



The
Poarch Band of Creek Indians
Tribal Gaming Commission

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**Summary of Regulatory Revisions of the Poarch Creek Indians'
Tribal Internal Control Standards**

October 22, 2013

The National Indian Gaming Commission (NIGC) has promulgated regulations revising the Minimum Internal Control Standards for Class II Gaming (25 CFR Part 543). Accordingly, the Poarch Band of Creek Indians' Tribal Gaming Commission has made revisions to the Tribal Internal Control Standards (TICS) to reflect the revisions to NIGC's Minimum Internal Control Standards for Class II Gaming. The revisions to the TICS were extensive and the following is a summary of the major additions/removals:

- Additions were made to include sections for Promotions and Player Tracking Systems, Electronic Bingo Systems, Patron Deposit Accounts and Cashless Systems, Auditing Revenue, Lines of Credit, and Card Games. Such sections now include kiosk standards in the section for Cage and Vault, NIGC Technical standards and references (25 CFR 547) in the Information Technology Section, and standards for the monitoring of kiosks in the Surveillance Section.
- Standards for the auditing of controlled (sensitive) keys moved from the Drop and Count Section to the new Auditing Revenue Section.
- The Audit and Accounting section is a combination of two previous sections entitled Internal Audit and CPA Testing.
- Removals were made to include the Pari-Mutuel Wagering Section and the Gaming Machine Internal Controls Section. However, many of the applicable standards from the Gaming Machine Internal Controls Section can now be found in the following sections: Bingo, Electronic Bingo Systems, Cage & Vault, and Patron Deposit Accounts & Cashless Systems.
- There were several changes to the Definitions Section that include new definitions and amendments to old definitions that affect regulatory requirements.
- Grammatical, formatting, and language changes were made throughout the document to provide clarity and reflect clearer intentions of regulatory standards.

Notice of the revisions to the regulations are posted in Tribal offices and the Tribe's website. Additionally, notice will be sent to all gaming facilities. A thirty-day comment period provided opportunity for the public to submit written comments up until 5:00 p.m. on Thursday, November 21, 2013.

An open meeting will be held by the Tribal Gaming Commission on Tuesday, November 5, 2013, at 4:00 p.m. Written comments may also be submitted to Daniel K. McGhee, Tribal Gaming Commission Administrator, 5825 Highway 21, Atmore, AL 36502. All comments received by the Gaming Commission Office shall be considered by the Tribal Gaming Commission. Any comments received will be addressed, if necessary, by further revisions.

Poarch Band of Creek Indians

Tribal Internal Control Standards

Class II Gaming
(As amended October 22, 2013)

Poarch Band of Creek Indians
Tribal Internal Control Standards
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Purpose Statement

The intent of these standards is to provide regulatory guidance to Poarch Creek Indian tribal jurisdictions that have enacted tribal legislation permitting the operation of gaming activities when played in accordance with applicable law. These standards shall not be construed as an endorsement for any other form of gaming.

Section 1:

Background Information

Tribal Ordinance 2010-002 authorizes, licenses and regulates all classes of gaming on tribal lands and gives all regulatory authority to the Tribal Gaming Commission of the Poarch Band of Creek Indians (Tribal Gaming Commission), with oversight from the Tribal Council.

Indian gaming is an ever-changing industry, and as a result, the National Indian Gaming Commission (NIGC) has continued to update and revise its Minimum Internal Control Standards (MICS). In 2012, the NIGC published new MICS for §543 as a final rule. The Tribal Gaming Commission thereafter revised its existing Tribal Internal Control Standards (TICS) to ensure that they, at a minimum, meet the standards outlined in the final rule. The following standards represent the most recent TICS approved by both the Tribal Gaming Commission and the Tribal Council of the Poarch Band of Creek Indians.

Section 2: General Principles

1. Tribal Council Ordinance 2010-002 is the Tribal Council Ordinance (TCO) that authorizes, licenses, and regulates all classes of gaming on Tribal lands and gives regulatory authority to the Tribal Gaming Commission.
2. The Tribal Council adopted TCO 2010-002 on May 20, 2010, revising Section 20 of the Tribal Code of the Poarch Band of Creek Indians. The term “ordinance” was used not because of a change in Tribal policy, but instead because of the regulations of the National Indian Gaming Commission. While not in typical Tribal format, the document is intended to be TCO 2010-002. No other document was assigned the number TCO 2010-002 by the Tribal Council.
3. To ensure consistent interpretation and application of regulations, it is recommended that the administration and enforcement of gaming related regulations be the responsibility of the Tribal Gaming Commission of the Poarch Band of Creek Indians. Fragmenting the tasks and assigning them to varying sub-jurisdictions or multiple agencies is not recommended. Fair and consistent regulation protects the Tribe and the Indian gaming industry.
4. The costs of regulating gaming activity are to be provided by Tribal Government as approved by the Tribal Council.
5. The conduct of all gaming activities provided by the Tribe shall comply with the Indian Gaming Regulatory Act, 25 U.S.C. Section 2701, et. seq. (IGRA), the Bank Secrecy Act, 31 CFR Chapter X, and any relevant regulations promulgated under Federal jurisdiction.
6. Approved Policies and Procedures will be utilized in all phases of operations not covered or required by these standards.

Section 3: Licensing Requirements

To ensure the integrity of Poarch Creek Indian gaming facilities and to adequately control gaming activity within the federal-tribal regulatory jurisdiction, all individuals working with or within the facilities, management, and control of gaming shall be licensed in accordance with the approved licensing procedures of the Tribal Gaming Commission.

All manufacturers or suppliers who sell, lease, deliver, or supply products into the jurisdiction must obtain a Tribal gaming license in accordance with the Tribal Gaming Commission's Vendor Licensing Policy.

The Tribal Gaming Commission will be responsible for the issuance of licenses. The Tribal Gaming Commission or its designee will have the sole responsibility of developing current and future procedures for issuing applications for individual licensing, vendor licensing, facility licensing, fingerprinting, and background investigations.

In determining suitability for licensing, the Tribal Gaming Commission will consider all of the applicant's relevant history including, but not limited to, their criminal, personal, business, and financial history. The Tribal Gaming Commission must comply with all applicable licensing requirements, including IGRA and any regulations promulgated by the NIGC.

Section 4:
Fiscal Policies and Procedures & Disposition of Funds

1. The Tribal Gaming Commission will approve and enforce any PCI Gaming Authority financial reporting and accounting policies and procedures. Financial reporting and accounting policies and procedures are to be adhered to for each phase of operations.

The integral part of records, accounting procedures, daily operations, and general performance of gaming business operations is the responsibility of the management personnel under the direction of the PCI Gaming Authority.

2. Reporting the disposition of funds for lawful purposes as set out in IGRA, statutes and administrative rules should include a complete description of how the funds were used, what tribal programs received the funds, and the responsible party within the tribal government that accepted the funds. If funds are transferred out of the banking accounts of any gaming facility into a different bank account of the tribal entity or related body, the disbursement from the account that received the funds generated from the gaming activity must be reported.

Creek Indian Enterprises (CIE) also adheres to the Tribal Council rules governing profits generated by the gaming facility. The Tribal Gaming Commission will regulate and investigate any and all profit sharing involved in gaming activity.

Section 5: Definitions (NIGC 543.2)

The Definitions in this section apply to all sections of this part unless otherwise noted.

Accountability—All financial instruments, receivables, and patron deposits constituting the total amount for which the bankroll custodian is responsible at a given time.

Actual Cash value-The amount equal to the replacement cost for all patrons. (Also known as market value.)

Agent—A person authorized by the gaming operation, as approved by the Tribal Gaming Commission, to make decisions or perform assigned tasks or actions on behalf of the gaming operation.

Automated payout—Payment issued by a machine.

Bill-in meter- A meter included on an electronic bingo terminal that accepts cash and tracks the number of bills put in the machine.

Cage—A secure work area within the gaming operation for cashiers, which may include a storage area for the gaming operation bankroll. Some cage associated areas include the cage service areas, main bank lobby, main bank, and vault.

Cash equivalents—Documents, financial instruments other than cash, or anything else of representative value to which the gaming operation has assigned a monetary value. A cash equivalent includes, but is not limited to, tokens, chips, coupons, vouchers, payout slips and tickets, and other items to which a gaming operation has assigned an exchange value.

Cashless system—A system that performs cashless transactions and maintains records of those cashless transactions.

Cashless transaction—A movement of funds electronically from one component to another, such as to or from a patron deposit account.

Chair—The Chair of the National Indian Gaming Commission.

Chips- Cash substitutes, in various denominations, issued by a gaming operation and used for wagering.

Class II gaming—Class II gaming has the same meaning as defined in 25 U.S.C. 2703(7)(A).

Class II gaming system—All components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games, including accounting functions mandated by these TICS or 25 CFR Part 547.

Commission—The National Indian Gaming Commission, established by the Indian Gaming Regulatory Act, 25 U.S.C. 2701 et seq.

Complimentary services and items—Services and items provided to a patron at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the gaming operation. Services and items may include, but are not limited to, travel, lodging, food, beverages, or entertainment expenses.

Controlled Keys- Those keys considered sensitive to the operation of gaming that includes the keys identified in these standards, and, therefore, require strict control over custody and issuance.

Count—The act of counting and recording the drop and/or other funds. Also, the total funds counted for a particular game, electronic bingo terminal, shift, or other period.

Count room—A secured, restricted room where the count is performed in which the cash and cash equivalents are counted. The count room includes the mantrap and any additional storage cart/canister area.

Count room equipment- Any and all tools, equipment, required uniforms and accessories that are required for the performance of a count.

Coupon—A financial instrument of fixed wagering value, that can only be used to acquire non-cashable credits through interaction with a voucher system. This does not include instruments such as printed advertising material that cannot be validated directly by a voucher system.

Credit- The right granted by a gaming operation to a patron to defer payment of debt or to incur debt and defer its payment.

Credit limit- Maximum dollar amount of credit assigned to a patron by the gaming operation.

Dedicated camera—A fixed video camera that continuously records a specific activity.

Drop box—A locked container in which cash or cash equivalents are placed at the time of a transaction, typically used in card games.

Drop proceeds—The total amount of financial instruments removed from drop boxes and financial instrument storage components.

Exception report—A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.

Financial instrument—Any tangible item of value tendered in Class II game play, including, but not limited to bills, coins, vouchers, and coupons.

Financial instrument storage component—Any component that stores financial instruments, such as a drop box.

Flare- The information sheet provided by the manufacturer that sets forth the rules of a particular pull tab game and that is associated with a specific deal of pull tabs. The flare must contain the following information:

- Name of the game;
- Manufacturer name or manufacturer's logo;
- Ticket count; and
- Prize structure, which must include the number of winning pull tabs by denomination, with their respective winning symbols, numbers, or both.

Gaming operation- A business entity owned by the Tribe that operates Class II and/or Class III Gaming and that is licensed by the Tribal Gaming Commission. This includes any outlet providing merchandise or services provided by the PCI Gaming Authority to assist the progress of Class II and/or Class III Gaming.

Gaming promotion—Any promotional activity or award that may require game play as a condition of eligibility.

Generally Accepted Accounting Principles (GAAP)—A widely accepted set of rules, conventions, standards, and procedures for reporting financial information, as established by the Financial Accounting Standards Board (FASB), including, but not limited to, the standards for casino accounting published by the American Institute of Certified Public Accountants (AICPA).

Generally Accepted Auditing Standards (GAAS)—A widely accepted set of standards that provide a measure of audit quality and the objectives to be achieved in an audit, as established by the Auditing Standards Board of the American Institute of Certified Public Accountants (AICPA).

Governmental Accounting Standards Board (GASB)—Generally accepted accounting principles used by state and local governments.

Independent—The separation of functions to ensure that the agent or process monitoring, reviewing, or authorizing the controlled activity, function, or transaction is separate from the agents or process performing the controlled activity, function, or transaction.

Intermediate Distribution Frame (IDF) - A free-standing or wall-mounted rack for managing and interconnecting the telecommunications cable between end user devices and a main distribution frame (MDF).

Kiosk—A device capable of redeeming vouchers and/or wagering credits or initiating electronic transfers of money to or from a patron deposit account or issuing/redeeming cash or cash equivalents.

Lines of credit—The privilege granted by a gaming operation to a patron to:

- (1) Defer payment of debt; or
- (2) Incur debt and defer its payment under specific terms and conditions.

Main Distribution Frame (MDF)- A room or cable rack that interconnects and manages the telecommunications wiring between itself and any number of IDFs. Unlike an IDF, which connects internal lines to the MDF, the MDF connects private or public lines coming into a building with the internal network.

Manual payout—Any non-automated payout.

Marker—A document, signed by the patron, promising to repay credit issued by the gaming operation.

MICS—Minimum internal control standards as issued by the National Indian Gaming Commission (NIGC).

Multi-game – An electronic bingo terminal that enables a player to engage in more than one variety of bingo game, each of which contains varying game themes with varying paytables.

Network communication equipment—A device or collection of devices that controls data communication in a system including, but not limited to, cables, switches, hubs, routers, wireless access points, landline telephones and cellular telephones.

Patron—A person who is a customer or guest of the gaming operation and may interact with a Class II game. Also may be referred to as a “player.”

Patron deposit account—An account maintained on behalf of a patron, for the deposit and withdrawal of funds for the primary purpose of interacting with a gaming activity.

Player interface—Any component(s) of a Class II gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds, fixed units, etc.), that directly enables player interaction in a Class II game. Also, referred to as an “electronic bingo terminal.”

Player tracking systems- A system typically used in gaming operations that can record the gaming activity of individual patrons.

Player tracking terminal- A component of the player tracking system typically used in a gaming operation to access a patron’s record of gaming play, comps, and associated gaming activities. Terminals include, but are not limited to, the player’s club department terminals, ambassador stations, manager terminals, hotel desk terminals and other terminals within the gaming operation as defined by these standards.

Prize payout—Payment to a player associated with a winning or qualifying event.

