



COMMUNITY CORRECTIONS FACILITIES AND PROGRAMS BUREAU FACILITY OPERATIONAL REQUIREMENT

Requirement:	PFB 6.2.431 KEY AND TOOL CONTROLS
Effective Date:	11/23/2020 Page 1 of 3
Revision Date(s):	09/06/2021; 04/01/2025
Signature/Title:	/s/ Scott Eychner, Rehabilitation and Programs Chief

This requirement is referenced as **ACCD 3.1.1300 Key Control** and **ACCD 3.1.1400 Tool Control** in Section 3.H. Offender Management; Security/Counts in the following contracts: Alternatives, Inc., Butte Prerelease, Gallatin County Reentry Program, Helena Prerelease, Passages, Elkhorn, Nexus, and START. This requirement is referenced as **ACCD 3.1.1300 Key Control** and **ACCD 3.1.1400 Tool Control** in Section 2.2.7 Services; Offender Management; Security/Counts in the following contracts: Connections Corrections Program (CCP) and WATCh.

I. PURPOSE

FPB contract facilities will establish practices that govern the control and use of keys and the maintenance and control of all tools and culinary and medical equipment used in facility operations to ensure against loss, damage, introduction into the facility as a weapon, or use for other than intended purposes.

II. DEFINITIONS (see Glossary)

III. REQUIREMENTS

A. KEY CONTROL

1. Key Responsibility

- a. Each facility will have written processes that describe in detail the inventory, storage, issuance, distribution, and handling of keys, including the staff positions responsible for key control at specific posts.
- b. The Facility Administrator will ensure that proper key control processes require that designated staff:
 - 1) oversee the facility key control program;
 - 2) ensure all key and lock operations effectively secure the facility, when applicable;
 - 3) approve any keys permanently issued to staff;
 - 4) restrict access to sensitive keys;
 - 5) enable prompt emergency response; and
 - 6) identify and train an employee to manage the key control program.

2. Key Categories: Facilities will account for keys in 2 basic key categories:

- a. **Security keys:** Keys that if lost or duplicated by offenders would jeopardize the safety or security of the facility, employees, visitors, or offenders, or directly or indirectly facilitate an escape that may jeopardize public safety. The Facility Administrator must approve issuance of any facility keys for staff personal key rings and restrict the practice to an absolute minimum.
 - 1) **Emergency keys:** Each facility will:
 - a) establish emergency key rings to provide access to every facility area in case of fire, riot, or other major emergency;
 - b) maintain a duplicate set of emergency key rings in a secure location separate from the area containing operational keys, unless the issuing point is outside the perimeter; and
 - c) train all staff in the use of the emergency key system.
 - 2) **Restricted keys:** Each facility will:
 - a) classify certain keys as restricted, for example, keys to the pharmacy, records office, business office, and warehouse;

- b) issue keys only to designated, authorized staff; and
 - c) ensure that any restricted key issuance is approved by designated staff.
- b. *Non-security keys*: Keys that do not control access to security-type doors, grilles, or areas with hazardous or sensitive materials and, if lost, would not require urgent security action.

3. Key Accountability

- a. Facilities will have a complete accountability system that is automated and provides key issue and tracking information, or a manual accountability system for all keys that meets the following requirements to provide:
 - 1) a manual inventory of all control center keys;
 - 2) an accounting of all emergency and restricted keys; and
 - 3) a determination of who has possession of keys at all times.
- b. Facility staff will immediately inform the shift supervisor of any lost or misplaced key ring, including facts of the discovery, circumstances, and keys involved; and
 - 1) immediately take proper security precautions to guard against unauthorized access to sensitive areas, or facility escape;
 - 2) report the loss or malfunction of a facility key to the FPB as required in *PFB 6.2.403 Incident Reporting Requirements*; and
 - 3) change locks at once if security keys are lost, unaccounted for, or if offenders may have made key impressions, and immediately notify other facilities that may use the same keys.

4. Duplication of Keys

- a. The Facility Administrator, or designee, will strictly prohibit staff from the unauthorized possession, alteration, marking, duplication, manufacture, or impression making of keys.
- b. Staff will be required to report any such alleged incidents in writing to the chief of security for investigation.
- c. Any staff involved in key duplication will be subject to disciplinary action.
- d. If criminal acts are involved, the facility will refer the matter for prosecution.
- e. The chief of security must authorize any change in lock location or key duplication.

5. **Staff Training**: All staff must be trained in the key control system, particularly in the emergency key system, so that in a time of crisis any staff who were issued keys can use them as intended.

B. TOOL CONTROL

- 1. Each facility will develop operational processes for tool control that are applicable to the program structure of the facility. These processes may vary according to the physical plant and custody level of the facility or program.
- 2. Common issues that must be addressed in processes include:
 - a. responsibility/oversight of tool control requiring all staff to maintain accountability and control of each tool in their specific work areas;
 - b. tool categories in accordance with safety and security risks, considering what may be used as weapons, effect an escape, or compromise security. Categories could be determined as restricted, hazardous, and non-hazardous tools;
 - c. tool use supervision determined according to tool category and requiring direct, general, and indirect staff supervision;
 - d. tool storage in establishing secure storage, restrictions on offender tool issuance, and rigid inventories of all tools;
 - e. tool issuance and establishing a system of tool checkout logs, chits, or a combination and identifying who issues the tool, who receives the tool, and who is responsible for the security, safe usage, and return of the tool;
 - f. tool quotas to establish and evaluate tool numbers;
 - g. tool procurement and receipt to track facility tool orders, deliveries, and inventories;

- h. tool inventories maintaining a master inventory of all tools and their locations, establishing supervisory checks, physical inventories, and tool audits;
- i. tool marking that properly identifies assigned tools in accordance with tool categories;
- j. tool exchange in replacing unserviceable tools;
- k. lost tools and reporting missing or lost tools, location and offender searches, and recovery of tools;
- l. food service tools establishing safety and maintenance to include classification, inventory, and accountability during shifts, storage, and food items that may be misused;
- m. medical tools properly inventoried, physically controlled, and safely stored; and
- n. non-facility workers and their tools to be supervised by designated staff.

IV. CLOSING

Questions about this requirement should be directed to the FPB Chief.

V. REFERENCES

- A. *PFB 6.2.403*