DPSST Private Security Entity Rules Advisory Committee
Minutes
August 11, 2026
2:00 – 4:00 P.M.

The DPSST Private Security Entity Rules Advisory Committee met on August 11, 2026. The meeting was hybrid via Teams and in person at the Department of Public Safety Standards and Training located at 4190 Aumsville Hwy SE, Salem, Oregon. Jennifer Howald called the meeting to order at 2:04 P.M.

Workgroup Members Present:
Zach Baker, Premier Products
Jason Bledsoe, Foresight Security Co.
Raul Herrera, Rapid Response
Tom Hoefft, CYA Security
Kainoa Pang, Coast to Coast Events

Workgroup Members Absent:
Jackie Gray, Succor Global and RAJ Sports
Jeremy Simer, SEIU

DPSST Staff Present:
Marie Atwood
Suzy Herring
Michael Holsapple
Jennifer Howald
Carissa White

1. **<u>Introductions</u>**
   Each participant from the workgroup and from DPSST introduced themselves for the record.

2. **<u>Review of Draft Changes for Oregon Administrative Rules (OAR) Chapter 259 Division 59, the Private Security Entity Licensing Program</u>**
   Note: Agenda items 2 & 3 were reviewed together.

   Jennifer Howald noted that several questions and comments raised during the first meeting had been set aside for additional review at this meeting. However, those items will remain set aside until the next meeting. This meeting will focus on reviewing OAR 259-059-0110 through 259-059-0440 and addressing the remaining discussion items listed on the agenda. Items held over include:

   - Suggested additions to OAR 259-059-0080
   - Finalization of the licensing period date changes and implementation
   - Updating draft rule changes to include an option for a two-year license
   - Resolving any remaining questions about contracting an executive manager to perform private security services as a private security professional

   Jennifer Howald provided an overview of each rule, including the rule's purpose and the draft rule changes prepared by DPSST. The following provides a summary of the workgroup discussion.

   OAR 259-059-0110:

There were no DPSST proposed changes to this rule. There were no workgroup questions or discussions.

OAR 259-059-0120:

See section 3.a. under Review of Discussion Topics for the summary of the discussion on General Liability Insurance Coverage Requirements.

There were no workgroup questions or concerns on the DPSST proposed draft rule changes.

OAR 259-059-0125:

DPSST proposes adoption of a new rule to define the proof requirements for business tax compliance. The workgroup did not identify any concerns with the draft rule.

OAR 259-059-0130:

The workgroup did not identify any concerns with the draft rule changes.

See section 3.c. under Review of Discussion Topics for the summary of the discussion on the dollar amounts required for a surety bond or deposit.

OAR 259-059-0140:

The workgroup did not identify any concerns with the draft rule changes.

See section 3.d. under Review of Discussion Topics for the summary of the discussion on the rule placement of the record keeping requirements.

OAR 259-059-0150:

The workgroup did not identify any concerns with the draft rule changes.

See section 3.d. under Review of Discussion Topics for the summary of the discussion on the rule placement of the record keeping requirements.

The workgroup revisited the discussion on whether the Professional Workplace Training Course can be combined with private security professional basic training for certification and renewal training. The workgroup feedback highlighted that if the training requirements were consolidated, then employers would know that the individuals that they hire have received the training, and it would simplify entity licensing requirements by reducing the entity's required documentation and paperwork. The workgroup suggested that DPSST could provide the training to the private security instructors and that the instructors could document delivery of the professional workplace training on the training affidavit (DPSST Form PS-6).

Staff referred to the requirements found in ORS 181A.908, which require the entity to provide the Professional Workplace Training to their private security providers through BOLI. Staff noted that this has been an item of discussion in the past. As the licensing program was established, the best compromise was for DPSST to coordinate with BOLI to create the training course and then make the training course accessible to private security entities and private security providers. There are no individual or separate costs for access to the training. Costs of the training are part of the entity licensing fee as part of the costs for administering the licensing program.

Staff acknowledged the workgroup's feedback and desire for simplification and will continue to consider the feedback and review options for follow up at the next meeting.

OAR 259-059-0160:

There were no DPSST proposed changes to this rule. There were no workgroup questions or discussions.

OAR 259-059-0170:

There were no DPSST proposed changes to this rule. There were no workgroup questions or discussions.

OAR 259-059-0180:

There were no DPSST proposed changes to this rule. There were no workgroup questions or discussions.

OAR 259-059-0190:

The workgroup did not identify any concerns with the draft rule changes.

OAR 259-059-0200:

The workgroup did not identify any concerns with the draft rule changes.

See section 3.d. under Review of Discussion Topics for the summary of the discussion on the rule placement of the record keeping requirements.

OAR 259-059-0300:

There were no DPSST proposed changes to this rule. There were no workgroup questions or discussions.

OAR 259-059-0310:

There were no DPSST proposed changes to this rule. There were no workgroup questions or discussions.

OAR 259-059-0400:

The workgroup did not identify any concerns with the draft rule changes.

The workgroup asked if having an entity license suspended or revoked would have an impact on private security provider certification or licensure. Staff explained that it would depend on the violation. Some entity violations are specific to business practices and would not affect the licensing of the entity's executive manager. If the violation was a violation in both rule sets, then it is possible that an entity violation may also result in a provider violation.

However, each violation would be reviewed case by case. The entity representative and the entity's designated executive manager are not always the same person.

OAR 259-059-0410:

The workgroup did not identify any concerns with the draft rule changes.

