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To: All Udall Foundation Employees
From: David Brown, Executive Director
Subject: Udall Foundation Prohibited Items Policy

The Udall Foundation is committed to keeping its employees, contractors, and visitors safe when working in agency facilities. Accordingly, the Udall Foundation has reviewed applicable Interagency Security Committee (ISC) policies, recommendations, and standards and developed a list of prohibited and controlled items for agency facilities. Those items are codified in this policy, which was also informed by Executive Order (EO) 12977 (*Interagency Security Committee*) and the ISC *Standard Items Prohibited in Federal Facilities (2022 Edition)*.

This policy applies to all Udall Foundation employees, contractors, and visitors in agency-maintained spaces in Tucson, Arizona, and Washington, D.C. This policy specifies prohibited and controlled items and the process for requesting exemptions and exceptions.

Udall Foundation Prohibited Items Policy

I. BACKGROUND

In October 1995, President Clinton signed EO 12977 establishing the Interagency Security Committee, which has developed and published over 20 policies, standards, and recommendations to identify, assess, and prioritize risks at Federal facilities. Consistent with EO 12977, the ISC has identified a baseline list of prohibited items that each responsible authority (in this case, the Udall Foundation Executive Director) shall customize to mitigate facility risk. It is applicable to all executive branch buildings and facilities in the United States occupied by Federal personnel for nonmilitary activities. These facilities include those currently owned, to be purchased, or leased; standalone facilities; Federal campuses; and, where appropriate, individual facilities on Federal campuses and special-use facilities.

II. UDALL FOUNDATION FACILITIES

This policy applies to the Udall Foundation's Tucson, Arizona Headquarters (Tucson HQ) and its Washington, D.C. Office (DC Office). This policy applies to all Udall Foundation employees, contractors, and visitors¹.

For Tucson HQ, this policy extends to all Udall Foundation space on the third floor of the building located at 434 E. University Blvd., Tucson, AZ, 85705. For the DC office, this policy extends to Udall Foundation fifth floor offices subleased from The University of Arizona, including its D.C. Huddle Room, of the building located at 1301 Pennsylvania Ave. NW, Washington, DC, 20005. This policy does not apply to common areas at either facility (e.g., lobbies, elevators), space occupied by non-Federal tenants, public areas such as sidewalks, and parking lots.

III. PROHIBITED ITEMS

The items that are prohibited in Udall Foundation facilities include any item prohibited by any applicable Federal, State, Local, or Tribal law and/or ordinance as well as firearms, dangerous weapons, explosives, or other destructive devices, including their individual parts or components, that are designed, redesigned, used, intended for use, or readily converted to cause injury, death, or property damage. Prohibited items may only be used in Udall Foundation facilities when the Administrative Officer has granted an exception or exemption (see section V).

Firearms and Projectile Weapons

The list of prohibited firearms and projectile weapons includes, but is not limited to:

- Firearms or similar devices (i.e., 3D or Ghost Guns, etc.) that expel a projectile through the action of an explosive, unless meeting the exemptions listed in 18 U.S.C. § 930(d);
- BB or pellet guns;
- Compressed air guns;

¹ Law enforcement, members of the Armed Forces, and applicable Federal officials may possess firearms or other dangerous weapons if such possession is authorized by law.

- Flare guns;
- Realistic replica or toy firearms, unless meeting the exemptions listed in 18 U.S.C. § 930(d);
- Spear guns;
- Starter pistols;
- Stun guns, cattle prods, dart-firing stun guns, and other electric weapons;
- Ammunition, shotgun shells, firearm cartridges, black powder, smokeless propellant powder, unless meeting the exemptions listed in 18 U.S.C. § 930(d); and
- Slingshots.

Bladed, Edged, or Sharp Tools or Implements

The list of prohibited bladed, edged, or sharp tools or implements includes, but is not limited to:

- Axes and hatchets;
- Bows and arrows;
- Ice axes/ice picks;
- Throwing stars (martial arts);
- Knives, sabers, swords, daggers, and other bladed devices with a blade of more than 2 ½ inches, unless meeting the exemptions listed in 18 U.S.C. § 930(d); and
- Razor-type blades such as box cutters, utility knives, and razor blades not in a cartridge, unless meeting the exemption listed in 18 U.S.C. § 930(d)(3).

Club-like Items and Striking Devices

The list of prohibited club-like items and striking devices includes, but is not limited to:

- Billy clubs;
- Blackjacks;
- Brass knuckles;
- Chains exceeding 12 inches; jewelry exceptions can be made;
- Night sticks, unless meeting the exemptions listed in 18 U.S.C. § 930(d); and
- Martial arts weapons, including nunchucks and kubatons.

