
SENATE COMMITTEE ON BUSINESS, PROFESSIONS AND ECONOMIC DEVELOPMENT

Senator Dr. Aisha Wahab, Chair
2025 - 2026 Regular

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Author:	Smallwood-Cuevas		
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Consultant:	Yeaphana La Marr		

Subject: Security services

SUMMARY: Prohibits Proprietary Private Security (PPS) licensees and Private Patrol Operator (PPO) licensees with the Bureau of Security and Investigative Services (Bureau) from providing required security officer skills training to registered security guards and officers unless the licensee enters into a collective bargaining agreement, as specified. Increases the mandated hours of security skills training by two hours to accommodate required training on workers' rights to be instructed by a union organization upon request. Makes many additional reforms to security officer and security guard training and Bureau administration of the training program. Increases maximum fines for various violations of the Proprietary Security Services Act and the Private Security Services Act.

NOTE: *This bill is double-referred to the Senate Committee on Public Safety, second.*

Existing law:

- 1) Establishes the Proprietary Security Services Act, administered by the Bureau to license and regulate PPS employers and security officers. (Business and Professions Code (BPC) §§ 7574, et seq.)
- 2) Requires PPS security officers to complete training in security officer skills, which includes Power to Arrest and Appropriate Use of Force, within six months from the date upon which registration is issued, or within six months of their employment with a proprietary private security employer. (BPC § 7574.18(a))
- 3) Requires the Bureau to develop and establish by regulation a standard course and curriculum, which shall include a minimum number of hours of instruction, for the skills training required by 2) above to promote and protect the safety of persons and the security of property, which may be administered, tested, and certified by any PPS employer, organization, or school approved by the Bureau. (BPC § 7474.18(d))
- 4) Authorizes the Bureau to approve any PPS employer, organization, or school to teach the course required by 2). (BPC § 7474.18(e))
- 5) Requires each PPS employer to annually provide each registered employee with specifically dedicated review or practice of the security officer skills prescribed in 2) above. Requires the Bureau to adopt by regulation the minimum number of hours required for annual review. (BPC § 7474.18(f)(1))

- 6) Requires a PPS employer to maintain at the principal place of business or branch office a record verifying completion of the review or practice training for a period of not less than two years and make the records available for inspection by the Bureau upon request. (BPC § 7474.18(f)(2))
- 7) Authorizes the Director of the Department of Consumer Affairs (DCA) to issue a citation, which may include an administrative fine, for a violation of the Proprietary Security Services Act as follows:
 - a) The fine for violating subdivision (a), (b), or (e) of Section 7574.38 shall be five hundred dollars (\$500) per violation.
 - b) The fine for violating subdivision (c) or (d) of Section 7574.38 shall be two thousand five hundred dollars (\$2,500) per violation.
 - c) The fine for violating subdivision (a) or (c) of Section 7574.39 shall be five hundred dollars (\$500) per violation.
 - d) The fine for violating subdivision (b) of Section 7574.39 shall be one thousand dollars (\$1,000). (BPC § 7474.30(c),(d),(e),(f))
- 8) Provides that a PPS employer shall not do the following:
 - a) Fail to properly maintain an accurate and current record of the name, address, commencing date of employment, and position of each proprietary private security officer, and the date of termination of employment when a proprietary private security officer is terminated as required by subdivision (a) of Section 7574.21.
 - b) Fail to properly maintain an accurate and current record of proof of completion by each proprietary private security officer of the trainings training required by Section 7574.18.
 - c) Fail to certify proof of current and valid registration for each employee who is subject to registration.
 - d) Permit any employee to carry a firearm or other deadly weapon, including any electronic control device, stun gun, baton, or any chemical agent, including pepper spray.
 - e) Fail to administer to each registered employee of the licensee the review or practice training required by paragraph (1) of subdivision (f) of Section 7574.18. (BPC § 7474.38)
- 9) Establishes the Private Security Services Act, administered by the Bureau, to provide for regulation of Private Patrol Operators (PPOs) that employ security guards and patrolpersons. (BPC §§ 7580, et seq.)
- 10) Defines a PPO as a person who agrees to furnish, or furnishes, a watchman, guard, patrolperson, or other person to protect persons or property or to prevent the theft, unlawful taking, loss, embezzlement, misappropriation, or concealment of any goods, wares, merchandise, money, bonds, stocks, notes, documents, papers, or

property of any kind; or performs the service of a watchman, guard, patrolperson, or other person, for any of these purposes. (BPC § 7582.1(a))

