

# YOUTH SERVICES POLICY

<b>Title:</b> Key Control Program	<b>Type:</b> C. Field Operations
<b>Next Annual Review Date:</b> 06/02/2018	<b>Sub Type:</b> 2. Security
	<b>Number:</b> C.2.13
<b>Page 1 of 15</b>	
<b>References:</b> ACA Standard 4-JCF-2A-23 (Performance-Based Standards for Juvenile Correctional Facilities); Division of Administration, Office of Risk Management, Loss Prevention Manual; and YS Policy Nos. A.1.4 "Investigative Services", A.1.14 "Unusual Occurrence Reports", A.2.1 "Employee Manual", A.2.35 "Employee Exit Processing", A.7.1 "Safety Plan" and B.5.1 "Youth Code of Conduct – Secure Care"	
<b>STATUS: Approved</b>	
<b>Approved By:</b> <i>James Bueche, Ph.D., Deputy Secretary</i>	<b>Date of Approval:</b> 06/02/2017

## I. AUTHORITY:

Deputy Secretary of Youth Services (YS) as contained in La. R.S. 36:405. Deviation from this policy must be approved by the Deputy Secretary.

## II. PURPOSE:

To promote public safety through the safe and secure operation of secure care facilities by ensuring that each adopt established procedures for the control of all keys and locks. These procedures shall encompass the following:

- Enable staff to maintain effective operations through the control of all doors, gates and other locking devices that comprise the physical plant both inside and outside of the perimeter; and
- Ensure that staff has total control of all keys and locking devices supplies, equipment and storage areas that support the agency's key control program.

In addition, this policy promotes safety by ensuring that in case of fire or other emergency situations, exit keys are readily accessible to designated staff.

## III. APPLICABILITY:

Deputy Secretary, Assistant Secretary, Undersecretary, Chief of Operations, Deputy Assistant Secretary, Regional Directors and Facility Directors.

Facility Directors are responsible for ensuring that all necessary procedures are in place to comply with this policy and for advising all affected persons of its content.

#### IV. DEFINITIONS:

Each facility's "Standard Operating Procedure" (SOP) must clearly define the various categories of keys used in the facility so that staff is aware of different accountability requirements for each category.

**Emergency Keys** – These keys shall be maintained in the Control Center separate from all other keys. They provide immediate access to all areas of the facility during emergency situations such as fires, disturbances and evacuations.

**Grand Master Key** – A single key cut to open all locks within the secure care facility.

**Juvenile Justice Specialist (JJS)** - Provides security of youth and assist in application of clinical treatment in accomplishing the overall goal of evaluation and/or treatment of individuals judicially remanded to a YS secure care facility.

**Key Control Officer** – The staff member designated by the Facility Director to be responsible for the storage and inventory of all facility keys. It is also the responsibility of the Key Control Officer to maintain the function and operation of the "Key Control Database". The purpose of this database is specifically designed to maintain the accountability of keys.

**Limited Issue Keys** – These keys shall be maintained on the "Limited Key Board" or separate cabinet in the Control Center. These keys are limited to check out by supervisory staff only. These keys may also be identified as specialty keys for designated areas (e.g., areas utilized by social service staff).

**Lock Maintenance** – Primary functions include the core and lock replacement, broken key extractions, etc. Each Facility Director shall designate in their Key Control Program the person responsible for maintaining lock maintenance. This could be the Key Control Officer, maintenance staff or outside contractor.

**Markers** – Tags that identify when keys are drawn from the Control Center. When keys are checked out from the Control Center a marker is placed on the hook in lieu of the keys to indicate that the keys are drawn, vehicle in shop, blank hook, etc.

**Master Key** – A single key cut to open more than one locking device in a series of locks from a single manufacturer within multiple designated areas of the facility.

**Non-Security Keys** – Keys that do not control access to security- type doors, gates or areas with hazardous or sensitive materials and, if lost or stolen, would not require an immediate response.

**Operational Keys** – Keys that shall be maintained on the “Operational Key Board” located in the Control Center and issued on a regular basis for the daily operation of the facility. These keys are accessible 24 hours a day, seven (7) days a week.

**Operations Shift Supervisor (OSS)** – An employee who is responsible for a range of duties that support management in maintaining a safe, secure facility. An OSS oversees administrative and operational security activities during specific shifts; manages employees during each assigned shift; ensures adequate security coverage; leads count procedures; oversees the custody, supervision and control of secure care youth; manages frontline security employees; assists in controlling youth movement; assists in directing the use and issuance of keys, locks, and security equipment.