OAR 259-059-0420:

The workgroup did not identify any concerns with the draft rule changes.

OAR 259-059-0430:

The workgroup did not identify any concerns with the draft rule changes.

OAR 259-059-0440:

There were no DPSST proposed changes to this rule. There were no workgroup questions or discussions.

3. <u>Review of Discussion Topics</u>

Note: Agenda items 2 & 3 were reviewed together.

a. General Liability Insurance Coverage Requirements

The general liability insurance requirements are found in Oregon Revised Statute (ORS) 181A.900 and specifically require "public liability, personal injury, and property damage insurance covering all aspects of the private security services being provided." DPSST has received feedback from constituents that obtaining general liability insurance that meets the specific categories found in ORS is difficult and expensive, most notably for the personal injury component. DPSST asked the workgroup if they had any experience with this or had heard from others that this was an issue.

Workgroup members shared the following:

- Next to payroll, the general liability insurance is the biggest expense for the company. Obtaining coverage for the personal injury component increased the company's insurance premium costs by 60%. As a significant business expense this cost has to be passed to the client or it could affect the budget available to pay for staffing. This means as costs rise for the business, costs rise for the client. Businesses are starting to see clients forgo security services as a cost they can no longer afford. The member noted that their clients have legal teams and reviewing the entity's insurance coverage is a part of the contracting process. The client has the opportunity to determine if the entity's insurance is adequate for the services being performed. What is currently required is too detailed.
- It is challenging to find insurance companies that will cover all components of this requirement. The member recently had to change insurance companies to maintain adequate coverage, at a significant cost increase. The member supported looking into this further to see if the requirements can be changed.

Michael Holsapple shared that he frequently receives questions from applicants and other insurance companies who are trying to find out who provides this coverage to a private security business. He noted that one of the challenges to finding a solution is that it will require a statutory change by the Legislature.

Jennifer Howald shared that DPSST has requested a legislative concept placeholder and the agency will evaluate whether this is an issue that can be addressed as part of the agency's requested changes.

Workgroup members asked how to pursue a change if DPSST isn't able to. Staff responded that the process would involve contacting their lawmakers (a state representative or state senator) to explain the issue and request a change.

The workgroup also discussed the coverage amounts that are designated through administrative rules as "minimum liability limits of $1,000,000 per occurrence and $2,000,000 in the aggregate." There were no recommended changes. However, there was a suggestion to research other markets or states to review comparable requirements. One member volunteered to contact their insurance provider to see what changes there are to insurance premium costs if the minimum amounts are changed but the coverage criteria stays the same.

b. Tax Compliance Certification Requirement

DPSST proposes adoption of a new rule to define the proof requirements for business tax compliance. The workgroup did not identify any concerns with the draft rule.

c. Surety Bond or Deposit Amounts for Proof of Ability to Pay Wages Requirements

DPSST asked the workgroup to review the current dollar amounts required, which are based on the number of private security professionals and executive and supervisory managers that the entity employs. DPSST requested feedback on the amounts and corresponding employee numbers, as well as how to address changes to employee numbers within a licensing period.

Workgroup feedback and questions:

- How are the number of employees counted? Is it just full time employees? Does it include event staff?
  - Staff response: It includes any employees who are required to be certified or licensed as a private security professional or manager. This would include part-time employees, but it would not include crowd management staff who are exempt from the private security professional certification requirements.
- One proposal was to change the requirement to a single dollar amount for all entities, regardless of entity size or employee count.

- Another proposal was to reduce the breakdown to two levels; 25 or more employees at $30,000 and 24 or less employees at $15,000 (or an amount that would appropriately pay 15 employees for their founded wage claims).
- How often do companies apply for the license reporting their employees at the time of application, but then later staff up to a higher level?
    - Staff response: DPSST hasn't tracked this because there is no requirement at this time to report a change in the number of employees and to increase the amount retained to correspond with the staffing changes.
- What happens if I have been in good standing? Can this be changed to a system that if you have had wage claims you have to carry the surety bond, but if you haven't you don't?
    - Staff response: Those changes would require a statutory change.
- The general consensus was to change the rule to one amount of $30,000 for all entities.

Staff will collect some data on entity sizes based on the number of employees to estimate how many entities would be impacted if the lower amounts were eliminated or consolidated into one or two levels.

d. Rule Placement of Record Keeping Requirements

Two topic specific record keeping requirements are found in OAR 259-059-0140 and OAR 259-059-0150 while all other record keeping requirements are found in OAR 259-059-0200. DPSST asked the workgroup for feedback on placement. The workgroup recommended consolidating all of the record keeping requirements under one rule. Staff will revise the draft rule changes to transfer the record keeping requirements to a single rule.

e. Additional Discussion Topics as Needed

The workgroup asked whether there are loopholes contributing to businesses remaining unlicensed and out of compliance. Suzy Herring responded that the biggest hurdle is that the noncompliant businesses are ignoring the agency's phone calls and letters. Compliance is a workload issue, and in these cases staff need to show up in person to verify a violation is occurring in order to pursue additional compliance actions. Michael Holsapple responded that these rule changes address several known issues and are intended to help improve the process for those who are licensed and those who are working toward being licensed, while also limiting the ability to continue operating indefinitely without a license.
There were no other questions or concerns identified by the workgroup.

4. **<u>Meeting Close</u>**
The meeting concluded at 3:30 P.M. The next workgroup meeting is scheduled for Thursday, August 27, 2026, 2:00-4:00 P.M.