Destructive Devices, Explosives, or Combustible Chemical Compounds and Mixtures

The list of prohibited destructive devices, explosives, and chemical compounds or mixtures that can combust or oxidize upon the application of heat, flame, or shock includes, but is not limited to:

- Blasting caps or detonators;
- Dynamite, nitroglycerin, trinitrotoluene, and other similar materials;
- Fireworks;
- Gunpowder;
- Hand grenades, mines, bombs, rockets, missiles, pipe bombs, plastic explosives;
- Realistic replicas of explosives or similar devices;
- Explosive or expanding gases;
- Gas torches; and

- Flammable liquids, such as gasoline, turpentine, and paint thinner, unless meeting the exemption listed in 18 U.S.C. § 930(d)(3).

Disabling Chemicals and Other Dangerous Items

The list of prohibited chemicals and other dangerous items includes, but is not limited to:

- Mace, pepper spray, tear gas, or other chemical sprays designed for self-defense, unless meeting the exemption listed in 18 U.S.C. § 930(d);
- Spillable batteries, except those in wheelchairs or similar devices used by a mobility impaired individual;
- Spray paint, unless meeting the exemption listed in 18 U.S.C. § 930(d)(3); and
- Poisonous gases.

IV. CONTROLLED ITEMS

Controlled items are considered potentially dangerous devices or items that are not prohibited in Federal facilities but that still require advance notification for use. Udall Foundation employees and contractors may use these items in the performance of their duties; visitors are prohibited from bringing controlled items into Udall Foundation facilities. Controlled items may only be used in Udall Foundation facilities following an advanced notification to the Administrative Officer.

Tools of the Trade

Controlled tools of the trade are any items required for a person to do their job, such as hand tools for maintenance and construction or a chef's knife for catering.

Bladed, Edged, or Sharp Items

The list of controlled bladed, edged, or sharp items includes, but is not limited to:

- Saws, including cordless portable power saws;
- Scissors, metal with pointed tips;
- Screwdrivers (except those in eyeglass repair kits);
- Drills, including portable power drills; and
- Other tools including, but not limited to, wrenches, pliers, and folding, multipurpose utility tools.

Club-like Items and Striking Devices

The list of controlled club-like items and striking devices includes, but is not limited to:

- Hammers; and
- Crowbars.

Destructive Devices, Explosives, or Combustible Chemical Compounds and Mixtures

The list of controlled destructive devices, explosives, and chemical compounds or mixtures that may combust or oxidize upon the application of heat, flame, or shock includes, but is not limited to:

- Flares;
- Gasoline;
- Ammonium nitrate, and
- Aerosol sprays.

Disabling Chemicals and Other Dangerous Items

The list of controlled disabling chemicals and other dangerous items includes, but is not limited to:

- Chlorine and bleach;
- Compressed gas cylinders, including fire extinguishers; and
- Toxic industrial chemicals and/or materials.

Training Aids

Controlled inert training aids include, but are not limited to, realistic replicas of explosives or other dangerous weapons used in the training of security personnel, (e.g., vehicle searches, facility searches, and general improvised explosive device recognition). These items are not currently used by the Udall Foundation and would require an approved exception for any future use.

Sporting Equipment

Controlled sporting equipment consists of items used in the practice of, or participation in, certain physical activities, games, or sports, many of which may be used as club-like items or striking devices. The list includes, but is not limited to:

- Baseball bats;
- Golf clubs;
- Hockey sticks;
- Lacrosse sticks
- Pool cues; and
- Ski poles.

V. PROCEDURES FOR EXCEPTIONS AND EXEMPTIONS

Some items that are otherwise prohibited from a Federal facility may have a legitimate and lawful purpose or use in the course of agency business. These legitimate and lawful purposes may also include accommodations for compliance with specific civil rights and civil liberties under Federal laws including, but not limited to, Title VII of the Civil Rights Act, the Americans with Disabilities Act,

the Rehabilitation Act, and the Religious Freedom Restoration Act. An example of such an item is the Kirpan, which is a single-edged sword or knife carried by Sikhs as part of a religious commandment.

All requests for exceptions or exemptions to the list of prohibited items should be made to the Udall Foundation Administrative Officer. Exceptions may be temporary in nature, granted for specific occurrences, or granted for a defined period. Exemptions may be permanent in nature and granted until rescinded. The Udall Foundation Administrative Officer will consult with the agency's General Counsel and Executive Director as needed when reviewing requests for exceptions or exemptions.

Requests for exemptions or exceptions may be made via email and should include the following information:

- Type of Request (Exemption or Exception)
 - In the case of an exception, the duration of the request (how long the exception is needed).
- Individual(s)
 - Who needs the exemption or exception.
- Name and Description of Prohibited Item(s)
- Justification for Exemption or Exception