

ADMINISTRATIVE REGULATION

No. 706(c)

Board of Trustees Douglas County School District

PROPERTY

KEY INVENTORY

Purpose: To provide optimal physical security and safety for building occupants and to protect the assets of the District. This regulation applies to all buildings maintained by the District.

Definitions:

- A. Buildings and Site Maintenance Department ("Maintenance"): Under the direction of the Director of Maintenance, this shall be the only District Department authorized to make and distribute keys, change locks, re-print/re-key entry points and modify access services.
- B. Key Safe: Each school was provided multiple locking Key Safes in which all Master Keys or unassigned keys are to be stored. The main lock box in the office which shall hold at least two copies of each keyset in relation to their site: one to be used if needed as a spare and one to be kept unused for proper duplication purposes. When a key is used often the notches wear down, making it difficult to copy a key that will work appropriately. Two other key boxes were provided to all sites specifically designated for Substitute Keys and Custodial uses.
- C. Key Holder: A person to whom an authorized key(s) has been issued.
- D. Key Function Summary: A hierarchical list of keys by site that the Director of Maintenance oversees and maintains. While each site will be uniquely keyed, all sites will have similar summaries. At a minimum, the list will include Master Key (Level 1), Classroom/Office Key (Level 2), Common Area Key (Level 3), Exterior Door/Restricted Access Key (Level 4), and Substitute Key (Level 5).
 - i. Master Keys (Level 1): Provides access to every door within a specific building. These keys should be guarded carefully and distributed sparingly as this is the highest level of security at the site. It is highly recommended that only the principal, department secretary and head custodian use this function. It is also highly recommended that Master Keys be left at the site in the Key Safe rather than taken off site.
 - ii. Classroom/Office Key (Level 2): Each individual office and/or classroom shall be keyed unto itself, with all doors within that room being keyed alike, unless otherwise specified.
 - iii. Common Area Key (Level 3): One key that works multiple locations. All interior of exterior door interior cylinders and all interior of interior door interior cylinders shall be keyed to also allow a Common Area Key

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to engage the lock in an emergency situation. One, or more, entrance at each site is designated as "Staff Entrance" and is opened by this key function.

- iv. Exterior Door/Restricted Access Key (Level 4): All exterior doors, along with areas with special circumstances as designated by the Director of Maintenance, within a site, with exception of Staff Entrance, are keyed alike, and operated by not only the Master Key but by this separate key working only the exterior doors. It is highly encouraged this key be distributed sparingly, if at all. All classrooms with Exterior Doors will be keyed to this same Exterior Door key in keeping with the Single Point of Entry initiative.
 - v. Substitute Key (Level 5): A spare key for each room shall be differentiated by a special alphanumeric or color from all other keys to easily identify Substitute Keys which shall be kept in the Substitute Key Safe provided for this purpose. It is intended that Level 5 keys be temporarily issued to substitutes, not Level 2 keys.
1. Key Holder Responsibilities: Every District employee is responsible for maintaining building security. Each Key Holder is responsible for the safekeeping of each District key issued to them.
 - A. The duplication or possession of any unauthorized District key by Key Holders is strictly forbidden.
 - B. Key Holders shall NOT loan or transfer their keys to any other individual.
 - C. Key Holders shall not unlock a building or room or provide access for another individual unless the individual has checked in with the site's front office, and has been verified to have a legitimate need to enter.
 - D. Key Holders are not allowed to let anyone into a building after school/business hours under any circumstances except for public safety personnel if required for an emergency.
 - E. Keys will immediately be returned to the Key Holder's Supervisor when Key Holder resigns, transfers to another site within the District, or is terminated.
 - F. Doors to unoccupied rooms are to be locked when not in use.**
 - G. Outside doors are to remain locked with the exception of the single point of entry in single point of entry sites or after normal school hours in other sites or District Offices and Operational Facilities.**
 - H. Unauthorized person or suspicious activities are to be reported to the Principal, School Resource Officer, or Douglas County Sherriff's Office.

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- I. Any found District Keys should be turned into the site's front office or the District Office.
- J. If any staff member must open a gate or other enclosure secured by a padlock, that employee must lock the padlock again immediately upon completion of their task. Padlocks must be secured in a such a way while gate is open so as to not be lost or stolen prior to re-securing the enclosure.

**Note: Because buildings have diverse security levels and vary in daily usage, the locking procedures for unoccupied rooms, areas and buildings fluctuate.

