

CARD ACCESS AND ENHANCED SECURITY MEASURES CRITERIA CHECKLIST

CARD ACCESS AND ENHANCED SECURITY MEASURES CRITERIA

This document is designed to help personnel assess their security requirements for Michigan State University rooms, suites, laboratories, facilities and areas. The results of this checklist will help determine if card access is required, enhanced security measures and/or protocols are required, or if no additional security is needed.

If it is concluded that a card access control system is required, please refer to the MSU Construction Standard for Card Access for system requirements.

Enhanced security measures and/or protocols can include any equipment or system that adds increased protection against theft, damage, tampering or personal injury. This includes, but is not limited to, card access, locks, video cameras, motion detectors, fencing, the separation of animals and humans, gates, lighting, posted hours of operation, warning-related signage and administrative security protocols.

Prior to assessing the need for enhanced access security control, units and individuals should:

- Read and understand the descriptions and definitions provided in this document
- Know all legal, regulatory and/or external requirements pertaining to the assessed space
- Know the approximate value of cash and equipment in the assessed space
- Consolidate storage and processing of all confidential and proprietary data (CPD) necessary to academic and business operations to systems and locations that may be properly and optimally secured
- Destroy any CPD which are not needed for academic and business purposes
- Provide appropriate layers of security for any CPD which must remain in distributed locations (e.g., locked cabinets for paper records)

The following checklist contains questions addressing five major areas: research areas, server rooms, sensitive interior areas, farm areas, and physical plant rooms.

PLEASE REVIEW ALL CRITERIA BEFORE MAKING A DECISION TO IMPLEMENT CARD ACCESS AND/OR ENHANCED SECURITY MEASURES.

DESCRIPTIONS AND DEFINITIONS

Agricultural Chemicals

Fertilizers, herbicides, fungicides, insecticides, rodenticides, pesticides and other materials with similar characteristics and applications.

BSL 2, 3,4

Biosafety Level 2 or 3 and 4 facilities are those subject to standards contained in the NIH Biosafety in Microbiological and Biomedical laboratories, Section IV, Laboratory Biosafety Level Criteria.

See: [NIH Biosafety in Microbiological & Biomedical Laboratories](#)

Card Access

See 'MSU Construction Standard for Card Access' pg. 15.

Chemicals of Interest

The Department of Homeland Security (DHS) has issued **Chemical Facility Anti-Terrorism Standards (CFATS)** for all facilities that manufacture, use, store, or distribute certain chemicals above a specified quantity. The federal government has recognized that research universities may have chemicals of interest (COIs) to terrorists, and the legislation requires detailed chemical inventory reporting.

Communications Rooms

Rooms that are utilized to terminate fiber optic and other types of cabling and to house computing, telecommunication and related equipment. In order of priority, three levels have been determined:

- Level 1. Termination point for cabling and equipment which support multiple floors or wings of the facility. Typically contains the main distribution frame (MDF) and is often the primary communications entry point for the facility. Potential outage impact is high.
- Level 2. Termination point for cabling and equipment which support an entire floor or wing of the facility. Typically contains an intermediate distribution frame (IDF) and is connected to one or more Level 3 rooms. Potential outage impact is medium.
- Level 3. Termination point for cabling and equipment which support one or more office areas within a floor. Typically serves as demarcation point for local on-premises wiring. Potential outage impact is low.

Confidential or Proprietary Data (CPD)

Data, regardless of the form (electronic, paper, other), in which the data are stored or processed in the subject space. The checklists are based on the current University definitions of Confidential and Proprietary Data.

Controlled Substances

Drugs and certain other chemicals, both narcotic and non-narcotic, which come under the jurisdiction of federal and state laws regulating their manufacture, sale, distribution, use and disposal, which include any substance listed in the Controlled Substances Act, Code of Federal or Substance Regulations (21 CFR, part 1300 to end).

Controversial Research

Research that due to its characteristics or nature presents an increased security risk or hazard to the University.

Dual Use Research

Research that has the potential to be misused for nefarious purposes is said to be “dual-use”. The techniques needed to engineer a bioweapon are the same as those needed to pursue legitimate research.