Promotional progressive pots and/or pools—Funds contributed to a game by and for the benefit of players that are distributed to players based on a predetermined event.

Shift—A time period, unless otherwise approved by the Tribal Gaming Commission, not to exceed 24 hours.

Shill—An agent financed by the gaming operation and acting as a player.

Signature – A handwritten depiction of someone’s first and last name. For an agent, signature must include a legible gaming license number, where notation of “TEMP” or “temporary” is prohibited in place of the license number. This definition does not apply to electronic signatures and is not related to system software signature verifications.

Smart card—A card with embedded integrated circuits that possesses the means to electronically store or retrieve account data.

Sufficient clarity—The capacity of a surveillance system to record images at a minimum of 30 frames per second and at a resolution of 1280x720 to clearly identify the intended activity, person, object, or location.

Surveillance operation room(s)—The secured area(s) where surveillance takes place and/or where active surveillance equipment is located.

Surveillance system—A system of video cameras, monitors, recorders, video printers, switches, selectors, and other equipment used for surveillance.

SICS (System of Internal Control Standards)—An overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures, and standard practices based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of a gaming operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.

TICS—Tribal Internal Control Standards established by the Tribal Gaming Commission that are at least as stringent as the standards set forth in this part.

Vault—A secure area where cash and cash equivalents are stored.

Voucher—A financial instrument of fixed wagering value, usually paper, that can be used only to acquire an equivalent value of cashable credits or cash through interaction with a voucher system. Examples of a voucher include a payout ticket, cash-out ticket or TITO ticket.

Voucher system—A system that securely maintains records of vouchers and coupons; validates payment of vouchers; records successful or failed payments of vouchers and coupons; and controls the purging of expired vouchers and coupons.

Section 6: Bingo Internal Controls (NIGC 543.8)

(a) Bingo Standards

- (1) Supervision must be provided as required for bingo operations by an agent(s) with authority equal to or greater than those being supervised. **(NIGC 543.8 (a))**
- (2) All employees, including management, must not be allowed to play bingo games conducted by the operations with which they are employed except for Employee bingo night which is designated by the Gaming Board. Clerks who are designated to play for customers while away at bathroom breaks are the only other exception.

(b) Bingo cards (NIGC 543.8 (b))

- (1) Physical bingo card inventory controls must address the placement of orders, receipt, storage, issuance, removal, and cancellation of bingo card inventory to ensure that:
 - (i) The bingo card inventory can be accounted for at all times; and
 - (ii) Bingo cards have not been marked, altered, or otherwise manipulated.
- (2) Receipt from supplier.
 - (i) When bingo card inventory is initially received from the supplier, it must be inspected (without breaking the factory seals, if any), counted, inventoried, and secured by an authorized agent.
 - (ii) Bingo card inventory records must include the date received, quantities received, and the name of the individual conducting the inspection.
 - (iii) Manufacturers of bingo cards must be required to provide a verification book or other system verification for all cards it manufactures and to certify its validity for use with a set of cards.
 - (iv) The manufacturer must develop internal control procedures, which enable them to track the series of disposable bingo paper by serial numbers. The serial number, description, and packaging cut must be reported to the Tribal Gaming Commission, or its designee, at specific intervals which provide the information required.
 - (v) The distributor must assist the gaming operations in developing a procedure to track the disposable bingo paper sold to the gaming operations. The tracking procedure must account for all paper purchased, sold, and in inventory at any given time.
- (3) Storage.
 - (i) Bingo cards must be maintained in a secure location, accessible only to authorized agents, and with surveillance coverage adequate to identify persons accessing the storage area.
 - (ii) Reserved.
- (4) Issuance and returns of inventory.
 - (i) Controls must be established by the gaming operation for the issuance and return of bingo card inventory. Records signed by the issuer and recipient must be created under the following events:
 - (A) Issuance of inventory from storage to a staging area;
 - (B) Issuance of inventory from a staging area to the cage or sellers;
 - (C) Return of inventory from a staging area to storage; and
 - (D) Return of inventory from cage or seller to staging area or storage.
 - (ii) [Reserved]
- (5) Cancellation and removal.
 - (i) Bingo cards removed from inventory that are deemed out of sequence, flawed, or misprinted and not returned to the supplier must be cancelled to ensure that they are not utilized in the play of a bingo game. Bingo cards that are removed from inventory and returned to the supplier or cancelled must be logged as removed from inventory.
 - (ii) Bingo cards associated with an investigation must be retained intact outside of the established removal and cancellation policy.
- (6) Logs.
 - (i) The inventory of bingo cards must be tracked and logged from receipt until use or permanent removal from inventory.
 - (A) Bingo cards must be inventoried, secured and logged by an agent(s) independent of the bingo sales; and
 - (B) Bingo card inventory must be tracked and re-logged at the end of the month.

- (ii) The bingo card inventory record(s) must include:
- (A) Date;
 - (B) Shift or session;
 - (C) Time;
 - (D) Location;
 - (E) Inventory received, issued, removed, and returned;
 - (F) Name and Signature of agent performing transaction;
 - (G) Name and Signature of agent performing the reconciliation;
 - (H) Any variance;
 - (I) Beginning and ending inventory; and
 - (J) Description of inventory transaction being performed.

(c) Bingo card sales (NIGC 543.8 (c))

- (1) Agents who sell bingo cards must not be the sole verifier of bingo cards for prize payouts. Agents who sell cards on the floor must not verify payouts with cards in their possession. Agents who sell cards on the floor are permitted to announce the serial numbers of winning cards.
- (2) Manual bingo card sales: In order to adequately record, track, and reconcile sales of bingo cards, the following information must be documented:
 - (i) Date;
 - (ii) Shift and/or session (if applicable);
 - (iii) Number of bingo cards issued, sold, and returned;
 - (iv) Dollar amount of bingo card sales;
 - (v) Name and Signature, of the agent preparing the record; and
 - (vi) Name and Signature, of an independent agent who verified the bingo cards returned to inventory and dollar amount of bingo card sales.
- (3) Bingo card sale voids must be processed in accordance with the rules of the game and established controls that must include the following:
 - (i) Patron refunds;
 - (ii) Adjustments to bingo card sales to reflect voids;
 - (iii) Adjustment to bingo card inventory;
 - (iv) Documentation of the reason for the void; and
 - (v) Authorization for all voids.
- (4) Class II gaming system bingo card sales. In order to adequately record, track and reconcile sales of bingo cards, the following information must be documented from the server (this is not required if the system does not track the information, but system limitation(s) must be noted):
 - (i) Date;
 - (ii) Time;
 - (iii) Number of bingo cards sold;
 - (iv) Dollar amount of bingo card sales; and
 - (v) Amount in, amount out and other associated meter information.
- (5) Bingo cards cannot be reserved by the agent for any patron(s) with the exception of "Braille" cards intended for use by blind patrons. Legally blind patrons may bring and use their own cards if the agent does not make them available as long as they meet the operation standards.
- (6) Bingo cards contained on one sheet or within a packet cannot be separated and played at another gaming operation or held for play in another game unless specifically announced and approved prior to game play.
- (7) Patrons must not be allowed to play more bingo cards than paid for or received in free plays.

(d) Draw (NIGC 543.8(d))

- (1) Controls must be established and procedures implemented to ensure that all eligible objects used in the conduct of the bingo game are available to be drawn and have not been damaged or altered. Verification of physical objects must be performed by two agents before the start of the first bingo game/session. At least one of the verifying agents must be a supervisory agent or independent of the bingo games department. Controls established must at a minimum include the following:

- (i) Prior to the draw (selection) and call of the first number in a game, the agent (bingo caller) must announce or display the pattern or arrangement of squares to be covered in order to win the game. This information must be displayed and/or listed in the facility and/or session program.
 - (ii) Prior to the start of the first bingo game/session, the bingo balls, whether intended for use in a regular or special bingo game, must be accounted for and examined by a patron who is not an employee or a person having control, interest in, or related to management, a caller, or any other interested party. The patron, caller, and a representative for management must document that all bingo balls are accounted for and correctly numbered for play.
 - (iii) Following the selection of each number, the agent (bingo caller) must do the following to ensure the correct calling of numbers selected in the bingo game:
 - (A) Clearly announce the letter and number.
 - (B) Show each ball to a camera immediately before it is called so that it is individually displayed to all patrons. (For speed bingo games not verified by camera equipment, a person independent of the agent (bingo caller) responsible for calling the speed bingo game must verify each ball drawn.)
 - (C) The ball must be placed in a receptacle so as to prevent being placed back in the selection device before the next game.
 - (D) Each letter and number called must be entered on a flashboard for patron viewing.
 - (E) Controls must ensure that all numbered balls are placed back into the selection device before the next game.
 - (2) Where the selection is made through an electronic aid, certification in accordance with 25 CFR 547.14 is acceptable for verifying the randomness of the draw and satisfies the requirements of paragraph (d)(1) of this section.
 - (3) Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to provide a method of recall of the draw, which includes the order and identity of the objects drawn, for dispute resolution purposes.
 - (4) Verification and display of draw. Controls must be established and procedures implemented, as approved the Tribal Gaming Commission, to ensure that:
 - (i) The identity of each object drawn is accurately recorded and transmitted to the participants. The procedures must identify the method used to ensure the identity of each object drawn.
 - (ii) For all games offering a prize payout of \$1,200 or more, as the objects are drawn, the identity of the objects are immediately recorded and maintained for a minimum of thirty (30) days.
 - (5) Bingo equipment must be maintained and checked for accuracy no less than once every three (3) months. All equipment must be free of defects. Documentation of maintenance and accuracy checks must be maintained for one year and be provided to the Tribal Gaming Commission.
- (e) Prize payout (NIGC 543.8 (e))**
- (1) Controls must be established and procedures implemented for cash or cash equivalents that address the following:
 - (i) Identification of the agent authorized (by position) to make a payout;
 - (ii) Predetermined payout authorization levels (by position);
 - (iii) Documentation procedures ensuring separate control of the cash accountability functions; and
 - (iv) The gaming operation must establish prize payout levels that align with agent authorization levels as approved by the Tribal Gaming Commission.
 - (2) Verification of validity.
 - (i) Controls must be established and procedures implemented to verify that the following is valid for the game in play prior to payment of a winning prize:
 - (A) Winning card(s);
 - (B) Objects drawn; and
 - (C) The previously designated arrangement of numbers or designations on such cards, as described in 25 U.S.C. 2703(7)(A).
 - (ii) At least two agents must verify that the card, objects drawn, and previously designated arrangement were valid for the game in play.

- (iii) Where an automated verification method is available, verification by such method is acceptable.
- (3) Validation.
 - (i) For manual payouts, at least two agents must determine the validity of the claim prior to the payment of a prize. The system may serve as one of the validators.
 - (ii) For automated payouts, the system may serve as the sole validator of the claim.
 - (iii) In order to have a claim for the prizes offered, patrons must be present at the property in which the game is held.
- (4) Verification.
 - (i) For manual payouts, at least two agents must verify that the winning pattern has been achieved on the winning card prior to the payment of a prize. The system may serve as one of the verifiers.
 - (ii) For automated payouts, the system may serve as the sole verifier that the pattern has been achieved on the winning card.
 - (iii) Winners are determined when the announced pattern of squares is covered by a patron(s) on a card. Winning card(s) must contain the last number called.
 - (iv) It is the patron's responsibility to notify the game operator or caller that he/she has the winning bingo combination as announced. Should a patron fail to stop the game before the next number is called, the bingo must not be honored. When a patron declares a winning card the following steps are required for winner verification:
 - (A) The game is stopped before the next number is called. If the next number has already been selected it must be secured until the declared "bingo" is deemed valid, if the bingo is invalid the game may continue.
 - (B) A game employee must take the winning card from the patron, call back the set serial number, and the series number for verification.
 - (C) A copy of the bingo card control log must be given to the caller for purposes of determining if the winner purchased the card that was issued for sale that day (electronic verification satisfies this requirement as listed in the following standard).
 - (D) The caller will verify the number combination by inputting the center card number in the electronic verifying system. The exact replica of the card will be shown on the monitors for verification. An electronic card verifying system may function as the second person verifying the pattern if the card with the winning numbers is displayed on a reader board or shown on the monitor for all patrons to see.
 - (E) No other bingos will be honored when the caller announces that the game is closed. The caller then announces the payout amount and number of winners for the game.
 - (F) If more than one winner is declared in a given bingo game, the following standards must be applied:
 - (1) Cash prizes must be divided equally between winners.
 - (2) If the prize is something other than cash and cannot be divided among the winners, substitute prizes of equal proportionate value must be awarded.
 - (3) A playoff is acceptable if there is to be one winner for the prize.
- (5) Authorization and signatures.
 - (i) At least two agents must authorize, sign, and witness all manual prize payouts.
 - (ii) Manual prize payouts of \$1,200.00 or more must require one of the two signatures and verifications to be a supervisory or management employee independent of the operation of Class II Gaming System bingo.
 - (iii) A Class II gaming system may substitute for one authorization/signature verifying, validating or authorizing a winning card, but may not substitute for a supervisory or management authorization/signature.
- (6) Payout records, including manual payout records, must include the following information at the time of payout:
 - (i) Date and time;
 - (ii) Amount of the payout (alpha & numeric); and
 - (iii) Bingo card identifier.
 - (iv) Manual payout records must also include the following:
 - (A) Game name or number;
 - (B) Description of pattern covered, such as cover-all or four corners;
 - (C) Signature of all, but not less than two, agents involved in the verification of the transaction;

- (D) For override transactions, verification by a supervisory or management agent independent of the transaction;
 - (E) Patron's name, player tracker number or I.D; and
 - (F) Any other information necessary to substantiate the payout.
- (7) If the gaming operation offers promotional payouts or awards, the payout form/documentation must include the following information:
- (i) Date and time;
 - (ii) Dollar amount of payout or description of personal property (e.g., jacket, toaster, car, etc.) including fair market value;
 - (iii) Type of promotion; and
 - (iv) Signature of at least two agents authorizing and completing the transaction.

