

CHAPTER: 700

Operational Security

DEPARTMENT ORDER:

702 – Key Control

**OFFICE OF PRIMARY
RESPONSIBILITY:**

**OPS
FM**

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ACCESS

Contains Restricted Section(s)

Arizona Department of Corrections Rehabilitation and Reentry



Department Order Manual

A handwritten signature in black ink, appearing to read "Ryan Thornell".

Ryan Thornell, Director

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PURPOSE

This Department Order establishes a system for Department key control providing an exact accounting for all keys. The system establishes requirements for the continuous control and accountability of all keys in Central Office buildings, Department institutions, and private prisons.

PROCEDURES

1.0 RESPONSIBILITIES

- 1.1 Employees, contractors, and Program Associates shall be responsible for the safe-keeping and control of keys/key rings issued to them until they are formally relinquished and returned.
 - 1.1.1 Key control violations constitute major security breaches. Employee negligence in failing to follow key control practices shall result in disciplinary action in accordance with Department Order #601, Administrative Investigations and Employee Discipline.
- 1.2 Pharmacy and Medical keys shall be issued and maintained in accordance with the Medical Services Technical Manual and this Department Order.
- 1.3 Employees, contractors, and Program Associates shall not duplicate keys without the written approval of the Warden/Bureau Administrator or designee.
- 1.4 Employees, contractors, and Program Associates assigned permanently issued keys/key rings shall:
 - 1.4.1 Complete the Receipt of Permanent Issue Keys/Key Rings, Form 702-5.
 - 1.4.1.1 All key issuances and returns shall be documented on the Key and Credit Card Control Log, Form 702-1.
 - 1.4.1.2 Approval for Central Office keys/key rings shall be in accordance with section 3.0.
 - 1.4.2 Return all keys/key rings they are responsible for on their last day of work at their work site/location.
 - 1.4.2.1 Costs associated with the replacement of keys/key rings and/or re-keying locks shall be assessed and may be withheld from employees' paychecks if they fail to return all keys/key rings for which they are responsible.
- 1.5 If keys/key rings is determined to be missing, employees, contractors, and Program Associates shall immediately:
 - 1.5.1 Initiate a search for the keys/key ring.
 - 1.5.2 Notify their supervisor.
 - 1.5.3 Report the loss to security staff or the Central Office Physical Plant Supervisor, as applicable.
 - 1.5.3.1 Institution staff shall submit an Information Report, Form 105-2, to the shift supervisor.

- 1.6 Employees, contractors, Program Associates, volunteers, and interns shall maintain personal keys on their person or secure them in a lock box or locked drawer.

2.0 GENERAL KEY CONTROL GUIDELINES

- 2.1 All keys/key rings, including emergency keys, shall be:
 - 2.1.1 Commercially manufactured and permanently fastened closed in a manner approved by the Assistant Director for Prison Operations or the Assistant Director for Facilities Management, as applicable.
 - 2.1.2 Stamped or marked with permanent identifying numbers, and have an additional brass tag which identifies the number of keys assigned to the key ring.
 - 2.1.3 Stored in such a manner as to:
 - 2.1.3.1 Prevent inmate access when they are not in the possession of a staff member or other authorized person.
 - 2.1.3.1.1 Inmates shall not possess keys/key rings unless with prior written approval by the Deputy Warden, Warden or the Central Office Physical Plant Supervisor.
 - 2.1.3.1.1.1 Fleet maintenance shall be governed by the Equipment Shop Supervisor and/or Lead Technician at each prison facility or State vehicle yard. Inmates conducting official duties are exempted from section 2.1.3.1.1. The Shop Supervisor and/or Lead Technician assume full responsibility of the security of keys, vehicles, site operations, inmate safety, and all activities therein.
 - 2.1.3.1.2 In the event an inmate's work status necessitates the issuance of a key on a daily/temporary basis, staff issuing the key shall document the transaction on the applicable log.
 - 2.1.3.1.2.1 Institution employees shall utilize the Key and Credit Card Control Log.
 - 2.1.3.1.2.2 Central Office physical plant staff shall utilize the Porter Key Check Out Log, Form 702-3.
 - 2.1.3.2 Allow easy determination of the presence or absence of keys/key rings.
 - 2.1.3.3 Provide an exact accounting for all keys to include present locations and possessors.
- 2.2 Key Destruction
 - 2.2.1 Keys that are damaged or broken shall be replaced with a new key.
 - 2.2.1.1 Non-functional keys shall be destroyed by the Complex Key Control Officer or Central Office physical plant staff.