- 11) Restricts a person licensed as a PPO from making, “any investigation or investigations except those that are incidental to the theft, loss, embezzlement, misappropriation, or concealment of any property, or any other thing enumerated in this section that they have been hired or engaged to protect, guard, or watch.” (BPC § 7582.1(b)(1))
- 12) Defines a security guard or security officer as an employee of a PPO or an employee of a lawful business or public agency who performs the functions described above in 10) on or about the premises owned or controlled by the customer of the PPO or by the guard’s employer or in the company of persons being protected. (BPC § 7582.1(e))
- 13) Requires a PPO to submit a written report describing circumstances surrounding the discharge of any firearm or physical altercation with a member of the public while on duty, by a licensee or any officer, partner, or employee of a licensee while acting within the course and scope of their employment within seven business days after the qualifying incident, as specified. (BPC § 7583.2(f))
- 14) Requires each applicant for a security guard registration to complete a course in the exercise of the Power to Arrest and the Appropriate use of force as a condition for the issuance of the registration. The training shall be administered and certified by a single course provider and completed within six months preceding the date of application to the Bureau. (BPC § 7583.6(a))
- 15) Requires a PPO security guard registrant to complete 32 hours of security officer skills within six months from the date an initial registration is issued, including 16 of the 32 hours within 30 days from the date of registration. (BPC § 7583.6(b))
- 16) Requires PPO security guard registrants to annually complete eight hours of specifically dedicated review or practice of security officer skills, as specified. (BPC § 7583.6(e))
- 17) Authorizes the training specified above in 14) to be administered, tested, and certified by one of the following:
 - a) Any licensee;
 - b) Any training facility certified pursuant to this chapter; or
 - c) Any organization or school approved by the bureau so long as the bureau approves any instructor of an organization or school who will administer the trainings specified in this section to ensure that the organization or school complies with the requirements of the Act, as well as any applicable regulations. (BPC § 7583.6(f))
- 18) Requires each licensee to maintain at the principal place of business or branch office a record for each of its registrant employees verifying completion of the training required by BPC § 7583.6 for the duration of the registrant’s employment

and to make the records available for inspection by the Bureau upon request. (BPC § 7583.6(g)(2))

- 19) Requires the course of training in the exercise of the power to arrest and the appropriate use of force to be administered, tested, and certified by any licensee or by any organization or school approved by DCA. The course of training is required to be approximately eight hours in length and cover 24 individual topics, including:
 - a) Legal standards for use of force;
 - b) Duty to intercede;
 - c) The use of objectively reasonable force;
 - d) Supervisory responsibilities;
 - e) Use of force review and analysis;
 - f) Deescalation and interpersonal communication training, including tactical methods that use time, distance, cover, and concealment, to avoid escalating situations that lead to violence;
 - g) Implicit and explicit bias and cultural competency;
 - h) Skills, including deescalation techniques, to effectively, safely, and respectfully interact with people with disabilities or behavioral health issues;
 - i) Use of force scenario training, including simulations of low-frequency, high-risk situations and calls for service, shoot-or-don't-shoot situations, and real-time force option decision making;
 - j) Mental health and policing, including bias and stigma; and
 - k) Active shooter situations. (BPC § 7583.7(a))
- 20) Requires the PPO skills training to be taught by means of verbal instruction where the instructor is physically present with students in a classroom for a minimum of 50 percent of the course and is available at all times, including during instruction provided through distance learning or remote platforms, to answer students' questions while providing the required training. (BPC § 7583.7(b))
- 21) Requires DCA to make available the Power to Arrest and Appropriate Use of Force Manual. Exempts the development, adoption, amendment, or repeal of the Power to Arrest and Appropriate Use of Force Manual from the Administrative Procedure Act. (BPC § 7583.7(c))
- 22) Authorizes the Bureau to issue a citation to a licensee for violation of BPC §§ 7583.2, 7583.3, 7583.37, 7585.19, 7587.2, or 7587.14 that may contain an assessment of an administrative fine that shall in no event exceed \$2,500. (BPC § 7587.7)
- 23) Requires on or before February 1, 2026, and annually thereafter, an employer to provide a stand-alone written notice to each current employee, and each new employee upon hire, in a manner the employer normally uses to communicate

employment-related information, whether by personal service, email, or text message, to include a description of specified workers' rights, including the right to organize a union or engage in concerted activity in the workplace. (Labor Code (LAB) § 1553(a))