**Pattern Keys** – Blank keys from which all other keys for a particular lock or series of locks are cut. These keys are maintained separately in a secure location designated by the Facility Director. This shall also apply to all inactive core locks and core keys.

**Restricted Keys** - Keys that shall be maintained in a separate cabinet located in the Control Center. Restricted keys provide access to highly sensitive areas and are issued only to authorized staff as designated by the Facility Director. Approval from the Facility Director must be obtained before they are temporarily issued to anyone other than the employee designated on a regular basis.

**Security Keys** – Any facility key which, if lost, stolen or duplicated by youth, would jeopardize the security of the facility, facility property, employees, visitors and youth, and may directly or indirectly facilitate an escape. Immediate action is necessary if a security key is lost, compromised or missing.

**24-Hour Keys** – Keys permanently assigned and issued to staff after approval by the Facility Director.

**Unassigned Keys** – Duplicate keys maintained in the Control Center or other secure location as designated by the Facility Director in a locked cabinet separate from all other keys. These keys are duplicate keys that are retained as backup for active locks. Access to the facility’s unassigned keys is totally restricted to the Key Control Officer.

**Unusual Occurrence Report (UOR)** – A form/document that must be completed by employees to report incidents or observations of events that may have an impact on any aspect of the agency. UOR forms shall be made available to all employees, working all areas at all times. Employees must complete and submit a UOR prior to the end of their tour of duty on the day the incident was observed or comes to the employee’s attention in any way. If a UOR form is not available, the employee must use any paper available to him to report the pertinent information. UORs may also be submitted by email in any format. The UOR

shall be submitted to the Operations Shift Supervisor (OSS) prior to the end of the OSS tour of duty on the date the UOR was completed. (Refer to YS Policy No. A.1.14)

(For the purposes of this policy, a UOR shall be completed detailing any unusual circumstances involving keys, and submitted by staff to their supervisor/OSS prior to the end of their tour of duty on the day that such an incident happened.)

**Vehicle Keys** – Keys that typically operate state owned vehicles, including tractors and other specialized machines located inside or outside the perimeter of the facility.

**V. POLICY:**

All secure care facilities shall maintain an accountability system for keys that ensures constant control of each key. Facility Director's shall ensure that the "Key Control Program" provides a safe and secure key control environment for all staff responsible for locks, keys, cores; restricts access to sensitive areas; and enables prompt response to emergencies.

Under no circumstance shall a youth be permitted to handle security or any other keys used at the facility, except those specifically issued and authorized (if any) for youth such as a personal locker key.

**VI. PROCEDURES:**

A. The Facility Director shall designate a Key Control Officer who shall be responsible for the storage, data entry and inventory of all keys. The Facility Director shall also select an alternate to be trained by the Key Control Officer in order to cover the duties during any long term absence of the designated Key Control Officer.

In the event that it is necessary to change the assignment of the Key Control Officer, the Facility Director shall contact the YS Safety Coordinator to schedule the appropriate training prior to the placement of the new designated Key Control Officer.

The Key Control Officer shall ensure that:

1. One side of each key is numbered and stamped either by the manufacturer or by engraving, unless the size of the key makes this impossible. Identical keys shall reflect the same number.
2. The other side of each key shall be numbered and stamped according to the key ring's designated tag number.
3. Each set of keys maintained in the Control Center shall have an attached metal tag (chit), indicating the assigned tag number and total number of keys.

The metal chit for 24-Hour keys shall indicate the assigned tag number **and** total number of keys for each ring set.

4. All keys (except unassigned keys) shall be maintained on a metallic key ring that is tamper proof or soldered/crimped at the joint to prevent tampering, loss or removal.
- B. The Key Control Officer shall maintain an inventory of all keys utilizing the facility's "Key Control Database". All information fields must be entered in the database as applicable to each key.

Each quarter, (July, October, January and April), a complete audit shall be conducted of the key control system. The Facility Director may assign someone to assist the Key Control Officer with this function. The audit shall include at a minimum:

1. An inventory of all keys;
  2. Testing of emergency keys/locks for proper function; and
  3. Evaluation of adherence to policy and procedure.
- C. The "Quarterly Key Control Inventory" shall reflect the following at a minimum:
1. Tag Number;
  2. Board Number;
  3. Total Number of Keys;
  4. Key Number;
  5. Assigned To;
  6. Type Use;
  7. Lock Type;
  8. Building;
  9. Door #/Location; and
  10. Type Space.
- D. The "Key Control Inventory" shall be adjusted in the "Key Control Database" as necessary to reflect audit findings.
- E. A written report shall be provided to the Facility Director detailing the audit findings. Corrective action shall be taken as needed.

