1. Purpose

1.1.1. The purpose of these procedures is to help protect the life, property, and security of Maury County Public Schools (herein referred to MCPS) and all its occupants.

1.1.2. It shall serve as the framework by which all keys and access credentials will be managed, issued, duplicated, stored, controlled, returned, replaced, and accounted for by the Key Control Authority (KCA).

1.1.3. For this document, the term “key(s)” and “badge(s)” may be synonymous.

2. Enforcement

2.1.1. All key & badges remain the property of MCPS.

2.1.2. Keys & badges that are no longer required for authorized purposes shall be returned to the Key Control Authority for the facility.

2.1.3. No person or department shall knowingly receive, borrow, or possess any key for any space without receiving permission from a person duly authorized to give permission to possess such key.

2.1.4. No person shall knowingly alter, duplicate, copy, or make a facsimile of any key to a lock of a facility building or property without receiving permission from the KCA.

2.1.5. To enforce effective key control, administrators may choose to impose a deposit for each key issued.

2.1.6. Key holders shall use assigned keys for access to authorized locks only.

2.1.7. Key holders shall take measures to protect and safeguard any facility keys issued to them or in their name.

2.1.8. Key holders shall not loan their facility key(s).

2.1.9. Key holders shall not use their key(s) to grant access to non-authorized individuals.

2.1.10. Key holders shall not attempt in any manner to duplicate or alter facility keys in their possession.
2.1.11. Key holders shall immediately report any lost, missing, stolen or damaged keys.
2.1.12. Persons entering locked buildings or spaces are responsible for re-securing all doors and shall not prop open any doors.
2.1.13. Individuals shall not store keys in desk drawers or other unsecured areas.
2.1.14. Violations of any of these enforcement policies may result in disciplinary action up to and including dismissal.

3. Key Control Procedures

3.1. Key Control Authority—“KCA”

3.1.1. Each MCPS Facility shall appoint a Key Control Authority with power and authority to:

3.1.1.1. Appoint or become a Key Control Manager to:
3.1.1.2. Implement, execute and enforce the key control policies and procedures.
3.1.1.3. Issue and return pre-assigned keys to that facility with proper documentation, authorization, and transaction receipts.

3.2. Key distribution:
3.2.1. Building Master Keys will only be handed out to the principal, assistant principal(s), book keeper, building operator and SRO
3.2.2. “Sub Master” keys for the kitchen area will be given to the kitchen manager and assistant manager.
3.2.3. (2) sets of sub-master keys, which are comprised of a classroom, administration, kitchen, gym and library will be made for our contracted custodial service. These will be maintained in the lockbox provided and kept in a secured place.
3.2.4. At the end of the school year, all keys shall be collected, tagged with a room # and stored in the school’s vault.

3.3. Storage
3.3.1. Keys, credentials, and key records shall be stored in a secure condition (data) or location (physical items) protected by lock and key or vault.
3.3.2. Keys shall be stored in a locked cabinet or container, in a secured area.
3.3.3. Key rings issued for temporary use shall be of a tamper resistant design so that keys cannot be removed from the ring prior to return.
3.3.4. Keys stored in a non-centralized location:
3.3.4.1. Sequence locks release one key upon the insertion and trapping of another.
3.3.4.2. Allows remote issuance of master keys.
3.3.4.3. Permits fewer master keys to be issued on a permanent basis.
3.3.4.4. Emergency key storage boxes (Knox, Supra type).
3.3.4.5. Subject to local regulations and to protect against theft or duplication, no master keys should be stored in these types of containers.

3.3.4.6. Computerized key cabinets with access control and audit capability may be used in remote locations for temporary key issuance.

3.3.5. Key records shall be stored in a secure location protected against fire and theft:
   3.3.5.1. Bitting lists.
   3.3.5.2. Authorization forms.
   3.3.5.3. Key issuance and return records.
   3.3.5.4. Data files shall be password protected and encrypted.

4. Key Management Formats: The key management system shall be maintained in either a manual or computerized format.

4.1. The manual format shall use card and index files to easily access, maintain, and cross-reference information on:
   4.1.1. Keys:
   4.1.2. Blind code numbers.
   4.1.3. Standard Key Coding Symbols (“SKCS”).
   4.1.4. Key identity: serial, inventory, or sequence number.
   4.1.5. Individuals with authority to issue for each key.