- 24) Requires the Industrial Welfare Commission (Commission), "to ascertain the wages paid to all employees in this state, to ascertain the hours and conditions of labor and employment in the various occupations, trades, and industries in which employees are employed in this state, and to investigate the health, safety, and welfare of those employees." (LAB § 1173)

Existing Regulations:

- 1) Sets forth subjects that shall be taught and the minimum number of hours that shall be allowed toward meeting required training for PPS officers, including Power to Arrest and Use of Force training (Title 16 of the California Code of Regulations (16 CCR) §§ 643(a) and 643 Appendix)
- 2) Requires PPS training providers to issue a certificate of completion to the individual completing the course for each training. (16 CCR § 663(b))

This bill:

- 1) Makes legislative findings and declarations regarding the role of security officers and their historical status as low-wage workers.
- 2) Codifies PPS officer requirement to complete training in Power to Arrest and Use of Force, but as a condition of registration, while also allowing 18 of the 34 hours within 30 days from the date registration is issued.
- 3) Codifies course provider requirements to issue a certificate of completion to the PPS officer upon completion of training.
- 4) Requires PPS officers to complete eight hours of training dedicated to practicing de-escalation skills through in-person role-play and interactive training methods administered by an organization, or a person certified by an organization, that employs evidence-based, trauma-informed techniques and strategies in their training, in addition to the de-escalation training currently required.
- 5) Increases maximum fines that may be issued for a violation of BPC § 7574.38, subdivisions (a), (b), or (e) from \$500 to \$1,000.
- 6) Establishes that failing to ensure that the PPS officer skills training occurs as required by this bill is a violation and authorizes a fine of up to \$10,000 per violation.
- 7) Establishes that failing to compensate a PPS employee for completing officer skills training and de-escalation training is a violation and authorizes a fine of up to \$10,000 per violation.

- 8) Requires the written report describing an incident describing a physical altercation to include those that include a security officer requiring first aid or other medical attention, the race and gender of the member of the public, and whether the security officer involved received all required training at the time of the incident.
- 9) Requires the Bureau to release an annual report containing specified incident report data by county and comparative analysis with previous years' data.
- 10) Requires the Bureau to develop through regulation a standard course and curriculum that shall include a minimum number of hours of instruction for training individuals on the role of implicit and explicit bias on racial profiling and the use of firearms in commercial, entertainment, government property, urban street, and residential settings in addition to any other training.
- 11) Allows the de-escalation training required by this bill to be provided by a separate provider than approved training providers.
- 12) Increases PPO security officer skills training from 32 to 34 hours that must be taken within six months of registration and increases the number of hours that must be completed within 30 days of registration from 16 to 18 hours.
- 13) Requires PPO security officer skills training to be conducted through traditional classroom instruction and prohibits the training from being completed while on duty.
- 14) Requires the additional two hours of PPO security officer skills training to be dedicated to training employees on the rights contained in a notice outlined in the Labor Code.
- 15) Increases PPO security guard registrant annual training from eight to 16 hours, with eight hours dedicated to practicing de-escalation skills through in-person role-play and interactive training methods administered by an organization, or a person certified by an organization, that employs evidence-based, trauma-informed techniques and strategies in their training.
- 16) States that, upon request, a Bureau-approved labor organization that represents security officers is entitled to provide the two-hour training on rights contained in the employee rights notice to the licensee's security officers and specifies that it is a violation of the Act to fail to ensure compliance.
- 17) Requires the Bureau to approve a labor organization as a provider for the two-hour training within 30 days of the labor organization's written request if the request identifies the names of the trainers and certifies that the trainers are qualified to provide the training.
- 18) Effective July 1, 2028, requires the course of training in the exercise of power to arrest and the appropriate use of force to be administered, tested, and certified by any organization that is *not* a licensee except under 19).
- 19) Effective July 1, 2028, allows a licensee to provide the power to arrest and appropriate use of force training if expressly agreed to in a valid collective

bargaining agreement that provides for hours of work, working conditions of employees, final and binding arbitration of disputes concerning any training provisions, premium wage rates for all overtime hours worked and regular hourly rate of pay of not less than 30 percent more than the state minimum wage.

