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**Subject: Access Control: Key Control Policy**

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## **1. Purpose**

This is a statement of policy regarding access control of buildings and property owned or occupied by Virginia Tech. This policy will serve as the framework by which keys to university buildings will be issued, monitored, and maintained. The Key Control Office within the Physical Plant Department and the Virginia Tech Police Department shall implement and oversee the procedures set forth herein.

The Key Control Office and Virginia Tech Police Department shall work closely with the campus community to ensure that all university access needs are met. The dual responsibility of the two organizations will ensure checks and balances to a critical, high-risk university program. Key issuance and control for Residential and Dining Programs is governed by University Policies for Student Life (UPSL).

The issuing of keys, maintenance of physical security devices, and other arrangements concerning security for leased properties other than those at the Virginia Tech Corporate Research Center are covered by the specific lease agreement for the property in question.

### **1.1 Objectives**

1. To achieve maximum physical security with minimum logistics.
2. To establish control of the campus keying system including key duplication and distribution.
3. To establish a recorded chain of accountability for all keys issued.
4. To restore physical security in a timely manner whenever key control has been compromised.

## **2. Policy**

This policy applies to any individual who is granted authorized access to any Virginia Tech property and to all keys and devices that control access to Virginia Tech property.

## 2.1 University Guidelines

1. No person shall knowingly possess an unauthorized key to property owned by the Commonwealth of Virginia through Virginia Tech. The Key Control Office and Virginia Tech Police are the only authorized vendors for university keys.
2. All keys remain the property of Virginia Tech. Keys that are no longer needed shall be promptly returned to the departmental Key Control Designate or the Key Control Office.
3. All members of the university community are responsible for keys assigned to them.
4. Lost or stolen keys must be reported immediately through the appropriate Department Head to the Virginia Tech Police Department.
5. The installation, changing, or removal of locks shall be performed only by an authorized Key Control office designate.
6. Installation of electronic keypads, proximity readers, biometric locks, or card readers require the approval of the Virginia Tech Police Department and the Key Control Office prior to purchase.

The following clause is to be incorporated into all solicitations for the above-mentioned goods or services:

SECURITY LICENSE: In accordance with Section 9.1-138 et seq. of the Code of Virginia (1950), the Bidder/Offeror shall be licensed by the Department of Criminal Justice Services for solicitations that include the following work: installation, service, maintenance, or design of security equipment; security officer service; central station alarm condition monitoring service; and/or private investigator service. Licenses must be obtained prior to submitting a bid/offer. The Bidder/Offeror shall place their license number in the space provided below:

Private Security Services Business License Number: \_\_\_\_\_

Unauthorized locks are prohibited on doors and if found will be removed and discarded. Any damage or repair necessitated by the removal of unauthorized locks will be the responsibility of the department found in violation of this policy. Purchases must be approved by the Virginia Tech Police Department and a Key Control office representative.

7. Keys should at no time be left unattended (i.e., hanging in a door lock, lying on a desk, etc.).
8. Only the manager of the key control office and the on-duty police shift commander shall have access to the university master key or the storage box containing master keys at any time.

## 2.2 Departmental Responsibility

1. Deans, Directors, or Department Heads or their specific designates shall be the only personnel authorized to request keys or lock changes within their respective departments. Departmental designates shall have their authority delegated in writing by their respective Department Head.
2. Each department shall establish and implement a key control record-keeping system that will ensure accountability for all departmental keys. All records will be considered high security and confidential and shall be kept current at all times. The Key Control Office and Virginia Tech Police Department will assist each department in developing a workable key control system using the latest information available.

Whenever a key audit is requested, each department shall be required to allow examination of all key control records and departmental file keys.

3. Each department is responsible for developing and enforcing a key return policy. All students, faculty, and staff members must promptly surrender all university keys assigned to them upon termination or transfer to another department.
4. Keys are not to be transferred from their assigned carrier to another without proper departmental authorization.
5. Each department is responsible for the total cost of lock changes and new keys to secure areas compromised by lost or stolen keys.

## 2.3 Policy Enforcement

The university regards any violation of this Policy as a serious threat to security, including security compromises caused by failure to retrieve keys from departing users. Individuals who violate this policy are subject to the terms described in the following sections of the CODE OF VIRGINIA and applicable sections of the STANDARDS OF CONDUCT AND PERFORMANCE for state employees.