## **VII. CONTROL CENTER KEY BOARDS:**

All operational keys, restricted keys, limited issue keys, vehicle keys and emergency keys shall be controlled, issued and accounted for by the facility's Control Center staff assigned to each shift. Keys shall be stored so that their presence or absence can be easily determined.

The facility shall maintain a "Control Center Key Board" as the primary issue point and main repository for all assigned operational, restricted, limited issue and emergency keys. All lockable key boards shall remain locked at all times when not in use.

- A. The "Control Center Key Board" shall be maintained as follows:
  - 1. Sufficient size to accommodate all keys and key rings routinely used;
  - 2. Contain rows of hooks that are lettered vertically and numbered horizontally;
  - 3. Provide one hook for each key ring identifiable by its location in the matrix of letters and numbers;
  - 4. Filled at all times with one of the following: a set of keys, a marker indicating that the keys have been drawn, vehicle in shop, blank hook, etc.; and
  - 5. Color coded: operational board/white; limited issue board/yellow and emergency board/red.
  
- B. Each hook on the board shall be assigned a number and only one key ring shall be assigned to each hook.
  
- C. Upon reporting for duty, the staff assigned to the Control Center shall conduct a daily inventory of all keys assuring that they account for each key ring on the key boards. This inventory shall be logged in the "Control Center Log Book" at the beginning of each shift (morning, afternoon, and night).

In addition to the above, staff listed below by shift, shall conduct a daily inventory of all keys assuring that they account for each key ring on the key boards. This inventory shall be documented on the unit's "Control Center Daily Key Control Inventory" [see Attachment C.2.13 (c)].

8-Hour Shift	3:00 p.m. - 11:00 p.m., evening shift
12-Hour Shift	6:00 p.m. - 6:00 a.m., night shift

At a minimum, the "Daily Key Control Inventory" shall reflect the following:

- 1. Key Board number (by alpha/numerical order);
- 2. Assignment/Location;
- 3. Total number of keys on each key ring;
- 4. Keys on Board (check as applicable);
- 5. Checked out (check as applicable);
- 6. Total # Keys Counted;
- 7. Name (if signed out); and
- 8. Comments.

- D. All keys assigned in the Control Center are prohibited from leaving the facility. Any employee who exits the grounds with a key that is checked out from the Control Center, during any shift, shall be contacted and required to return the key immediately to ensure an accurate key accountability for all keys on the boards by the Control Center staff.

If the key(s) are missing, the Control Center staff shall immediately notify their Supervisor, the Key Control Officer, and the Facility Director. The Facility Director shall immediately notify the appropriate Regional Director verbally, followed by an email notification.

The Control Center staff shall complete an Unusual Occurrence Report (UOR) detailing the circumstances surrounding the loss and the identification of each key on the key ring. A copy of the "Key Control Log Book" page identifying the individual who checked out the key shall be attached to the UOR.

The Facility Director shall determine the type of immediate action that is needed; searches, replacement of locks, etc., and inform the Regional Director of the action(s) to be taken.

- E. The Key Control Officer shall maintain an up to date inventory of the "Control Center Key Boards", cross referencing the key board number to the assigned tag number for each key ring. This inventory shall be dated, posted in the Control Center and maintained on file by the Key Control Officer. The inventory shall be reviewed and updated as needed. (Refer to Page 4 C. "Quarterly Key Inventory".)

#### **VIII. CONTROL CENTER KEY ISSUE:**

- A. When a key is issued from the Control Center, the receiving employee shall document the following in the "Key Control Log Book":
  - 1. The date and time out;
  - 2. Key tag number;
  - 3. Board location number;
  - 4. Emergency/Restricted; identify "E" for emergency and "R" for restricted;
  - 5. Number of keys received; and
  - 6. Legibly print their name.

When keys are returned, the employee shall document the time returned, date returned, and initial the "Key Control Log Book" on the entry noted above.

- B. The employee checking out the key shall inspect the key ring to ensure that it has the number of keys indicated and that no keys appear to be damaged.

- C. The Control Center staff shall ensure that the “Key Control Log Book” is appropriately documented prior to the employee leaving the Control Center.

