UCLA Policy 825: Key and Electronic Access Administration and Control

Issuing Officer: Assistant Vice Chancellor, Facilities Management
Responsible Dept: Facilities Management
Effective Date: April 11, 2025
Supersedes: UCLA Policy 825, dated 6/7/2023

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I.   PURPOSE & SCOPE

This Policy maximizes the security of UCLA facilities by providing the administration and control of campus keys, and establishing the framework for moving the campus to electronic building access systems that are compatible with the Bruin Card. BruinCard is the only electronic building access authorized on the UCLA campus.

This Policy applies to keys and BruinCard access used for entrance into any on-campus building and spaces within buildings, including but not limited to offices, laboratories, classrooms, residence halls, and meeting spaces.

Exceptions: This Policy does not apply to keys or electronic BruinCard access to residential off-campus apartments, the UCLA Medical Center and other Health System spaces, UC Police Department, the UCLA Faculty Club, ASUCLA operated facilities, Athletics Facilities, Luskin Conference Center, The Inn at UCLA, Lake Arrowhead Lodge, or leased space.

II.   DEFINITIONS

For the purposes of this Policy:

Building Coordinator is the individual(s) appointed by the department head to serve as the Facilities Management (FM) principal point of contact for FM issues in a particular building(s). The individual(s) may or may not also be the Building Entrance Key Control Coordinator, and is the individual(s) responsible for coordinating BruinCard access for building occupants with the BruinCard Center staff, for buildings that have transitioned to BruinCard access.

Building Entrance Key Control Coordinator is the individual(s) designated by their department head in the official campus Space Inventory database who has the authority to change and/or authorize access to a building that has not yet transitioned to electronic BruinCard access.

Off-Master Spaces are areas/rooms that are routinely accessible only to department personnel and are specifically not routinely accessible to FM personnel. These areas normally contain unprotected confidential personnel records, cash money, vivarium, or potentially harmful laboratory chemicals or biological materials (e.g., BSL-3 laboratories).

On-Master Spaces are areas/rooms that are readily accessible to FM custodial and maintenance personnel.

III.   POLICY STATEMENT

Buildings are keyed in accordance with a campus master keying plan. Unauthorized fabrication, duplication, possession, or use of keys to premises owned by the University of California is a crime (California Penal Code, Section 469) and a violation of this Policy.

The FM Hardware Shop fabricates and issues campus keys according to this Policy and UCLA Procedure 825.1: Building Entrance Keying, Electronic Access, and Control. The FM Hardware Shop is responsible for the overall administration of campus keys.

The UCLA campus continues to transition from physical key access to electronic access using systems that are compatible with the BruinCard for all campus buildings. The intent is to install each building with a BruinCard compatible reader on at least two entrances. Once a building has transitioned to BruinCard access, all "after normal business hours" or "off-hour" building access must be obtained through the use of an electronic system compatible with a BruinCard. In general, campus buildings are open from 7:00 a.m. until 10:00 p.m., Monday through Friday, unless other specific building hours are established and posted.

The Building Coordinator, in conjunction with the BruinCard Center, issues BruinCard access to buildings within their area of responsibility in accordance with this Policy and UCLA Procedure 825.1. The Building Coordinator is responsible for the overall administration of electronic building access via BruinCard.

Specific responsibilities are assigned in order to implement and ensure compliance with this Policy.

A. Responsibilities

1. **Facilities Management (FM)** is responsible for:

   a. Maintaining up-to-date records of: keying systems, issuance of all master keys, central key control files, and Building Entrance Key Control Coordinators as reported by departments, with the exception of Housing and Hospitality Services (H&HS), who maintains the records and files for keying systems used in campus dormitories. The central key control files identify key systems used, key-ways, master keys, change keys, types of lock on doors, and department contact information.

   b. Fabricating and issuing all keys and installing BruinCard compatible readers:

      - For new buildings, the initial complement of keys for interior spaces and BruinCard compatible readers for at least two exterior entrances, will be furnished under the new building or alteration contracts by FM. The initial complement of keys and BruinCard compatible readers will be supplied as an expense against building project funds. Any subsequent issuance of keys or BruinCard compatible readers will be charged to the requesting department with the exception of H&HS, who issues all keys used in campus dormitories, and who will only be recharged if FM is requested to install a BruinCard compatible reader on or in an H&HS building.

      - For additional or replacement of BruinCard compatible readers or keys or re-keying of existing departmental space, a Facilities Service Request (FSR) with the proper signature authorization is required from the department head or their designee. See UCLA Procedure 825.1, Building Entrance Keying, Electronic Access, and Control.

      - When a department receives a new allocation of space, FM should be consulted regarding keying of the newly assigned area.