\*18.2-503. Possession or duplication of certain keys:

1. No person shall knowingly possess any key to the lock of any building or other property owned by the Commonwealth of Virginia, or a department, division or agency thereof, without receiving permission from a person duly authorized to give such permission to possess such key.
2. No person, without receiving permission from a person duly authorized to give such permission shall knowingly duplicate, copy, or make a facsimile of any key to a lock of a building or other property owned by the Commonwealth of Virginia, or a department, division, or agency thereof.

Violation of this section shall constitute a class 3 Misdemeanor (Code 1950, \*18.1-408; 1972, C. 1939; 1975, CC 14, 15)

## 3. Procedures

Interdepartmental Service Requests (ISR) or Facilities Service Requests (FSR) for lock changes and/or keys should be completed and forwarded to the Key Control Office. For assistance in proper completion, please contact the Key Control Office or the Virginia Tech Police Department. The department requesting keys will then be notified when the keys have been duplicated. Departmental Key Control Designates will sign for and pick up completed key orders at the Virginia Tech Police Department.

1. Keys to areas with special security or potentially hazardous areas such as electrical switch vaults, biological labs with the BSL-3 designation, and labs designated by Environmental Health and Safety (EHSS) as having other specific hazards, will not normally be issued by the Key Control Office without prior notification to the responsible party occupying the space and/or EHSS. If an urgent concern that needs to be immediately addressed exists and the responsible party cannot be contacted, the Access Control Manager will utilize resources such as the Virginia Tech Police Department, EHSS, and the Director of Physical Plant in order to evaluate the potential benefits and hazards of providing access. Certain areas (i.e. BSL3, ABSL3, and select agent areas) will require an FBI and EHSS security clearance prior to providing access unless other arrangements have been made to secure access to these materials prior to entry.

Parties desiring to limit access to their spaces must contact the Access Control Manager for assistance. The Access Control Manager will evaluate the request and may seek the assistance of the Virginia Tech Police

Department, EHSS, and the Director of Physical Plant in arriving at a decision. During the evaluation process, the potential risks associated with delayed or restricted access in an emergency situation will be considered. Parties requesting limited access to spaces must have a plan in place to ensure that a responsible person is available on a 24 hour basis in case a situation requiring urgent access should arise. Costs associated with approved limited access requests will be the responsibility of the requesting department.

2. The issuing of keys, maintenance of access control devices, and other matters pertaining to physical security for rental properties are covered by the appropriate lease agreement for the property in question. The University's proprietary key system will not normally be used in these locations due to the need to maintain the security of the system. Questions concerning physical security for rental properties should be directed to Real Estate Management for discussion with the appropriate landlord.

#### **4. Definitions**

#### **5. References**

#### **6. Approval and Revisions**

Approved June 16, 1993, by Vice President for Finance and Treasurer, Raymond Smoot.

Approved June 16, 1993, by Associate Vice President for Personnel and Administrative Services, Ann Spencer.

- Revision 1

Section 1. Added statement about key issuance for Residential and Dining Programs.

Section 2. Expanded statement to include all keys and devices.

Section 2.1. Added guideline #6. Added statement about purchase approval to #7.

Section 3. Changed completed key order pickup location from Key Control Office to the Virginia Tech Police Department.

Approved June 4, 1999, by Vice President for Finance and Treasurer, Raymond D. Smoot, Jr.

- Revision 2

Section 2.1, #6: - Referenced Code of Virginia corrected to section 9.1-138 et seq.

Approved May 8, 2002 by the Vice President for Administration and Treasurer, Raymond D. Smoot, Jr.

- Revision 3

Section 1: Changed "or operated" to "or occupied" to clarify leased property agreements. Added statement addressing key issuance & maintenance of physical security devices for leased property.

Section 2.2.6: Added statement concerning not sharing keys or codes to potentially hazardous areas.

Section 3: Added Facilities Service Request as additional approved document used for formal requests.

Section 3.1: Added statement defining procedure for restricted access

Section 3.2: Added statement defining procedure for leased properties

Minor technical corrections.

Approved April 23, 2007 by the Executive Vice President and Chief Operating Officer, James A. Hyatt.