**IX. HOUSING UNIT KEY EXCHANGE:**

- A. When obtaining keys from an officer/JJS on post/housing unit, the relieving officer/JJS shall immediately count the keys on the ring and verbally report any discrepancies to the nearest supervisor prior to the previous officer/JJS leaving post.

This information shall be documented in the unit’s log book and a written UOR shall be completed and submitted prior to the end of the officer’s/JJS’ tour of duty detailing the results of the key discrepancy.

- B. Each officer/JJS shall be responsible for knowing which locks each key in their possession operates. The keys assigned to post/housing unit are not transferable until the end of shift, unless transfer is to a new relieving officer/JJS as authorized by the Operations Shift Supervisor (OSS). In the event only one officer/JJS is relieved, the extra set of housing unit keys shall be returned to the Control Center.

**X. 24-HOUR KEY AUTHORIZATION:**

- A. The Facility Director may approve the issuance of key(s) to certain employees on a 24-Hour basis. The issuance of 24-Hour keys should be limited to administrative personnel.
- B. Grand master, master and perimeter keys shall be issued only with the direct approval of the Facility Director.
- C. The employee’s immediate supervisor must initiate the “Key Request Form” [see Attachment C.2.13 (a)]. The form must be filled out completely. The employee’s immediate supervisor shall authorize the request form prior to the Facility Director’s approval.
- D. The Facility Director must review the request and approve and/or disapprove the issue of 24-Hour keys. The form shall then be submitted to the Key Control Officer for keys to be issued.
- E. The Key Control Officer shall issue all keys, maintain the inventory in the “Key Control Database”, and adjust the master inventory for the “Unassigned Key Cabinet”. The “Key Request Form” shall be maintained by the Key Control Officer.



**XI. EMERGENCY KEYS:**

- A. Keys necessary to facilitate emergency evacuation from all parts of the facility shall be included on emergency key rings maintained in the Control Center. These keys shall be issued by Control Center staff only in an emergency situation with the express approval of the Facility Director. If the Facility Director cannot be contacted, the Deputy Director/Assistant Director shall be contacted for authorization of removal. Emergency keys shall be stored separately from the operational, limited and restricted keys in a locked red cabinet.
- B. When emergency keys are checked out from the Control Center, the following information shall be recorded by Control Center staff in the "Key Control Log Book":
  - 1. Date and Time Checked Out;
  - 2. Name of Authorizing Staff; must be documented in the "Control Center Log Book";
  - 3. Key tag number;
  - 4. Board Location number;
  - 5. Emergency/Restricted; identify "E" for emergency and "R" for restricted;
  - 6. Name of Receiving Employee;
  - 7. Location and Number of Keys; and
  - 8. Date and Time Returned.
- C. Emergency key rings must contain all the keys necessary for the complete evacuation of the facility. (If multiple key rings are used, the rings must be attached in some way.)
- D. All fire and emergency keys shall be color coded and marked for identification by touch. Fire door keys (i.e., exit doors) shall be marked by touch and color coded "Red".
- E. Unit keys shall be used during all emergency drills. Any malfunctions shall be reported to the Key Control Officer immediately on a UOR and Fire Drill Reports so that corrective action can be initiated.
- F. The Key Control Officer shall test emergency keys maintained in the Control Center quarterly to ensure proper function. Necessary repairs shall be conducted immediately. This inspection shall be documented in writing and provided to the Facility Director.
- G. All staff, particularly front line staff, must have a thorough understanding of the use of emergency keys to facilitate an evacuation during an emergency situation. Staff's use of emergency keys must be demonstrated during the monthly fire drills to ensure their ability to utilize the emergency keys quickly and without mistake.

**XII. RESTRICTED KEYS:**

- A. Restricted keys are maintained in the Control Center's locked restricted key cabinet. Restricted keys provide access to highly sensitive areas and are issued only to authorized staff as designated by the Facility Director. These keys shall not be issued to any employee other than the authorized employee for the restricted area without the express prior authorization from the Facility Director. The authorization of the Facility Director must be documented in the "Control Center Log Book".
- B. Listed below are examples of restricted keys:
1. Grand master keys;
  2. Master key;
  3. Keys to property storage areas;
  4. Keys to active and inactive record storage areas;
  5. Keys to pharmacy;
  6. Keys to administration;
  7. Keys to infirmary;
  8. Keys to tool and chemical storage areas;
  9. Keys to food service areas;
  10. Keys to food and dry warehouse areas;
  11. Keys to vocational areas; and
  12. Keys to maintenance areas, and maintenance equipment.
- C. When restricted keys are checked out from the Control Center, the below information shall be recorded by Control Center staff in the "Key Control Log Book":
1. Date and Time Checked Out;
  2. Name of Authorizing Staff; must be documented in the "Control Center Log Book";
  3. Key tag number;
  4. Board location number;
  5. Emergency/Restricted; identify "E" for emergency and "R" for restricted;
  6. Name of Receiving Employee;
  7. Location and Number of Keys; and
  8. Date and Time Returned.
- D. Each Facility Director shall establish procedures that provide for how authorized staff will routinely access restricted keys, the completion of a written UOR if the box is accessed by unauthorized person(s), and emergency access when needed.

