

REGULATION MONTGOMERY COUNTY PUBLIC SCHOOLS

Related Entries: ECM, ECM-RA

Responsible Office: Office of the Chief Financial Officer; Office of Security and Compliance;
Office of Facilities Management/Division of Maintenance and Operations

Keys and Access Control System Badges for MCPS Properties

I. PURPOSE

To secure Montgomery County Public Schools (MCPS) schools and facilities owned or operated by MCPS

To establish procedures for distributing, replacing, and revoking keys and Access Control System (ACS) badges

II. DEFINITIONS

A. *Appropriate building administrator* means the superintendent of schools' designee responsible for specific administrative or operational functions of MCPS. For the purposes of this regulation, *appropriate building administrator* means –

1. local school principals for local schools, and
2. directors or chief officers of other operational units in facilities owned or operated by MCPS.

B. *Master key* means a physical key that provides access to building exteriors and interiors, including closets and other storage spaces within a building.

C. *Unit member* means an employee who is eligible for membership in one of the employee associations representing MCPS employees.

III. PROCEDURES

A. Responsibility for Keys and ACS Badges

The security of access to schools and other facilities owned or operated by MCPS

is centrally managed and monitored as follows:

1. The Office of Security and Compliance (OSC) oversees the distribution, access control, and monitoring of ACS badges and employee access. ACS badge distribution and access control are centrally managed by OSC to ensure consistency and security across the system.
2. The Office of Facilities Maintenance/Division of Maintenance and Operations (DMO) oversees the distribution, replacement, and revocation of keys.

B. General Access

1. In order to permit appropriate access to spaces in schools or other facilities, both during and after duty hours, all unit members of that building will be provided secured access to offices, lounges, workrooms, and interior hallway gates, as needed for their work.
2. All unit members are issued ACS badges.
 - a) Unit members are additionally provided with the necessary keys to secure their respective classroom or office spaces.
 - b) While essential for those unit members in buildings where physical locks for classrooms and office doors are in use, keys are also provided to unit members in buildings equipped for ACS for access, as a contingency measure in case of emergencies that may disable the ACS system.
 - c) It is mandatory for all unit members to display their ACS badges prominently on their person for identification purposes during duty hours, and as directed for MCPS-sponsored events.
3. Upon request, subject to approval by the appropriate building administrator, unit members may be provided temporary access to an outside door in their area of the building during non-duty hours.
4. OSC will establish protocols for providing and monitoring building access to unit members who may be assigned to multiple locations.
5. Upon a unit member's transfer to another location, termination from employment, or placement on administrative leave—

- a) employees must turn in their keys and ACS badges to their supervisor/designee; and
- b) their supervisor must inform the chief of OSC/designee within 24 hours of a unit member's transfer, termination, or placement on administrative leave.
- c) OSC will deactivate ACS immediately, and no later than 24 hours after notification.
- d) In the case of changes in principals, all school building keys will normally be given to the incoming principal or acting principal directly by the departing principal.

C. Keys

1. Keys Per Building

- a) DMO allocates the total number of master keys to each school, based on the following: one key for each of the following staff members assigned to a facility: principal or appropriate building administrator, assistant principal(s), school business administrator, building service manager, designated security personnel, preventive maintenance technicians and preventive specialists, building service assistant manager, and Interagency Coordinating Board employees.
- b) Three additional master keys will be placed in the local school key box for discretionary distribution by the principal.

2. Accountability

- a) The appropriate building administrator is responsible for the control, distribution, and use of master keys assigned to the building.
- b) Unit members are not to share keys or ACS badges.

3. Extra Keys

- a) DMO is responsible for storing extra keys for schools/facilities as well as a master key to each building in a key vault.
- b) The principal or appropriate building administrator is responsible for maintaining any extra keys for the school in a secure location.

4. Duplication of Keys

- a) Duplication of keys is the sole responsibility of DMO. Master keys may not be duplicated by local school/MCPS facility personnel.
- b) No master key may be duplicated without the approval of the director of DMO.
- c) If a duplicate key is required, the appropriate building administrator will make such request via email to the director of DMO and shall state the reason for the request.

5. Keys for New School Buildings

- a) Upon completion of a new school building, the contractor will furnish a full set of tagged keys to the director of the Division of Construction. The director of the Division of Planning, Design, and Construction will then turn the keys over to the director of DMO who, in conference with the principal, will determine which interior keys will be required for the operation of the school plant. In every instance, a complete set of keys will be left with the principal, and any remaining excess keys will be properly tagged and deposited in the key vault, which is operated by DMO.
- b) In the event that a new school is not fully completed, but partially occupied at the time of occupancy, all keys will be tagged and turned over to the director of construction in accordance with the first paragraph of this regulation.
- c) In the event that a new school is completed, but not immediately occupied, total responsibility for the new school, including key distribution, will be determined by the director of the Office of Facilities Management.

6. Keys for Additions to Existing School Buildings

The procedures concerning keys for additions to existing school buildings are the same as above, except that no additional master keys will be given to anyone. The master key for the addition should be mastered to the existing building.

D. Lost, Missing, or Damaged ACS Badges and Keys

1. In the event of a lost, missing, or damaged ACS badge or key, unit members are required to promptly inform their supervisor or school business administrator.
2. Additionally, employees must contact OSC immediately to deactivate the lost badge and request a replacement.
3. A nominal fee may be assessed for badge replacements, not to exceed the cost of producing and activating the new badge.
4. Broken keys shall be replaced at no cost to the unit member.
5. The chief financial officer/designee has the discretion to assess reasonable fees to unit members for repeated loss of keys. The director of DMO shall recommend fees to the chief of the Office of District Operations that shall not exceed the cost of cutting keys and rekeying locks affected by the loss.

