



# WASHINGTON STATE CRIMINAL JUSTICE TRAINING COMMISSION

Monica Alexander, Executive Director

19010 1st Avenue South • Burien, WA 98148 • Phone: 206-835-7300 • [www.cjtc.wa.gov](http://www.cjtc.wa.gov)

November 21, 2023

## ELECTRONICALLY DELIVERED

Re: Unarmed License – Requirement to participate in the firearms certificate qualifications/courses

Dear Esteemed Stakeholders:

In May 2023, the WSCJTC communicated the requirements of an unarmed license for private security guards (PS) and private investigators (PI) to participate in armed training; this same message was posted on the program webpage. Since that time, we discovered the Washington Department of Licensing does not issue temporary licenses, but rather a temporary registration.

- Under [RCW 18.170.090](#), the WA DOL issues the “temporary registration” while they complete the application review process and verify the background check requirements.
- In summary, this registration card is valid for a maximum period of sixty days and does not authorize a person to carry firearms during the performance of his or her duties as a private security guard.



Effective immediately, temporary registration cards will not be accepted to participate in armed qualifications. Should you have any questions regarding the requirement of an unarmed license for PS & PI, please contact Tisha Tyler at [tisha.tyler@cjtc.wa.gov](mailto:tisha.tyler@cjtc.wa.gov) or (206) 779-5381.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jerrell Wills".

Jerrell Wills  
Deputy Director

Enclosures (1)

Cc: Bart Hayes, Advanced Training Division Manager  
Tisha Tyler, PSPI Program Manager

# PROGRAM COMMUNICATION

## WASHINGTON STATE CRIMINAL JUSTICE TRAINING COMMISSION



**TO:** Private Security Certified Firearms Instructors  
**FROM:** Tisha Tyler, Program Manager *THT*  
**SUBJECT:** Eligibility to participate in the firearms certificate qualifications/courses.  
**DATE:** 5/25/2023

This memo is to provide clarity and direction regarding eligibility to participate in the firearms certificate qualifications/courses; as well as updated information regarding Form 727 - PS Firearms Certificate Training Roster.

The information provided below outlines the requirement of all instructors to verify eligibility to participate in the firearm(s) certificate process for the private security, private investigator, and bail bond recovery agents seeking their licensing through the Washington State Department of Licensing (WA DOL).

### *Special Note:*

- RCW 18-165, 170, & 185 are specific to the WA Department of Licensing.
- WACs 139-30, 33, 35 are specific to the WA State Criminal Justice Training Commission.

### **Private Security (PS)**

If an applicant is not employed by a private security company, they are not eligible to participate in the firearms certificate process/qualification.

- [Chapter 139-30 WAC](#) outlines Private Security
- [RCW 18-170-050](#) paragraph (2) requires all firearms carried by armed private security guards in the performance of their duties must be owned or leased by the employer and, if required by law, must be registered with the proper government agency.
- [WAC 139-30-010](#) – requires any **licensed private security guard** desiring to be licensed as an armed private security guard by the department [WA DOL] shall, as a precondition of being licensed as an armed private security guard, obtain a firearms certification from the commission [WSCJTC].
- [WAC 139-30-015](#) – outlines the firearms certificate application process. I would like to call your attention to paragraph (1) (c) (ii) which requires the applicant to possess a valid and current private security guard license.

Given the above information, PS Certified Handgun Instructors are required to verify any student attending your:

- 1) **Renewal Course**
  - a. has an active and valid armed guard license, in hand, from the company sponsoring their participation.
- 2) **Initial Course**

- a. has an active and valid unarmed guard license, in hand, from the company sponsoring their participation.

### **Private Investigator (PI)**

If an applicant is not employed by a private investigation company or does not have a valid PI license issued by WA DOL, they are not eligible to participate in the firearms certificate process/qualification.

- [Chapter 139-35 WAC](#) outlines Private Investigators
- [RCW 18.165.040](#) paragraph (1)(a) explains any PI seeking an armed license must to be licensed private investigator as a minimum requirement.
- [WAC 139-35-010](#) – requires any **licensed private investigator** desiring to be licensed as an armed private security guard by the department [WA DOL] shall, as a precondition of being licensed as an armed private security guard, obtain a firearms certification from the commission [WSCJTC].
- [WAC 139-35-015](#) – outlines the firearms certificate application process. I would like to call your attention to paragraph (1) (c) (ii) which requires the applicant to possess a valid and current private investigator license.

Given the above information, PS Certified Handgun Instructors are required to verify any student attending your:

#### **1) Renewal Course**

- a. has an active and valid armed PI license, in hand, from the company sponsoring their participation.

#### **2) Initial Course**

- a. has an active and valid PI license, in hand, from the company sponsoring their participation.

### **Bail Bond Recovery Agent (BBRA)**

BBRA's are eligible to participate in the firearms certificate qualification if they have their concealed carry in hand.

- [Chapter 139-33 WAC](#) outlines Bail Bond Recovery Agents
- [RCW 18.185.250](#) outlines the minimum requirements to obtain a bail bond recovery agent license. I'd like to call your attention to paragraph (9)(a) – have a current license or equivalent permit to carry a concealed pistol.
- [WAC 139-33-010](#) – requires any **licensed bail bond recovery agent** desiring to use a firearm while working as a bail bond recovery agent shall, as a precondition of being licensed, obtain a firearms certification from the commission [WSCJTC].
- [WAC 139-33-015](#) – outlines the firearms certificate application process. In 2014, when this language was adopted, it was overlooked that a BBRA must have a firearms certificate to obtain their BBRA license under RCW 18.185.250; therefore, this language will need to be reviewed.

Eligibility to participate in the firearms certificate qualifications/courses.

Page 3 of 3

05/25/2023

- A WAC change can take up to a year or longer; therefore, I am authorizing a BBRA to participate in the firearms certificate qualification if they have their concealed pistol license in hand.

Given the above information, PS Certified Handgun Instructors are required to verify any student attending your:

**1) Renewal Course**

- a. has an active and valid BBRA license in hand.

**2) Initial Course**

- a. has an active and valid concealed pistol license in hand.

**Form 727 - PS Firearms Certificate Training Roster (05-2023)**

This required form has been updated to reflect these requirements. Effective July 1, 2023, any outdated forms will be returned to the instructor for resubmission.

Form 727 must be submitted within 72 hours of completion of the course; illegible forms will not be processed and will be returned for resubmission.

Should you have any questions, please contact me directly at [tisha.tyler@cjtc.wa.gov](mailto:tisha.tyler@cjtc.wa.gov) or (206) 779-5381.