Policy 4301
Building Security

Date of Current Revision: October 2022
Responsible Officer: Assistant Vice President for Business Services

1. PURPOSE

The effective control and security of university buildings are necessary requirements for the safety and protection of students, university personnel, and equipment. Therefore, the following policy is established for the issuance and security of university keys.

2. AUTHORITY

The Board of Visitors has been authorized by the Commonwealth of Virginia to govern James Madison University. See Code of Virginia § 23.1-1600; § 23.1-1301. The Board has delegated the authority to manage the university to the president.

3. DEFINITIONS

Access
The ability to enter a university space by means of a traditional key or JACard.

Access Devices
Traditional keys, JACards or any electronic means of access.

Approving Authority
University official who has the authority to approve the issuance of keys to JMU personnel and outside contractors and entities. The university official is either the supervisor of the employee requesting the keys or the building coordinator.

Electronic Access
Allows use of a JACard as a means of access. The door access system (CBORD CS Gold) replaces traditional keys with an electronic door strike that is configured to allow for remote communication.

JACard
The official James Madison University identification card. This card permits access to many university services and facilities.

Outside Contractors
Companies hired by JMU to provide a service to the university.

4. APPLICABILITY

This policy is applicable to persons requesting access to university-controlled properties.

5. POLICY

Building security is a high priority for the university. As such, the duplication of any university key is prohibited except by the authorization of the executive director of facilities and construction through established procedures in the Facilities Management Lock Shop.

Access to all facilities 24-hours a day is limited to Card Services Technicians, JMU Police Department, Harrisonburg Fire and Rescue, the Facilities Management Lock Shop and the vice president for administration and finance.

The Facilities Management Lock Shop employees are the only persons authorized to distribute keys. One key of a particular building is permitted for each individual. Multiple copies of identical keys for one person may be authorized under special circumstances.

6. PROCEDURES

6.1 Key Access

Approving authorities will determine those individuals whose duties require the possession of university keys. One criterion used in this determination will be the need for access to buildings or areas outside of normal working hours. Primary responsibility for unlocking and securing of offices, classrooms, meeting rooms and other facilities rests with department heads and/or building coordinators (or their designees) for routine university business. If they do not have the necessary keys to accomplish this task, such keys can be obtained and distributed using the Facilities Management AiM system. The JMU Police Department may provide assistance and backup, when appropriate, as a courtesy to the community.

a. Key inventory procedures: The key inventory software utilized by the Facilities Management Lock Shop keeps a perpetual inventory. If someone requests a key that has previously been issued either to them or someone else, the system will notify the Lock Shop that the key is already in use. The Facilities Management Lock Shop is notified on a daily basis of departures, and the Lock Shop administrative office support specialist flags anyone who leaves and has been issued keys.

b. If a key that has been issued by the Facilities Management Lock Shop is lost or stolen, the corresponding doors/cylinders that said key operated must be rekeyed at the expense of the key holder, contractor, authorizing official's department or project.

6.2 Card Access

a. Installation of electronic card access readers requires contacting Card Services thru the Cherwell system. Users log in with their JMU e-ID and provide contact information with a brief description of where electronic card access is needed. All card reader installations must use the JACard and interface online with the CBORD CS Gold system. Approving authorities may maintain their own permissions/schedules for electronic access. Card Services will provide training as requested by the approving authority.

b. Electronic access is available to some university academic and administrative buildings. When access is needed beyond the normal operating hours of the university, the following steps must be followed.

1. Individuals needing electronic card access must complete the ELECTRONIC CARD ACCESS REQUEST FORM, which requires approval by the approving authority or

the building coordinator. All areas of the form must be filled out, and the requestor must sign the form and agree to abide by the responsibilities listed.

2. Each department requesting and granting electronic card access for individuals will be responsible for auditing and maintaining records on who has access to their respective area. A formal audit must be performed by June 30 annually and must list all access cards in the department's possession. In addition, the audit must document who each card is assigned to or when access was removed prior to audit. A copy of the completed audit must be maintained in the department, and a copy must also be sent to the Card Services office for their annual audit of all access to the CS Gold System.

6.3 University officials authorized to approve requests for university keys requested from the Facilities Management Lock Shop or electronic access from Card Services are listed below.

- President and vice president for administration and finance - All types
- Associate and assistant vice presidents and deans - Master keys for building(s) in which their departments are located
- Department heads, academic unit heads, directors and residence hall area coordinators - Department entrance and room keys
- Building coordinators for areas to which they have been assigned
- Faculty desiring to provide students with specific key access must go through either the building coordinator or their academic unit head to accomplish such authorization

6.4 Individuals who do not possess university keys or card access and must gain emergency entry to a university building or area may request assistance from the JMU Police Department. Upon the receipt of such request, JMU Police personnel will make positive identification of the requestor, secure permission from the appropriate university official (if not already handled by prior arrangement) to allow the requestor to enter the designated area and record the action taken in the daily communications log.