(f) Cash and cash equivalent controls (NIGC 543.8(f))

- (1) Cash or cash equivalents exchanged between two persons must be counted independently by at least two agents and reconciled to the recorded amounts at the end of each shift. Variances must be documented and maintained. Unverified transfers of cash or cash equivalents are prohibited. All cash or cash equivalents used to operate the bingo department must be recorded on the appropriate accountability form.
- (2) Procedures, as approved by the Tribal Gaming Commission, must be implemented to control cash or cash equivalents based on the amount of the transaction. These procedures must include the following documentation by shift:
 - (i) Inventory, including any increases or decreases;
 - (ii) Transfers;
 - (iii) Exchanges, including acknowledging signatures or initials; and
 - (iv) Resulting variances.
- (3) Any change to control of accountability, exchange, or transfer requires that the cash or cash equivalents be counted and recorded independently by at least two agents and reconciled to the recorded amount.

(g) Technologic aids to the play of bingo (NIGC 543.8(g))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to safeguard the integrity of technologic aids to the play of bingo during installations, operations, modifications, removal and retirements. Additionally, if any approved gaming program has the ability to track or document installations, operations, modifications, removals and retirements, then the capability of such program must be utilized and available for review by the Tribal Gaming Commission. Such procedures must include the following:

- (1) Shipping and receiving.
 - (i) The gaming operation and vendor must comply with the Tribal Gaming Commission Technical Approval Procedures. Such procedures must include:
 - (A) Notification of pending shipments must be provided to the Tribal Gaming Operation by the gaming operation;
 - (B) Certification in accordance with 25 CFR part 547;
 - (C) Notification from the gaming operation of the shipping date and expected date of delivery. The shipping notification must include:
 - (1) Name and address of the supplier;
 - (2) Description of shipment;
 - (3) For player interfaces: a serial number;
 - (4) For software: software version and description of software (software notification must include the Technical Approval Request reference number as outlined in the Tribal Gaming Commission Technical Approval Procedures);
 - (5) Method of shipment; and
 - (6) Expected date of delivery.
 - (ii) Procedures must be implemented by the gaming operation, as approved by the Tribal Gaming Commission and in line with the Tribal Gaming Commission Technical Approval Procedures, for the exchange of Class II gaming system components for maintenance and replacement.
 - (iii) Class II gaming system components must be shipped in a secure manner to deter unauthorized access.

- (iv) The gaming operation must receive all Class II gaming system components and verify the contents against the shipping notification. The Tribal Gaming Commission must receive all Class II game play software packages and verify the contents against the shipping notification.
 - (v) The gaming operation must maintain a documented inventory of Class II gaming system components that includes receipt, storage, implementation and either the destruction or return to vendor of such components.
- (2) Access credential control methods.
- (i) Controls must be established by the gaming operation to restrict access to the Class II gaming system components.
 - (ii) The controls must include, but are not limited to, the following:
 - (A) Restricted access to secured physical location of Class II gaming system components by authorized agents only.
 - (B) Restrict and record access by means of access devices, such as keys, cards, or fobs.
 - (C) Maintaining and updating a record of agents granted access privileges.
- (3) Recordkeeping and audit processes.
- (i) The gaming operation must maintain the following records, as applicable, related to installed/moved/modified game servers and player interfaces:
 - (A) Date placed into service;
 - (B) Date made available for play;
 - (C) Supplier;
 - (D) Software version;
 - (E) Serial number;
 - (F) Game title;
 - (G) Asset and location number;
 - (H) Seal number; and
 - (I) Initial meter reading.
 - (ii) Records established by this section must be maintained and available upon request to the Tribal Gaming Commission.
- (4) System software signature verification.
- (i) The Tribal Gaming Commission must create, approve, and ensure implementation of procedures for system software signature verification that include comparing signatures generated by the verification programs required by 25 CFR 547.8, to the signatures provided in the independent test laboratory letter for that software version.
 - (ii) An agent of the Tribal Gaming Commission must perform system software signature verification(s) to verify that only approved software is installed.
 - (iii) Procedures must be implemented and include the investigation and resolution of any software verification variances by the Tribal Gaming Commission.
 - (iv) Internal audits must be conducted as set forth in the Audit and Accounting (NIGC 543.23) Section of these standards. Such audits must be documented.
- (5) Installation testing.
- (i) Testing must be completed by a department independent of bingo operations during the installation process to verify that the player interface has been properly installed. This must include, but is not limited to, the testing and documentation of the following, as applicable:
 - (A) Communication with the Class II gaming system;
 - (B) Communication with the accounting system;
 - (C) Communication with the player tracking system and accrual of Player tracking points;
 - (D) Currency and vouchers to bill acceptor;
 - (E) Voucher printing;
 - (F) Meter incrementation;
 - (G) Pay table, for verification;
 - (H) Player interface denomination, for verification;
 - (I) All buttons, to ensure that all are operational and programmed appropriately;
 - (J) System components, to ensure that they are safely installed at location;
 - (K) Locks, to ensure that they are secure and functioning;
 - (L) Vendor Name;
 - (M) Electronic bingo game asset and location numbers;

- (N) Electronic bingo game theme and software version number; and
- (O) Name and signature of agent performing installation testing.

(ii) [Reserved]

- (6) The gaming operation must verify that all game rules and disclaimers are displayed at all times or made readily available to the patron upon request, as required by 25 CFR part 547.
- (7) Approval of all technologic aids before they are offered for play in accordance with the Tribal Gaming Commission Technical Approval Procedures.
- (8) All Class II gaming equipment must comply with 25 CFR part 547, Minimum Technical Standards for Gaming Equipment Used With the Play of Class II Games.
- (9) Dispute resolution.

(h) Operations(NIGC 543.8 (h))

(1) Malfunctions.

(i) Procedures must be implemented by the gaming operation to investigate, document and resolve malfunctions. Such procedures must address the following:

- (A) Determination of the event causing the malfunction;
- (B) Review of relevant records, game recall, reports, logs, surveillance records;
- (C) Repair or replacement of the Class II gaming component; and
- (D) Verification of the integrity of the Class II gaming component before restoring it to operation.

(ii) Malfunctions not resolved within twenty-four (24) hours must be reported to the Tribal Gaming Commission.

(2) Removal, retirement and/or destruction. Procedures must be implemented by the gaming operation to retire or remove any or all associated components of a Class II gaming system from operation. Procedures must include the following:

(i) For player interfaces and components that accept cash or cash equivalents:

- (A) When player interfaces and components are permanently removed from the floor, operations must coordinate with the drop team to perform a final drop. Drop contents must be counted and recorded in accordance with the controls established in the Drop and Count section of these standards. When player interfaces and components are temporarily removed from the floor, drop contents must be protected to preclude the misappropriation of stored funds;
- (B) Collect final accounting information such as meter readings, drop and payouts;
- (C) Remove and/or secure any or all associated equipment such as locks, card reader, or ticket printer from the retired or removed component; and
- (D) Document removal, retirement, and/or destruction.

(ii) For removal of software components:

- (A) Return the software to the license holder; and
- (B) Document the removal.

(iii) For other related equipment such as blowers, cards, interface cards:

- (A) Remove and/or secure equipment; and
- (B) Document the removal or securing of equipment.

(iv) For all components:

- (A) Verify that unique identifiers, and descriptions of removed/retired components are recorded as part of the retirement documentation; and
- (B) Coordinate with the accounting department to properly retire the component in the system records.

(v) Where the Tribal Gaming Commission authorizes destruction of any Class II gaming system component, procedures, as approved by the Tribal Gaming Commission, must be developed and implemented by the gaming operation to destroy such components. Such procedures must include the following:

- (A) Methods of destruction;
- (B) Witness or surveillance of destruction;
- (C) Documentation of all components destroyed; and
- (D) Signatures of agent(s) destroying components attesting to destruction.

(i) Vouchers (NIGC 543.8(i))

(1) In addition to the applicable standards of this Section, all voucher standards in the cage and vault section must apply. Controls must be established and procedures implemented:

- (i) Verifying the authenticity of each voucher redeemed.
 - (ii) If the voucher is valid, verifying that the patron is paid the appropriate amount.
 - (iii) Documenting the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.
 - (iv) Retaining payment documentation for reconciliation purposes.
 - (v) For manual payment of a voucher of \$100 or more, requiring a supervisory employee to verify the validity of the voucher prior to payment.
- (2) Vouchers paid during a period while the voucher system is temporarily out of operation being marked "paid" by the cashier.
 - (3) Vouchers redeemed while the voucher system was temporarily out of operation being validated as expeditiously as possible upon restored operation of the voucher system.
 - (4) Paid vouchers being maintained in the cashier's accountability for reconciliation purposes.
 - (5) Unredeemed vouchers only being voided in the voucher system by supervisory employees. The accounting department maintaining the voided voucher, if available.

(j) IT (NIGC 543.8(j))

All relevant controls from the Information Technology section of these standards will apply.

(k) Revenue Audit(NIGC 543.8(k))

Standards for revenue audit of bingo are contained in the Auditing Revenue section of these standards.

(l) Variance (NIGC 543.8 (l))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance, including deviations from the mathematical expectations required by 25 CFR 547.4, must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 7: Pull Tab Internal Controls (NIGC 543.9)

(a) Supervision (NIGC 543.9 (a))

Supervision must be provided as required for pull tab operations and over pull tab storage areas by an agent(s) with authority equal to or greater than those being supervised.

(b) Pull tab inventory (NIGC 543.9 (b))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to ensure that:

- (1) Access to pull tabs is restricted to authorized agents.
 - (i) An access list with levels of authorization by job title must be predetermined and provided to the Tribal Gaming Commission for approval.
 - (A) The Tribal Gaming Commission must be provided a new list for approval within twenty-four (24) hours of changes or deletions made to the access list.
 - (B) This list must be posted and visible on the outside of the door to the entrance to the area of pull tab storage at all times.
 - (ii) Access to the pull tabs within machines must be documented by two authorized agents, one of which is independent of the bingo department.
 - (iii) Documentation must include date, time, authorized agent's signature, signature of a second agent witnessing the activity performed, and a detailed explanation of the reason for access;
- (2) The pull tab inventory is controlled by agents independent of pull tab sales;
- (3) Pull tabs exchanged between agents are secured and independently controlled;
- (4) Increases or decreases to pull tab inventory are recorded, tracked, and reconciled;
- (5) Pull tabs are maintained in a secure location, accessible only to authorized agents, and with surveillance coverage adequate to identify persons accessing the area;
- (6) A document log for the issuance of pull tabs, at a minimum, must include the following:
 - (i) The serial number of the pull tabs issued;
 - (ii) The roll number or box number;
 - (iii) The machine number or specific location;
 - (iv) The date a roll or box is issued;
 - (v) Person responsible for inventory control;
 - (vi) Agent receiving the pull tabs; and
 - (vii) Security representative witnessing the fill or departmental delivery.
- (7) At the end of each week, a person or persons independent of pull tab sales and inventory control must verify the accuracy of the ending balance in the pull tab control by reconciling the pull tabs on hand;
- (8) Transfers of pull tabs from the secure location to the sales location or machines must be made by an authorized agent and security so that they are secured and independently controlled. Surveillance must be notified of pull tab transfers to ensure that they are documented and monitored.

(c) Pull tab sales (NIGC 543.9 (c))

- (1) Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to record, track, and reconcile all pull tab sales and voids.
- (2) When pull tab sales are recorded manually, total sales must be verified by an agent independent of the pull tab sales being verified.
- (3) No person may have unrestricted access to pull tab sales records.

(d) Winning pull tabs (NIGC 543.9 (d))

- (1) Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to record, track, and reconcile all redeemed pull tabs and pull tab payouts.
- (2) The redeemed pull tabs must be defaced so that they cannot be redeemed for payment again.
- (3) Pull tabs that are uniquely identifiable with a machine readable code (including, but not limited to a barcode) may be redeemed, reconciled, and stored by kiosks without the need for defacing, so long as the redeemed pull tabs are secured and destroyed after removal from the kiosk in accordance with the procedures approved by the Tribal Gaming Commission.

- (4) At least two agents must document and verify all prize payouts above \$50.
 - (i) An automated method may substitute for one verification.
 - (ii) The predetermined threshold must be authorized by management, approved by the Tribal Gaming Commission, documented, and maintained.
- (5) Total payout must be calculated and recorded by shift.
- (6) Personnel independent of pull tab sales and inventory must verify the amount of winning pull tabs redeemed each day.

(e) Pull tab operating funds (NIGC 543.9 (e))

- (1) All funds used to operate the pull tab game must be accounted for and recorded and all transfers of cash and/or cash equivalents must be verified.
- (2) All funds used to operate the pull tab game must be independently counted and verified by at least two agents and reconciled to the recorded amounts at the end of each shift or session.

(f) Statistical records (NIGC 543.9 (f))

- (1) Statistical records must be maintained, including (for games sold in their entirety or removed from play) a win-to-write hold percentage as compared to the expected hold percentage derived from the flare for each shift, day, month-to-date and year-to-date.
- (2) A manager independent of the pull tab operations must review statistical information when the pull tab deal has ended or has been removed from the floor and must investigate any unusual statistical fluctuations. These investigations must be documented, maintained for inspection, and provided to the Tribal Gaming Commission upon request.
- (3) Each month, the actual hold percentage must be compared to the theoretical hold percentage. Any significant variations (3% or more) must be investigated. These investigations must be documented, maintained for inspection, and provided to the Tribal Gaming Commission.

(g) Revenue audit (NIGC 543.9 (g))

Standards for revenue audit of pull tabs are contained in the Revenue Audit section of these standards. Standards must include a documented monthly comparison for reasonableness for the amount of pull tabs sold from the pull tab control log to the amount of revenue recognized. Such documentation must be provided to the Tribal Gaming Commission upon request.