Enhanced Security

Any equipment or system that adds increased protection against theft, damage, tampering or personal injury. This includes, but is not limited to, card access, locks, video cameras, motion detection, fencing, the separation of animals and humans, gates, lighting, posted hours of operation, warning-related signage and administrative security protocols.

Environmental Hazard Areas

Situations or state of events that pose a threat to the surrounding environment - potential hazards might include a chemical spill or dumping, but also various emissions of pollutants or the leaching of pesticides and fertilizers into the surrounding environment.

Export Control Laws and Regulations

Export control laws and regulations are those federal laws and regulations that control the conditions under which certain information, technologies, and commodities can be transmitted over-seas to anyone, including U.S. citizens, or to a foreign national on U.S. soil. For example, programs are implemented by both the Department of Commerce through its Export Administration Regulations (EAR) and the Department of State through its International Traffic in Arms Regulations (ITAR).

High-Energy Radioactive Sources

Positron Emission Tomography (PET) and Cyclotrons are examples of facilities that utilize high energy radioactive sources.

High Replacement Cost Instruments/Equipment/Materials/Contents

Individual pieces of instrumentation, equipment, materials or contents with a replacement value in excess of \$250,000. A security assessment will be made by the Department and Police and Public Safety Security Team to determine the appropriateness of required enhanced security measures and/or protocols.

Material Quantity

Program-scale or department-scale storage of such data (for example, that would be associated with a director’s or chairperson’s office, or workspace of a related administrative associate), or larger.

Note regarding Confidential and Proprietary Data: It is the intention of these criteria to describe conditions under which due consideration should be given to enhanced means of physical access control for spaces in which “material quantities” of CPD are stored or processed. These criteria recognize that many types of CPD (for example, student educational records, copies of personal personnel records) exist in small and even significant volumes on faculty and staff computers and office files, and that it would be impractical to apply expensive security controls to every office or laboratory space in which this may be the case.

Proprietary Information

Information, records, or data whose value would be lost or reduced by disclosure or by disclosure in advance of the time prescribed for its authorized public release, or whose disclosure would otherwise adversely affect the University financially.

Examples of proprietary information include but are not limited to:

- Research data or results prior to publication or the filing of a patent application.
- Non-patentable technical information or know-how that enhances the value of a patented invention or that has independent commercial value.
- Information about the University's intention to buy, sell, or lease property whose disclosure would increase the cost of that property for the University or decrease what the University realizes from that property.

Research Laboratories

Research laboratories that utilize normally expected research practices, protocols and materials that, while potentially hazardous, may not fall within the guidelines established for other categories

Select Agent

A microorganism (virus, bacterium, fungus, rickettsia) or toxin listed by the CDC (7 CFR Part 331, 9 CFR Part 121, and 42 CFR Part 73). This term also includes:

- Genetically modified microorganisms or genetic elements from organisms listed as select agents, shown to produce or encode for a factor associated with a disease, and
- Genetically modified microorganisms or genetic elements that contain nucleic acid sequences coding for any of the toxins listed as a select agent, or their toxic submits.

Sensitive Interior Areas

Rooms or areas that contain a variety of materials, equipment and/or services that are essential to the function of the University, including south campus farms and other University facilities. Should unauthorized persons gain access to these areas; they could create a risk of public or personal and/or institutional harm.

These areas may be support areas storing equipment and supplies or the main area for a function that is not directly research related. These rooms are critical to the operation of an individual 5 department or the University as a whole. The nature and use of these areas suggests that they be considered for access control.

Server Room

A room that has enhanced power and/or cooling infrastructure installed specifically to support computing equipment.

Significant Cash Operation

Location whose primary operation is dealing with amounts of cash, checks or credit card sales over \$5,000. These areas do not include "petty cash" kept in various offices.

Significant Chemical Hazard

This category comprises chemicals that by their nature or volume (or combination thereof), present a substantial and quantifiable hazard to campus health or safety, as determined following the completion of a comprehensive risk assessment of the facility. This category may extend to facilities containing chemicals and/or other materials using quantities that exceed statutory or regulatory thresholds established by federal or state agencies, such as USEPA, OSHA, CDC, DOT MDEQ, MIOSHA, MDOT, etc.

