

August 11, 2026

Councilor Gabriela Coletta Zapata, Chair
Committee on Government Operations
1 City Hall Square, Room 550
Boston, MA 02201
617-635-3040

Councilor Ruthzee Louijeune, Vice Chair
Committee on Government Operations
1 City Hall Square, Room 550
Boston, MA 02201
617-635-3040

Dear Chair Coletta Zapata and Vice Chair Louijeune,

On behalf of the Greater Boston Chamber of Commerce and our 1,200 members, I write to submit comments on Docket #1541, *An ordinance proposing mandatory training requirements for Unarmed Security Guards in the City of Boston*. The Chamber shares the Council's commitment to workplace and public safety and supports efforts to strengthen training and professionalism within the security workforce. However, Docket #1541 would create a sweeping new permitting, training, and enforcement framework before the City has clearly identified the specific public safety challenges it seeks to address or demonstrated that existing training requirements and industry practices are insufficient.

As drafted, the ordinance raises substantial questions regarding scope, implementation, cost, and enforcement. Its broad applicability would impact a wide range of employers across Boston, while its restrictive training requirements, limited provider structure, and aggressive implementation timeline could increase costs, constrain hiring, and reduce the availability of qualified security personnel. Given the potential consequences for employers, workers, and public safety, the Chamber believes a more robust stakeholder process is necessary before moving forward.

Overly Broad Impact

Docket #1541 will have a dramatic impact on many different types of employers. As written in Sections 17-22.2(E) and (F), the ordinance applies to any employer that directly employs or contracts for the services of two or more unarmed security guards within the City of Boston. "Unarmed security guard" is also loosely defined as anyone employed who "protect(s) persons or property, to protect the theft or unlawful taking of goods..." blurring the lines between traditional security staff and other employees. Combined, the ordinance would impact a variety of industries in unpredictable ways, including but not limited to commercial office buildings, hospitals, universities, life sciences facilities, hotels, residential properties, entertainment venues, retailers, nonprofit institutions, bars, and countless other organizations that rely on security personnel to keep their facilities, staff, wares, and patrons safe.

Additionally, the definitions found in this ordinance would create a duplicative compliance structure for employers. The definition of "Security Employer" includes "Any individual, corporation, association, partnership, or business trust, watch, guard or patrol agency as defined in M.G.L. Chapter 147, Section 22, or other business entity, or any group of persons, or a successor thereof, that employs two (2) or more Unarmed Security Guards to perform Security Services at one (1) or more Covered Property", while the definition of "Employ" or "Hire" includes full-time, part-time, or contracted staff. When combined with Section 17-22.3, property owners, businesses, and institutions will be required to obtain permits and assume reporting responsibilities even when they contract with permitted third-party security providers who would be already responsible for the same requirements.

Aggressive Implementation Timeline

This ordinance would take effect just one month after enactment, with a window of 180 days for all current unarmed security guards to complete 40 hours of coursework. In short, this implementation timeline is impractical and likely impossible to achieve. It is highly unlikely that the Office of Labor Compliance and Worker Protections will be able to craft new regulations and certify training providers in a transparent manner that also allows all

unarmed security guards working in the Boston area time to receive the mandated training. Despite this, employers would face penalties shortly thereafter, including high daily fines and potential debarment from city contracts.

These requirements will increase hiring costs, delay onboarding, and create barriers to recruitment. At a time when many employers continue to face labor shortages, policies that make it more difficult to bring qualified workers into the workforce merit careful scrutiny. The City should look for ways to expand the pool of trained and qualified security personnel, not create new obstacles that could reduce workforce participation. Employers should not be placed in a position where they face daily penalties because training programs are unavailable, oversubscribed, or unable to accommodate demand. Before imposing new mandates and enforcement mechanisms, the City must ensure that the infrastructure necessary for compliance actually exists.

Highly Restrictive Training Certification

The ordinance establishes a training framework that severely restricts who may provide training while simultaneously mandating that all covered workers receive it. The proposed certification requirements found in 17-22.5 limit eligibility to a narrow category of 501(c)(3), 501(c)(4), or 501(c)(5) organizations, prohibit employers from conducting their own training, require all instruction to be provided in person, and establish barriers that would prevent many otherwise qualified providers from entering the market by requiring five years of operation. Collectively, these restrictions would dramatically limit the number of entities eligible to provide training and reduce overall training capacity throughout the city.

A successful workforce development model depends on adequate capacity, accessibility, and flexibility. This proposal instead concentrates training opportunities among a very limited number of providers and creates the conditions for a closed marketplace with little competitive pressure to expand availability. Employers would have no practical ability to seek alternative providers if costs rise or training availability becomes constrained.

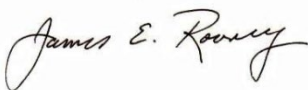
At the same time, employers would be required to pay the full cost of training while also compensating employees for their time spent attending training. These new mandates would create immediate cost increases for employers throughout Boston while offering few assurances that sufficient training capacity would exist to meet demand.

More Discussions and Collaboration are Needed

A more robust stakeholder process is needed before moving forward with a proposal of this magnitude. The ordinance assumes significant deficiencies exist within the current training system, yet the City has not established the extent of those deficiencies or demonstrated how the proposed framework would improve public safety outcomes. Before creating an expansive new permitting, training, and enforcement regime, the City should engage employers, security providers, workforce development organizations, and other stakeholders to identify specific challenges and develop targeted, evidence-based solutions.

For these reasons, we respectfully urge the Council not to advance the ordinance in its current form.

Sincerely,



James E. Rooney
President & CEO