- 2.2.1.2 All keys deemed for destruction shall be stored in a secure enclosure or lock-box.
- 2.2.1.3 The Warden or Central Office Physical Plant Supervisor or designee shall provide written approval of all key destructions.
- 2.2.2 Keys shall be scheduled for destruction as needed.
- 2.2.3 Smaller keys shall be cut in two pieces; separating the cuts section of the key from the blade.
- 2.2.4 Keys that are larger than 3" in length or unable to be cut shall be melted with a torch or ground to render the cuts section of the key inoperable.
- 2.2.5 The Complex Key Control Officer shall:
 - 2.2.5.1 Dispose of inoperable keys in a secure metal bin for off-site destruction.
 - 2.2.5.2 Document destroyed key(s) by completing an Information Report.

3.0 CENTRAL OFFICE KEY CONTROL

3.1 Central Office Building Access

- 3.1.1 Employees shall use their magnetic strip identification cards for Central Office building access, in accordance with Department Order #515, Identification System.
- 3.1.2 Central Office Communications Center (COCC) staff shall provide Central Office building access to authorized staff outside of regular business hours.

3.2 Keys/Key Ring Requests

- 3.2.1 Central Office employees requesting keys/key rings for specific Central Office rooms/areas shall submit memorandums, through their chain of command, to the appropriate approving authority (e.g., Deputy Director, Assistant Director, Bureau Administrator), specifying their reason or reasons for the request.
- 3.2.2 The approving authority shall:
 - 3.2.2.1 For an approved request, indicate approval of valid key access by signing and dating the memorandum and forwarding it to the Central Office Physical Plant Supervisor for additional review and approval.
 - 3.2.2.2 For a disapproved request, indicate the reason(s) for denying the request on the memorandum and return it to the submitting employee.
- 3.2.3 Upon receipt of key access memorandums from approving authorities, the Central Office Physical Plant Supervisor shall:
 - 3.2.3.1 Determine if approved access requests is relevant to the performance of employee's work duties.
 - 3.2.3.2 Issue the requested building keys/key rings, if deemed appropriate.

- 3.2.3.3 Inform key access approving authorities of any requests not relevant to the performance of employees' work duties.
- 3.3 Central Office employees who have been approved to have permanent issue keys/key rings to Central Office rooms/areas shall sign for receipt of keys/key rings and accept responsibility as outlined in section 1.0.
- 3.4 The Central Office Physical Plant Supervisor shall:
 - 3.4.1 Identify access methods for all Central Office building rooms/areas.
 - 3.4.2 Ensure all Central Office keys/key rings' identifying numbers are recorded when issued.
 - 3.4.3 Maintain all un-issued, spare and returned building keys/key rings in a secure area and manner.
 - 3.4.4 Perform an inventory of the lockbox physical plant keys at the beginning and end of each shift.
 - 3.4.5 Maintain an inventory record of all issued Central Office building keys/key rings.
 - 3.4.5.1 Inventory reports shall be retained in accordance with the appropriate retention schedule.
 - 3.4.6 Conduct annual audits of building key assignments for each Central Office Division and Bureau to determine assignment accuracy and compliance with this Department Order.
 - 3.4.7 Forward copies of annual audit reports to the respective Deputy Director or appropriate Assistant Director when inaccuracy and/or noncompliance problems are discovered.

4.0 INSTITUTION/FACILITY KEY CONTROL

4.1 Access

- 4.1.1 Wardens and their designee(s) shall have unrestricted access to all areas of the institution or complex.
 - 4.1.1.1 The maintenance of a single key set containing all the keys to access the entire institution is not required.
- 4.1.2 Shift Commanders shall also have keys for all areas of the Kitchen and Inmate Commissary.
 - 4.1.2.1 This key-set shall be a pass along set and must always be in possession of the senior ranking security supervisor (Shift Commander) of the shift.
- 4.1.3 Employees who inadvertently take keys/key rings off of institution/unit grounds shall immediately return them to the institution/unit and submit an Information Report to the shift supervisor.

