



**STATE OF TENNESSEE
DEPARTMENT OF COMMERCE AND INSURANCE
500 JAMES ROBERTSON PARKWAY
DAVY CROCKETT TOWER
NASHVILLE, TENNESSEE 37243**

June 8, 2022

***RE: Tennessee Detection Services Licensing Program
Private Protective Services Security Guard Training Changes***

Pursuant to Public Chapter 1121 of the Acts of 2022, also known as “Dallas’s Law, signed by Governor Bill Lee on June 1, 2022, there will be several changes regarding the administration of the Private Protective Services Licensing and Regulatory Act (“Act”), codified in Tennessee Code Annotated, Title 62, Chapter 35. This newly enacted law can be found online through the following link: <https://publications.tnsosfiles.com/acts/112/pub/pc1121.pdf>.

This law takes effect January 1, 2023, and all requirements listed below will be required as of that date. The Detection Services Licensing Program (“Program”) is providing this information before this law goes into effect to assist with compliance of these regulatory changes. If you have any questions, please do not hesitate to contact the Program.

First, Dallas’s Law removed the exemption for general unarmed guard training for unarmed security guards pursuant to T.C.A. § 62-35-103(b). Effective January 1, 2023, all unarmed security guards, unless they are otherwise exempt, will need to complete the unarmed general four-hour training required pursuant to T.C.A. § 62-35-118.

Second, Dallas’s Law added additional training requirements for certain security guards. Dallas’s Law added two additional provisions to T.C.A. § 62-35-118 that require additional training for both armed and unarmed security guards who are either employed by a proprietary security organization that holds a license or permit for on-premises consumption from the alcoholic beverage commission or a beer board, or are employed by a contract security company for the purposes of performing security guard and patrol services at a commercial establishment that holds a license or permit for on-premises consumption from the Tennessee Alcoholic Beverage Commission or a local beer board. These additional trainings are to include a training in de-escalation techniques and proper and safe restraint techniques; and a first aid and cardiopulmonary resuscitation (CPR) training course. These additional trainings need to be completed by the guards

within fifteen days of employment with the respective contract security company or proprietary security company.

The Program's training forms will be updated to allow trainers to show where guards have completed these additional courses. Dallas's Law does not outline specific requirements related to the length of these new training courses or who will provide these courses, however, the Act gives the Commissioner discretion to approve or deny certification to teach training courses. The Program intends to promulgate rules to outline the minimum requirements for these training courses, but in the meantime, trainers will be able to submit requests to the Program to be certified to teach these additional courses and may submit training materials to be approved by the Commissioner to ensure guards in their courses are receiving approved trainings. Additionally, security guards may submit proof of having completed relevant first aid or CPR training through organizations such as the American Red Cross with their applications for consideration. Although guards would not be required to be first aid or CPR certified, having this certification would meet the requirement for completing relevant training courses in this subsection.

Third, Dallas's Law will require additional refresher trainings for security guards. Dallas's Law requires all unarmed security guards complete two hours of refresher training as a prerequisite of registration renewal. This two-hour refresher training must be related to the topics covered in the four-hour general training required by T.C.A. § 62-35-118(a)(2)(A). Additionally, armed and unarmed guards who are required to complete the initial de-escalation training course and the first aid and CPR training course will be required to complete refresher training courses related to these topics. As stated above, if you have any questions about whether the training that you intend to offer or have completed comports with these requirements, please do not hesitate to contact the Program.

All security guards who apply for new registration cards or renew their registrations after January 1, 2023, will need to have this additional training or refresher training as part of their applications. As a reminder, trainings need to be dated within a year of the date of the application, so these guards can complete these applicable trainings prior to Dallas's Law taking effect.

Fourth, Dallas's Law prohibits unarmed guards working for any proprietary security organization from carrying any type of weapon, including less than lethal devices. If a proprietary security organization chooses to have guards carrying weapons, whether they will carry firearms or less than lethal devices, then these guards will need to obtain armed guard registrations and complete the appropriate trainings for these registration cards.

Fifth, Dallas's Law gives further disciplinary authority to local beer boards and the Tennessee Alcoholic Beverage Commission regarding violations of having unregistered or improperly registered security guards. Dallas's Law states that the Tennessee Alcoholic Beverage Commission or a local beer board shall suspend the license or permit for on-premises consumption of alcoholic beverages for any establishment for thirty days if the establishment has employed or contracted for security guards and the guards are not properly registered.

A copy of Dallas's Law is attached to this correspondence. If you have any questions, you may contact the Tennessee Department of Commerce and Insurance by phone at 615-741-4827 or by e-mail at private.protective@tn.gov.

Sincerely,

Alex Martin

Alex Martin
Assistant Commissioner
Division of Regulatory Boards