



Blue Line Investigations and Security Services LLC

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Providing Blue Line Services

Dear Rep. Pete Johnson,

I hope this letter finds you well. My name is Tim Gulden, and I am the owner of Blue Line Investigations and Security Services, a small, law enforcement and military veteran-owned business in St. Paul. We employ eight employees, many of whom are military veterans, and we provide vital security services to our local community. I am writing to express my concerns regarding the proposed legislation that would significantly increase training requirements for Protective Agents. While I fully support the goal of enhancing the professionalism and skills of Protective Agents, I believe the proposed changes could place an undue financial burden on small businesses like mine.

Under the current regulations, Protective Agents are required to complete:

- **12 hours of Pre-Assignment training** upon initial hire,
- **6 hours of continuing education** annually after Pre-Assignment training,
- **6 hours of continuing armed training** annually after initial armed training.

However, the bill proposes the following increases:

- **40 hours of Pre-Assignment training** upon initial hire,
- **24 hours of continuing education** annually after Pre-Assignment training,
- **6 hours of continuing armed training** annually after initial armed training.

This represents an increase of:

- **333%** for Pre-Assignment training hours (from 12 to 40 hours),
- **400%** for continuing education hours (from 6 to 24 hours).

To put this in context, Minnesota's POST Board requires 48 hours of training for licensed peace officers over a three-year period, which equates to 16 hours annually—significantly fewer hours than those proposed for Protective Agents in a single year. The disparity in these requirements raises concerns about their proportionality, especially when considering that Protective Agents often have more limited duties and responsibilities than peace officers.

The proposed changes would impose considerable challenges, particularly for small businesses:

1. **Increased Costs:** The substantial increase in required training hours would result in significant costs for instructor fees, venue rentals, and potentially travel and lodging expenses. For small businesses like mine, with only eight employees, absorbing these additional expenses would be extremely difficult. Moreover, we would need to allocate time and resources to train new employees frequently due to high turnover rates in the Protective Agent industry, which can range from 90% to 400% annually.
2. **Impact of In-Person Training:** While in-person training has benefits, the requirement for all training to be conducted in person presents logistical challenges and additional costs. Small companies may struggle to absorb these costs, and employees may face difficulties attending training due to scheduling conflicts, travel time, and other commitments. Online or hybrid training options would offer flexibility, reduce costs, and allow companies to better manage their workforce's training needs without compromising quality.
3. **Disproportionate Hours:** The proposed 24 hours of annual continuing education for Protective Agents is excessive when compared to the training requirements for law enforcement officers, who only need 16 hours per year under the Minnesota POST Board regulations. Given that peace officers are responsible for a much broader range of duties, the proposed training requirements for Protective Agents seem disproportionate and potentially burdensome for small businesses.
4. **Financial Strain on Small Businesses:** As a veteran-owned small business, we do not have the same resources as larger companies to absorb these additional training costs. The increased expenses could make it more difficult to remain competitive and sustainable in the market. Many smaller security companies may be forced to pass these costs onto consumers, which could drive up the cost of security services across the board.

In light of these concerns, I respectfully urge you to reconsider the proposed increases in training hours for Protective Agents and the requirement for in-person training. A more balanced approach, one that aligns the training requirements with industry standards and allows for flexible training options, would better support small businesses while maintaining the integrity of the training process.

Thank you for your time and consideration. I would welcome the opportunity to discuss this further and provide any additional information you may need.

Sincerely,