://nocsae.org/nocsae-finalizes-first-ever-performance-standard-for-youth-football-helmets/>; article attached).

Knowing weight is another important consideration—particularly for younger athletes—Riddell's football helmets are carefully engineered to balance protection, fit, and weight distribution to minimize strain on an athlete's neck and cervical spine. Adding external padding increases the total mass of the helmet and alters the distribution of that weight. Specifically, adding a soft-shell cap (7 ounces; roughly 0.44 lbs) on top of a youth helmet can therefore increase neck strain, fatigue, and potential risk during impacts, while also deviating from NOCSAE's certification requirements.

For youth and adolescent athletes whose neck muscles are still developing, this added weight can increase strain during play and may contribute to fatigue or reduced neck stability during impacts. Increased head mass can also influence the biomechanics of head acceleration during collisions. Because helmets are originally tested and certified without these soft-shell helmet covers, the effect of this added weight is in direct conflict with NOCSAE's new youth standard.

The NFL's Usage of Soft-Shell Helmet Covers

We would be remiss if we failed to note that the soft-shell helmet covers referenced in this legislation are not the same equipment used in professional football. The National Football League has permitted the use of a specific, custom-designed Guardian Cap model developed in collaboration with the league and equipment experts for use in controlled practice environments. These professional practice helmet covers differ in materials, design specifications, and testing protocols from the commercially available versions like what is referenced in these legislative proposals. The NFL's use of a specialized practice product should therefore not be interpreted as validation of all soft-shell helmet covers or as evidence that such devices reduce concussions in youth or high school football.

Financial Considerations

As you are likely aware, there are also significant cost implications associated with requiring the use of soft-shell helmet covers. First, these products are recommended for only one season of use - - due to wear, degradation of materials, and hygiene considerations. That means all schools and youth football programs in the State of Rhode Island would be required to repurchase these soft-shell helmet covers every year for every athlete to comply with such a mandate. For many school districts and youth leagues—particularly those operating with limited athletic budgets—this would create a recurring annual expense that could amount to thousands of dollars per program. Unlike helmets, which are designed to be reconditioned and recertified over multiple seasons, soft-shell helmet covers typically cannot be refurbished or recertified for extended use. As a result, the legislation would effectively impose a per-player annual equipment cost that schools, parents, and youth programs would need to absorb year after year without evidence that the equipment provides measurable safety benefits.



Other Awareness and Safety Options

We firmly believe there are practical and evidence-based solutions that can meaningfully improve athlete safety. Research consistently shows that the most effective strategies for reducing concussions include increased concussion awareness and education for athletes, coaches, and parents; access to certified athletic trainers and medical professionals on team staffs; improved coaching and tackling techniques that emphasize head-up and safe contact methods; and consistent helmet fitting, maintenance, and reconditioning practices.

Programs that invest in education, medical oversight, and proper equipment management create safer environments for athletes without introducing unproven equipment mandates or conflicting with nationally recognized equipment standards.

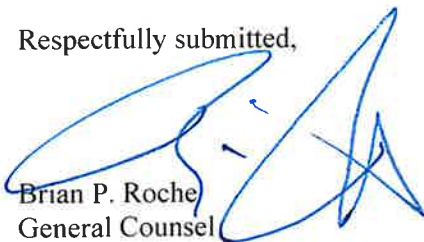
Conclusion

Riddell remains fully committed to improving player safety through scientifically validated innovations, rigorous product testing, and collaboration with medical and engineering experts. We strongly support policies that enhance concussion education, reinforce proper coaching and tackling techniques, ensure proper helmet fitting and maintenance, and maintain alignment with NOCSAE's national equipment standards.

For these reasons, we respectfully urge the Rhode Island General Assembly to reconsider SB 2213 and to work with medical experts, engineers, athletic organizations, and standards bodies to pursue evidence-based policies that meaningfully improve athlete safety while preserving the integrity of established helmet certification systems.

Thank you for your time and your commitment to protecting Rhode Island's athletes.

Respectfully submitted,



Brian P. Roche
General Counsel
Riddell, Inc.