- 20) Effective July 1, 2028, requires 100 percent of the training in exercise of power to arrest and the appropriate use of force to be in-person.
- 21) Requires the Bureau to develop emergency regulations establishing the criteria the Bureau to use in evaluating whether any organization is a qualifying organization to provide the de-escalation training required by this bill.
- 22) Requires the Bureau to amend the Power to Arrest and Appropriate Use of Force Manual to include material on de-escalation skills and techniques and to consult with approved organizations when otherwise developing, adopting, amending, or repealing the Power to Arrest and Appropriate Use of Force Manual.
- 23) Increases maximum fines that may be issued for various violations of the Private Security Services Act from \$2,500 to \$10,000 per violation.
- 24) Requires the Commission to convene regional hearings to perform their mandated duties for the “property services industry,” as defined.
- 25) Requires the Commission to issue a wage order specific to employees employed in the property services industry by June 30, 2028, and meet every two years, to evaluate the adequacy of the minimum wage.

FISCAL EFFECT: Unknown. This bill is keyed fiscal by Legislative Counsel.

COMMENTS:

1. **Purpose.** Services Employees International Union is the sponsor of this bill. According to the Author, “Security guards are relied upon by communities, local businesses, property managers, nonprofits, and local governments to help keep people safe. They are often the first to respond during emergencies and high-stress situations and must act quickly to protect those around them.

Communities increasingly rely on security guards as essential workers, and the scope of their work has significantly expanded. However, their wages, working conditions, and training standards have not kept pace with the importance of their role or the risks of the profession. SB 1203 improves working conditions for security guards by ensuring they are adequately trained and fairly compensated for their responsibilities.”

2. **Background.**

BSIS and Private Security. The private security industry in the U.S. dates back to the 19th century, with private citizens performing many duties associated with today’s federal and state law enforcement. Growth in the number of individuals and breadth of activities performed, including guarding railroad shipments, detective

work to investigate crimes, tracking down and apprehending criminals, and providing security advice to banks was integral to supporting regulation of the industry.

Regulatory oversight of the private security industry in California began in 1915 with the creation of the Detective Licensing Board under the State Board of Prison Directors, which licensed and regulated private detectives. The Detective Licensing Board went through several iterations, structures, and scope changes until AB 936 (Rainey, Chapter 1263, Statutes of 1993) formally renamed the Bureau as its current identifier, the Bureau of Security and Investigative Services. The Bureau currently licenses approximately 3,000 PPOs and registers approximately 313,000 security guards who are employed by the PPOs.

Approved Training Providers. The PSS Act requires any security guard applicant to complete an eight-hour course in the exercise of Powers to Arrest and the Appropriate Use of Force as a requirement of registration. Within six months of obtaining a Bureau registration, the security guard applicant must complete an additional 32 hours of security guard skills training, for a total of 40 hours of training.

To provide security guard training to security guard and security officer applicants and registrants, the organization or school must be approved by the Bureau (BPC § 7583.6). To obtain approval, organizations and schools must submit a letter to the Bureau with a request to this effect and include the name of the organization or school; the location where the training will take place; the location where all training records will be maintained; and the names and resumes for all related instructors.

PPOs that provide the required security guard training to their own employees are not required to obtain approval. PPOs are required to maintain at the principal place of business or branch office a record for each of its registrant employees verifying completion of the Powers to Arrest and Appropriate Use of Force training for the duration of the registrant's employment. The Bureau may inspect the records of any PPO to ensure compliance.

Required training, including power to arrest, appropriate use of force, de-escalation, and explicit and implicit bias training. Applicants must complete the full eight-hour Power to Arrest and Appropriate Use of Force training in order to qualify for a license. AB 229 (Holden, Chapter 697, Statutes of 2021) increased training requirements for security guard applicants and mandated that 50 percent of the appropriate use of force training be provided through traditional classroom instruction. Extensive regulations implementing AB 229 were adopted by the Bureau, effective December 1, 2023.

The Power to Arrest and the Appropriate Use of Force training is required to be taken within six months preceding application to the Bureau for registration as a security guard or security officer. The Power to Arrest training includes the following subject matter: responsibilities and ethics in citizen arrest; relationship between a security guard and a peace officer in making an arrest; limitations on security guard power to arrest; restrictions on searches and seizures; criminal and civil liabilities, including personal liability and employer liability; trespass law; ethics and

communications; emergency situation response, including response to medical emergencies; and security officer safety.