      - Any request for master keys will be elevated to the Assistant Vice Chancellor, FM for validation with the respective department head with the exception of H&HS, who maintains the key control system for campus dormitories.

   c. Performing all lock work and BruinCard compatible reader installation, except work that is required using capital construction contractors.

   d. Coordinating lost or stolen key records with the UCLA Police Department (UCPD), if applicable. Determination as to whether re-keying of an area is required (e.g. because of lost or stolen keys) will be based on consultation between FM and the department head and/or

their designee. If it is determined rekeying is necessary for departmental security purposes due to lost or stolen key(s), the cost will be the responsibility of the respective department.

e. Furnishing a list of master keys and rooms that a department controls, when requested by department head and/or their designee. Information will be provided in person only to the designated individual and will not be provided via telephone or email.

f. Locking and unlocking campus buildings by Custodial Services according to posted building schedules, including requests to open buildings and classrooms during normal building hours. As buildings transition to BruinCard access, any building schedule changes are the responsibility of the department(s) seeking the change and will be accomplished through direct coordination with the BruinCard Center.

g. Performing weekend openings and/or off-hour requirements by Custodial Services as requested by clients for campus building entrances that use physical keys through a Facilities Service Request. This service is normally requested in support of a scheduled, off-hour or weekend event within the building and requires notification to Custodial Services at least two (2) business days before the off-hour or weekend event.

h. Providing key access to buildings and/or offices to authorized individuals who have locked themselves out. This service is provided on a recharge basis and will be billed to the respective department's blanket account. In order to prevent unauthorized access, FM will verify in the official UCLA Space Inventory database that the individual is listed in the "occupant" field for the requested space. Individuals who are listed in the occupant field are also required to provide photo proof of identity prior to access being granted. In the interest of campus and department security, if the individual is either not listed as an authorized occupant of the space or does not possess a photo proof of identity, access cannot be provided. Approval must then be obtained by the respective Building Coordinator. See UCLA Procedure 825.1.

i. Identifying the sequence of which facilities are to be placed on exclusive BruinCard access, and notifying Building Coordinators at least sixty (60) days in advance of changing entrance door locks so that they may validate access for building occupants with the BruinCard Center staff.

j. Funding the annual BruinCard Center charges for maintenance fees for ongoing support and troubleshooting costs for the BruinCard compatible readers installed at campus direction.

2. **UCLA Police Department (UCPD)** is responsible for:

a. Retaining reports of stolen keys and BruinCards.

b. Enforcing California Penal Code, Section 469, which applies to unauthorized use of keys to premises owned by the University of California.

c. Notifying the BruinCard Center of any changes to the UCPD list of First Responders who require BruinCard access to buildings.

3. **UCLA Fire Department (UCFD)** is responsible for:

a. Notifying the BruinCard Center of any changes to the UCFD list of First Responders who require BruinCard access to buildings.

b. Conducting periodic inspection and verification of key(s) or access control cards stored within building Knox Boxes. FM will supply UCFD with the current building key(s) and or key list upon request from authorized UCFD personnel.

4. **BruinCard Center** is responsible for:

a. Receiving BruinCard access requests from FM, UCPD, UCFD, and Department Building Coordinators and programming access for identified individuals into the respective building's BruinCard compatible system.

b. Performing weekend openings and/or off-hour requirements for campus building entrances that use BruinCard access as requested by clients through the BruinCard Center intake process.

c. Reviewing/approving departmental requests to change the door status of a BruinCard controlled door via BruinCard Center intake process.

5. **Department Head or their designee** is responsible for:

    a. Recovering all University keys from and as applicable, removing BruinCard access for faculty, visiting scholars, staff, student employees, and students under their jurisdiction who are terminating or transferring to another department or activity, and recording return of associated keys. See UCLA Procedure 825.1

    b. Issuing recovery of key letters to former faculty, visiting scholars, staff, student employees, and students at the request of campus departments.

    c. Securely storing unassigned keys pending reassignment. Locked key boxes may be purchased from FM.

    d. Screening requests for opening campus buildings and rooms during off-hours or for non-classroom space during normal building hours for authorized personnel holding valid identification.

    e. Maintaining departmental key records including take home keys, departmental keys, contact information, date of issuance, and date of retrieval.

    f. Ensuring that weekend openings and/or off-hour requests are scheduled through the use of a completed Facilities Service Request and submitted two (2) business days in advance of event to Custodial Services for entrance into campus buildings that use physical keys and for entrance into campus buildings with BruinCard access, send requests directly to BruinCard Center through the BruinCard Center intake process.

    g. Notifying the Building Entrance Key Control Coordinator regarding lost, stolen, or refusal to return building entrance keys and notifying Building Coordinators/ BruinCard Door Coordinator of lost or stolen BruinCard. See UCLA Procedure 825.1.

    h. Paying BruinCard Center fees associated with any readers installed at department direction and expense, beyond those directed by the campus.

