
UNFINISHED BUSINESS

Bill No: SB 1203
Author: Smallwood-Cuevas (D), et al.
Amended: 8/28/26
Vote: 21

SENATE BUS., PROF. & ECON. DEV. COMMITTEE: 6-0, 4/13/26
AYES: Wahab, Archuleta, Arreguín, Caballero, Grayson, Smallwood-Cuevas
NO VOTE RECORDED: Choi, Menjivar, Niello, Strickland, Umberg

SENATE PUBLIC SAFETY COMMITTEE: 4-1, 4/21/26
AYES: Arreguín, Cortese, Pérez, Wiener
NOES: Seyarto
NO VOTE RECORDED: Caballero

SENATE APPROPRIATIONS COMMITTEE: 5-2, 5/14/26
AYES: Cervantes, Cabaldon, Grayson, Richardson, Wahab
NOES: Seyarto, Dahle

SENATE FLOOR: 25-8, 5/27/26
AYES: Archuleta, Arreguín, Ashby, Becker, Blakespear, Cervantes, Cortese, Durazo, Gonzalez, Hurtado, Laird, Limón, McGuire, McNerney, Menjivar, Padilla, Pérez, Reyes, Rubio, Smallwood-Cuevas, Stern, Umberg, Wahab, Weber Pierson, Wiener
NOES: Alvarado-Gil, Grove, Jones, Niello, Ochoa Bogh, Seyarto, Strickland, Valladares
NO VOTE RECORDED: Allen, Cabaldon, Caballero, Choi, Dahle, Grayson, Richardson

ASSEMBLY FLOOR: Passed, 8/31/26

SUBJECT: Security services

SOURCE: SEIU

DIGEST: This bill, beginning January 1, 2029: 1) increases the hours of security officer skills training from 32 to 42 hours that must be completed within six months of registration by the Bureau of Security and Investigative Services (BSIS), which shall include eight hours dedicated to de-escalation training; 2) requires security guards to complete two hours of training on workers' rights, to be instructed by a labor organization, within 30 days from the date of registration; 3) requires BSIS to issue a certificate to a labor organization that meets specified requirements to provide workers' rights training; 4) authorizes BSIS to charge application, renewal, and reinstatement fees to labor organizations seeking approval to provide workers' rights training; 5) amends fines associated with employee recordkeeping and training; and 6) makes numerous changes to security officer training required by the security practice acts administered by BSIS.

Assembly Amendments:

- 1) Delay implementation to January 1, 2029;
- 2) Add a severability clause to prevent sections that are held to be invalid from affecting sections that are held to be valid;
- 3) Repeal and recast security officer skills training requirements including amendments to: remove exemptions from training requirements for a church, mosque, shine, synagogue, temple, or other place of worship; remove requirements for BSIS disciplinary review committees to perform functions related to de-escalation organizations; remove requirements that BSIS establish, by emergency regulation, a standard course and curriculum relevant to implicit and explicit bias on racial profiling; restore the single training provider requirement; remove the requirement that de-escalation training be provided by a "de-escalation organization"; require BSIS to determine criteria to evaluate whether de-escalation trainings are based on principles and methods informed by peer-reviewed or clinical research on trauma; require a course provider to issue a certificate of completion for the de-escalation portion of the security officer skills training; reduce mandated annual dedicated review or practice of security skills from 16 to 12 hours overall and hours dedicated to de-escalation from eight to four; require a labor organization seeking BSIS approval to offer training on worker rights to submit an application, as specified; require BSIS to issue a "labor organization certificate," to an approved organization; authorize BSIS to charge fees to labor organizations to process applications, renewals, and reinstatements; subject labor organizations to discipline;
- 4) Codify training requirements in the Proprietary Security Service Act;

- 5) Require BSIS to annually solicit feedback from representatives of a recognized or certified collective bargaining agent representing security workers and other related subject matter experts about changes to regulations;
- 6) Reduce the maximum proposed fine for failing to meet security skills training requirements from \$10,000 to \$5,000 per violation in the Proprietary Security Services Act;
- 7) Amend, but do not align, fines for violations relevant to employee recordkeeping and training across both practice acts;
- 8) Remove mandate for BSIS to convene a training advisory committee;
- 9) Add chaptering amendments to conform to SB 1148 (Niello, 2026); and
- 10) Make other technical amendments.