2. Key Identification: Tags, markings and other forms of identification that refer to the District, Site, or a Specific Building or in any way indicate the purpose of the key are not to be attached to the key. The only identifying marks will be an alphanumeric code stamped on the key. Do not attach keys to name badges and/or lanyards with school or department identification.
3. Key Issuing Guidelines: Keys shall only be issued by administrators/department supervisors or their designee. For security and site/department control purposes, Business Services recommends the following guidelines be adhered to for the issuing of keys:
 - Administrators, Department Supervisors, Custodians, and Departmental Secretaries – Master Key, Office and Common Area Key; Master Keys should never leave the site and should be properly locked in the main Key Safe or custodial Key Safe.
 - Teaching Staff – Classroom Key, and Common Area Key
 - Classified Staff – Office Key (if applicable), and/or Common Area Key
 - Substitute teachers, temporary employees and contractors – a Substitute Key may be issued to and signed for by the substitute for a limited, designated timeframe, but must be returned to the office at end of assignment. Use the Key Distribution Form to document key allocation and recall when assignment is completed.
 - Maintenance Personnel – no keys will be issued; if a site key is required, Maintenance Personnel should sign for the necessary key and returning directly to office personnel when work has been completed.
 - Volunteers or non-District personnel – no keys shall be issued without express written permission by the Chief Financial Officer

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4. Key Control and Inventory: Each site/department will be responsible for keys issued within their site/department. It is required that each site/department maintain internal written inventory of keys and Key Holders, and that physical, semi-annual audits occur at the end of each semester. Records of these audits must be kept on-site with copies of the mid-year audit distributed to Maintenance and Business Services by January 15, and end of year audit by June 20 each year. An inventory of all keys issued District-wide is maintained by the Maintenance. Contact Maintenance for help with inventorying of keys.
5. Key Transfers: For security, safety, accessibility, and accurate recordkeeping, the transfer of Keys between site/department personnel and/or other District staff is STRICTLY PROHIBITED. Keys no longer needed must be returned to the administrator/department supervisor. A new request must be submitted for Key Holders transferred to another site.
6. Returning Keys: When terminating employment, all keys MUST BE RETURNED IMMEDIATELY via the process initiated by Human Resources. All keys are to be given to the appropriate administrator/department supervisor. It is the responsibility of the administrator/ department supervisor to retrieve all keys from all departing employees. Individuals failing to return assigned keys prior to their departure may have a financial hold placed on their final paychecks.

Employees transferring from one site to another within the District are also required to return their current keys and request new ones.

7. Lost or Stolen Keys: Lost or stolen keys MUST BE REPORTED IMMEDIATELY to the appropriate issuing administrator/department supervisor so officials can assess the impact of such events against site/building security. It is the supervisor's responsibility to immediately inform Maintenance: a work order should be placed followed by a phone call.

In the case of stolen keys, it is suggested that the administrator/ department supervisor contact the District's Sheriff Resource Officer. Any lost or stolen key can present major security issues. The administrator/department supervisor should work with the District to perform a threat assessment to determine which accesses, if any, should be re-keyed.

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A Lost/Stolen Key Report must also be completed and sent to Human Resources so the event can be noted on the Key Holder's record. This especially becomes important when the Key Holder terminated employment with the District.

8. Installation, Repair, Re-Keying and Re-Pinning of Locks:
 - A. Only Maintenance – or their approved, licensed contractor – will perform all installations, alterations and/or repairs to door locks and mechanisms.
 - B. When new construction, remodeling or building renovation work is performed by the District, lock and hardware standards of the District must always be followed. All non-District locks encountered during a remodel or renovation will be removed.
9. Unauthorized duplication/replacing Keys: Duplicating or replacing keys through an agency, company, or private business other than the District Approved vender by Maintenance is **strictly prohibited** and is a breach of this regulation. It is also a breach of copyright law. When such violations are discovered, the appropriate administrator/department supervisor and the Human Resources Director will be notified for appropriate action.
10. Key Fees: Administration, Department Supervisors and Staff will not be required to pay for their initially authorized keys.
 - A. Lost/Stolen: All re-keying costs associated with stolen keysets will be borne by Maintenance. All re-keying costs associated with lost keysets will be borne by the individual.
 - B. Broken/Defective/Worn: A new Key Request Form must be completed to replace a broken, defective or worn key. Broken keys will be replaced at no charge and will be an exact reproduction of the original. Defective items should be brought to the administrator/department supervisor who shall return to Maintenance for disposal. Worn or faulty hardware, including normal wear and tear, will be repaired or replaced at the discretion of Maintenance, and paid for by Maintenance.
 - C. Additional Set(s): If an administrator or department supervisor determines that additional keys of a particular keyset are needed, they are to complete a Key Request Form and submit the form to Maintenance. The Director of

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Maintenance will review, and if approved, Maintenance will order the keys. The cost will be borne by the requesting site.

Payment must be made via Business Services with a chargeable account number at the time of the request for replacement of lost keys or additional keysets. It is at the sole discretion of the Chief Financial Officer and Director of Human Resources to determine if replacement charges will be passed on to the individual responsible for the keys at the time of the loss.

Key replacement fees are estimated as follows, and fluctuate based on size of site and key hierarchy complexity:

- Master Key: \$25,000 – 85,000
- Classroom/Office Key: \$250
- Common Area: \$4,000 – 5,000
- Exterior Door/Restricted Access: \$15,000 – 50,000
- Substitute Key: \$250

Furniture and cabinet keys are not covered by this administrative regulation. Maintenance will pass through to the site/department any costs associated with furniture and cabinet keys.

[See Policy related to this Administrative Regulation](#)
[Key Distribution Contract](#)
[Lost/Stolen Key Form](#)
[Key Request Form](#)

Adopted: July 27, 2016