The Appropriate Use of Force training is required to include all of the following topics: legal standards for use of force; duty to intercede; the use of objectively reasonable force; supervisory responsibilities; use of force review and analysis; deescalation and interpersonal communication training, including tactical methods that use time, distance, cover, and concealment, to avoid escalating situations that lead to violence; implicit and explicit bias and cultural competency; skills, including deescalation techniques, to effectively, safely, and respectfully interact with people with disabilities or behavioral health issues; use of force scenario training, including simulations of low-frequency, high-risk situations and calls for service, shoot-or-don't-shoot situations, and real-time force option decision-making; mental health and policing, including bias and stigma; and active shooter situations.

3. **Related Legislation.** SB 1148 (Niello of 2026) would authorize applicants for registration as a security guard with the Bureau to complete all 40 hours of required training before their registration is issued. (Status: *This bill is currently pending in the Senate Committee on Appropriations.*)

SB 652 (Richardson, Chapter 94, Statutes of 2025) requires an applicant for a security guard registration with the Bureau to complete the power to arrest and the appropriate use of force training courses to be administered and certified by a single course provider. Limits the individuals to whom a private patrol operator (PPO) licensee may provide the required training to employees of that licensee.

AB 229 (Holden, Chapter 697, Statutes of 2021) makes significant changes to the private security training standards, including expanding power to arrest training to include appropriate use of force topics and mandates 50 percent of the appropriate use of force training be provided through traditional classroom instruction.

4. **Arguments in Support.** SEIU California writes in support, "Security officers deserve the tools to protect themselves and the communities they serve. SB 1203 takes an important step forward by strengthening training standards, requiring meaningful, in-person de-escalation training, ensuring workers are paid for required training, and improving oversight of wages and working conditions."

The California Federal of Labor Unions writes, "Security officers report that training does not adequately prepare officers to respond to various situations that are part of their job. The lack of appropriate training puts security officers in dangerous situations without preparation, increasing the likelihood of injury or harm. To make sure security officers are well-equipped and trained, SB 1203 increases the overall total number of hours required to be licensed as a security officer and ensures the delivery of additional interactive, in-person de-escalation training."

5. **Arguments in Opposition.** Allied Universal writes in opposition, "California currently faces high rates of retail theft and property crime. By making lawful, regulated security services significantly more expensive, struggling retail operators may be forced to forgo professional security services entirely. Furthermore, the intense cost pressures will incentivize unethical, unregulated providers to skip

licensing requirements and operate under alternative titles like "Event Staff" or "Ushers". This proliferation of underground, unregulated personnel will jeopardize public safety during a time of heightened risk. This is especially concerning given the additional security needs for upcoming global events in California, including the 2026 FIFA World Cup, Super Bowl LXI, and the LA 2028 Summer Olympics. For these reasons, we must respectfully oppose SB 1203."

The California Association of Licensed Security Agencies, Guards & Associates (CALSAGA) opposed this bill, writing, "SB 1203 will immediately make it more expensive and more difficult to employ security guards, resulting in an even greater shortage and delayed deployment of the exact individuals the bill seeks as necessary to provide protection to California citizens and visitors, especially in light of the upcoming world-wide events coming to California. SB 1203 will eliminate jobs making companies that seek to automate security functions more competitive thereby displacing the very people the bill intends to help."

6. Staff Comments, Policy Considerations, and Drafting Challenges.

Comprehensive sunset review oversight for the Bureau was just undertaken by the Legislature and raised the issue of training but stakeholders did not participate and did not ask that topics in this bill be considered. The Bureau underwent sunset review oversight in 2024, during which the Bureau proposed increasing the amount of training for security guards in its sunset report (see New Issue #7). In response, this Committee raised training as *Issue #4: Security Guard Training Requirements* in its [background paper](#) and asked the question, "Are current security guard training requirements rigorous enough to be effective in reducing inappropriate use of force and protecting the public from unnecessary violent incidents involving security guards?" A sunset hearing was held on March 11, 2024, and public comment allowed for stakeholders to provide input on these issues. Additionally, increased training was included in this Committee's bill analysis for the sunset extension vehicle, SB 1454 (Ashby, Chapter 484, Statutes of 2024), as a potential reform for consideration (see item d). Each of the three policy hearings for SB 1454 also allowed opportunity for public comment.