ANALYSIS:

Existing law:

- 1) Establishes the Private Security Services Act, administered by BSIS to provide for regulation of Private Patrol Operators (PPOs) that employ security guards and patrolpersons. (Business and Professions Code (BPC) §§ 7580, et seq.)
- 2) 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))
- 3) 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))
- 4) 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 (collectively, “skills training”) as a condition of issuance of the registration. The skills training shall be administered and certified by a single

course provider and completed within six months preceding the date of application to BSIS. (BPC § 7583.6(a))

- 5) Requires a security guard registrant to complete 32 hours of skills training 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))
- 6) Requires security guard registrants to annually complete eight hours of specifically dedicated review or practice of skills training, as specified. (BPC § 7583.6(e))
- 7) Requires the skills training to be administered, tested, and certified by any licensee or by any organization or school approved by Department of Consumer Affairs (DCA). The course of training is required to be approximately eight hours in length and cover specified topics, including de-escalation. (BPC § 7583.7(a))
- 8) Requires the 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))
- 9) 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))
- 10) Authorizes BSIS to issue a citation to a licensee for a violation of BPC §§ 7583.2, 7583.3, 7583.37, 7585.19, 7587.2, or 7587.14 that may contain an administrative fine that shall in no event exceed \$2,500. (BPC § 7587.7)
- 11) Establishes the Proprietary Security Services Act, administered by the BSIS within the DCA to license and regulate Proprietary Security Service Employers (PSS employer) and security officers. (BPC §§ 7574, et seq.)
- 12) Requires security officers to complete skills training within six months from the date registration is issued, or within six months of their employment with a PSS employer. (BPC § 7574.18(a))
- 13) Requires BSIS 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 12) above to promote and protect the safety of persons and the security of property, which may be administered, tested, and

certified by any PSS employer, organization, or school approved by BSIS.
(BPC § 7474.18(d))

- 14) Authorizes BSIS to approve any PSS employer, organization, or school to teach the course required by 12). (BPC § 7474.18(e))
- 15) Requires each PPS employer to annually provide each registered employee with specifically dedicated review or practice of the skills training prescribed above in 12). Requires BSIS to adopt by regulation the minimum number of hours required for annual review. (BPC § 7474.18(f)(1))
- 16) 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 BSIS upon request. (BPC § 7474.18(f)(2))
- 17) Provides that a PPS employer shall not do certain acts, including failing to properly maintain an accurate and current record of proof of completion by each proprietary private security officer of the trainings training required by BPC § 7574.18. (BPC § 7474.38 (b))
- 18) 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))
- 19) Requires the Labor Commissioner to develop a video for employees advising them of their rights under the areas listed in LAB § 1553; requires the Labor Commissioner to make the video available in English and Spanish and authorizes to make the video available in other languages; requires the Labor Commission to post the videos to the Labor Commissioner's website. (LAB § 1554 ((b),(c),(d))

This bill:

- 1) Makes legislative findings and declarations regarding the role of security guards and states intent to equip security guards with knowledge of their rights.
- 2) Delays implementation to January 1, 2029.

- 3) States if any provision of this act or its application is held invalid, that invalidity shall not affect other provisions or applications that can be given effect without the invalid provision or application.
- 4) Requires security guards to complete eight hours of training dedicated to de-escalation skills through in-person role-play and interactive training methods, in addition to the de-escalation training currently required.
- 5) 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.
- 6) Requires BSIS to release an annual report containing specified incident report data by county and comparative analysis with previous years’ data.
- 7) Codifies PPS officer requirements to complete skills training and aligns requirements with the revised requirements proposed for PPO employees.
- 8) Increases skills training from 32 to 42 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.
- 9) Requires the two additional hours to be taken within 30 days to be dedicated to training employees on rights contained in a notice, described in 18) above, to be taught by a BSIS-certified labor organization.
- 10) Requires the eight hours of de-escalation training to be provided by an instructor who is a human being and physically present, in-person, and live.
- 11) Requires the 42 hours of security officer skills training to be conducted through traditional classroom instruction 50 percent of the time and prohibits the training from being completed while on duty.
- 12) Increases security guard annual review (or practice) training hours from eight to 12 with four of those hours dedicated to de-escalation training.
- 13) Entitles a labor organization to provide the two-hour training on workers’ rights upon request; requires a labor organization to submit an application on a form, as specified, to BSIS accompanied by a fee for approval.