INDEPENDENT RESEARCH/STUDIES

- **Medical College of Wisconsin:** Guardian Caps use during practice in high school American football players was not associated with a decreased risk of sustaining SRC in practice or games.
 - Evaluated the association between Guardian Cap use during practices and sport-related concussion risk in high school American football players
 - Published in *British Journal of Sports Medicine*: January 28, 2025
 - Link to Study: <https://bjsm.bmj.com/content/59/4/257>
 - Link to Article: <https://www.med.wisc.edu/news/football-helmet-covers-ineffective-for-concussions/>
- **Virginia Tech:** Riddell SpeedFlex outperformed the Schutt F7 VTD with Guardian Cap in the control condition; helmet model selection should be prioritized
 - How Shell Add-On Products Influence Varsity Football Helmet Performance?
 - Published in *Annals of Biomechanical Engineering*: October 2, 2024
 - Link to Study: <https://link.springer.com/article/10.1007/s10439-024-03627-5>
- **Stanford University:** Protective headgear effects measured in the laboratory may not always translate to the field. However, on the field, no significant differences in any measure of head impact magnitude were observed between the bare helmet impacts and padded helmet impacts.
 - Padded Helmet Shell Covers in American Football: A Comprehensive Laboratory Evaluation with Preliminary On-Field Findings
 - Published in *Annals of Biomechanical Engineering*: March 13, 2023
 - Link to Study: <https://link.springer.com/article/10.1007/s10439-023-03169-2>

INDEPENDENT RESEARCH/STUDIES

- **Wearing a Guardian Cap Does Not Mitigate On-Field Head Impact Severity - University of North Carolina & University of Georgia:**
The Guardian Cap had no on-field effect on head impact magnitude or frequency, but impact location patterns presented between wearers and nonwearers, suggesting that Guardian Cap usage could influence how players use their head during collisions.
 - The stated objective was to compare on-field head impact biomechanics (magnitude, location, frequency) between college football athletes wearing a Guardian Cap and teammates not wearing a Guardian Cap during practices and games throughout a season.
 - Published in Medicine & Science in Sports & Exercise: November 2025
 - Link to Study: https://journals.lww.com/acsm-msse/abstract/2025/11000/wearing_a_guardian_cap_does_not_mitigate_on_field.2.aspx
- **University of North Carolina:** Protective soft-shell padding (i.e., Guardian Caps) did not reduce head impact kinematic outcomes among college football athletes.
 - Initiated research due to interest in concussion prevention strategies and the fact that aftermarket soft-shell padding purports to augment the protective capabilities of standard football helmets and to reduce head impact severity.
 - Published in the International Journal of Environmental Research and Public Health: October 28, 2023
 - Link to Study: <https://pmc.ncbi.nlm.nih.gov/articles/PMC10650906/pdf/ijerph-20-06991.pdf>
- **An Analysis of Guardian Cap Use and Changes in the Concussion Rate in National Football League Preseason Practices From 2018 to 2023:** Required use of the Guardian Cap NXT was associated with a 54% to 62% reduction in the overall incidence of NFL practice concussions. When only concussions involving a helmet shell impact were considered, there was no longer a significant relationship between Guardian Cap NXT use and the incidence of concussions.
 - Published in the American Journal of Sports Medicine: July 2, 2025
 - Link to Study: <https://pubmed.ncbi.nlm.nih.gov/40746051/>

RIDDELL POSITION: AFTERMARKET ACCESSORIES

RIDDELL RESPONSE TO ADDRESS AFTERMARKET ACCESSORIES AND NOCSAE CERTIFICATION

Football helmets and face masks worn by professional, collegiate, high school and most youth football players are required to meet National Operating Committee on Standards for Athletic Equipment (NOCSAE) performance standards. NOCSAE certification is conducted by Safety Equipment Institute (SEI), an ISO 17065 conformity assessment organization. The certification process involves rigorous internal product testing, independent laboratory testing and a sound quality assurance program. Each helmet and face mask model is certified by SEI to meet NOCSAE performance standards. The certification is void if the helmet or face mask is modified in any way.

Per NOCSAE, "The addition of an item to a helmet previously certified without that item creates a new, untested model." For more information, visit nocsae.org.

Riddell recommends against the use of any third party aftermarket accessories that alter the fit, form or function of the helmet or face mask as such modifications void the NOCSAE certification and render the helmet or face mask illegal for most organized play.

Consult with your risk management department, as the use of any aftermarket accessories could expose you to liability.