

TO: Public Safety Finance and Policy
FR: Greg Cook, Executive Director
DATE: 3/14/2025
RE: SEIU Legislative Proposal HF 1686 - Preliminary Stakeholder Impact Report

Greetings Representatives,

This report is an effort to provide legislators information regarding HF1686. This bill is proposing increasing required private security training with Preassignment (initial upon hiring) from 12 hours to 40 and increasing continuing education (annual) from 6 to 24. There are specific topics that are to be included in the training as well as requiring the training be conducted in person thus eliminating the online course format.

During my meeting with SEIU I informed them that as a government official responsible for regulating the industry I must remain objective and that any opinions on the proposed bill would have to come from the Board. I have informed SEIU that I am placing this issue on the Board agenda for our March 25th meeting. I have also informed and extended an invitation to the representatives from The National Association of Security Companies (NASCO) and the Minnesota Association of Private Detectives and Protective Agents (MAPI).

This legislation would have considerable impact on the industry. As the private security license holders and training providers need to be made aware of this, I have informed them of this legislation.

- **Numbers for consideration**
 - Current agency staff: 4 including the Executive Director
 - Budget: \$688K annually
 - Number of private security and investigators regulated statewide: 14,600
 - Number of union members SEIU represents in the 7 county metro area: 3,000
 - Number of number of training providers: 249
 - Total number of certified courses: 1,504/342 are online
 - Total number of certified course hours: 6,119
- **Statutes involved**
 - 326.3331 RULEMAKING
 - 326.3361 TRAINING
 - 326.3386 FEES
- **Administrative Rules involved**
 - 7506.0100 GENERAL DEFINITIONS
 - 7506.2100 CERTIFIED TRAINING PROGRAMS PURPOSE
 - 7506.2200 BOARD CERTIFICATION OF TRAINING PROGRAMS
 - 7506.2300 MINIMUM REQUIREMENTS FOR BOARD-CERTIFIED TRAINING PROGRAMS
 - 7506.2500 REVOCATION OR SUSPENSION OF CERTIFICATION STATUS
 - 7506.2600 PREASSIGNMENT OR ON-THE-JOB TRAINING REQUIREMENTS
 - 7506.2700 CONTINUING EDUCATION REQUIREMENTS
 - 7506.2900 FAILURE TO SATISFY TRAINING REQUIREMENTS

NOTE: This legislation would involve some Administrative Rule Changes.

- Generally Administrative Rule revisions can be a costly and a lengthy process

The Stakeholders

1. Impact on the Agency (MNPDB)

- i. Courses would need to be extensively reviewed upon submission and be audited going forward
- ii. This means having trained auditors do the initial review and actually take the class
- iii. This would be 40 hours per Preassignment and 24 per continuing of staff labor hours per course audited along with any reports derived from the process
- iv. There will be an initial large volume of courses to be reviewed once law is implemented
- v. Affidavit of Training (AOT) auditing at the time of renewal to ensure license holders are complying with the new law would take more time per AOT to review as more training hours are required, may be increased infractions
 1. With the potential of increased infractions during renewal, licenses that are referred to the Complaint Committee for possible discipline action could increase, requiring more staff time to investigate, process, and track penalties administered
- vi. More requirements may create more incentive for unlicensed activity which would in turn use more agency resources in investigating such situations
- vii. **Fiscal Impact**
 1. I have received the Fiscal Note request and will need some time to develop it
 2. Further analysis is needed but at a bare minimum our agency would need 4 additional FTE's to review, process, and audit revised courses
 3. This legislation could potentially double or more this agency's budget

2. Impact on License holders

- i. The security industry does have concerns with this proposed legislation
 1. The main security associations that represent the license holders are:
 - a. National Association of Security Companies (NASCO)
 - b. Minnesota Association of Private Detectives and Protective Agents (MAPI)
 - c. National Council of Investigation and Security Services (NCISS)
- ii. One could ascertain that the main contention of the security industry would be the cost to license holders
 1. Per Statute 181.645 Protective Agent employers would incur the cost of having their employees do the added training
 2. Current CEU requirements:
 - a. 12 hours Preassignment – upon initially hiring a security officer
 - b. 6 hours continuing – done annually after Preassignment training
 - c. 6 hours continuing armed – done annually after Initial Armed training
 3. Per the language of the bill proposed:
 - a. 40 hours Preassignment – upon initially hiring a security officer
 - b. 24 hours continuing – done annually after Preassignment training
 - c. 6 hours continuing armed – done annually after Initial Armed training
 4. The change from 12 to 40 hours is 333%
 5. The change from 6 to 24 hours is 400%
 6. One could ascertain that these percentages could be used to calculate the increase in training expense to the license holder
 7. As the legislation requires all training to be 'in person' there would be added cost involved; instructor's fees, renting rooms, possible hotel and food costs
 8. Some of our license holders have over 2500 employees
 9. We have seen statistics as high as 90-400% annual turnover rate in the industry
 - a. A turnover rate such as this would be repeated cost of training by the employer
 10. One could ascertain that this cost could be passed onto the consumer
 11. Some smaller security companies may not be able to absorb the cost