- 14) Authorizes BSIS to charge fees to labor organizations seeking approval to offer labor rights training as follows: a \$400 application fee; \$300 biennial renewal fee; and a \$350 reinstatement fee.
- 15) Increases maximum fines in the Private Security Services Act that may be issued for failing to keep accurate employee and training records from \$500 to \$1,000; increases the fine for failing to administer to each registered employee of the licensee, the review or practice training from \$250 to \$1,000; and reduces the fine for failing to deliver to the director a written report describing the circumstances surrounding the discharge of any firearm, or physical altercation with a member of the public, as specified, from \$5,000 to \$2,500.
- 16) Increases the fines in the Proprietary Security Services Act for failing to keep accurate employee and training records or failing to administer review or practice training to each employee from \$500 to \$1,000; imposes a fine of \$2,500 for failing to compensate employees for training; imposes a fine of \$5,000 for failing to ensure security skills training occurs as required.
- 17) Increases maximum fines that may be assessed for specified violations of the Private Security Services Act to \$10,000 per violation, for violations unrelated to training.
- 18) Requires BSIS to develop 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.
- 19) Requires the bureau to annually solicit feedback from representatives from a recognized or certified collective bargaining agent that represents security workers, security employers, labor-management groups in the security industry, security officers, worker centers, and other related subject matter experts. experts about possible changes or modifications to a rule or regulation related to skills training.

Background

BSIS and Private Security. BSIS currently licenses approximately 3,000 PPOs and registers more than 345,000 security guards who are employed by the PPOs. BSIS also registers nearly 700 PPS Employers and more than 9,000 security officers. The BSIS requires any security guard, patrolperson, or security officer applicant to

complete course in the exercise of Powers to Arrest and the Appropriate Use of Force (skills training) as a requirement of registration.

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 to qualify for a license. AB 229 (Holden, Chapter 697, Statutes of 2021) increased training requirements for security guard applicants and mandated that 50% of the appropriate use of force training be provided through traditional classroom instruction. Extensive regulations implementing AB 229 were adopted by BSIS, effective December 1, 2023.

Power to Arrest and Appropriate Use of Force are required to be taken within six months preceding application to BSIS for registration as a security guard or officer. Power to Arrest 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.

Appropriate Use of Force is required to include the following: legal standards for use of force; duty to intercede; the use of objectively reasonable force; supervisory responsibilities; use of force review and analysis; de-escalation 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 de-escalation 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.

Comments

This bill was amended several times since it was first heard in the Senate; however, the majority of policy concerns remain and recent amendments introduce additional policy concerns.

The Workplace Know Your Rights Act makes portions of this bill unnecessary. This bill adds two hours to the required training for security officers as necessary “skills training.” However, the newly added hours of the 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 LAB § 1553(a). To comply, 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” not only is *not* required by the Labor Code, but 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.

The most recent amendments require BSIS to issue a certification to a labor organization that submits an application containing specified information and pays a fee. By “certifying” an applicant, a licensing entity essentially grants an applicant a sense of authority they would not have otherwise. For BSIS to be required to grant a labor organization a similar authority is untenable for multiple reasons: 1) BSIS is not a subject matter expert in the Labor Code or assessing who is qualified to teach employee rights under the Labor Code and should not be certifying who is appropriate to provide the training, 2) BSIS did not, and is not required to develop or approve the curriculum being taught by the trainers; 3) By requiring BSIS certification, this bill could give captive audience security guards the impression that the labor organization providing the training has the endorsement of BSIS, i.e. the security guard’s licensing entity supports that organization, when a licensing entity should not endorse any licensee; and 4) Effective January 1, 2026, The Workplace Know Your Rights Act (SB 294, Reyes, Chapter 667, Statutes of 2025) requires the Labor Commissioner to develop a video for employees advising them of their rights and requirements under the areas listed in LAB § 1553, make the videos available in English and Spanish, and post the videos to the Labor Commissioner’s website by January 1, 2026. They are posted here <https://youtu.be/mK8gcTDCJLk> and here <https://youtu.be/5hDkz3H3488>.

Comprehensive sunset review oversight for BSIS 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. This bill’s amended implementation date of January 1, 2029, is the same day the Bureau’s next sunset extension bill is projected to be effective. However, this bill will not have the benefit of stakeholder input and consensus as stakeholders have been opposing this bill since it was introduced. Additionally, because it is enacted in 2026, this bill will not reflect the lessons learned from the enhanced incident reporting or the training overhaul the Legislature enacted to determine whether there should be changes to BSIS training.

BSIS underwent sunset review oversight in 2024, during which BSIS 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 (item d). Each of the three policy hearings for SB 1454 also allowed opportunity for public comment.

Since major reforms had so recently been 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 an issue in the Committee’s background paper, it will be revisited as a prior issue during the next BSIS sunset review in 2028. However, this bill will preempt any benefits realized from the recent training reforms, overshadow recommendations that may have been made to improve the training program, and hinder future progress.

Rationale behind nominal fee for approval of a training provider is unclear. The most recent amendments authorize the Bureau to charge an application fee of \$400 to process an application for a labor organization. Similar fees – those for firearm training facilities and baton training facilities – are \$800-\$880 and \$700-\$770, respectively. The fees in this bill were selected without the benefit of a fee study or some connection to workload, the typical standard for establishing fees for DCA programs.

