

DEPARTMENT OF CONSUMER AFFAIRS  
**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS**  
**DIVISION 7**  
BUREAU OF SECURITY AND INVESTIGATIVE SERVICES

NOTICE OF PROPOSED REGULATORY ACTION CONCERNING:  
**Exam Application Repeal, Terminology and Training-related Updates**

**NOTICE IS HEREBY GIVEN** that the Bureau of Security and Investigative Services (Bureau or BSIS) is proposing to take the action described in the Informative Digest below, after considering all comments, objections, and recommendations regarding the proposed action.

**PUBLIC HEARING**

The Bureau has not scheduled a public hearing on this proposed action. However, the Bureau will hold a hearing if it receives a written request for a public hearing from any interested person, or the interested person's authorized representative, no later than 15 days prior to the close of the written comment period. A hearing may be requested by making such request, in writing, addressed to the individuals listed under "Contact Person" in this Notice.

**WRITTEN COMMENT PERIOD**

Written comments relevant to the action proposed, including those sent by mail or e-mail to the addresses listed under "Contact Person" in this Notice, must be **received by the Bureau at its office no later than Midnight, March 24, 2026**, or must be received by the Bureau at the hearing, should one be scheduled.

**AUTHORITY AND REFERENCE**

Pursuant to the authority vested by sections 7501.6, 7515, 7574.05, 7581, 7583.6, 7583.7, and 7591.6 of the Business and Professions Code (BPC), the Bureau is considering amending sections 601, 601.1, 621, 628, 636, & 643 of Title 16 of the California Code of Regulations (CCR).

**INFORMATIVE DIGEST / POLICY STATEMENT OVERVIEW**

Existing California law at CCR 601 and 601.1 mandate that licensees file an application to be eligible for an exam, which were held at least once every two months. The Bureau also regulates advertisements at CCR 621 related to licensee business. Additionally, licensee categories regulated by the BSIS must complete specified training per CCR 628 and 643. For example, proprietary private security officers (PSOs) must complete a course in security officer skills that includes Power to Arrest (PTA) training pursuant to the BPC section 7574.18(a) and (b). Alarm agents, security guards, and private investigators must complete a course of training in the carrying and usage of firearms in order to obtain a BSIS firearms permit, pursuant to BPC sections 7583.23, 7596(a), and 7542(a)(1).

Effective July 1, 2023, Assembly Bill (AB) 229 (Holden, Chapter 697, Statutes of 2021) and AB 2515 (Holden, Chapter 287, Statutes of 2022), require the Bureau to expand PTA training to include appropriate use of force topics for applicants and licensees. In 2023, the Bureau updated PTA training requirements, but there are still requirements in regulation that are no longer a current practice of the Bureau (application for exams) as well as terminology that is not consistent with updated statute. Additionally, the Bureau has received public inquiries seeking additional insight and clarification on licensing requirements.

This proposal updates the application for examination process, and repeals the time requirements for examinations to be consistent with current business practice. This proposal broadens what the Bureau considers an advertisement. This proposal aligns regulatory language with updated statutory terminology for consistency and clarity. This proposal repeals CCR 636, course approval related to firearms, because it is no longer necessary as CCR 635 mandates a course outline for firearms training instructors.

This proposal also clarifies that 16 hours of elective courses for security personnel shall be completed within 6 months of initial registration or date of employment. It also clarifies/adds elective courses to be consistent with the most recent version of the "Power to Arrest and Appropriate Use of Force Training Manual" dated January 2025. The proposal would also make other minor, technical non-substantive changes to cross-references to address consistency with statutory authority.

This proposal is necessary to help ensure Bureau licensees have additional code references outlining their training requirements and licensing terms. Ensuring licensees have the proper resources to remain compliant is the Bureau's highest priority of consumer safety and protection.

### **Anticipated Benefits of Proposal**

The Bureau has determined that this regulatory proposal will have the following benefits to the welfare and public safety of California residents:

This action benefits the health and safety of California consumers by clarifying the licensing requirements for security personnel to help ensure that they meet training standards implemented by the Bureau, which has the primary mission of public protection.

This regulatory proposal does not affect worker safety or the environment.

### **Evaluation of Consistency and Compatibility with Existing State Regulations**

During the process of developing this regulatory proposal, the Bureau conducted a search of any similar regulations on these topics and has concluded that these regulations are neither inconsistent nor incompatible with existing state regulations.