Absent stakeholder and Committee member interest in augmenting training requirements, and because major reforms were so recently adopted and implemented (AB 229 training was effective December 1, 2023), consideration was given to allow time for the new training requirements to take hold and demonstrate whether they are effective in improving public safety before making more changes. Therefore, this topic was not included in the final legislation. Because training was brought up in the Committee's background paper, it will be revisited as a prior issue during the Bureau's next sunset review in 2028.

Training authority and collective bargaining. The amendments of April 9, 2026, would tie eligibility for a licensee to offer training to its employees to whether it enters into collective bargaining with its employees and dictates the stipulations that must be met. Placing this provision into the Bureau's practice acts does two things: 1) communicates that question of whether licensees provide adequate training is *not* the issue and 2) places enforcement of wages under the jurisdiction of the Bureau, an entity within the Department of Consumer Affairs, which has the role of

ensuring California's minimum professional standards are met. Although enforcing wages falls within the Department of Industrial Relations, this bill would place a substantial workload on the Bureau, a special fund agency, which is 100 percent funded by licensee fees, to ensure licensees only provide training if they have a bargaining agreement in place.

Effective October 1, 2025, the Bureau increased fees for private security services and proprietary security services (and all other practice acts) to offset a structural imbalance to ensure the Bureau can continue to meet its consumer protection mandate. This bill would add workload and costs that do not fall within the Bureau's consumer protection mandate, for which the licensees would be required to pay. If this bill were to result in another fee increase, or contribute to an increase sooner than would have been necessary otherwise, those costs would not be accounted for below in the economic impact stated by industry.

Perhaps most significantly, the Bureau administers four additional practice acts – those that regulate alarm companies, locksmiths, repossessioners, and private investigators – and the funds for those practice acts were merged into one by Senate Bill 609 (Glazer, Chapter 377, Statutes of 2019) effective July 1, 2020. Therefore, this bill would result in an unprecedented misuse of license fees from industries that otherwise would not be impacted by this legislation.

Conflicting language for PPO training cannot be implemented, PPOs cannot achieve compliance, but penalties for non-compliance are increased. PPO security officers are currently required to complete security officer skills training, which includes Powers to Arrest and Use of Force training (see 16 CCR § 643 Appendix). This bill would mandate completion of these courses as a condition of issuance of registration, i.e. training must be completed prior to registration. However, this bill would leave the existing language that allows the skills training to be completed within six months. Further, this bill goes on to state that 18 of the 34 hours must be completed within 30 days from the date registration is issued. These statements are contradictory and cannot be implemented by the Bureau. Most importantly, this section cannot be complied with by registrants and this bill establishes failing to comply with these provisions as a violation punishable by a fine of up to \$10,000 per violation. The threat of a \$10,000 fine for non-compliance with a requirement that is impossible to comply with will not result in a better trained workforce or increase public safety.

Other implementation issues. The training that would be enacted by this bill would be effective July 1, 2027. Because this bill requires the Bureau to adopt regulations in several places, this bill's effective date is not reasonable. Without contingencies, a regulation proposal can take up to a year for development, posting, public comment, and approval. Most take up to three years and complex regulations take much longer.

Specifically troubling is the mandate that de-escalation skills training can only be administered by an organization, or a person certified by an organization, that employs evidence-based, trauma-informed techniques and strategies in their training. This bill requires the Bureau to “develop regulations establishing the criteria the bureau shall use to evaluate *whether any organization is a qualifying*

organization.” In other words, there may not even be a qualifying organization. Yet this bill would disqualify existing licensees, who are subject matter experts on providing security services, from providing training to their own employees to be security guards, while this matter is worked out over a number of years through the regulatory process. Replacing a training system that was recently overhauled before the efficacy of that system is properly evaluated and replacing it with unknowns about who will offer the training is untenable and should be strongly reconsidered.

Also concerning is that this bill requires consultation with these yet to be determined outside entities to amend the Power to Arrest and Appropriate Use of Force Manual. The development, adoption, amendment, and repeal of the Power to Arrest and Appropriate Use of Force Manual are exempt from requirements of the Administrative Procedure Act. The exemption allows the Bureau to work with its subject matter experts to develop and deploy revisions when necessary. The consultation requirement substantially imposes workload and time issues, in addition to delays while the Bureau adopts criteria through regulation to determine whether any organization is a qualifying organization with which the Bureau could consult.

Additionally, the Bureau would need to approve the organization through a yet to be determined approval process for which this bill does not provide statutory authority. The Bureau cannot implement an application process, charge a fee, apply due process, or many other components necessary of an approval process. This bill simply provides that the Bureau develop criteria to determine whether an organization is a qualifying organization.