**XIII. UNASSIGNED KEYS:**

- A. These keys shall be maintained in the Control Center or other secure location as designated by the Facility Director in a locked cabinet separate from all other keys. These keys are duplicate keys that are retained as backup for active locks. Access to the facility's unassigned keys is totally restricted to the Key Control Officer.
- B. Each facility must maintain at least one (1) duplicate key for each lock.
- C. Unassigned keys to the same lock shall be linked and stored together so that inventory control can be easily conducted.
- D. The Key Control Officer shall pull replacement keys from the unassigned key cabinet to issue as needed for new staff, replace broken keys, rotate keys, etc.
- E. The Key Control Officer shall maintain a perpetual inventory [see Attachment C.2.13 (b)] on the contents of the unassigned key cabinet and maintain updates as needed in the "Key Control Database". The perpetual inventory shall be posted at the location of the unassigned keys and include, at a minimum, the following information:
  - 1. Heading; Key # and Lock Type;
  - 2. Date Issued/Returned or Added;
  - 3. Name of Staff Receiving Key(s);
  - 4. Total # of Keys(s) Issued/Returned or Added;
  - 5. Type Use;
  - 6. Name of Building;
  - 7. Type Space;
  - 8. Space Assignment by Department;
  - 9. Staff Initials; and
  - 10. Current Balance.

**XIV. LOST, MISPLACED, BROKEN OR DAMAGED KEYS AND LOCKS:**

- A. The Facility Director must approve all key making, duplication or change of any key, door or lock.
- B. Request for changes, duplication or additional keys or locks shall be made in writing to the Key Control Officer using the "Key Request Form". The Key Control Officer shall review the request and forward it to the Facility Director for approval/denial.
- C. When keys are lost or misplaced, including personal key rings, an immediate **verbal** report shall be made to the employee's supervisor, Unit Head, Key Control Officer, Investigative Services (IS), and the Facility Director. The Facility Director shall immediately notify the appropriate Regional Director verbally, followed by an email notification. A UOR shall

follow the verbal report stating the circumstances surrounding the loss, the identification of each key on the key ring, and shall reflect where the keys were last located.

- D. All facility movement shall cease, and an immediate search of the facility shall be conducted to locate the lost keys. Movement shall not resume until it has been determined by both the Facility Director and Regional Director that an imminent threat of a potential security breach does not exist. Prior to the issuance of new keys, the Facility Director shall determine if the situation warrants lock exchange and the issuance of new keys.

If not warranted, a "Key Replacement Form" shall be submitted to the Key Control Officer requesting a replacement for the lost keys. All keys found by staff must be turned in to the Key Control Officer immediately, along with a UOR detailing where and when the key was located.

- E. If an employee breaks a key and/or lock during normal business hours, the employee shall complete a UOR and notify their supervisor and the Key Control Officer immediately.
- F. If an employee breaks a key and/or lock after normal business hours, weekends or holidays, the employee shall complete a UOR and shall notify the OSS immediately. If the broken key is required for entry into a door within a housing unit or gate, the OSS shall contact the Key Control Officer or designated Lock Maintenance staff after receiving the Facility Director's approval for repair. The area shall be secured until the lock is replaced and/or repaired.
- G. Notification to the Key Control Officer and/or Lock Maintenance staff shall be documented as a maintenance work order in accordance with each facility's established work order procedures.
- H. Force shall not be used to operate locks. If the lock does not function easily it shall be immediately reported to the Key Control Officer via a UOR and repaired.
- I. Any employee who misplaces a key through negligence or carelessness may be subject to disciplinary action up to and including dismissal.

**XV. LOCK MAINTENANCE:**

- A. Lock maintenance shall be conducted as recommended by the manufacturer.
- B. The Facility Director shall authorize the disposal of all damaged keys and locks when requested by the Key Control Officer. All damaged keys and/or locks shall be disposed of off campus.