### **INCORPORATION BY REFERENCE**

This rulemaking does not incorporate forms or documents by reference.

### **DISCLOSURES REGARDING THIS PROPOSED ACTION**

The Bureau has made the following initial determinations:

## **FISCAL IMPACT ESTIMATES**

### **Fiscal Impact on Public Agencies Including Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State:**

The regulations do not result in a fiscal impact to the state. The Bureau does not anticipate additional workload or costs resulting from the proposed amendments.

The regulations do not result in costs or savings in federal funding to the state.

**Nondiscretionary Costs/Savings to Local Agencies:** None.

**Cost to any Local Agency or School District for which Government Code Sections 17500 - 17630 Require Reimbursement:** None.

**Mandate Imposed on Local Agencies or School Districts:** None.

**Significant Effect on Housing Costs:** None.

## **BUSINESS IMPACT ESTIMATES**

The Bureau has made the initial determination that the proposed regulatory action would have no significant statewide adverse economic impact directly affecting business, specifically individuals applying for licensure or current licensees of the Bureau, including the ability of California businesses to compete with businesses in other states.

### **Cost Impact on Representative Private Person or Business**

The Bureau is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

### **Impact on Small Business**

While the Bureau does not have, nor does it maintain, data to determine if any of its licensees are a “small business,” as defined in Government Code section 11342.610, the Bureau has made an initial determination that the proposed regulatory action may have an effect on small businesses. However, the effect will not be significant.

## **RESULTS OF ECONOMIC IMPACT ASSESSMENT / ANALYSIS**

The Bureau has made the initial determination that the proposed regulatory action would have no significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states.

### **Impact on Jobs / Businesses**

The Bureau has determined that this regulatory proposal will not have any impact on the creation of jobs or new businesses or the elimination of jobs or existing businesses or the expansion of businesses in the State of California because the proposed fees are anticipated to have minimal impact on businesses because the incremental fee increase is negligible compared to the average salary of licensees.

As stated earlier, this action benefits the health and safety of California consumers by clarifying the licensing requirements for security personnel to help ensure that they meet training standards implemented by the Bureau, which has the primary mission of public protection.

This regulatory proposal does not affect worker safety or the environment.

### **Business Reporting Requirements**

The regulatory action does not require businesses to file a report with the Bureau.

### **CONSIDERATION OF ALTERNATIVES:**

In accordance with Government Code section 11346.5, subdivision (a)(13), the Bureau must determine that no reasonable alternative it considered to the regulation or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposal described in this Notice, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

Any interested person may submit comments to the Bureau in writing relevant to the above determinations at 2420 Del Paso Road, Suite 270, Sacramento, CA 95834 during the written comment period, or at the hearing if one is scheduled or requested.

### **AVAILABILITY AND LOCATION OF THE FINAL STATEMENT OF REASONS AND RULEMAKING FILE**

All the information upon which the proposed regulations are based is contained in the rulemaking file which is available for public inspection by contacting the person named below.

You may obtain a copy of the Final Statement of Reasons once it has been prepared by making a written request to the Contact Person named below or by accessing the website listed below.

### **CONTACT PERSONS**

Inquiries or comments concerning the proposed rulemaking action may be addressed to:

Name:	Briana Goularte
Address:	Bureau of Security and Investigative Services 2420 Del Paso Road, Suite 270, Sacramento, CA 95834
Telephone No.:	279-895-1250
E-Mail Address:	<a href="mailto:BSISRegs@dca.ca.gov">BSISRegs@dca.ca.gov</a>

The backup contact person is:

Name: Valerie Peterson  
Address: Bureau of Security and Investigative Services  
2420 Del Paso Road, Suite 270, Sacramento, CA 95834  
Telephone No.: 916-623-1049  
E-Mail Address: [BSISRegs@dca.ca.gov](mailto:BSISRegs@dca.ca.gov)

#### **AVAILABILITY OF DOCUMENTS ON THE INTERNET**

Copies of the Notice of Proposed Action, the Initial Statement of Reasons, and the text of the regulations with modifications noted, as well as the Final Statement of Reasons when completed, and modified text, if any, can be accessed through the Bureau's website at [https://www.bsis.ca.gov/about\\_us/laws/prop\\_regs.shtml](https://www.bsis.ca.gov/about_us/laws/prop_regs.shtml)