



COMPTON COMMUNITY COLLEGE DISTRICT  
ADMINISTRATIVE REGULATIONS

AR 3331 Key Issuance and Return

ISSUED: March 16, 2010  
REVISED:

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The CEO directs that the following regulations apply to the Compton Community College District:

- I. **Management and Control of Keys:** The safeguarding of assets of the District shall include the control of keys to the facilities and property of the District. The management and control of keys shall be the responsible function of the Manager of Facilities, Maintenance and Operations. In implementing this policy, technical support personnel are to be designated.
- II. **Requirements:** Written policies and procedures on key control and management shall be developed and maintained and are to include the following:
  - A. Key system, building design, and departmental access requirements.
  - B. Use of key authorization forms for each key issued.
  - C. Distribution and issuance of keys only whenever essential and necessary.
  - D. Development and maintenance of records related to the issuance of keys, safeguarding, replacement, and return of keys.
  - E. Use of a signature authorization form for those employees authorized to issue keys.
  - F. The immediate reporting of lost or stolen keys to the Campus Police Office and completion of a police report.
  - G. The inclusion of a key return procedure whenever an employee changes assignments, resigns, retires, or is terminated.
  - H. A prohibition against unauthorized lending or duplication of keys.
  - I. A written acknowledgement of key policy requirements by each employee receiving a key which includes forceful direction on the employee's personal responsibility for safeguarding each key as well as District assets secured by the key.
  - J. An annual review or accounting of the District's key policy, practices, and inventory.
  - K. Application of monetary compensation for replacement keys and required re-keying of locks.
  - L. Disciplinary action for employees who fail to comply with the District's key policy.



### III. Policy

- A. **Issuance:** In support of safeguarding District assets, buildings, personnel, students, visitors, and respective personal properties, the issuance of keys shall be extremely limited and whenever possible, restricted to the key that most specifically opens a single door and to only those persons having a continuous need for frequent access to specified and authorized areas.
1. Keys may only be authorized to employees (excluding student workers and certain other unclassified positions) and contractors having an essential and work related need to access District facilities and property. In doing so, building, room, and area security shall be considered more important than any individual's personal convenience.
  2. Any person issued a District key shall accept full responsibility for safeguarding that key against theft and loss due to carelessness. In addition, control of the key and security of the facility or area is the direct responsibility to the employee who is issued the key. Keys issued to an employee shall not be loaned to co-workers, students, family members, or friends.
  3. Division or Department Heads authorizing key issuance maintain a fiduciary responsibility for all keys requested.
  4. Keys shall be issued to an individual, not a department for general use. No one person will be issued more than one key for any given building entrance, room, area, or item.
  5. For security reasons, the issuance of any grand master and building master key shall be limited to employees who organizationally report directly to the CEO. Issuance of such keys requires written authorization of the CEO and the division head as shown in Table AR-3731A, Grand Master, Building Master, and Restricted Key Supplemental Required Authorization, below.
  6. Key requests shall be disapproved if:
    - The request is not initiated by the appropriate administrator in writing on the appropriate form.
    - They result in unnecessary issuance of Master keys.
    - Facility, room, and/or area security will be compromised.
    - Previously issued keys have not been returned, have been lost multiple times, or replacement costs have not been paid.



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<b>TABLE AR-3731A GRAND MASTER, BUILDING MASTER, AND RESTRICTED KEY SUPPLEMENTAL REQUIRED AUTHORIZATION<sup>1</sup></b>	
<b>AREA</b>	<b>DIVISION HEAD</b>
<ul style="list-style-type: none"> <li>• Academic Affairs departmental offices</li> <li>• All computer labs</li> <li>• CEO's Suite Board Room</li> </ul>	CEO Dean, Academic Affairs CEO
<ul style="list-style-type: none"> <li>• Business Office</li> <li>• Bursar's Office</li> <li>• Payroll</li> <li>• Financial and payroll document storage areas</li> </ul>	CEO Chief Business Officer (CBO)
<ul style="list-style-type: none"> <li>• Any Student Services Office</li> <li>• Student record and document storage areas</li> </ul>	CEO Dean, Student Services
<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Personnel record and document storage areas</li> </ul>	CEO Dean, Human Resources
<sup>1</sup> Authorization is in addition to department head authorization.	

7. For security reasons, restricted access areas of the campus are not included in any Grand Master or Building Master issued. Table AR-3731-B, Restricted Access Areas, identifies such areas. Issuance of such keys is restricted to supervisors and individuals needing access to such area as part of their regular work responsibilities.

<b>TABLE AR-3731B RESTRICTED ACCESS AREAS</b>	
<b>DEPARTMENT</b>	<b>AREA</b>
Admissions & Records	Student File Room
Bookstore	Cash Room / Vault
Business Office	Cash Room / Vault
Human Resources	Personnel File Room
Facilities, Maintenance, and Operations	Key Room / Lock Shop Area

B. *Cleaning and Maintenance of Restricted Access Areas* can only be accomplished with the holder of the restricted key in attendance.