(h) Variances (NIGC 543.9 (h))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

(i) Electronic equipment

Controls must be established and implemented, as approved by the Tribal Gaming Commission, for electronic equipment connected with the play of pull tabs to ensure that:

- (1) If the electronic equipment contains a bill acceptor, then applicable procedures concerning drop and count must apply.
- (2) If the electronic equipment uses a bar code or microchip reader, then the reader must be tested at least quarterly by an agent independent of the department where pull tabs are maintained and operated to determine that it is correctly reading the bar code or the microchip. Such testing must be documented to include date, time, and tester's name, what was tested and, if applicable, what steps were used to repair the malfunction if one occurred.
- (3) If the electronic equipment returns a voucher or a payment slip to the player, then the standards in the electronic bingo system section must apply.
- (4) If the electronic equipment utilizes patron account access cards for activation of play, then standards in the Patron Deposit Accounts and Cashless systems apply.

Section 8:**Promotions and player tracking systems (NIGC 543.12)****(a) Supervision (NIGC 543.12 (a))**

Supervision must be provided as required for gaming promotions and player tracking by an agent(s) with authority equal to or greater than those being supervised.

(b) Gaming promotions (NIGC 543.12(b))

The gaming operation must establish controls and implement procedures, as approved by the Tribal Gaming Commission, for gaming promotions. The rules of a gaming promotion must be displayed or made readily available to patrons upon request. Gaming promotion rules require submission for approval by the Tribal Gaming Commission prior to the promotion starting, according to the requirements as listed in the Tribal Gaming Commission's Procedures for Submitting Promotions. Submission must include, but is not limited to, the following:

- (1) The rules of play;
- (2) The nature and value of the associated prize(s) or cash award(s);
- (3) Any restrictions or limitations on participant eligibility;
- (4) The date(s), time(s), and location(s) for the associated promotional activity or activities;
- (5) Any other restrictions or limitations, including any related to the claim of prizes or cash awards;
- (6) The announcement date(s), time(s), and location(s) for the winning entry or entries; and
- (7) Rules governing promotions offered across multiple gaming operations, third party sponsored promotions, and joint promotions involving third parties.

(c) Player tracking systems and gaming promotions (NIGC 543.12 (c))

(1) Changes to the player tracking systems, promotion and external bonusing system parameters, which control features such as the awarding of bonuses, the issuance of cashable credits, non-cashable credits, coupons and vouchers, must be performed under the authority of supervisory agents, independent of the department initiating the change.

(i) For player tracking systems, an access list must be maintained by the gaming operation and provided to the Tribal Gaming Commission for approval within twenty-four (24) hours of changes or deletions to the list. List must include:

- (A) Agent name and gaming license number;
- (B) Functions agent can perform; and
- (C) Other necessary information relevant to the operation of the system(s).

(ii) The player tracking system must be secured so as to prevent unauthorized access.

(iii) The addition or subtraction of points/promo to members' accounts other than through actual play must be sufficiently documented (including substantiation of reasons for increases/decreases) and must be authorized in writing by a department supervisor, or above, independent of the player tracking and electronic bingo system departments.

(iv) Agents who redeem points for members are allowed to receive lost players club cards, provided that they are immediately deposited into a secured container for retrieval by independent personnel.

(2) All other changes to the player tracking system must be appropriately documented.

(d) Variances.

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 9: Electronic Bingo Systems (NIGC 543.8)

(a) Electronic Bingo System Standards

- (1) Supervision must be provided as needed for bingo operations by an agent(s) with authority equal to or greater than those being supervised. **(NIGC 543.8(a))**
- (2) Management must ensure that all new and revised gaming vendor hardware and software agreements/contracts contain language requiring the vendor to adhere to tribal internal control standards applicable to the goods and/or services the vendor is providing. All gaming vendor hardware and software agreements/contracts must be provided to the Tribal Gaming Commission.
- (3) For this section only, a credit means a unit of value equivalent to cash or cash equivalents deposited, wagered, won, lost or redeemed by a patron.
- (4) For all electronic bingo gaming machines, an access list must be maintained by the gaming operation and provided to the Tribal Gaming Commission for approval within twenty-four (24) hours of changes or deletions to the list. List must include:
 - (i) Agent name and gaming license number;
 - (ii) Functions agent can perform or equivalent means of identifying the same; and
 - (iii) Other necessary information relevant to the access of the machine.

(b) Jackpot Payouts and Promotional Payouts or Awards

- (1) Procedures must be established and implemented by the gaming operation, as approved by the Tribal Gaming Commission, for jackpot payouts and promotional payouts or awards.
- (2) All payouts must be cashed out and verified by an attendant.
- (3) For all jackpots and promotional payouts or awards, surveillance must be notified and must document at least the following:
 - (i) The location and number of the electronic bingo terminal on which the jackpot and/or promotional payout or award was won.
 - (ii) Time of Jackpot and/or Promotional payout or award.
- (4) For jackpot payouts, documentation must at a minimum include the following information:
 - (i) Name of patron and player tracking number or personal I.D.;
 - (ii) Date and time;
 - (iii) Terminal number and denomination;
 - (iv) Dollar amount of payout (both alpha and numeric or description of personal property awarded, including fair market value);
 - (v) Game outcome (including balls drawn, unique identifier of the winning card, etc.) for jackpot payouts.
 - (vi) Preprinted or concurrently printed sequential payout form number; and
 - (vii) Signatures of at least two (2) agents verifying and witnessing the payout (except as otherwise provided in paragraph (5) of this section). **(NIGC 543.8 (e))**
- (5) Jackpot payouts over \$10,000.00 must require the signature and verification of supervisory or management personnel independent of the electronic bingo systems department (in addition to the two signatures required in paragraph (4)(vii)). The gaming operation must establish prize payout levels that align with agent authorization levels as approved by the Tribal Gaming Commission.
- (6) Computerized jackpot systems must be restricted so as to prevent unauthorized access and fraudulent payouts.
- (7) Payout forms must be controlled and routed in a manner that precludes the production of fraudulent payout (e.g., by forging signatures or by altering the amount paid out subsequent to the payout and misappropriating the funds).
- (8) If the gaming operation offers promotional payouts or awards, the payout form/documentation must, in addition to the information required in paragraph (b)(4) of this section, include the following:
 - (i) Dollar amount of payout or description of personal property (e.g., jacket, toaster, car, etc.) including fair market value
 - (ii) Type of promotion

(c) RESERVED

(d) Standards for evaluating theoretical and actual hold percentages

- (1) Accurate and current theoretical hold worksheets must be maintained for each electronic bingo terminal.
- (2) For multi-game/multi-denominational terminals with varying paytables, an employee or department independent of the electronic bingo systems department must:
 - (i) Weekly, record the total coin-in meter;
 - (ii) Quarterly, record the coin-in meters for each payable contained in the machine; and
 - (iii) On an annual basis, adjust the theoretical hold percentage in the statistical report to a weighted average based upon the ratio of coin-in for each game payable.
- (3) For those gaming operations that are unable to perform the weighted average calculation as required by paragraph (2) of this section, the following procedures must apply:
 - (i) On at least an annual basis, calculate the actual hold percentage for each terminal;
 - (ii) On at least an annual basis, adjust the theoretical hold percentage in the statistical report for each terminal to the previously calculated actual hold percentage; and
 - (iii) The adjusted theoretical hold percentage must be within the spread between the minimum and maximum theoretical payback percentages.
- (4) The adjusted theoretical hold percentage for multi-game/multi-denominational terminals may be combined for terminals with exactly the same game mix throughout the year.
- (5) The theoretical hold percentages used in the analysis reports must be within the performance standards set by the manufacturer.
- (6) Records must be maintained for each terminal indicating the dates and type of changes made and the recalculation of theoretical hold as a result of the changes.
- (7) All terminals must contain functioning meters that record coin-in or credit-in, or an on-line monitoring system that captures similar data.
- (8) Terminal in-meter readings must be recorded at least weekly immediately prior to or subsequent to a drop. On-line monitoring systems can satisfy this requirement. However, the time between readings may extend beyond one week in order for a reading to coincide with the end of an accounting period only if such extension is for no longer than six (6) days. In-meter readings must be retained for five (5) years.
- (9) The employee who records the in-meter reading must either be independent of the count team or must be assigned on a rotating basis, unless the in-meter readings are randomly verified quarterly for all terminals and currency acceptors by someone other than the regular in-meter reader.
- (10) The gaming operation must develop procedures, as approved by the Tribal Gaming Commission, that are performed by the PCI Gaming Revenue Audit department to identify unusual/unreasonable activity upon receipt of the meter reading summary.
- (11) Prior to final preparation of statistical reports as required by this section, meter readings that do not appear reasonable must be reviewed with electronic bingo system department employees or other appropriate designees, and exceptions documented, so that meters can be repaired or clerical errors in the recording of meter readings can be corrected.
- (12) A report must be produced at least monthly showing month-to-date, year-to-date, and life-to-date actual hold percentage computations for individual terminals and a comparison to each terminal's theoretical hold percentage previously discussed.
- (13) Each change to a terminal's theoretical hold percentage, including progressive percentage contributions, must result in that terminal being treated as a new terminal in the statistical reports (i.e., not commingling various hold percentages), except for adjustments made in accordance with paragraph (2) of this section.
- (14) If promotional payouts or awards are included on the statistical reports, it must be in a manner that prevents distorting the actual hold percentages of the affected terminals.
- (15) For statistical reports required by this section, both electronic bingo system department management and management personnel independent of the electronic bingo system department must review the reports on at least a monthly basis.
- (16) For those terminals that have experienced at least 100,000 wagering transactions, large variances (three percent (3%) or more) between theoretical hold and actual hold must be investigated and resolved by the revenue audit department with the findings documented. Documentation pertaining to this standard must be provided to the Tribal Gaming Commission.
- (17) In-meter readings and the weigh process must be made prior to updates to the on-line monitoring system to reflect additions, deletions, or movements of terminals.

(e) In-house Progressive Standards

- (1) A meter or sign that shows the amount of the progressive jackpot must be conspicuously displayed at or near the terminals to which the jackpot applies.
- (2) At least once each day, the gaming operation must collect and record the amount shown on each progressive jackpot meter at the gaming operation except for those jackpots that can be paid directly from the terminal.
- (3) Explanations for meter reading decreases (wins/payouts) must be maintained with the progressive meter reading sheets, and where the payment of a jackpot is the explanation for a decrease, agent must record the jackpot payout number on the sheet.
- (4) The base amount of each progressive jackpot and reserve base amount offered by the gaming operation must be recorded on the progressive meter reading sheet.
- (5) The CEO of PCI Gaming and/or the CFO of PCI Gaming have the authority to approve the transfer of progressive amounts in excess of the base amount to other progressive pools or approve other means of distribution of the funds by giving away awards or prizes equivalent to the progressive jackpot amounts to the gaming public. In the event the progressive jackpot amount is transferred to another terminal or a promotion, notification must be made by submitting current and accurate retired progressive amounts and transfer information to the Tribal Gaming Commission within seventy-two (72) hours of the transfer taking place. In regards to promotions, retired progressive jackpot amounts in excess of the base amount(s) must be used for prize payouts only.

(f) Wide Area Progressive Standards

- (1) A meter that shows the amount of the progressive jackpot must be conspicuously displayed at or near the terminals to which the jackpot applies.
- (2) As applicable to participating gaming operations, the wide area progressive system must be adequately restricted to prevent unauthorized access.
- (3) The gaming operation must establish policies and procedures, as approved by the Tribal Gaming Commission, for wide area progressives. Tribal Gaming Commission has approved procedures (see Cash Operations Manual, Wide Area Progressive Jackpot Payout Procedures) for the wide area progressive system that:
 - (i) Reconcile meters and jackpot payouts;
 - (ii) Collect/drop electronic bingo systems funds;
 - (iii) Verify jackpot, payment, and billing to gaming operations on pro-rat basis;
 - (iv) System maintenance;
 - (v) System accuracy; and
 - (vi) System security.
- (4) Reports, where applicable, adequately documenting the procedures required in paragraph (3) of this section must be generated and retained for review by the Tribal Gaming Commission upon request.