Weapons (not including culinary service items)

Firearms, knives, swords, explosives and any other items typically thought of as weapons.

CARD ACCESS REQUIRED CRITERIA

My room/suite/laboratory/facility/area:

- utilizes select agents or exempt select agents including related support and office areas
- is subject to Export Control Laws and Regulations, International Trade in Arms Regulations (ITAR), Export Administration Regulations (EAR), including related office and data management facilities
- is a BSL 2 or 3 or 4 Facility or uses materials that fall into the BSL 2 or 3 or 4 category
- uses Recombinant DNA and is subject to Biosafety Committee Review (i.e., non-exempt research) including related support and office areas
- is a Level 1. or Level 2. communications room.
- is a research animal facility, including related support and office areas
- stores controlled substances
- is licensed to use radioactive materials
- conducts potentially controversial research, including related support and office areas
- stores information relating to research involving human or animal subjects
- has operations that present a significant chemical hazard to the University community, or uses chemicals on the DHS “Chemicals of Interest” list above screening threshold quantities
- is a main electrical vault with switch gear or contains air handling equipment
- Health Information – (any quantity) as defined and governed by the Health Insurance Portability and Accountability Act (HIPAA)
- Stores weapons

**If you checked one or more of the above, then
ENHANCED SECURITY MEASURES AND/OR PROTOCOLS MAY BE REQUIRED.
See Security Assessment on Page 8.**

ENHANCED SECURITY MEASURES AND/OR PROTOCOLS

My room/suite/laboratory/facility/area:

- is a standard research facility
- houses animals other than research animals
- has manure pits
- has bunker silos
- has spaces with research freezers/growth chambers located in common and/or public areas
- houses an emergency generator
- is a fuel storage area
- is a residence hall
- is an area for storing large amounts of fertilizer, pesticide storage or anhydrous ammonia
- is a significant cash operation
- contains water wells, either potable or irrigation wells
- is a server room
- contains the main water feed to the building
- has the main natural gas feed to the building
- contains sump pumps

My office/room/laboratory/area contains material quantities of:

- Records describing security measures
- Payment (credit/debit) card account numbers and related information
- Bank account numbers, Automated Clearinghouse (ACH), Electronic Funds Transfer (EFT) account numbers and related information
- Personal financial information – as defined and governed by the Gramm-Leach- Bliley Act (GLB)
- Research information – as defined and governed by federal regulation (45 CFR 46, 21 CFR 50, 21 CFR 56) and MSU's Internal Review Boards. See: VP Research and Graduate Studies - Compliance

- Employment data such as benefits enrollment, beneficiary data, and certain grievance, arbitration, or legal proceedings documentation (other than individual personal copies of such)
- Social Security numbers (SSNs) – the use of which is controlled by the Michigan Social Security Number Privacy Act, and institutional policy. See: University Policy on Social Security Number Privacy
- Student educational records – as defined and governed by the Family Educational Rights and Privacy Act (FERPA) and MSU’s Guidelines Governing Privacy and Release of Student Records (www.reg.msu.edu), including student number and student name pairings
- Driver’s license numbers
- Names, addresses and phone numbers when used in conjunction with any of the above data and other personal data such as date of birth, mother’s maiden name, or when restricted or protected by the individual

**If you checked one or more of the above, then
ENHANCED SECURITY MEASURES AND/OR PROTOCOLS MAY BE REQUIRED.
See Security Assessment on Page 8.**

SECURITY ASSESSMENT

A security assessment can be requested and will be made by the MSU Security Review Team to determine the appropriateness of required and enhanced security measures and/or protocols for the campus. Examples of when a security assessment may be most beneficial include but are not necessarily limited to spaces that:

- meet any of the criteria listed under the “Card Access Required” on Page 11.
- contain high value equipment, instruments, materials or contents
- is an area or room where its loss would represent a major material or business continuity loss to the University, unit, or individual department
- has information described by the University as “Proprietary Information”
- has had several occurrences of theft or vandalism in the last five years