6.5 Authorizing officials who wish to allow university personnel to enter a university facility under their authority for an extended period of time without issuing them a key or card access may notify the JMU Police Department by memorandum/email of the person's name and the circumstances of the needed access. The JMU Police Department will then coordinate the admission of the authorized individual into the designated university facility.

6.6 When access to university facilities is required in connection with a commercially contracted project, the contracting officer's technical representative will coordinate the contractors' requirements with the director of procurement services, the chief of police and appropriate officials where the work is to be performed. Prior to issuance of keys/cards to contractors or concessionaires by the Facilities Management Lock Shop or individual departmental staff, the director of facilities management will ensure that the contractors are thoroughly familiar with their responsibilities. Upon completion of their proof of need for university keys/cards,

the contracting officer's technical representative will ensure that the keys/cards are returned to the Facilities Management Lock Shop or Card Services.

7. RESPONSIBILITIES

Approving Authorities are responsible for the following:

- Maintain a current listing of personnel to whom they have issued university keys and/or card access.
- Make an accounting of all university keys/cards issued under their authority to ensure proper control and accountability each year by June 30. Student residence hall keys will be inventoried promptly at the end of each semester and at the end of each summer session, and replacement keys will be ordered immediately.
- Notify Card Services and the Lock Shop when employees separate from the university or transfer to other departments. Ensure the return of university keys/cards by individuals at the termination of their employment or when their duties no longer require the possession of university keys. Also, notify Card Services when card access is no longer required for an employee remaining in the department.
- Investigate and report to the JMU Police Department and the Facilities Management Lock Shop all incidents involving the loss of university keys. These reports should provide the following data:

  o Name of the official who authorized issue of the key(s)
  o Name of the individual to whom the key(s) were issued
  o Type of key(s)
  o Room(s), building(s) or area(s) to which the key(s) provide access
  o Date of the discovery of the key(s) loss or theft and any other pertinent facts. If the key(s) was lost or stolen outside the jurisdiction of the JMU Police Department, a report should be filed with the police in the jurisdiction where the loss or theft occurred.

Key Holder Responsibilities: Individuals issued university keys are responsible for their physical security. The loss of a key(s) must be immediately reported to the appropriate approving authority. If said key(s) is lost or stolen off campus, a report must be filed with the police in the jurisdiction where the loss or theft occurred as well as filing a report with the JMU Police Department when the individual returns to campus. The loss of cards must be reported to Card Services. Loaning a key/card to another individual is strictly prohibited.

Facilities Management is responsible for the manufacture/duplication and issuance of all keys. The duplication of university keys by any other person or activity is prohibited by this policy and the laws of Virginia. Such duplication, or the possession of a key duplicated without authorization, constitutes a Class 3 misdemeanor if the key(s) in question allows access to state property. University keys will be duplicated only upon authorization of the appropriate key approving authority and subsequent approval of the executive director of facilities and construction through the established FM departmental procedures.

The Facilities Management Lock Shop will generate and maintain a current listing of all keys manufactured/duplicated, and the list will document the distribution. Approving authorities will use the Facilities Management work order system to order keys.

Card Services/Facilities Management Lock Shop has the authority to question, modify and deny access requests. Card Services will coordinate an annual audit of current card access users with approving authorities for verification. This will be completed annually by June 30.

In order to maintain a proper university key registry, the Facilities Management Lock Shop is authorized to conduct periodic audits of key distribution by departments throughout campus. Departments not following proper issuance and maintenance guidelines will be reported to the appropriate administrative authority for corrective action.

Departments with Key Distribution Delegation:
- Residence Life is responsible for all access to the residence halls. Residence Life has the authority to question, modify and deny access requests. Residence Life maintains their own inventory and key control.
- Athletics is responsible for all access to athletic spaces. Athletics has the authority to question, modify and deny access requests. Athletics maintains their own inventory and key control.
- University Recreation (UREC) is responsible for all access to UREC spaces. UREC has the authority to question, modify and deny access requests. UREC maintains their own inventory and key control.
- Information Technology is responsible for all access to their facilities. IT has the authority to question, modify and deny access requests.

Human Resources is responsible for notifying Card Services and the Facilities Management Lock Shop of employees who leave the university so that access can be changed or removed.

All departments, offices and employees that generate, receive or maintain public records under the terms of this policy are also responsible for compliance with Policy 1109 - Records Management.

8. SANCTIONS

Sanctions will be commensurate with the severity and/or frequency of the offense and may include termination of employment.

Possession or duplication of keys to the lock of any building or other property owned by the Commonwealth of Virginia or agency thereof without authorization constitutes a Class 3 misdemeanor.

All persons who violate this policy may be subject to applicable criminal prosecution.

9. EXCLUSIONS

Certain keys are not available to the JMU Police Department (e.g., Bookstore and certain Dining Service keys). Entrance to these facilities may be approved only by the administrator in charge of the facility.

10. INTERPRETATION

Authority to interpret this policy rests with the president and is generally delegated to the assistant vice president for business services.

Previous version: February 2019
Approved by the president: July 2002