3. Impact on Training Providers

1. Our agency currently has over 1,500 certified courses listed for training CEU's
2. There are 259 training providers
3. The majority of them are designed between 6 and 12 hour modules required by current statutes and rules
4. Training providers would need to revise their courses to fit the suggested 40 hours for Preassignment and 24 hours for continuing education
5. There would be an increased cost per course to employers as these courses could be more expensive to develop and administer with the added hours
6. With the language in the bill stating that this has to be 'in-person' training this would eliminate the online courses
7. There could possibly be a reduction in certified training options in Minnesota

4. Employees of license holders

1. Increase the professionalism of the security personnel in the industry
2. Make security personnel more valuable partners with law enforcement
3. Make security personnel more valuable to employers
4. Possibly reduce the turnover rate
5. Provide more educated security professionals in the public
6. Provide more enhanced training certification that security personnel can use throughout their career
7. Help security personnel feel more safe and confident while they carry out their daily job responsibilities
8. Could lower the barrier to entry as a security professional if more initial training is required, companies may not need to rely on past experience or education for hiring qualified candidates

5. General Public

1. Increase in public safety
2. Increase in confidence of security officers

6. Law Enforcement

1. Private security would become a more knowledgeable and skilled partner with law enforcement
2. Security professionals would be able to provide enhanced skills when responding prior to LE coming on site
3. Security professionals would be able to provide more educated information in reporting incidents
4. More requirements may create more incentive for unlicensed activity, in those situations we refer these cases to law enforcement which may increase their caseload

7. Points for consideration

1. An important component of this discussion is the perspective of the security industry itself
 - i. The best contacts for that would be the representatives of the security industry associations as listed above
 - ii. I have contacted and informed the National Association of Security Companies (NASCO) and the Minnesota Association of Private Detectives and Protective Agents (MAPI) of this bill, I have also extended an invitation to each of their representatives to attend the March 25th Board Meeting
2. Language definitions: Some of the language in the bill would need more clarity, this becomes particularly important when dealing with violations and Office of Administrative court hearings
 - i. "...event security"
 - ii. "...part time"
 - iii. "...regularly scheduled security work"
 - iv. "...in person training"
3. The language needs clarity that this is for the protective agent side of the industry, not the private detectives
4. There could be an opportunity during the process to revise/add some language that would also enhance regulation of the industry
 - i. Examples:
 1. Require that at the end of each Preassignment course the students would have to take a test

- to assure they have understood the content
- 2. Set in writing a fee schedule for application costs to training providers for courses they submit
- 3. Clarify “Preassignment or on-the-job training”
- 4. Clarify Initial Armed Training
- 5. Add HR 218 as a qualification for armed training
- 6. Remove 7506.2200/Subpart 1/E. “the location where the training will be held, the dates on which the training will be offered”
- 5. An extension may be needed for having Preassignment completed within a larger window than 21 days
- 6. Currently Peace Officer and Standards Training (POST) requires 48 hours over a 3 year period for active police officers, which equates to 16 hours per year
 - i. This training initiative would be more than what is required for police officers
- 7. The specific training requirements that the bill adds are pertinent to today’s environment
- 8. Attached is a list of certified courses that are currently available, these courses do cover the content that SEIU is currently proposing
- 9. Development of these courses would require further analysis
 - i. For example the “Administration of opiate antagonists” (NARCAN)
- 10. Continuing Education Units (CEU’s) can be perceived as subjective
 - i. Difficult to monitor if courses would be implementing the required hours
- 11. Our agency has received no complaints related to training. I have informed the SEIU representative that we have a complaint process and that if their members have issues with any of the training they receive, or lack of, there is a mechanism to report it to us for investigation.
- 12. I have received calls from license holders and trainers that if this bill were to become law they would have to close down their business
- 13. The Board, License Holders, Training Providers and Agency Staff will need more time than January 2026 to adjust to the these new regulations if implemented
 - Note: I have heard this has been pushed to August of 2026, I have not seen the written amendment
- 14. Consideration would need to be given to those license holders whose renewals are due the first part of 2026. With a 2 year license renewal cycle, there is potential that we would not be able to accurately regulate these changes until 2028.

Option for Consideration:

As the true goal of this legislation is to increase the knowledge of security officers I offer this option:

Form a policy review/working group made up of representatives from SEIU, security officers, the license holders, certified trainers, and the Board. Our agency could facilitate this process. This group could develop very detailed content for a Preassignment course. This would include the content requested by SEIU. Once developed, actually run the course through several different groups and see how long it actually takes. Make a decision on the hours after it is determined the length of time needed. Test students to insure they comprehend the material. This can be done for continuing education as well.

Given the timing of this request, and the fact that legislation is already in session, this is a brief preliminary report. Our agency would need more time to produce further analysis and more detailed data on the matter.

I can tell you that Agency Staff are proponents of enhanced security training for the industry. I am confident the Board would agree. The further discussion would lie in the details of implementation and exact requirements going along with training enhancements.

Sincerely,

Greg Cook, CFE, CPP
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