**C. Unauthorized Making, Duplication, or Possession of a Key to a Public Building:**

1. Penal Code 469 states, in relevant part:

Any person who knowingly makes, duplicates, causes to be duplicated, or uses, or attempts to make, duplicate, cause to be duplicated, or use, or has in his possession any key to a building or other area owned, operated, or controlled by . . . any public school or community college



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district without authorization from the person in charge of such building or area or his designated representative and with knowledge of the lack of such authorization is guilty of a misdemeanor.

- 2. Unauthorized duplication, possession, or loaning of District keys is grounds for District-related discipline and/or criminal prosecution as allowed under California statute(s). At a minimum, employees are subject to disciplinary action and contractors/vendors are subject to contract termination.

D. **Security of Facility and District Property:** The control of the key and the security of the District’s facility and property controlled by that lock is the direct responsibility of the employee who is issued a key to a given area.

E. **Duplication of Keys:** Keys shall only be duplicated through the Manager of Facilities, Maintenance, and Operations office. Keys shall be engraved “Do Not Duplicate” prior to issuance. An exception to the “Do Not Duplicate” engraving requirement may be made for low security office equipment keys issued by manufacturers, e.g. time clocks, file cabinets, desks, etc.

F. **Key Inventory and Recordkeeping:** A record of all keys made (cut) and/or issued shall be maintained by the Facilities, Maintenance, and Operations office. The key inventory shall include, at a minimum, the items identified in Table AR\_331C, Required Key Inventory Data Elements.

<b>TABLE AR-331C REQUIRED KEY INVENTORY DATA ELEMENTS</b>
<ul style="list-style-type: none"> <li>• Total number of copies of each key made (cut).</li> <li>• Key identification number stamped on key.</li> <li>• Key type.<sup>1</sup></li> <li>• Facility, room, area, or item secured by the key.<sup>2</sup></li> <li>• Name of the person, and when applicable, name of firm, to whom the key is issued.<sup>3</sup></li> <li>• Date key is issued and returned.</li> </ul>
<p><sup>1</sup> May be a code.</p> <p><sup>2</sup> If equipment, the District’s inventory or the equipment serial number is to be included.</p> <p><sup>3</sup> System shall be able to easily reconcile number of issued keys with overall number keys made for each key.</p>

- 1. Department Heads may review their department’s key issuance records for security or other purposes.
- 2. A list of all individuals issued a Grand Master, Building Master, and Restricted Access Keys shall be maintained and provided to the CEO, Saturday/Evening Administrator, and Campus Police whenever an issuance change occurs.



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- 3. A record shall be maintained for all changes made when a door lock is added, removed or changed or when an area is re-keyed.
  - 4. Facilities, Maintenance, and Operations Office shall ~~review~~ conduct an audit/inventory of key records to active employee assignments. At a minimum, such review shall be conducted every two (2) years or as needed. This review shall involve the responsible area administrator.
- G. Lost or Stolen Keys.** Due to the potential threat to the safety of District facilities, property, and persons posed by lost or stolen keys, employees shall report lost or stolen keys in person to the Campus Police Office and his/her supervisor within 24 hours of knowledge of the loss.
- H. Replacement / Rekeying Charges:** Lock change requests resulting from lost keys, over-issued keys, or internal departmental security concerns may be charged back to the department requesting the change and/or employee responsible for requiring the change.

<b>TABLE AR-3331D REPLACEMENT / REKEYING CHARGES <sup>1</sup></b>	
<b>KEY TYPE <sup>2</sup></b>	<b>CHARGE PER KEY</b>
Not Limited	\$5.00 <sup>2</sup>
Limited	\$50.00 <sup>2</sup>
<sup>1</sup> District-initiated changes to improve security operations are not charged to departments or employees. <sup>2</sup> See AP-3731 Key Issuance and Return for details. <sup>3</sup> Rekeying charges may also be applicable.	

**I. Return of Keys**

- 1. Employees and contractors are responsible for returning any and/or all key(s) issued to them whenever an assignment change occurs affecting key issuance, when employment terminates, or upon management request.
  - 2. Employees who fail to return keys when no longer authorized to possess such key(s) due to assignment change or management request are subject to disciplinary action.
  - 3. Employees who fail to return keys upon termination of employment will have their final pay warrant, or in the case of a contractor, payment, withheld until the employee clears key obligations as specified in the college check-out procedure.
- J. Safes / Vaults:** Combinations to safes / vaults shall be provided to only those permanent employees whose official job duties require access to the safe / vault. A list of all individuals with access to the combination shall be maintained in the same manner as occurs with Grand Master and Restricted Keys. Combinations shall be changed whenever an employee with knowledge of the combination terminates his/her assignment.