Requiring duplicative or unnecessary training for PPS and PPO Officers places undue burdens on industry and registrants. This bill adds two hours to the required training for security officers as necessary skills training. However, the newly added hours of the “skills” training is to be dedicated to training employees on the rights contained in a notice that is required to be given to employees as required by Labor Code § 1553(a). To comply with this notification requirement today, an employer is only required to provide written notice to each current employee and newly hired employee of their rights in a manner the employer normally uses to communicate employment-related information. Adding two hours of training does not comply with the Labor Code provisions and imposes an undue burden on employers who have not been proven to be out of compliance with this law.

Other programs within the DCA have been tasked with assisting licensees in understanding their rights as employees. For example, the Board of Barbering and Cosmetology’s existing Advisory Committee was tasked with making recommendations on how to ensure licensees are made aware of basic labor laws through legislation in 2016 (AB 2025, Gonzalez, Chapter 409, Statutes of 2016). That bill also required applicants for licensure to sign that they understand their rights and basic labor laws. Is there a more streamlined way for Bureau licensees to continue receiving information about their rights as employees from their employer?

This bill requires each PPS officer to annually complete a minimum of eight hours of training dedicated to practicing de-escalation skills through in-person role-play and interactive training methods administered by an organization, or a person certified

by an organization, that employs evidence-based, trauma-informed techniques and strategies in their training. This training is *in addition to training already required in regulation*. Bureau regulations require PPS officers to complete in-person de-escalation and interpersonal communication training, including tactical methods that use time, distance, cover, and concealment, to avoid escalating situations that lead to violence; and skills, including de-escalation techniques, to effectively, safely, and respectfully interact with people with disabilities or behavioral health issues. (16 CCR § 643 Appendix)

For PPO security officers, this bill requires the Bureau to develop and establish implicit and explicit bias on racial profiling and the use of firearms in commercial, entertainment, government property, urban street, and residential settings, *in addition to any other required training*. Existing training includes implicit and explicit bias and cultural competency, making implicit an explicit bias training requirement duplicative. It is not clear why specialized training in urban street, residential settings, and government property is necessary as a matter of minimum standards for security guards statewide. Presumably, these are topics that are better suited to be determined on the employee's individual job site.

Multiple industry organizations project a severe economic toll as a result of this bill with estimated costs of more than two billion dollars as a direct result in job losses and extra costs (the additional cost of the training requirements alone is expected to exceed \$350 Million a year). While some costs may be absorbed by business entities who contract with security companies, increased burden will also flow to state and local government entities who hire security companies. CALSAGA states that doubling the Powers to Arrest and Appropriate Use of Force training to 16 hours creates a barrier to employment without any demonstrated benefit by driving significant cost increases to the employer (again, including many state agencies) and prospective guards. Further, CALSAGA writes that because SB 1203 allows any organization other than a licensee to teach the Powers to Arrest and Appropriate Use of Force course, this bill will create a huge recruitment and hiring bottleneck because employers will be reliant on a third party to conduct the training.

Reverses course on recent policy regarding security guard training. SB 652 (Richardson, Chapter 94, Statutes of 2025) allows a PSS licensee to provide required training so long as the training is to their applicants for employment and direct employees. This bill would prohibit a licensee from training their employees. Additionally, SB 652 requires the power to arrest and appropriate use of force to be provided by a single provider. This amendment was enacted because some online providers were not interested in providing the required in-person segment of the required training. This bill would reverse the single provider policy by singling out the de-escalation portion of the training and allowing that portion to be provided by a separate provider and requiring training on workers' rights to be provided by yet another provider.

Additionally, AB 229 (Holden, Chapter 697, Statutes of 2021) makes significant changes to the private security training standards, including expanding Power to Arrest training to include Appropriate Use of Force topics, including de-escalation. AB 229 mandates that 50 percent of the appropriate use of force training be provided through traditional classroom instruction. This Committee recommended

that consideration should be given to unintended consequences related to lack of access to training in certain regions throughout the state. Despite the policy consideration behind allowing 50 percent of the training to be taken online, this bill would require 100 percent in class training.

SUPPORT AND OPPOSITION:

Support:

SEIU California (Sponsor)
California Federal of Labor Unions, AFL-CIO

Opposition:

Allied Universal
CALSAGA

-- END --