Effective October 1, 2025, BSIS increased license fees to offset a structural imbalance. 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.

This bill adds workload and costs that, based on fees for other training provider approvals, may not cover the workload costs to process requests for approvals. Consequently, the cost of implementing this bill would fall on the licensees of the

other four practice acts. The BSIS fiscal impact confirmed implementing this bill will result in a fee increase.

Requires BSIS to annually solicit feedback from specified groups prior to pursuing regulatory changes. This bill requires the Bureau to consult with a recognized or certified collective bargaining agent that represents security workers, labor-management groups, etc., if it wishes to modify training requirements that are adopted in regulation. Regulations must be adopted according to the Administrative Procedure Act (Government Code §§ 11340, et. seq), which provides substantial opportunity for public participation. It is unclear why it is necessary, or appropriate, for statute to require the Bureau to consult with a specific group on regulations when the public participation is already an integral element of the regulatory process.

Requiring duplicative training for security guards places undue burdens on registrants and industry. 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 already require security guards 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 California Code of Regulations § 643 Appendix)

For PPO security guards, this bill requires BSIS 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.

Drafting issues will create inconsistent enforcement. The fines added or amended by this bill are not consistent. While the fines for failing to properly maintain accurate and current employee records (BPC §§ 7574.38(a) and 7583.2(b)), failing

to properly maintain accurate and current proof of completion of training (BPC §§ 7574.38(b) and 7583.2(c)), and failing to administer annual review or practice training (BPC §§ 7574.38(e) and (7583.2(h)) were amended to be consistent across the practice acts, a \$2,500 fine was added to the Proprietary Security Services Act for failing to compensate employees for training and a \$5,000 fine was added for failing to ensure training occurred as required. No such fine authority is added to the Private Security Services Act.

Additionally, this bill reduces the fine in the Private Security Services Act for failing to submit a written report describing the 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 (BPC § 7583.2 (f)). The rationale for this reduction is unknown and there has been no public discussion of whether reducing the fine for such an egregious violation is in the best interest of public safety.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: Yes

BSIS anticipates significant ongoing costs in the low millions of dollars annually for the expansion of its responsibilities (Private Security Services Fund). BSIS indicates the specific need for additional positions and IT support to accommodate new de-escalation and employee rights training responsibilities, meet new data reporting requirements, develop emergency regulation packages, create new categories of regulated entities, and handle an increased enforcement caseload, including referral of additional complaints to the Attorney General. BSIS indicates it may not be able to complete mandated regulations and hire new staff by the bill's July 1, 2028, delayed implementation date. BSIS also notes it recently increased all fees to their statutory maximums and would need to raise its fees through statute to comply with this bill. As a special fund agency, BSIS receives no General Fund support, relying solely on fees set by statute and collected through licensing and renewal fees.

SUPPORT: (Verified 8/29/26)

None received for this version of the bill.

OPPOSITION: (Verified 8/29/26)

Allied Universal
Kern County Board of Supervisors

ARGUMENTS IN OPPOSITION: Allied Universal writes, “Without any clearly established need, SB 1203 would increase the required "Powers to Arrest and Appropriate Use of Force" training from 8 to 12 hours and similarly doubles the mandatory annual refresher training from 8 to 12 hours. In addition, the bill entitles labor organizations, upon request, to teach a two-hour training module on workers' rights. These requirements are costly and unnecessary. In addition to the very real operational challenges, this bill will create an excessive financial burden on private security employers, which will inevitably lead to job losses. Our industry trade group has estimated the total financial impact of SB 1203 may be near one billion dollars annually...the new training requirements alone could cost over \$400 million a year. Initial training costs could exceed \$150 million, factoring in 360,000 guards in California at an average wage of \$20 per hour and a 15% payroll tax markup. Additionally, the 12 hours of annual refresher training, calculated at an overtime rate of \$30 per hour plus payroll taxes, adds roughly \$130 million. These massive costs will worsen existing difficulties for both private security employers and the businesses and local governments that utilize their services. By making lawful, regulated security services significantly more expensive, struggling retail operators may be forced to forgo professional security services entirely. These financial and operational pressures will result in increased costs, heighten public safety risks and likely give rise to unregulated operators.”

The Kern County Board of Supervisors writes, “...the extensive new costs, rigid training requirements, and significant administrative penalties in SB 1203 will reduce flexibility, strain public budgets, and may even discourage firms from bidding on public security contracts, particularly in rural counties like ours. These increasingly rigid and costly mandates risk making contracted security services financially impractical, limiting competition for public contracts and weakening Kern County’s ability to choose the most efficient and cost-effective method of providing security at county facilities.”

Prepared by: Yeaphana La Marr / B., P. & E.D. /
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**** END ****