
SENATE COMMITTEE ON APPROPRIATIONS

Senator Sabrina Cervantes, Chair
2025 - 2026 Regular Session

SB 1203 (Smallwood-Cuevas) - Security services

Version: April 9, 2026

Policy Vote: B., P. & E.D. 6 - 0, PUB. S. 4
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Urgency: No

Mandate: Yes

Hearing Date: May 4, 2026

Consultant: Janelle Miyashiro

Bill Summary: SB 1203 revises training administration and enforcement for Proprietary Private Security (PPS) and Private Patrol Operator (PPO) licensees under the Bureau of Security and Investigative Services (Bureau) by restricting training delivery to entities with collective bargaining agreements (CBAs) and expanding the curriculum to include workers' rights and additional training hours on arrest powers and use of force. SB 1203 also expands the required information for security guard incident reports involving a physical altercation and increases current and establishes new fines for various violations of the Proprietary Security Services Act and the Private Security Services Act.

Fiscal Impact:

- The Bureau reports significant costs, ranging in the millions of dollars, for the expansion of its responsibilities to develop standards for power to arrest and use of force curricula, and to ensure licensee compliance with CBAs (Private Security Services Fund). The Bureau's estimate accounts for additional personnel to handle various functions, such as reviewing applications, developing a standard guidebook, and approving schools and unlicensed persons seeking to provide training. The Bureau will also need staff resources to research and approve labor organizations as training providers within 30 days of an organization's request to provide employee rights training.
- Unknown, potentially significant fiscal impact, likely ranging from the high hundreds of thousands to low millions of dollars for the Industrial Welfare Commission (Commission) to convene and issue a wage order for the property services industry. Staff notes that the Commission has remained non-operational since 2004. Although the Budget Act of 2023 initially allocated \$3 million to restart the Commission, this funding was subsequently repealed. To the extent the Commission requires resources comparable to those proposed in 2023, General Fund costs may range into the millions of dollars.

Background: Under the Private Security Services Act, security guard applicants must complete a comprehensive 40-hour training program. This begins with an initial eight-hour course in the exercise of powers to arrest and the appropriate use of force required for registration, followed by an additional 32 hours of skills training within the first six months of obtaining a Bureau registration.

Training Provider Approval and Oversight. To administer this training, schools and organizations must obtain approval from the Bureau by submitting a request that includes the name of the organization or school, facility locations, location where

training records will be maintained, and instructor names and resumes. While PPOs may train their own employees without separate Bureau approval, they must maintain verified training records for all registrants at their principal place of business for the duration of employment. All PPO training records remain subject to Bureau inspection to ensure compliance.

Mandated Curriculum and Standards. In accordance with AB 229 (Holden, Chapter 697, Statutes of 2021) and adoption of subsequent regulations in 2023, at least 50% of use of force training must be conducted through traditional classroom instruction. The initial training, which must be completed within six months prior to application, is divided into two primary areas:

- **Powers to Arrest:** This module covers the legal and ethical framework of citizen arrests, including the professional relationship between security guards and peace officers in making an arrest, limitations on arrest authority, and restrictions on search and seizure. It also addresses trespass law, civil and criminal liabilities for both the guard and employer, emergency medical response, and officer safety.
- **Appropriate Use of Force:** This curriculum focuses on legal standards for use of force, the duty to intercede, and supervisory responsibilities. It emphasizes de-escalation techniques such as the use of time, distance, and cover, alongside training on implicit and explicit bias, cultural competency, and interactions with individuals facing behavioral health issues. The program also includes scenario-based simulations, including "shoot-or-don't-shoot" decision-making and responses to active shooter situations.

Proposed Law:

- Provides that a PPS applicant must complete a course in the exercise of the power to arrest and the appropriate use of force as a condition of registration, specifying 18 of the 34 hours must be completed within 30 days their registration is issued. Requires a course provider to issue a certificate of completion to the PPS officer upon completion of training.
- 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.
- Increases fines for PPS employers from \$500 to \$1,000 per violation for failing to meet employee recordkeeping and training review requirements.
- Establishes a fine of up to \$10,000 per violation for PPS employers who fail to ensure that PPS officer skills training occurs or fail to compensate employees for training time.
- 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 apparent 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.

- Requires the Bureau to release an annual report containing specified incident report data by county and comparative analysis with previous years' data.
- 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.
- Allows the de-escalation training required by this bill to be provided by a separate provider than approved training providers.
- Increases the total number of training hours for security guard registrants from 32 to 34, and increases the number of hours required to be completed within the first 30 days after registration is issued from 16 to 18.
 - Requires two hours of the first 18 of the 34 hours of training to be dedicated to training employees on the rights contained in a notice outlined in Section 1553 of the Labor Code.
 - Requires PPO security guard skills training to be conducted through traditional classroom instruction and prohibits the training from being completed while on duty.
- 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.
- Requires an employer to compensate current guard employees and registrants with a pending employment offer for all trainings.
- 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.
- 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.
- Effective January 1, 2028, the required PPO training course on arrest powers and use of force may not be administered, tested or certified by any licensee; however, an exception is granted 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.

- Authorizes the department to approve any non-licensed person or school to teach the course in the exercise of the power to arrest and the appropriate use of force.
- 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.
- 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.
- Increases maximum fines that may be issued for various violations of the Private Security Services Act from \$2,500 to \$10,000 per violation.
- Requires the Commission to convene regional hearings to perform their mandated duties for the “property services industry,” as defined.
- 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.
- States legislative findings and declarations.

Related Legislation: 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. SB 652 limits the individuals to whom a 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.

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