(g) Technologic aids to the play of bingo (Electronic Bingo Systems Hardware/Software Components). (NIGC 543.8(g))

Controls must be established and procedures implemented to safeguard the integrity of technologic aids to the play of bingo during installations, operations, modifications, removal and retirements. Additionally, if any approved gaming program has the ability to track or document installations, operations, modifications, removals and retirements, then the capability of such program must be utilized and available for review by the Tribal Gaming Commission. Such procedures must include the following:

- (1) Shipping and receiving.
 - (i) The gaming operation and vendor must comply with the Tribal Gaming Commission Technical Approval Procedures. Such procedures must include:
 - (A) Notification of pending shipments must be provided to the Tribal Gaming Commission by the gaming operation;
 - (B) Certification in accordance with 25 CFR part 547;
 - (C) Notification from the gaming operation of the shipping date and expected date of delivery. The shipping notification must include:
 - (1) Name and address of the supplier;
 - (2) Description of shipment;
 - (3) For electronic bingo terminals: a serial number;

- (4) For software: software version and description of software; software notification must include the TAR reference number as outlined in the Tribal Gaming Commission Technical Approval Procedures;
 - (5) Method of shipment; and
 - (6) Expected date of delivery.
 - (ii) Procedures must be implemented by the gaming operation, as approved by the Tribal Gaming Commission and in line with the Tribal Gaming Commission Technical Approval Procedures, for the exchange of Class II gaming system components for maintenance and replacement.
 - (iii) Class II gaming system components must be shipped in a secure manner to deter unauthorized access.
 - (iv) The gaming operation must receive all Class II gaming system components and verify the contents against the shipping notification. The Tribal Gaming Commission must receive all Class II game play software packages and verify the contents against the shipping notification.
 - (v) The gaming operation must maintain a documented inventory of Class II gaming system components that includes receipt, storage, implementation and either the destruction or return to vendor of such components.
- (2) Access credential control methods.
- (i) Controls must be established by the gaming operation to restrict access to the Class II gaming system components, the controls must include but are not limited to the following:
 - (A) Restricted access to secured physical location of Class II gaming system components by authorized agents only.
 - (B) Restrict and record access by means of access devices, such as keys, cards, or fobs.
 - (C) Maintaining and updating a record of agents granted access privileges.
- (3) Recordkeeping and audit processes.
- (i) The gaming operation must maintain the following records, as applicable, related to pending or completed installations/moves/modifications of game servers and electronic bingo terminals:
 - (A) Date placed into service/Date of pending installations/moves/modifications;
 - (B) Actual date made available for play/removed from service;
 - (C) Vendor;
 - (D) Software version;
 - (E) Serial number;
 - (F) Game title (theme name);
 - (G) Asset and location number;
 - (H) Seal number (as applicable);
 - (I) Initial meter reading;
 - (J) Type of action (i.e. removal of game, theme change);
 - (K) Date of action;
 - (L) Gaming property;
 - (M) Designation of leased or owned; and
 - (N) Designation of non-progressive, in-house or wide-area.
 - (ii) Documentation, as required in paragraph (g)(3)(i), must be sent to the Tribal Gaming Commission fourteen (14) days prior to installations/moves/modifications.
 - (iii) Monthly, documentation, as required in paragraph (g)(3)(i), must be sent to the Tribal Gaming Commission for all completed installations/moves/modifications.
- (4) System software signature verification.
- (i) Procedures for system software signature verification created and approved by the Tribal Gaming Commission must include comparing signatures generated by the verification programs required by 25 CFR 547.8, to the signatures provided in the independent test laboratory letter for that software version.
 - (ii) An agent of the Tribal Gaming Commission must perform system software signature verification(s) to verify that only approved software is installed.
 - (iii) Procedures must be implemented and include the investigation and resolution of any software verification variances by the Tribal Gaming Commission.
 - (iv) Internal audits must be conducted as set forth in the Audit and Accounting (NIGC 543.23) section of these standards. Such audits must be documented.
- (5) Installation testing.

- (i) Testing must be completed by a department independent of bingo operations during the installation process to verify that the electronic bingo terminal has been properly installed. This must include but is not limited to the testing and documentation of the following, as applicable:
- (A) Communication with the Class II gaming system;
 - (B) Communication with the accounting system;
 - (C) Communication with the player tracking system and accrual of Player Tracking points;
 - (D) Currency and vouchers to bill acceptor;
 - (E) Voucher printing;
 - (F) Meter incrementation;
 - (G) Pay table, for verification;
 - (H) Electronic bingo terminal denomination, for verification;
 - (I) All buttons, to ensure that all are operational and programmed appropriately;
 - (J) System components, to ensure that they are safely installed at location;
 - (K) Locks, to ensure that they are secure and functioning;
 - (L) Vendor Name;
 - (M) Electronic bingo game asset and location numbers;
 - (N) Electronic bingo game theme and software version number; and
 - (O) Name and signature of agent performing installation testing.
- (6) The gaming operation must verify that all game rules and disclaimers are displayed at all times or made readily available to the player upon request, as required by 25 CFR part 547;
- (7) Approval of all technologic aids before they are offered for play in accordance with the Tribal Gaming Commission Technical Approval Procedures.
- (8) All Class II gaming equipment must comply with 25 CFR part 547, Minimum Technical Standards for Gaming Equipment Used With the Play of Class II Games; and
- (9) The gaming operation must establish procedures, as approved by the Tribal Gaming Commission, for resolution of patron disputes. Procedures must include at a minimum the following:
- (i) Documentation pertaining to the electronic bingo terminal (i.e., pay table screenshots, bingo card screenshots, cash-out tickets, etc.) and patron dispute forms. Documentation must be maintained and available for review by the Tribal Gaming Commission upon request.
 - (ii) Maintaining the integrity of the electronic bingo terminal's functionality at the time of the dispute and, if applicable, including placing a terminal out of service.
 - (iii) Gaming operation implementation and compliance with the Tribal Gaming Commission Patron Dispute Resolution Procedures.
- (h) Operations (NIGC 543.8(h)).**
- (1) Malfunctions.
- Procedures, as approved by the Tribal Gaming Commission, must be implemented by the gaming operation to investigate, document and resolve malfunctions. Malfunctions not resolved within twenty-four (24) hours must be reported to the Tribal Gaming Commission. Such procedures must address the following:
- (i) Determination of the event causing the malfunction;
 - (ii) Review of relevant records, game recall, reports, logs, surveillance records;
 - (iii) Repair or replacement of the Class II gaming component;
 - (iv) Verification of the integrity of the Class II gaming component before restoring it to operation; and
 - (v) Random Access Memory (RAM) Clears.
- (2) Removal, retirement and/or destruction.
- Procedures, as approved by the Tribal Gaming Commission, must be implemented by the gaming operation to retire or remove any or all associated components of a Class II gaming system from operation. Procedures must include the following:
- (i) For electronic bingo terminals and components that accept cash or cash equivalents:
 - (A) When electronic bingo terminals are permanently removed from the floor, operations must coordinate with the drop team to perform a final drop. Drop contents must be counted and recorded in accordance with the controls established in the Drop and Count section of these standards. When terminals are temporarily removed from the floor, drop contents must be protected to preclude the misappropriation of stored funds
 - (B) Collect final accounting information such as meter readings, drop and payouts;

- (C) Remove and/or secure any or all associated equipment such as locks, card reader, or ticket printer from the retired or removed component; and
- (D) Document removal, retirement, and/or destruction.
- (ii) For removal of software components:
 - (A) Return the software to the license holder; and
 - (B) Document the removal.
- (iii) For other related equipment:
 - (A) Remove and/or secure equipment; and
 - (B) Document the removal or securing of equipment.
- (iv) For all components:
 - (A) Verify that unique identifiers, and descriptions of removed/retired components are recorded as part of the retirement documentation; and
 - (B) Coordinate with the accounting department to properly retire the component in the system records.
- (v) Procedures must be developed and implemented by the gaming operation, as approved by the Tribal Gaming Commission, to destroy any Class II gaming system components. The gaming operation must notify the Tribal Gaming Commission seven (7) days in advance for the destruction of components, including at a minimum, a listing of components to be destroyed and location/time of destruction. Such procedures must include the following:
 - (A) Methods of destruction;
 - (B) Witness or surveillance of destruction;
 - (C) Documentation of all components destroyed; and
 - (D) Signatures of agent(s) destroying components attesting to destruction.

(i) Vouchers (NIGC 543.8(i))

- (1) In addition to the applicable standards of this Section, all voucher standards in the cage and vault section must apply and are not limited to controls for the following:
 - (i) Verifying the authenticity of each voucher redeemed.
 - (ii) If the voucher is valid, verifying that the patron is paid the appropriate amount.
 - (iii) Documenting the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.
 - (iv) Retaining payment documentation for reconciliation purposes.
 - (v) For manual payment of a voucher of \$100 or more, requiring a supervisory employee to verify the validity of the voucher prior to payment.
- (2) Vouchers paid during a period while the voucher system is temporarily out of operation being marked "paid" by the cashier.
- (3) Vouchers redeemed while the voucher system was temporarily out of operation being validated as expeditiously as possible upon restored operation of the voucher system.
- (4) Paid vouchers being maintained in the cashier's accountability for reconciliation purposes.
- (5) Unredeemed vouchers only being voided in the voucher system by supervisory employees. The accounting department maintaining the voided voucher, if available.

(j) Information Technology (NIGC 543.8(j))

All relevant controls from the Information Technology section of these standards will apply.

(k) Revenue Audit (NIGC 543.8(k))

Standards for revenue audit of electronic bingo systems are contained in the **Auditing Revenue** section of these standards.

(l) Variance(NIGC 543.8(l))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance, including deviations from the mathematical expectations required by 25 CFR 547.4, must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 10:**Cage, vault, kiosk, cash and cash equivalents (NIGC 543.18)****(a) Supervision (NIGC 543.18(a))**

Supervision must be provided as required for cage, vault, kiosk, and other operations using cash or cash equivalents by an agent(s) with authority equal to or greater than those being supervised.

(b) Check cashing (NIGC 543.18(b))

- (1) Checks cashed at the cage/kiosk must be done in accordance with the controls established within the Cash Operations Manual, as approved by the Tribal Gaming Commission. For each check cashing transaction, the agent(s) conducting the transaction must:
 - (i) Verify the patron's identity;
 - (ii) Examine the check to ensure it includes the patron's name, current address, and signature;
 - (iii) For personal checks, verify the patron's check cashing authority and record the source and results in accordance with management policy; however
 - (iv) If a check guarantee service is used to guarantee the transaction and the procedures required by the check guarantee service are followed, then the above requirements do not apply with the exception of verifying the patron's identity.
- (2) The issuance of counter checks is not authorized.
- (3) Checks that are not deposited in the normal course of business, as established by management, (held checks) are subject to §543.15 lines of credit standards.
- (4) When traveler's checks or other guaranteed drafts, such as cashier's checks, are presented, the cashier must comply with the examination and documentation procedures as required by the issuer and in accordance with the controls established within the Cash Operations Manual.
- (5) If a third party check cashing or guarantee service is used, the examination and documentation procedures required by the service provider apply, unless otherwise provided by tribal law or regulation.

(c) Cage and vault accountability (NIGC 543.18 (c))

- (1) All transactions that flow through the cage must be summarized for each work shift of the cage and must be supported by documentation. Cage and vault accountability paperwork, with all supporting documents, must be delivered to the accounting department by a cage and vault agent. Additionally, it must be secured so that it is only accessible to accounting agents.
- (2) Increases and decreases to the total cage inventory must be verified, supported by documentation, and recorded. Documentation must include the date and shift, the purpose of the increase/decrease, the agent(s) completing the transaction, and the agent or department receiving the cage funds (for decreases only).
- (3) The cage and vault inventories (including coin rooms) must be counted independently by at least two agents, attested to by signature, and recorded in ink or other permanent form at the end of each shift during which the activity took place. These agents must make individual counts to compare for accuracy and maintain individual accountability. Unverified transfers of cash and/or cash equivalents are prohibited. All variances must be documented and investigated.
- (4) The gaming operation must establish and comply with a minimum bankroll formula, as approved by the Tribal Gaming Commission, to ensure the gaming operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the gaming operation's patrons as they are incurred.

(d) Kiosks and cash dispensers (NIGC 543.18 (d))

- (1) Kiosks must be maintained on the cage accountability and must be counted independently by at least two agents, documented, and reconciled for each increase or decrease to the kiosk inventory. Cash dispensers must be maintained on the cage accountability and must be counted by at least two agents, documented, and reconciled for each increase or decrease to the cash dispenser inventory.
- (2) Currency cassettes must be counted and filled by an agent and verified independently by at least one agent, all of whom must sign each cassette.
- (3) Currency cassettes must be secured with a lock and serialized tie wrap or serialized security tape and, if not placed inside a kiosk/cash dispenser, must be stored in a secured area of the cage/vault.

- (4) The gaming operation, as approved by the Tribal Gaming Commission, must develop and implement physical security controls over the kiosks/cash dispensers. Controls should address the following: forced entry, evidence of any entry, and protection of circuit boards containing programs.
- (5) With regard to cashless systems the gaming operation, as approved by the Tribal Gaming Commission, must develop and implement procedures to ensure that communications between the kiosk and system are secure and functioning.
- (6) The following reconciliation reports must be available upon demand for each day, shift, and drop cycle (this is not required if the system does not track the information, but system limitation(s) must be noted):
 - (i) Starting balance dollar amount per financial instrument;
 - (ii) Starting balance number of items per financial instrument;
 - (iii) Dollar amount per financial instrument issued;
 - (iv) Number of items per financial instrument issued;
 - (v) Dollar amount per financial instrument redeemed;
 - (vi) Number of items per financial instrument redeemed;
 - (vii) Dollar amount per financial instrument increases;
 - (viii) Number of items per financial instrument increases;
 - (ix) Dollar amount per financial instrument decreases;
 - (x) Number of items per financial instrument decreases;
 - (xi) Ending balance dollar amount per financial instrument; and
 - (xii) Ending balance number of items per financial instrument.
- (7) Redemption of a voucher at a kiosk is limited to the maximum amount of \$2,999.99 per cash-out transaction.

(e) Patron deposited funds (MICS 543.18(e))

If a gaming operation permits a patron to deposit funds with the gaming operation at the cage, and when transfers of patron deposited funds are transferred to a gaming area for wagering purposes, the following standards apply:

- (1) The receipt or withdrawal of a patron deposit must be documented, with a copy given to the patron and a copy remaining in the cage.
- (2) Both copies of the document of receipt or withdrawal must contain the following information:
 - (i) Same receipt number on each copy;
 - (ii) Patron's name, signature, and player tracking or I.D. number;
 - (iii) Date of receipt and withdrawal;
 - (iv) Dollar amount of deposit/withdrawal (for foreign currency transactions include the US dollar equivalent, the name of the foreign country, and the amount of the foreign currency by denomination);
 - (v) Nature of deposit/withdrawal; and
 - (vi) Name and signature of the agent who conducted the transaction.
- (3) Procedures, as approved by the Tribal Gaming Commission, must be established and complied with for front money deposits to:
 - (i) Maintain a detailed record by patron name and date of all funds on deposit;
 - (ii) Maintain a current balance of all patron deposits that are in the cage/vault inventory or accountability; and
 - (iii) Reconcile the current balance with the deposits and withdrawals at least daily.

(f) Promotional payments, drawings, and giveaway programs (NIGC 543.18(f))

The following procedures must apply to any payment resulting from a promotional payment, drawing, or giveaway program disbursed by the cage department or any other department. This section does not apply to payouts for card game promotional pots and/or pools.