Regulation History: Formerly Regulation No. 2306, May 19, 1975; reprinted April 1988; revised November 6, 1992; revised June 11, 1993; revised March 4, 2005; revised August 22, 2024.

MCPS NONDISCRIMINATION STATEMENT

Montgomery County Public Schools (MCPS) prohibits illegal discrimination based on race, ethnicity, color, ancestry, national origin, nationality, religion, immigration status, sex, gender, gender identity, gender expression, sexual orientation, family structure/parental status, marital status, age, ability (cognitive, social/emotional, and physical), poverty and socioeconomic status, language, or other legally or constitutionally protected attributes or affiliations. Discrimination undermines our community's long-standing efforts to create, foster, and promote equity, inclusion, and acceptance for all. The Board prohibits the use of language and/or the display of images and symbols that promote hate and can be reasonably expected to cause substantial disruption to school or district operations or activities. For more information, please review Montgomery County Board of Education Policy ACA, *Nondiscrimination, Equity, and Cultural Proficiency*. This Policy affirms the Board's belief that each and every student matters, and in particular, that educational outcomes should never be predictable by any individual's actual or perceived personal characteristics. The Policy also recognizes that equity requires proactive steps to identify and redress implicit biases, practices that have an unjustified disparate impact, and structural and institutional barriers that impede equality of educational or employment opportunities. MCPS also provides equal access to the Boy/Girl Scouts and other designated youth groups.*

It is the policy of the state of Maryland that all public and publicly funded schools and school programs operate in compliance with:

- (1) Title VI of the federal Civil Rights Act of 1964; and
- (2) Title 26, Subtitle 7 of the Education Article of the Maryland Code, which states that public and publicly funded schools and programs may not
 - (a) discriminate against a current student, a prospective student, or the parent or guardian of a current or prospective student on the basis of race, ethnicity, color, religion, sex, age, national origin, marital status, sexual orientation, gender identity, or disability;
 - (b) refuse enrollment of a prospective student, expel a current student, or withhold privileges from a current student, a prospective student, or the parent or guardian of a current or prospective student because of an individual's race, ethnicity, color, religion, sex, age, national origin, marital status, sexual orientation, gender identity, or disability; or
 - (c) discipline, invoke a penalty against, or take any other retaliatory action against a student or parent or guardian of a student who files a complaint alleging that the program or school discriminated against the student, regardless of the outcome of the complaint.**

Please note that contact information and federal, state, or local content requirements may change between editions of this document and shall supersede the statements and references contained in this version. Please see the online version for the most up-to-date information at www.montgomeryschoolsmd.org/info/nondiscrimination.

For inquiries or complaints about discrimination against MCPS students***	For inquiries or complaints about discrimination against MCPS staff***
Director of Student Welfare and Compliance Office of District Operations Student Welfare and Compliance 15 West Gude Drive, Suite 200, Rockville, MD 20850 240-740-3215 SWC@mcpsmd.org	Human Resource Compliance Officer Office of Human Resources and Development Department of Compliance and Investigations 45 West Gude Drive, Suite 2500, Rockville, MD 20850 240-740-2888 DCI@mcpsmd.org
For student requests for accommodations under Section 504 of the Rehabilitation Act of 1973	For staff requests for accommodations under the Americans with Disabilities Act
Section 504 Coordinator Office of School Support and Improvement Well-Being and Student Services 850 Hungerford Drive, Room 257, Rockville, MD 20850 240-740-3109 504@mcpsmd.org	ADA Compliance Coordinator Office of Human Resources and Development Department of Compliance and Investigations 45 West Gude Drive, Suite 2500, Rockville, MD 20850 240-740-2888 DCI@mcpsmd.org
For inquiries or complaints about sex discrimination under Title IX, including sexual harassment, against students or staff***	
Title IX Coordinator Office of District Operations Student Welfare and Compliance 15 West Gude Drive, Suite 200, Rockville, MD 20850 240-740-3215 TitleIX@mcpsmd.org	

*This notification complies with the federal Elementary and Secondary Education Act, as amended.

**This notification complies with the Code of Maryland Regulations Section 13A.01.07.

***Discrimination complaints may be filed with other agencies, such as the following: U.S. Equal Employment Opportunity Commission (EEOC), Baltimore Field Office, GH Fallon Federal Building, 31 Hopkins Plaza, Suite 1432, Baltimore, MD 21201, 1-800-669-4000, 1-800-669-6820 (TTY); Maryland Commission on Civil Rights (MCCR), William Donald Schaefer Tower, 6 Saint Paul Street, Suite 900, Baltimore, MD 21202, 410-767-8600, 1-800-637-6247, mCCR@maryland.gov; Agency Equity Officer, Office of Equity Assurance and Compliance, Office of the Deputy State Superintendent of Operations, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, MD 21201-2595, oeac.msde@maryland.gov; or U.S. Department of Education, Office for Civil Rights (OCR), The Wanamaker Building, 100 Penn Square East, Suite 515, Philadelphia, PA 19107, 1-800-421-3481, 1-800-877-8339 (TDD), OCR@ed.gov, or www2.ed.gov/about/offices/list/ocr/complaintintro.html.

This document is available, upon request, in languages other than English and in an alternate format under the *Americans with Disabilities Act*, by contacting the MCPS Office of Communications at 240-740-2837, 1-800-735-2258 (Maryland Relay), or PIO@mcpsmd.org. Individuals who need sign language interpretation or cued speech transliteration may contact the MCPS Office of Interpreting Services at 240-740-1800, 301-637-2958 (VP) mCPSinterpretingservices@mcpsmd.org, or MCPSInterpretingServices@mcpsmd.org.