4.2 Emergency Key Rings

- 4.2.1 Wardens or their designee(s) shall identify locks and locking devices that affect life, health or safety and designate keys to those areas as emergency keys.
 - 4.2.1.1 At institutions where the units are closely located, emergency key rings shall be maintained or stored in the institution's Main Control Room.
 - 4.2.1.1.1 Duplicate emergency key rings may be maintained or stored in the institution's Main Control Room within a locked/secured cabinet.
 - 4.2.1.2 At institutions where the units are not closely located, emergency key rings shall be maintained or stored at the unit Main Control Rooms.
 - 4.2.1.2.1 Duplicate emergency keys for ASPC–Safford, Globe Unit and ASPC–Winslow, Apache Unit shall be maintained and retained at the local Police Department or Sheriff's Office.
 - 4.2.1.2.2 Duplicate emergency keys for ASPC-Safford/Fort Grant Unit shall be maintained and retained at ASPC-Safford Complex Control Room.
- 4.2.2 Standardized Color-Code System
 - 4.2.2.1 Subject to the approval of the Assistant Director for Prison Operations or designee, Wardens shall adhere to the Alpha Dot color-code guide to identify each building or area within each unit.
 - 4.2.2.1.1 Each door or lock within a building or area having a key on an emergency key ring shall be marked with the color and alpha designator for the key.
 - 4.2.2.2 Emergency key rings shall be:
 - 4.2.2.2.1 Coded using the standardized "Alpha/Color Dot System" of identification and shall enable staff to access every area of the institution/facility rapidly to respond to a disturbance, fire or any other crisis.
 - 4.2.2.2.2 Clearly delineated from all other keys and stored in a separate key box than key rings used for regular operational purposes.
 - 4.2.2.2.3 Coded and configured to provide access to a specific building or area of the institution or unit. Key rings shall have an attached key chit painted with the corresponding color to match the designated building color in accordance with the Alpha Dot System.
 - 4.2.2.2.4 Tagged with a red-colored metal tag, with an additional brass tag that identifies the number of keys assigned to the ring.
 - 4.2.2.2.5 Issued from a designated Central Control area or Main Control Room.

- 4.2.2.3 All doors or locks within a building or area having keys on emergency key rings shall be marked with the color and alpha designator for the key.
 - 4.2.2.3.1 Markings shall consist of a colored circle, or dot, with the alpha designator stenciled within the circle or a commercially manufactured reflective sticker.
- 4.2.2.4 Individual keys shall be identified by having the alpha designator for the door each key fits engraved on the key. Manufacturer numbers shall be removed from the key and shall not be used to identify the key. Manufacturer numbers shall be maintained in the master key inventory.
- 4.2.3 Emergency key drills shall be conducted once per month per each shift to ensure they are in working order. The key drills shall include the utilization of the actual emergency key set to access a location based on its alpha dot designated color. Unit Shift Commanders shall coordinate amongst the other unit Shift Commanders to ensure that drill locations conducted are held at various locations throughout the facility. The results of this inspection shall be submitted in writing to the Complex Chief of Security.

4.3 Inventory/Inspection

- 4.3.1 Wardens and Deputy Wardens shall ensure master key inventories are maintained specifying the following:
 - 4.3.1.1 Key and key tag numbers
 - 4.3.1.2 Lock/locking device locations
 - 4.3.1.3 The number of keys available for each lock/locking device
 - 4.3.1.4 The number of keys on each key ring
- 4.3.2 All keys/key rings including emergency keys shall be inventoried at the beginning and ending of each shift and documented on the appropriate logs by assigned staff.
 - 4.3.2.1 When colored seals/tags on emergency key boxes are broken to receive emergency key sets, two employees shall be present for the inventory.
 - 4.3.2.1.1 Two employees shall also be present when emergency key sets are returned to the key boxes and new colored seals are put in place.
 - 4.3.2.1.2 The names of both employees shall be logged in the Correctional Service Log, Form 105-6.
- 4.3.3 All keys/key rings and locking devices shall be inspected monthly for proper function by the assigned Key Control Officer or designee. The inspection of all keys/key rings and locking devices shall be tracked by the Key Control Officer to ensure they are inspected comprehensively throughout the entire facility. **[Alignment – October 23, 2023]**
 - 4.3.3.1 Repair or replacement of keys/key rings shall be completed as needed, and documented on Locksmith Work Order, Form 702-6.