- (1) All payments of cash or cash equivalents must be documented to support the cage accountability.
- (2) Payments above \$599.99 must be documented at the time of the payment, and documentation must include the following:
 - (i) Date and time;
 - (ii) Dollar amount of payment/actual cash value and description of personal property;
 - (iii) Reason for payment;
 - (iv) Patron's name and confirmation that identity was verified; and

- (v) Signature(s) of at least two agents verifying, authorizing, and completing the promotional payment with the patron.

(g) Chip(s) and token(s) (NIGC 543.18(g))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to ensure accountability of chip and token inventory. Such controls must include, but are not limited to, the following:

- (1) Purchase;
- (2) Receipt;
- (3) Inventory;
- (4) Storage; and
- (5) Destruction.

(h) Vouchers (NIGC 543.18(h))

- (1) Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to:
 - (i) Verify the authenticity of each voucher redeemed by scanning the bar code of the voucher or manually entering the validation number into the system. The host computer must verify the authenticity of the voucher and communicate directly to the agent cashing the voucher. The voucher must be noted as "paid" in the system. The voucher system must electronically reconcile the agent's bank for the paid vouchers.
 - (ii) If the voucher is valid, ensure that the patron is paid the appropriate amount.
 - (iii) Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.
 - (iv) Retain payment documentation for reconciliation purposes.
 - (v) For manual payment of a voucher of \$100 or more, require a supervisory employee to verify the validity of the voucher prior to payment. Documentation for the manual payment of a voucher for any amount must include the following:
 - (A) Name of patron and player tracking number or personal I.D. number;
 - (B) Date and time;
 - (C) Machine number and location;
 - (D) Dollar amount of payout (alpha and numeric);
 - (E) Validation number;
 - (F) Reason for manual payment;
 - (G) Preprinted or concurrently printed sequential payout form number; and
 - (H) Signatures of at least two (2) agents verifying and witnessing the payout.
 - (vi) Secure vouchers and payment documentation during a shift and after a shift ends.
 - (vii) Allow the customer to redeem a voucher at the cage or kiosk, as detailed in the standards in this section.
 - (viii) Voucher must be valid for a time period not to exceed a specific period of time, as approved by the Tribal Gaming Commission.
- (2) Vouchers paid during a period while the voucher system is temporarily out of operation must be marked "paid" by the cashier.
- (3) Vouchers redeemed while the voucher system was temporarily out of operation must be validated as expeditiously as possible upon restored operation of the voucher system. For vouchers redeemed, the following must be documented at a minimum:
 - (i) Validation number of the voucher (pre-printed);
 - (ii) Date and time of redemption (written or stamped);
 - (iii) Dollar amount of the voucher (pre-printed); and
 - (iv) Machine number (pre-printed).
- (4) Paid vouchers must be maintained in the cashier's accountability for reconciliation purposes.
- (5) Unredeemed vouchers can only be voided in the voucher system by supervisory employees. The accounting department will maintain the voided voucher, if available.
- (6) If the voucher system is down for more than four (4) hours, the gaming operation must immediately notify the Tribal Gaming Commission.
- (7) All vouchers must be validated as expeditiously as possible. All test vouchers must be validated immediately at the conclusion of testing.

- (8) Only authorized agent(s) will have access to vouchers.
- (9) Vouchers, redeemed at the cage or for test purposes, must be retained for investigative purposes for at least two (2) years in a safe, secure place.
- (10) Procedures must be written by the gaming operation and approved by the Tribal Gaming Commission for the secure storage of unissued vouchers and disposal of applicable vouchers by authorized agents.

(i) Cage and vault access (NIGC 543.18 (i))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to:

- (1) Restrict physical access to the cage to cage agents, designated staff, and other authorized persons. An access list must be maintained by the gaming operation and provided to the Tribal Gaming Commission for approval within twenty-four (24) hours of changes or deletions to the list. List must include. An access list must be kept readily available so that cage agents may verify whether access should be granted to persons seeking entrance into the room;
- (2) Prohibit transportation of extraneous items into and out of the cage. "Extraneous items" includes, but is not limited to, personal belongings, tool boxes, and beverage containers. The policy must also address extraneous audio within the cage or vault and associated areas. "Extraneous audio" includes, but is not limited to, music players, personal telephones, and televisions; and
- (3) Address storage of items within the cage and vault areas.

(j) Variances (NIGC 543.18 (j))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 11: Information Technology Standards (NIGC 543.20)

(a) Supervision (NIGC 543.20(a))

- (1) Controls must identify the supervisory agent in the department or area responsible for ensuring that the department or area is operating in accordance with established standard operating procedures (SOPs), as approved by the Tribal Gaming Commission.
- (2) The supervisory agent must be independent of the operation of Class II games.
- (3) Controls must ensure that duties are adequately segregated and monitored to detect procedural errors and to prevent the concealment of fraud.
- (4) Information technology agents having access to Class II gaming systems may not have signatory authority over financial instruments and payout forms and must be independent of and restricted from access to:
 - (i) Financial instruments;
 - (ii) Accounting, audit, and ledger entries;
 - (iii) Payout forms; and
 - (iv) Controlled keys, with the exception of facilitating Tribal Gaming Commission's testing of new games in the lab.

(b) Information Technology System (NIGC 543.20(b))

As used in the IT section of these standards, an information technology system is any computerized system that is integral to the gaming environment. This includes, but is not limited to, the server and peripherals for Class II gaming systems, voucher, cashless and player tracking systems, point of sale, hospitality, financial, electronic bingo system accounting, surveillance, essential phone systems, door access, warning systems and any related back of house system.

(c) Class II gaming systems' logical and physical controls (NIGC 543.20(c))

Controls must be established and procedures implemented by the gaming operation, as approved by the Tribal Gaming Commission, to ensure adequate:

- (1) Control of physical and logical access to the information technology system.
- (2) Physical and logical protection of storage media and its contents, including recovery procedures;
- (3) Access credential control methods;
- (4) Record keeping and audit processes; and
- (5) Departmental independence, including, but not limited to, means to restrict agents that have access to information technology from having access to financial instruments.

(d) Physical security (543.20 (d))

- (1) The information technology environment and infrastructure must be maintained in a secured physical location such that access is restricted to authorized agents only in accordance with SOPs, as approved by the Tribal Gaming Commission.
- (2) Access devices to the systems' secured physical location, such as keys, cards, or fobs, must be controlled by an independent agent.
- (3) Access to the systems' secured physical location must be restricted to agents in accordance with established policies and procedures, which must include maintaining and updating a record of agents granted access privileges.
- (4) A log of physical access to secured locations must be maintained.
- (5) Network Communication Equipment must be physically secured from unauthorized access.
- (6) Management must take an active role in making sure that physical security measures are implemented, maintained, documented and adhered to in order to prevent unauthorized access that could cause errors or compromise data or processing integrity.
- (7) Procedures must be in place that ensures that proper care and maintenance is performed to prevent premature hardware failure that would compromise IT operations. Proper care and maintenance includes at a minimum the following:
 - (i) Internal and external cleanliness of hardware, such as preventing dust accumulation.
 - (ii) Proper cable management to prevent restricted airflow or accidental disconnection.

- (iii) Ensure MDF and IDF rooms are not used for storage and the respective areas are kept clean and free from trash and non-IT items.
- (8) All informational technology hardware must be properly installed and secured per the manufacturer's specifications to prevent hardware failure that would compromise IT operations.

(e) Logical security (NIGC 543.20 (e))

- (1) Controls must be established and procedures implemented by the gaming operation, as approved by the Tribal Gaming Commission. To protect all systems and to ensure that access to the following is restricted and secured:
 - (i) Systems' software and application programs;
 - (ii) Data associated with information technology systems; and
 - (iii) Communications facilities and information transmissions.
- (2) Unused services and non-essential ports must be disabled.
- (3) Procedures must be implemented to ensure that all activity performed on systems is restricted and secured from unauthorized access, and logged. Such logs must be maintained for a minimum of two (2) years and made available to the Tribal Gaming Commission upon request.
- (4) Communications to and from systems via Network Communication Equipment must be logically secured from unauthorized access.
- (5) Management must take an active role in making sure that logical security measures are implemented, maintained, documented and adhered to by personnel to prevent unauthorized access that could cause errors or compromise data or processing integrity.

(f) User controls(NIGC 543.20 (f))

- (1) Systems, including application software, must be secured with passwords or other means for authorizing access.
- (2) Management personnel or agents independent of the department being controlled must assign and control access to system functions.
- (3) Access credentials such as passwords, PINs, or cards must be controlled as follows:
 - (i) Each user must have his or her own individual access credential;
 - (ii) Access credentials must be changed at least every 90 days; and
 - (iii) Access credential records must be maintained either manually or by systems that automatically record access changes and force access credential changes, including the following information for each user:
 - (A) User's name;
 - (B) Date the user was given access and/or password change; and
 - (C) Description of the access rights assigned to user.
 - (iv) Service accounts can only be used to run a required process and must not be used to gain any other access to information technology systems. All service accounts must be documented outlining the associated systems and purpose.
- (4) Lost or compromised access credentials must be deactivated, secured or destroyed within an established time period approved by the Tribal Gaming Commission.
- (5) Access credentials of terminated users must be deactivated within an established time period approved by the Tribal Gaming Commission.
- (6) Only authorized agents may have access to inactive or closed accounts of other users, such as player tracking accounts and terminated user accounts.

(g) Installations and/or modifications (NIGC 543.20 (g))

- (1) Only Tribal Gaming Commission authorized or approved information technology systems and modifications may be installed.
- (2) Records must be kept of all new installations and/or modifications to information technology systems. These records must include, at a minimum:
 - (i) The date of the installation or modification;
 - (ii) The nature of the installation or change such as new software, server repair, significant configuration modifications;
 - (iii) Evidence of verification that the installation or the modifications are tested and approved; and
 - (iv) The identity of the agent(s) performing the installation/modification/testing.

- (3) Technical and user documentation must be maintained, such as manuals and user guides, describing the systems in use and the operation, including hardware, software and interfaces.

(h) Remote access (NIGC 543.20(h))

- (1) Agents may be granted remote access for system support, provided that each access session is documented and maintained at the place of authorization. The documentation must include:
- (i) Name of agent authorizing the access;
 - (ii) Name of agent accessing the system;
 - (iii) Verification of the agent's authorization;
 - (iv) Reason for remote access;
 - (v) Description of work to be performed;
 - (vi) Date and time of start of end-user remote access session; and
 - (vii) Date and time of conclusion of end-user remote access session.
- (2) All remote access must be performed via a secured method.

(i) Incident monitoring and reporting (NIGC 543.20 (i))

- (1) Procedures, as approved by the Tribal Gaming Commission, must be implemented for responding to, monitoring, investigating, resolving, documenting, and reporting security incidents associated with information technology systems.
- (2) All security incidents must be responded to within an established time period approved by the Tribal Gaming Commission and formally documented.

(j) Data backups (NIGC 543.20 (j))

- (1) Controls must include, but not be limited to, the following:
- (i) At a minimum daily data backup of all information technology systems;
 - (ii) Program backup of all information technology systems or the ability to reinstall the exact programs as needed;
 - (iii) Secured storage of all backup data files and programs,
 - (iv) Mirrored or redundant data source for systems essential for the continued operation of the class II gaming system; and
 - (v) Redundant and/or backup hardware for systems essential for the continued operation of the class II gaming system.
- (2) Controls must include recovery and disaster recovery procedures, as approved by the Tribal Gaming Commission, including, but not limited to, the following:
- (i) Data backup restoration;
 - (ii) Program restoration; and
 - (iii) Redundant or backup hardware restoration.
- (3) Recovery procedures must be tested and results documented on all systems at least every six (6) months and must be available to the Tribal Gaming Commission upon request.
- (4) Backup data files and recovery components must be managed with at least the same level of security and access controls as the system for which they are designed to support.

(k) Class II gaming software downloads (NIGC 543.20 (k-l))

Automatic or manual downloads must be performed in accordance with 25 CFR 547 as follows:

- (1) Downloads are an acceptable means of transporting approved content, including, but not limited to software, files, data, and prize schedules.
- (2) Downloads must use secure methodologies that will deliver the download data without alteration or modification, in accordance with the following:
- (i) Sensitive data. Communication of sensitive data must be secure from eavesdropping, access, tampering, intrusion or alteration unauthorized by the Tribal Gaming Commission. Sensitive data includes, but is not limited to:
 - (A) RNG seeds and outcomes;
 - (B) Encryption keys, where the implementation chosen requires transmission of keys;
 - (C) PINs;
 - (D) Passwords;

- (E) Financial instrument transactions;
 - (F) Transfers of funds;
 - (G) Player tracking information;
 - (H) Download Packages; and
 - (I) Any information that affects game outcome.
- (3) Downloads conducted during operational periods must be performed in a manner that will not affect game play.
 - (4) Downloads must not affect the integrity of accounting data.
 - (5) The Class II gaming system must be capable of providing:
 - (i) The time and date of the initiation of the download;
 - (ii) The time and date of the completion of the download;
 - (iii) The Class II gaming system components to which software was downloaded;
 - (iv) The version(s) of download package and any software downloaded. Logging of the unique software signature will satisfy this requirement;
 - (v) The outcome of any software verification following the download (success or failure); and
 - (vi) The name and identification number, or other unique identifier, of any individual(s) conducting or scheduling a download.
 - (6) Verifying downloads (**NIGC 543.20(I)**)
 - (i) The Class II gaming system must be capable of verifying downloaded software using a software signature verification method.
 - (ii) Software signature verification method. The manufacturer or developer of the Class II gaming system must provide to the testing laboratory and to the Tribal Gaming Commission an industry-standard methodology, acceptable to the Tribal Gaming Commission, for verifying the Class II gaming system game software. For example, for game software stored on rewritable media, such methodologies include signature algorithms and hashing formulas such as SHA-1.

(l) In-House developed systems.