6. **Faculty, visiting scholar, staff, student employee, or student** to whom keys and/or BruinCard access have been issued are responsible for:

    a. Reporting lost, misplaced, or stolen BruinCard and/or keys, as well as lockouts, to their supervisor.

    b. Reporting loss or theft of University keys and/or BruinCard to their department and reporting theft of University keys and/or BruinCard to UCPD as soon as possible.

    c. Reporting loss or theft of University master key rings to their department, FM, and to UCPD immediately.

    d. Signing a key issuance record and maintaining security for any key issued.

    e. Obtaining valid photo identification.

    f. Returning keys to their respective department upon separation, transfer, or as requested by the department.

7. **Building Entrance/Departmental Key Control Coordinators** will be designated for each building or department. Department head(s) may assign multiple Key Control Coordinators.

    a. Coordinating with departments that are interested in installing the BruinCard compatible electronic building access system for buildings or facilities within their area of responsibility.

    b. Coordinating lost or stolen BruinCards with the UCPD, if applicable.

    c. Furnishing a list of rooms with BruinCard access that a department controls, when requested by department head and/or their designated Coordinator. This information will be provided by the BruinCard Center in person only to the department's designated Coordinator and will not be provided via telephone or email.

    d. Maintaining departmental records of individuals with BruinCard access, including contact information, date of access, and date of inaccessibility.

    e. Reviewing/approving requests from departments for building entrance keys and BruinCard access; performing periodic reviews of the departments' record keeping systems; distributing

building entrance keys to departments and coordinating with departments on who can obtain BruinCard access; providing FM with a list identifying individuals in each department who are authorized to request keys and who has BruinCard access; and maintaining a list of individuals with building entrance keys and BruinCard access.

f. Departmental Key Control Coordinators are responsible for establishing and maintaining control of the keys to interior spaces assigned to their departments; reviewing/approving requests for keys; issuing a Facilities Service Request to FM with the proper signature authorization; distributing keys; and record keeping.

g. Submitting requests to the BruinCard Center using their intake process, to change the door status of a BruinCard controlled door, these requests do not require an FSR.

B. Special Security Keying, Keying Changes, or Off-Master Requests

Requests to key or BruinCard access any space as Off-Master requires a Facilities Service Request signed by the department head or their designee certifying that the space contains unprotected confidential personnel records, cash money, vivarium, or potentially harmful laboratory chemicals. Off-Master requests for a space based solely on unprotected confidential personnel records will require an inspection by FM to verify that those records cannot be secured inside the space. If none of these criteria are met, the department head or their designee must justify why the space must be Off-Master. All requests for any campus space as Off-Master requires approval from the Assistant Vice Chancellor, FM. First Responders may access Off-Master spaces at any time. FM personnel and Capital Programs personnel will be granted access to Off-Master spaces after a 48-hour notice to the occupant.

All locks or BruinCard compatible readers installed will meet current building safety, fire, and A.D.A. codes. The department is responsible for any damages that may result from forcible entry into an Off-Master space resulting from emergency response (i.e. flood, fire, earthquake, etc.).

For any Off-Master space, the department will pay for the cost of modifying the hardware. Additionally, the department will arrange for and fund all custodial work required in these room(s) through the use of a Facilities Service Request.
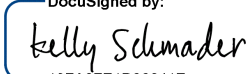
No department or individual may install locks, electronic access systems, or keys for space control nor may locks be changed without the prior evaluation and approval of the department head with the concurrence of FM, the appropriate governmental agencies, UCPD, and UCFD as appropriate with the exception of H&HS, who manages the key control program for campus dormitories. Suspected unauthorized locks and locking devices will be reported to FM, who will coordinate with the department head and UCPD, if necessary, prior to removal.

First Responders (i.e., UCPD, UCFD, etc.) will maintain access to all University buildings and spaces and may enter them at any time deemed necessary.

IV. REFERENCES

1. UCLA Policy 360, Internal Control Guidelines for Campus Departments (Section IV.D.3., regarding Custodial and Security Arrangements);
2. UCLA Procedure 825.1, Building Entrance Keying and Control;
3. UC Policies Applying to Campus Activities, Organizations and Students (PACAOS);
4. Online Facilities Service Request.

Issuing Officer

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Kelly Schmader

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Questions concerning this policy or procedure should be referred to the Responsible Department listed at the top of this document.