4.2. Temporary issue keys and key rings.
   4.2.1. Key holders:
      4.2.1.1. Name, address, ID #, telephone, key deposit.
      4.2.1.2. Authorized individual's signature.
      4.2.1.3. Optionally: signature, photo, PIN.
      4.2.1.4. Key deposit (if any).
   4.2.2. Locations:
      4.2.2.1. Room number.
      4.2.2.2. Door number.
      4.2.2.3. Description or usage.
      4.2.2.4. Departmental control.
      4.2.2.5. Security level or access restrictions.
   4.2.3. Hardware:
      4.2.3.1. Lockset, exit devices, deadbolt.
      4.2.3.2. Cylinder type.
      4.2.3.3. Door closer.
      4.2.3.4. Hinges.
      4.2.3.5. Finish.
      4.2.3.6. Protection plates.
4.3. All key records shall be kept current at all times and are to be considered high security and confidential.
4.4. Records shall be securely stored (see “Storage”).
4.5. All transactions shall be recorded in a timely manner.
4.6. Standardized forms shall be used (see “Forms”).

5. Procedures

5.1. Identifying Keys and Keying
   5.1.1. All keys should only be marked with a blind code number that does not in any way reflect its usage or level.
   5.1.2. The use of standard key coding to mark cylinders or keys is not recommended.
   5.1.3. Keys should not be marked M, MK, GMK, or GGMK to indicate level of keying.
   5.1.4. All issued keys should contain an inventory or serial number that reflects the total of keys issued and provides a unique identifier for every copy.
   5.1.5. Keys should not be stamped with room #’s or bittings.

5.2. Issuing Keys
   5.2.1. All keys must be approved by the school’s principal and then forwarded to MCPS safety coordinator. The safety coordinator will then forward request to MCPS locksmith to make the keys
   5.2.2. Each key can have its own appropriate level of authorization.
   5.2.3. Higher level keys may require higher levels of authorization.
   5.2.4. Issue the proper level key to each individual granting only the appropriate level of access.
   5.2.5. Issue keys by need, not desire.
   5.2.6. Require signature(s) on key holder agreement:
   5.2.7. Signature of key holder.
   5.2.8. Signature of authorizer.
   5.2.9. Require photo ID.
   5.2.10. Keys shall be issued by duration of need, not by term of employment.
   5.2.11. Signature required by key holder and authorizer.
   5.2.12. Keys must be personally picked up, not mailed.
   5.2.13. If necessary, keys may be delivered by courier or other return-receipt-required certified carrier.
   5.2.14. Keys shall be individually serialized or numbered.
   5.2.15. Keys shall be identified by blind code numbers and serialized number.
   5.2.16. Individuals may be issued only one copy of each keyset.
   5.2.17. The KCA shall establish key issuance authorization levels determined by the type of key. The general rule shall be that an authorizer may only approve keys for spaces directly under his/her control. In some cases, more than one authorizer may be required.
5.3. Types of keys:
  5.3.1. Grand master keys.
  5.3.2. Master keys.
  5.3.3. Sub master keys.
    5.3.3.1. Kitchen sub master key.
    5.3.3.2. Administration sub master key.
    5.3.3.3. Classroom sub master keys.
    5.3.3.4. Mechanical/Maintenance keys.
    5.3.3.5. Library sub master keys.
    5.3.3.6. Gym sub master keys.
    5.3.3.7. SKD vault keys
  5.3.3.8. Facility shall use standardized key deposits varying by key holder type and by level of key. For example, the deposit for a master key should be greater than that of a sub master key.
  5.3.3.9. Keys may not be duplicated or issued except through the KCA or authorized facility locksmith.
  5.3.3.10. Shift keys or rings shall be returned at the end of every work shift.
  5.3.3.11. Shift key rings shall be sealed and tamper evident.

5.4. Returning Keys
  5.4.1. All keys shall be returned to the issuing department by the authorized key holder.
  5.4.2. When keys are returned, any key deposit will be refunded and a key return receipt shall be issued to the key holder.
  5.4.3. Found keys must be turned into the KCA.
  5.4.4. Final paychecks, records, and/or transcripts may be held pending return of key(s).

5.5. Non-returned key procedure
  5.5.1. A fee for lost or stolen keys shall be established.
  5.5.2. In the event that facility keys are lost or stolen, it shall be standard procedure to re-combine immediately any cylinders accessible by the lost key(s).
  5.5.3. All re-keying charges must be paid by department, individual, or company responsible for losing the key.
  5.5.4. Rekeying charges shall be determined by the number of locks operated by the lost or stolen key(s).
  5.5.5. If any individual has two or more separate incidents of lost, stolen, or non-returned key violations within a one-year period, key privileges may be revoked.