Program changes for in-house developed systems must be documented as follows:

- (1) Requests for new programs or program changes must be reviewed by the PCI Gaming Information Technology supervisor. Approvals to begin work on the program shall be documented;
- (2) A written plan of implementation for new and modified programs must be maintained, and must include, at a minimum, the date the program is to be placed into service, the nature of the change, a description of procedures required in order to bring the new or modified program into service (conversion or input of data, installation procedures, etc.), and an indication of who is to perform all such procedures;
- (3) Testing of new and modified programs must be performed and documented prior to implementation; and
- (4) A record of the final program or program changes, including evidence of post-production report/testing and evidence of pre-production sign-off from respective business owner, date in service, programmer, and reason for changes, must be documented and maintained.

(m) Computer Security Logs.

If computer security logs are generated by the system, they must be reviewed by PCI Gaming Information Technology supervisory personnel in accordance with SOPs, as approved by the Tribal Gaming Commission, for evidence of:

- (1) Multiple attempts to log-on, or alternatively, the system must deny user access after three attempts to log on;
- (2) Unauthorized changes to live data files; and
- (3) Any other unusual transactions.

Section 12:**Complimentary Services or Items (NIGC 543.13)****(a) Supervision (NIGC 543.13(a))**

Supervision must be provided as required for approval of complimentary services by an agent(s) with authority greater than those being supervised.

(b) Complimentary services or items (NIGC 543.13(b))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, for complimentary services or items that address the following:

- (1) Agents authorized to approve the issuance of complimentary services or items, including levels of authorization;
- (2) Limits and conditions on the approval and issuance of complimentary services or items;
- (3) Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items;
- (4) Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts. Records must be prepared in accordance with the PCI Gaming Revenue Audit Manual, PCI Gaming Marketing Audit Procedures, and PCI Gaming Comp Audit Procedures;
 - (i) Records must include the following for all complimentary items and services equal to or exceeding \$100:
 - (A) Name and player tracking number or personal I.D. number of patron who received the complimentary service or item;
 - (B) Name(s) and/or equivalent means of identifying the issuer(s) of the complimentary service or item;
 - (C) The actual cash value of the complimentary service or item;
 - (D) The type of complimentary service or item (i.e., food, beverage);
 - (E) Date the complimentary service or item was issued; and
 - (F) Name(s) and/or equivalent means of identifying the approver of the complimentary service or item.
 - (ii) [Reserved].

(c) Reports (NIGC 543.13 (c))

Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds.

- (1) A detailed reporting of complimentary services or items transactions that meet the \$100 threshold, approved by the Tribal Gaming Commission, must be prepared at least monthly.
- (2) The detailed report must be forwarded to management and accounting for review and be made available to the Tribal Gaming Commission upon request.

(d) Variances (NIGC 543.13(d))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintain and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 13:**Applying to use an alternate standard (NIGC 543.5)****(a) Tribal Gaming Commission approval (NIGC 543.5 (a))**

- (1) The Tribal Gaming Commission may approve an alternate standard from those required by this part if it has determined that the alternate standard will achieve a level of security and integrity sufficient to accomplish the purpose of the standard it is to replace. A gaming operation may implement an alternate standard upon Tribal Gaming Commission approval subject to NIGC Chair's decision pursuant to paragraph (b) of this section.
- (2) For each enumerated standard for which the Tribal Gaming Commission approves an alternate standard, it must submit to the NIGC Chair within 30 days a detailed report, which must include the following:
 - (i) An explanation of how the alternate standard achieves a level of security and integrity sufficient to accomplish the purpose of the standard it is to replace; and
 - (ii) The alternate standard as approved and the record on which it is based.
- (3) In the event that the Tribal Gaming Commission or tribal government chooses to submit an alternate standard request directly to the NIGC Chair for joint government to government review, the Tribal Gaming Commission or tribal government may do so without the approval requirement set forth in paragraph (a)(1) of this section.

(b) NIGC Chair review (NIGC 543.5 (b))

- (1) The Chair may approve or object to an alternate standard approved by the Tribal Gaming Commission.
- (2) If the Chair approves the alternate standard, the Tribe may continue to use it as authorized by the Tribal Gaming Commission.
- (3) If the Chair objects, the operation may no longer use the alternate standard and must follow the relevant MICS set forth in this part.
- (4) Any objection by the Chair must be in writing and provide reasons that the alternate standard, as approved by the Tribal Gaming Commission, does not provide a level of security or integrity sufficient to accomplish the purpose of the standard it is to replace.
- (5) If the Chair fails to approve or object in writing within 60 days after the date of receipt of a complete submission, the alternate standard is considered approved by the Chair. The Chair may, upon notification to the Tribal Gaming Commission, extend this deadline an additional 60 days.

(c) Appeal of Chair decision (NIGC 543.5 (c))

A Tribal Gaming Commission may appeal the Chair's decision pursuant to 25 CFR chapter III, subchapter H.

Section 14: Drop and Count (MICS 542.41)

(a) Supervision (NIGC 543.17(a))

Supervision must be provided for drop and count as needed by an agent(s) with authority equal to or greater than those being supervised.

(b) Count room access (NIGC 543.17(b))

- (1) Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to limit physical access to the count room to count team agents, designated staff, and other authorized persons. An access list must be maintained by the gaming operation and provided to the Tribal Gaming Commission for approval within twenty-four (24) hours of changes or deletions to the list. List must include Access list must be kept readily available so that count team agents may verify whether access should be granted to persons seeking entrance into the room.
- (2) Such controls must include the following:
 - (i) Count team agents may not exit or enter the count room during the count except for emergencies or scheduled breaks.
 - (ii) Surveillance must be notified whenever count room agents exit or enter the count room during the count.
 - (iii) The count team policy, at a minimum, must address the transportation of extraneous items into or out of the count room. The policy must also address storage of count related items and transmission of extraneous items within the count room, mantrap and associated areas. "Extraneous items" includes, but is not limited to, personal belongings, tool boxes, and beverage containers.

(c) Count team and count room equipment (NIGC 543.17(c))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following:

- (1) All counts must be performed by at least three agents.
- (2) The gaming operation must comply with the following:
 - (i) At no time during the count of the electronic bingo system proceeds can there be fewer than three count team agents, who are assigned to the electronic bingo system count, in the room until the funds have been accepted in cage/vault accountability.
 - (ii) At no time during the count of the kiosk proceeds can there be fewer than three count team agents, who are assigned to the kiosk count, in the count room until the funds have been accepted in cage/vault accountability.
- (3) Count team agents must be rotated on a routine basis such that the count team is not consistently the same three agents more than four days per week. This standard does not apply to gaming operations that utilize a count team of more than three agents.
- (4) Functions performed by count team agents must be rotated on a routine basis.
- (5) Count team agents must be independent of the department being counted.
- (6) Jumpsuit standards must apply as follows:
 - (i) Count team agents must wear a one-piece, pocketless, solid-colored jumpsuit approved by the Tribal Gaming Commission;
 - (ii) Count team agents must be prohibited from wearing or taking jumpsuits out of the count areas; and
 - (iii) The gaming operation must implement a dry cleaning and jumpsuit inspection procedure, as approved by the Tribal Gaming Commission.
- (7) Procedures must be in place that ensures that proper care and maintenance is performed to prevent premature hardware failure that would compromise count operations. Proper care and maintenance at a minimum includes the following:
 - (i) Internal and external cleanliness of hardware, such as preventing the accumulation of dust. Routine cleaning of equipment must be performed.
 - (ii) Proper equipment management to prevent restricted air flow.
 - (iii) Ensure count rooms are not used for storage and the respective areas are kept clean and free from trash and non-count items.

- (8) All count equipment must be properly installed, maintained, and secured per the manufacturer's specifications to prevent hardware failure that would compromise count operations.
- (9) A log must be maintained for the routine and/or periodic maintenance of count equipment. The log must state the time, date, and nature of each maintenance.

(d) Card game drop standards (NIGC 543.17(d))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to ensure security of the drop process. Such controls must include the following:

- (1) Surveillance must be notified when the drop is to begin so that surveillance may monitor the activities.
- (2) At least two agents must be involved in the removal of the drop box, at least one of whom is independent of the card games department.
- (4) Once the drop is started, it must continue until finished.
- (5) All drop boxes may be removed only at the time previously designated by the gaming operation and reported to the Tribal Gaming Commission. If an emergency drop is required, surveillance must be notified before the drop is conducted and the Tribal Gaming Commission must be informed within seventy-two (72) hours.
- (6) At the end of each shift:
 - (i) All locked card game drop boxes must be removed from the tables by an agent independent of the card game shift being dropped;
 - (ii) For any tables opened during the shift, a separate drop box must be placed on each table, or a gaming operation may utilize a single drop box with separate openings and compartments for each shift; and
 - (iii) Card game drop boxes must be transported directly to the count room or other equivalently secure area by a minimum of two agents, at least one of whom is independent of the card game shift being dropped, until the count takes place.
- (7) All tables that were not open during a shift and therefore not part of the drop must be documented.
- (8) All card game drop boxes must be posted with a number corresponding to a permanent number on the gaming table and marked to indicate game, table number, and shift.

(e) Financial instrument storage component drop standards (NIGC 543.17 (e))

- (1) Surveillance must be notified by the drop team supervisor when the drop is to begin so that surveillance may monitor the activities.
- (2) At least three agents must be involved in the removal of the player storage component drop, at least one of whom is independent of the electronic bingo systems department.
- (3) All financial instrument storage components may be removed only at the time previously designated by the gaming operation and reported to the Tribal Gaming Commission. If an emergency drop is required, surveillance must be notified before the drop is conducted and the Tribal Gaming Commission must be informed within seventy-two (72) hours after the drop.
- (4) The financial instrument storage components must be removed by an agent independent of the electronic bingo systems department, then transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.
 - (i) Security and surveillance must be provided for the financial instrument storage components removed from electronic bingo terminals and awaiting transport to the count room.
 - (ii) Transportation of financial instrument storage components must be performed by a minimum of two agents, at least one of whom is independent of the electronic bingo systems department.
- (5) All financial instrument storage components must be posted with a number corresponding to a permanent number on the electronic bingo terminal.
- (6) Emergency drop procedures must be developed by the gaming operation and approved by the Tribal Gaming Commission.

(f) Card game count standards (NIGC 543.17 (f))

- (1) Access to stored, full or empty card game drop boxes must be restricted to:
 - (i) Authorized members of the drop and count teams; and
 - (ii) In an emergency, authorized persons for the resolution of a problem.
- (2) The card game count must be performed in a count room.

- (3) Access to the count room during the count must be restricted to members of the drop and count teams, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.
- (4) If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect to prevent the commingling of funds from different revenue centers.
- (5) Count equipment and systems must be tested, with the results documented, at minimum before the first count begins to ensure the accuracy of the equipment.
- (6) The card game drop boxes must be individually emptied and counted so as to prevent the commingling of funds between boxes until the count of the box has been recorded.
 - (i) The count of each box must be recorded in ink or other permanent form of recordation.
 - (ii) For counts that do not utilize a currency counter, a second count must be performed by a member of the count team who did not perform the initial count. Separate counts of chips and tokens must always be performed by members of the count team.
 - (iii) Coupons or other promotional items not included in gross revenue must be recorded on a supplemental document by either the count team members or accounting personnel. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.
 - (iv) If a currency counter interface is used:
 - (A) It must be restricted to prevent unauthorized access; and
 - (B) The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department, as approved by the Tribal Gaming Commission.
- (7) If currency counters are utilized, a count team member must observe the loading and unloading of all currency at the currency counter, including rejected currency.
- (8) Two counts of the currency rejected by the currency counter must be recorded per table, as well as in total. Posting rejected currency to a nonexistent table is prohibited.
- (9) Card game drop boxes, when empty, must be shown to another member of the count team and to surveillance.
- (10) Procedures, as approved by the Tribal Gaming Commission, must be implemented to ensure that any corrections to the count documentation are permanent and identifiable, and that the original, corrected information remains legible. Corrections must be verified by two count team agents that must legibly print their initials and gaming license numbers.
- (11) The count sheet must be reconciled to the total drop by a count team member who may not function as the sole recorder, and variances must be reconciled and documented.
- (12) All count team agents must sign the count sheet attesting to their participation in the count.
- (13) A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by at least two agents, one of whom is a supervisory count team member, and one a count team agent.
 - (i) Final verification must include a comparison of currency counted totals against the currency counter/system report, if any counter/system is used.
 - (ii) Any unresolved variances must be documented, and the documentation must remain part of the final count record forwarded to accounting.
 - (iii) This verification does not require a complete recount of the drop proceeds, but does require a review sufficient to verify the total drop proceeds being transferred.
 - (iv) The two agents must sign the report attesting to the accuracy of the total drop proceeds verified.
 - (v) All drop proceeds and cash equivalents that were counted must be submitted to the cage or vault agent (who must be independent of the count team). The agents must certify, by signature, the amount of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by accounting/revenue audit.
- (14) After verification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
 - (i) The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
 - (ii) The cage/vault agent must have no knowledge or record of the drop proceeds total before it is verified.
 - (iii) All count records must be forwarded to accounting or secured and accessible only by accounting agents.
 - (iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assume accountability of the drop proceeds, ending the count.
 - (v) Any unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer must be documented and investigated.

- (15) The count sheet, with all supporting documents, must be delivered to the accounting department by a count team member. Alternatively, it may be secured so that it is only accessible to accounting agents.

