



May 23, 2025

Mr. Mitchell Page
Department of Licensing & Regulatory Affairs
Corporations, Securities, and Commercial Licensing Bureau
PO Box 30018
Lansing, MI 48909

Re: Public Comment on Administrative Rules for Private Security Guard and Security Alarm Agencies - Rule Set 2023-80 LR

Dear Department Officials,

On behalf of the Michigan Association of Security and Investigative Professionals (MASIP) Board of Directors, I respectfully submit the following comments regarding the draft Rule Set 2023-80 LR, pertaining to the regulation of private security guard and alarm agencies.

MASIP is a nonprofit organization founded in 2002 to support and promote the private security and investigative industries throughout Michigan. Our mission is to enhance industry professionalism through ethical standards, continuing education, and responsible business practices. We serve as a unified voice for the professionals in our field and deeply appreciate the Department's ongoing efforts to improve industry professionalism, regulatory clarity and operational standards across the industry.

We thank the Department for the opportunity to submit comments and respectfully offer the following by rule section:

R 28.4001 – Definitions

No comments at this time.

R 28.4002 – Uniforms

MASIP requests clarification regarding whether a badge would satisfy the uniform identification requirement in lieu of name patches. Specifically, can an employee's badge displaying their name meet the requirement to display the employee's name on the uniform, or must the name be "sewn or printed" directly onto the garment?

Additionally, MASIP seeks clarification regarding non-public-facing personnel, such as administrative staff or office workers. Are these employees also subject to the uniform requirement, or is the rule limited to those employees actively engaging in public-facing or field duties?

R 28.4003 – Badges

While MASIP has no objection to the intent of this rule, we note that banning star-shaped badges may induce substantial redesign costs for security agencies whose logos incorporate such elements. We respectfully request that the Department consider a grace period or grandfathering clause to allow agencies to adjust branding in a fiscally responsible manner.

R 28.4004 – Prohibited Terms

No comments at this time.

R 28.4005 – Daily Supervision of Business

MASIP supports increased professionalism and accountability across our industry and supports the spirit of this rule. However, we request clarification on how the rule applies to silent or non-participatory investors and business owners. Our understanding is that the rule is intended to ensure that the qualifying officer is actively involved in daily operations and not that all owners must be physically present. We ask the Department to confirm this interpretation.

R 28.4006 – Employer and Employee Responsibilities

MASIP respectfully seeks clarification regarding what qualifies as a “multijurisdictional criminal background check.” Specifically, does use of the Michigan State Police ICHAT system satisfy this requirement, or must employers obtain fingerprint-based background checks each year?

Our initial concerns lie in the potentially significant cost burden if annual fingerprinting is required, as this could impact all agencies in our industry. We encourage the Department to provide guidance that balances security needs with cost-effective compliance measures.

In addition, MASIP would appreciate clarification of the term “multi-jurisdictional” in this context—does it imply background checks at the federal, state, and local levels, or only across multiple counties or municipalities?

MASIP appreciates the Department's efforts to improve regulatory standards and welcomes the opportunity to provide input. We remain committed to supporting a well-regulated and highly professional security industry in Michigan and look forward to continued collaboration.

Sincerely,



Jared Rodriguez

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