**XVI. KEY ACCOUNTABILITY:**

- A. Facility Director's shall ensure that a complete accountability system for all keys, which includes tracking the number of keys on each ring and being able to determine at all times who has what keys in their possession.
- B. All staff issued keys are responsible for the accountability of those keys at all times.
- C. Keys that are transferred during shift change must be accounted for prior to the shift change, and the staff member coming on shift is responsible for the accountability of those keys at all times.
- D. Staff signing out keys from the Control Center are responsible for the accountability of those keys until returned to the Control Center.

**XVII. STAFF'S HANDLING OF KEYS:**

- A. Staff shall always fasten keys to their person by chain, strap or snap hooks at all times when not in use. Staff shall never leave State issued keys or personal keys unattended.
- B. Staff's personal keys and state issued keys shall never be attached to the same ring.
- C. Staff shall check the key count against the key tag when exchanging keys from one employee to another.
- D. Staff shall avoid reference to key numbers or any identifying information in the presence of youth.
- E. Staff should avoid dropping keys. Keys shall be exchanged hand to hand. Staff shall never toss or throw keys.
- F. Staff shall not use force to operate locks.
- G. Staff shall not attempt to repair locks. If a lock does not function properly, the appropriate supervisor shall be notified immediately, and a UOR shall be completed.
- H. Staff shall never allow youth to handle any type of keys or locks.

**XVIII. DUPLICATION OF KEYS:**

No employee shall possess, alter, mark, duplicate, manufacture, make impressions of keys or add/remove keys from rings without the authorization of the Facility Director. Likewise, no employee shall alter or change locking devices or doors without authorization from the Facility Director.

Any such incident shall be reported in writing to the Facility Director and Key Control Officer via a UOR. The Facility Director shall ensure that the incident or suspected incident is thoroughly investigated by IS staff (refer to YS Policy No. A.1.4).

Such actions by staff or youth may result in disciplinary action and/or criminal prosecution (refer to YS Policy Nos. A.2.1 and B.5.1).

**XIX. STAFF ON EXTENDED LEAVE:**

- A. When an employee is placed on extended leave, i.e, enforced leave, FMLA, investigative leave, worker's compensation leave, or annual leave for two weeks or more, assigned keys must be returned to the Key Control Officer.
- B. The Key Control Officer shall ensure proper storage until the employee returns to work or the keys are reassigned.

**XX. RETURN OF KEYS:**

- A. Each staff member leaving the employment of OJJ must complete a clearance form known as the "Employee Exit Routing Form" (refer to YS Policy No. A.2.35). The Key Control Officer or HR Liaison shall endorse and receive all the keys from the exiting staff member in person, and date/initial the "Employee Exit Routing Form."
- B. Employees leaving employment shall not pass keys on to another employee under any circumstances. The keys must be returned to the Key Control Officer. An employee's final paycheck may be withheld pending receipt of facility keys.
- C. When an employee is reassigned within the facility, all keys assigned for the prior position shall be returned to the Key Control Officer and merged back into the master inventory. A new set of keys shall be issued for the reassigned position.

**XXI. STAFF DEVELOPMENT:**

Facility Directors shall ensure that all current employees receive training relative to the contents of the "Key Control Program".

All new employees shall receive training within ninety (90) days of hire.

The contents of each facility's "Key Control Program" shall be part of the annual in-service training curriculum.

**XXII. QUALITY ASSURANCE:**

- A. Continuous Quality Improvement Services (CQIS) shall conduct a General Safety Program Review to ensure compliance with the Office of Risk Management Standards and the State's Loss Prevention Program is being met.
- B. Corrective Action Plans shall be submitted to CQIS within ten (10) days following receipt of the Bi-Annual Continuous Quality Improvement Services (CQIS) Quality Assurance (QA) Review.
- C. Comprehensive audits are conducted on an annual basis by staff from the ORM, in conjunction with the State's Loss Prevention Program. The Unit Head/designee and designated CQIS staff shall be present during the exit interview following the review.

**Previous Regulation/Policy Number:** C.2.13

**Previous Effective Date:** 04/15/2016

**Attachments/References:**

- C.2.13 (a) Key Request Form – February 2011
- C.2.13 (b) Perpetual Inventory for Unassigned Keys – March 2011
- C.2.13 (c) CC Daily Key Inventory. June 2017