4.3.3.2 Inspectors shall prepare inspection reports and submit them to the Warden, Deputy Warden and Chief of Security (Complex and Unit).

4.3.3.2.1 Inspection reports shall be retained in accordance with the appropriate retention schedule.

4.4 All materials for duplication/repair of keys shall be secured when not in use.

5.0 LOCKOUT/TAGOUT SYSTEMS – Wardens, Deputy Wardens, and Administrators shall ensure an isolated lock and key system exists through the use of Lockout/Tagout Program in accordance with Department Order #404, Fire, Safety and Loss Prevention. The Lockout/Tagout Program shall operate in accordance with 29 Code of Federal Regulations (CFR) Part 1910.147, OSHA Control of Hazardous Energy Standard.

5.1 Lockout/Tagout systems shall be maintained and administered by the Physical Plant Manager/Administrator or Arizona Correctional Industries Operations supervisor, who shall supply sufficient keys, locks, and disabling devices.

5.2 The Physical Plant Manager/Administrator or supervisor shall ensure each employee engaging in the installation, removal, repair, or maintenance of machinery or systems are issued their own Lockout/Tagout lock box consistent with their job discipline.

5.2.1 Lockout/Tagout locks and keys shall not be of the same type utilized in security operations. Example: Best or Arrow key systems with the same keyway or core are not appropriate due to their use in securing areas of an institution against unauthorized access.

5.2.1.1 Once a Lockout/Tagout lock has been placed, the key shall remain with the employee until they determine the device is approved for safe operation.

5.2.1.1.1 The employee is not required to return the key to the Lockout/Tagout box until the lock has been removed.

5.2.1.2 Authorized Personnel who place a lock or Lockout/Tagout Tags on equipment, machines or systems are responsible for their removal. The Physical Plant Manager/Administrator shall develop procedures in accordance with Department Order #404, Fire, Safety and Loss Prevention that address the steps required to remove the Lockout/Tagout lock in the event of an emergency.

5.2.2 The Lockout/Tagout system shall remain exempt from the Emergency Key and Correctional Service Log, Form 105-6, requirements of this Department Order.

5.2.3 Lockout/Tagout kits shall be issued to Physical Plant staff on a State Property Receipt-Return, Form 304-2, and the corresponding keys shall be issued using the Receipt of Permanent Issue Keys/Key Rings form.

5.2.4 Lockout/Tagout locks shall:

5.2.4.1 Be individually keyed with only a single key existent for the lock. Additional copies of Lockout/Tagout keys are not authorized.

5.2.4.1.1 Lockout/Tagout keys shall be issued to the assigned staff member as a PIK (personally issued keys) set, which shall be kept on the individual at all times while on duty.

5.2.4.2 Not be utilized as a security device except in the manner outlined in this section.

6.0 FLEET/VEHICLE KEYS MANAGEMENT – Wardens, Deputy Wardens, and Administrators shall ensure the issuance, use and security of ADCRR vehicle keys are in accordance with Department Order #405, Vehicles/Vehicle Maintenance.

IMPLEMENTATION

Within 90 calendar days of the effective date of this Department Order, the Assistant Director for Prison Operations or designee shall publish the Alpha Dot Technical Manual and address the contents of this Department Order in authorized Post Orders, as appropriate.

DEFINITIONS/GLOSSARY

Refer to the Glossary of Terms for the following:

- Alpha/Color Dot System
- Building Key
- Central Office
- Life Safety Locking Device
- Locking Device
- Magnetic Stripped Identification Card
- Program Associates

FORMS LIST

702-1, Key and Credit Card Control Log
702-3, Porter Key Check Out Log
702-5, Receipt of Permanent Issue Keys/Key Rings
702-6, Locksmith Work Order

AUTHORITY

A.R.S. §13-3715, Unauthorized Manufacture, Duplication, Use or Possession of Key to a Public Building; Classification
CFR Part 1910.147, OSHA Control of Hazardous Energy Standard