5.6. Administration of the Master Key System
  5.6.1. Update the key schedule and bitting lists as new codes and bittings are issued and used.
  5.6.2. Send periodic updates to the cylinder manufacturer if factory control over the key system will continue.
5.6.3. Cross keyed conditions should be minimized or avoided.
5.6.4. When cross keying is unavoidable, all cross keyed conditions should be fully recorded.

5.7. Audits
5.7.1. Key holder:
  5.7.1.1. On at least an annual basis, the responsible department will determine that the proper accountability of keys is being maintained by conducting random key checks that sample the keys being carried by at least 25% of all departmental key holders.

5.7.2. Key System:
  5.7.2.1. It is recommended that, under normal circumstances, all keys and cylinders should be changed, or at least evaluated for change, at intervals not exceeding five years.
  5.7.2.2. Perform periodic audits of key cutters to determine if unauthorized duplicate keys can be obtained.
  5.7.2.3. Reports shall be periodically generated and distributed by department with a written response required to confirm the accuracy of the information being held.

5.8. Transfer/Temporary use
5.8.1. Keys shall not be transferred from one individual to another without proper authorization and record keeping from the KCA.

6. Servicing
6.1. Cutting keys:
  6.1.1. Only a MCPS-approved locksmith shall be permitted to cut keys.
  6.1.2. All facility keys shall be cut on factory approved code cutting machines, not on duplicating machines that trace from one key to another. Duplicating machines are less accurate and can transfer wear or inaccuracy that worsens through generations of keys.

6.2. Pinning/re-combining cylinders:
  6.2.1. Shall only be performed by MCPS-approved locksmith department.
  6.2.2. Shall be on the facility’s key system unless approved by.
  6.2.3. Combinate to all appropriate levels of keying unless pre-approved.
  6.2.4. SKD combinations must be pre-approved.

6.3. Installing locks:
  6.3.1. Shall only be performed by facility-approved locksmith department.
  6.3.2. Shall be on facility’s key system unless approved by.

6.4. Preventative maintenance shall be performed regularly to ensure proper operation of keys and locks and to maintain security.
6.4.1. Worn keys shall be replaced to avoid breakage.
6.4.2. Worn or poorly functioning cylinders shall be replaced to maintain proper security.
6.4.3. All facility key machines shall be checked and calibrated regularly, at least on a monthly basis.

6.5. Locksmithing work shall only be performed by:
   6.5.1. An in-house locksmith department, or
   6.5.2. A facility-approved outside locksmith business.

7. Electronic Access
   7.1. Doors with electronic card readers will give access to the badge holder providing they have clearance and the time clock on that particular device is not in a lock-out mode. Not all doors will have 24/7 access and not all badge holders will have 24/7 access.
   7.2. These badges will not only grant access if authorized, but will also keep a record of the time and who has requested access. This will leave a record trail.
   7.3. Teachers and staff will have access through their badge from 5:30 am to 6:00 pm to enter the building they are specifically credentialed for.
   7.4. Any other type of access must be approved by the principal due to need and then forwarded to MCPS safety coordinator. The safety coordinator will then forward the request to the appropriate HR person to apply the correct credentials to the badge.
KEY/BADGE REQUEST FORM
Maury County Public Schools
(Use one form for each Individual only)

School ____________________________________________________________

Persons Name _______________________________________________________

Employee ID# ___________________________ Cell Phone ______________________

Key Symbol ___________________________ last 4 digits badge# on back of badge ___________________________

Mfg. ___________________________

Key Location (Room # ) ________________________________________________

**Key/Badge Issue Agreement:** In return for the loan of this key/badge, I agree: 1) not to give or loan the key/badge to others; 2) not to make any attempts to copy, alter, duplicate, or reproduce; 3) to use the key/badge for authorized purposes only; 4) to safeguard and store the key/badge securely; 5) to immediately report any lost or stolen keys/badges; 6) produce or surrender the key/badge upon official request. I also agree that if the key/badge is lost, stolen, or not surrendered when requested a charge of **$25.00 for keys and $10 for badges**, this reflects the cost of changing any and all locks affected will be assessed to me. For MCPS employees this charge would be a payroll deduction. No keys will be reissued without paying this charge.

Signature _______________________________________________ Date____________

Issue Type: ☐ Standard ☐ Reissue Reason ________________________________

Authorizer’s Signature_______________________________________________ Date:____________

Print Name: ________________________________ Date:____________

**KEY RETURN:**

Title: ____________________________________________________________

**RETURN DATE:** ________________ BY ________________________________

**KEY NOT RETURNED:**

☐ LOST ☐ STOLEN ☐ BROKEN ☐ OTHER

EXPLAIN CIRCUMSTANCES: ____________________________________________

________________________________________

Phone ________________________________ RETURN REASON ___________________________