(g) Financial instrument storage component count standards (NIGC 543.17 (g))

- (1) Access to stored full or empty financial instrument storage components must be restricted to:
 - (i) Authorized members of the drop and count teams; and
 - (ii) In an emergency, authorized persons for the resolution of a problem.
- (2) The electronic bingo terminal financial instrument count must be performed in a count room.
- (3) Access to the count room during the count must be restricted to members of the drop and count teams, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.
- (4) If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from different revenue centers.
- (5) The count team must not have access to amount-in or bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability and documentation is secured as required by this section.
- (6) Count equipment and systems must be tested, and the results documented, before the first count begins, to ensure the accuracy of the equipment.
- (7) If a currency counter interface is used:
 - (i) It must be adequately restricted to prevent unauthorized access; and
 - (ii) The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department, as approved by the Tribal Gaming Commission.
- (8) The financial instrument storage components must be individually emptied and counted so as to prevent the commingling of funds between storage components until the count of the storage component has been recorded.
 - (i) The count of each storage component must be recorded in ink or other permanent form of recordation.
 - (ii) Coupons or other promotional items not included in gross revenue may be recorded on a supplemental document by the count team members or accounting personnel. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.
- (9) If currency counters are utilized, a count team member must observe the loading and unloading of all currency at the currency counter, including rejected currency.
- (10) Two counts of the currency rejected by the currency counter must be recorded per interface terminal as well as in total. Rejected currency must be posted to the electronic bingo terminal from which it was collected.
- (11) Storage components, when empty, must be shown to another member of the count team and to surveillance.
- (12) Procedures, as approved by the Tribal Gaming Commission, must be implemented to ensure that any corrections to the count documentation are permanent, identifiable and the original, corrected information remains legible. Corrections must be verified by two count team agents that must legibly print their initials and gaming license numbers.
- (13) The count sheet must be reconciled to the total drop by a count team member who may not function as the sole recorder, and variances must be reconciled and documented. This standard does not apply to vouchers removed from the financial instrument storage components.
- (14) All count team agents must sign the report attesting to their participation in the count.
- (15) A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by the at least two agents, one of whom is a supervisory count team member and the other a count team agent.
 - (i) Final verification must include a comparison of currency counted totals against the currency counter/system report, if a counter/system is used.
 - (ii) Any unresolved variances must be documented and the documentation must remain a part of the final count record forwarded to accounting.
 - (iii) This verification does not require a complete recount of the drop proceeds but does require a review sufficient to verify the total drop proceeds being transferred.
 - (iv) The two agents must sign the report attesting to the accuracy of the total drop proceeds verified.
 - (v) All drop proceeds and cash equivalents that were counted must be turned over to the cage or vault cashier (who must be independent of the count team) for verification. Agents must certify, by signature,

- the amount of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by accounting/revenue audit.
- (16) After certification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
 - (i) The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
 - (ii) The cage/vault agent must not have knowledge or record of the drop proceeds total before it is verified.
 - (iii) All count records must be forwarded to accounting, secured and accessible only by accounting agents.
 - (iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assuming accountability of the drop proceeds, and ending the count.
 - (v) Any unresolved variances between total drop proceeds recorded on the count room report and the cage/vault final verification during transfer must be documented and investigated.
 - (17) The count sheet, with all supporting documents, must be delivered to the accounting department by a count team member. Alternatively, it may be adequately secured and accessible only by accounting department.

(h) Controlled keys(NIGC 543.17 (h))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to safeguard the use, access, and security of keys in accordance with the following:

- (1) Each of the following requires a separate and unique key lock or alternative secure access method:
 - (i) Drop cabinet;
 - (ii) Drop box release;
 - (iii) Drop box content; and
 - (iv) Storage racks and carts.
- (2) Access to and return of keys or equivalents must be documented with the date, time, and signature of the agent accessing or returning the key(s).
 - (i) At least three (3) drop team agents are required to be present to access and return keys.
 - (ii) At least three (two for card game drop box keys in operations with three tables or fewer) count team agents are required to be present at the time count room and other count keys are issued for the count.
- (3) Documentation of all keys, including duplicates, must be maintained, including:
 - (i) Unique identifier for each individual key;
 - (ii) Key storage location;
 - (iii) Number of keys made, duplicated, and destroyed; and
 - (iv) Authorization and access.
- (4) Custody of all keys involved in the drop and count must be maintained by a department independent of the count and the drop agents as well as those departments being dropped and counted.
- (5) Other than the count team, no agent may have access to the drop box content keys while in possession of storage rack keys and/or release keys.
- (6) Other than the count team, only agents authorized to remove drop boxes are allowed access to drop box release keys.
- (7) Any use of keys at times other than the scheduled drop and count must be properly authorized and documented.
- (8) Emergency manual keys, such as an override key, for computerized, electronic, and alternative key systems must be maintained in accordance with the following:
 - (i) Access to the emergency manual key(s) used to access the box containing the electronic bingo terminal drop and count keys requires the physical involvement of at least three agents from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating persons signing out/in the emergency manual key(s);
 - (ii) The custody of the emergency manual keys requires the presence of two agents from separate departments from the time of their issuance until the time of their return; and
 - (iii) Routine physical maintenance that requires access to the emergency manual key(s), and does not involve accessing the electronic bingo terminal drop and count keys, only requires the presence of two agents from separate departments. The date, time, and reason for access must be documented with the signatures of all participating agents signing out/in the emergency manual key(s).
- (9) A system administrator, independent of the bingo, electronic bingo systems, card game, and finance departments, must assign and control user access to keys in the computerized key security system to ensure that keys are restricted to authorized employees.

(i) Variances (NIGC 543.17 (i))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 15:**Patron Deposit Accounts and Cashless systems (NIGC 543.14)****(a) Supervision (NIGC 543.14 (a))**

Supervision must be provided as required for patron deposit accounts and cashless systems by an agent(s) with authority equal to or greater than those being supervised.

(b) Patron deposit accounts and cashless systems (NIGC 543.14(b))

- (1) Smart cards cannot maintain the only source of account data.
- (2) Establishment of patron deposit accounts. The following standards apply when a patron establishes an account.
 - (i) The patron must appear at the gaming operation in person, at a designated area of accountability, as approved by the Tribal Gaming Commission, and present a valid government issued picture identification; and
 - (ii) An agent must examine the patron's identification and record the following information:
 - (A) Type, number, and expiration date of the identification;
 - (B) Patron's name and current address;
 - (C) A unique account identifier;
 - (D) Date the account was opened; and
 - (E) The agent's name and gaming license number.
- (3) The patron must sign a multi-part account documentation before the agent may activate the account.
- (4) The agent or cashless system must provide the patron deposit account holder with a secure method of access. A patron must select his/her PIN to be used in conjunction with the account access.
- (5) Procedures, as approved by the Tribal Gaming Commission, must be established and implemented for patron deposit accounts when the system is down.

(c) Patron deposits, withdrawals and adjustments (543.14(c))

- (1) Prior to the patron making a deposit or withdrawal from a patron deposit account, the agent or cashless system must verify the patron deposit account, the patron identity, and availability of funds. Patron identity must be verified by comparing the patron to the image on the computer screen and the patron's valid government issued picture identification. Additionally, the patron must be required to enter his/her PIN.
- (2) Adjustments made to the patron deposit accounts must be performed by an agent.
- (3) When a deposit, withdrawal, or adjustment is processed by an agent, a transaction record must be created containing the following information:
 - (i) Same document number on all copies;
 - (ii) Type of transaction, (deposit, withdrawal, or adjustment);
 - (iii) Name and I.D. number or player's tracking number;
 - (iv) The unique account identifier;
 - (v) Patron signature;
 - (vi) For adjustments to the account, the reason for the adjustment;
 - (vii) Date and time of transaction;
 - (viii) Amount of transaction;
 - (ix) Nature of deposit, withdrawal, or adjustment (cash, check, chips); and
 - (x) Name and Signature of the agent processing the transaction.
- (4) When a patron deposits or withdraws funds from a patron deposit account electronically, the following must be recorded:
 - (i) Date and time of transaction;
 - (ii) Location (electronic bingo terminal, kiosk);
 - (iii) Type of transaction (deposit, withdrawal);
 - (iv) Amount of transaction; and
 - (v) The unique account identifier.
- (5) Patron deposit account transaction records must be available to the patron upon reasonable request.
- (6) If electronic funds transfers are made to or from a gaming operation bank account for patron deposit account funds, the bank account must be dedicated and may not be used for any other types of transactions.

(d) Variances (543.14(d))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 16: Surveillance for gaming operations (MICS 542.43)

(a) Supervision (NICG 543.21(a))

Supervision must be provided as required for surveillance by an agent(s) with authority greater than those being supervised.

(b) Surveillance equipment and control room(s) (NICG 543.21(b))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, that include the following:

- (1) The surveillance system must be maintained and operated from a staffed surveillance operation room(s) with a minimum of two agents physically in the room monitoring and operating the system at all times.
- (2) The surveillance operation room(s) must be secured to prevent unauthorized entry. The entrance to a surveillance operation room must be located so that it is not readily accessible by the general public.
- (3) Access to the surveillance operation room(s) must be limited to surveillance agents and other authorized persons in accordance with the surveillance department policy. An access list must be kept readily available so that surveillance may verify whether access should be granted to persons seeking entrance into the room. Such policy and access list must be maintained by the gaming operation and approved by the Tribal Gaming Commission.
- (4) Surveillance operation room(s) access logs must be maintained and available for review by the Tribal Gaming Commission upon request. Logs must be maintained for a minimum of two (2) years.
- (5) Surveillance operation room equipment must have total override capability over all other satellite surveillance equipment.
- (6) Power loss to the surveillance system:
 - (i) In the event of power loss to the surveillance system, an auxiliary or backup power source must be available and capable of providing immediate restoration of power to the surveillance system to ensure that surveillance agents can observe all areas covered by dedicated cameras and all games remaining open for play; and
 - (ii) If the system is not capable of covering games remaining open for play, then additional supervisory or security agents must immediately be assigned to ensure continued observation of all games remaining open for play.
- (7) The surveillance system must record an accurate date and time stamp on video and recorded events. The displayed date and time must not significantly obstruct the recorded view.
- (8) All surveillance agents must be trained in the use of the equipment, games, and house rules (such as the SICS).
- (9) Each camera required by the standards in this section must be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled. Surveillance agents must ensure that each camera continues to meet this requirement.
- (10) The surveillance system must:
 - (i) Have the capability to display all camera views on a monitor;
 - (ii) Include sufficient number of recording devices to record the views of all cameras required by this section;
 - (iii) Record all camera views; and
 - (iv) Include sufficient number of monitors to simultaneously display gaming and count room activities.
- (11) A monthly inspection of the entire surveillance system must be conducted and documented. In addition, a daily inspection must be conducted and documented for review of camera display, video/audio recording capability and retention. When a malfunction of the surveillance system is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy-two (72) hours.
 - (i) Dedicated cameras. If a dedicated camera malfunctions, alternative security procedures, as approved by the Tribal Gaming Commission, must be implemented.
 - (ii) The Tribal Gaming Commission must be notified of any surveillance system and/or camera(s) that have malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.
- (12) Procedures approved by the Tribal Gaming Commission must be in place that ensure performance of proper care and maintenance to prevent premature hardware failure that would compromise Surveillance

operations. Proper care and maintenance at a minimum includes the following:

- (i) Internal and external cleanliness of hardware, such as preventing the accumulation of dust. Routine cleaning of cameras must be performed.
 - (ii) Proper cable management to prevent restricted air flow or accidental disconnection.
 - (iii) Ensure Surveillance MDF and IDF rooms are not used for storage and the respective areas are kept clean and free from trash and non-surveillance items.
- (13) All surveillance hardware must be properly installed, maintained, and secured per the manufacturer's specifications to prevent premature hardware failure that would compromise Surveillance operations.
- (14) Address transportation of extraneous items into and out of the surveillance room. "Extraneous items" includes, but is not limited to, personal belongings, tool boxes, and beverage containers. The policy must also address extraneous audio within the surveillance room and associated areas. "Extraneous audio" includes, but is not limited to, music players, personal telephones, and televisions.

(c) Additional surveillance requirements (NIGC 543.21(c))

With regard to the following functions, controls must also include:

- (1) Surveillance of the progressive prize meters for Class II gaming systems at the following thresholds:
- (i) Wide area progressives with a reset amount of \$250,000 or greater.
 - (A) A dedicated camera must monitor and record with sufficient clarity the patrons, agents and the area surrounding each electronic bingo terminal.
 - (B) A PTZ camera must record with sufficient clarity the image of the face of the electronic bingo terminal, including the payout line(s), ball draw and bingo card upon notification of a win.
 - (ii) In-house progressives with a reset amount of \$100,000 or greater.
 - (A) A dedicated camera must monitor and record with sufficient clarity the patrons, agents and the area surrounding each electronic bingo terminal.
 - (B) A PTZ camera must record with sufficient clarity the image of the face of the electronic bingo terminal, including the payout line(s), ball draw and bingo card upon notification of a win.
 - (iii) Except as otherwise provided in paragraphs (i) and (ii) of this section, electronic bingo systems offering a payout of more than \$100,000 must be monitored and recorded to provide coverage of:
 - (A) A dedicated camera must record with sufficient clarity all patrons and agents at the electronic bingo terminal, and
 - (B) A PTZ camera must record with sufficient clarity the image of the face of the electronic bingo terminal, including the payout line(s), ball draw and bingo card upon notification of a win.
- (2) Manual bingo:
- (i) For manual draws, the surveillance system must monitor the bingo ball drawing device or mechanical random number generator, which must be recorded with sufficient clarity during the course of the draw by a dedicated camera to identify the numbers or other designations drawn; and
 - (ii) The surveillance system must monitor and record with sufficient clarity the activities of the bingo game, including drawing, and entering the balls, numbers or other designations drawn.
- (3) Card games:
- (i) Except for card game tournaments, a dedicated camera(s) with sufficient clarity must be used to provide:
 - (A) An overview of the activities on each card table surface, including card faces and cash and/or cash equivalents;
 - (B) An overview of card game activities, including patrons and dealers; and
 - (C) An unobstructed view of all posted progressive pool amounts.
 - (ii) For card game tournaments, a dedicated camera(s) must be used to provide an overview with sufficient clarity of tournament activities, and any area where cash or cash equivalents are exchanged.
- (4) Cage and vault:
- (i) The surveillance system must monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify individuals within the cage and patrons and staff members at the counter areas and to confirm the amount of each cash transaction;
 - (ii) Each cashier station must be equipped with one (1) dedicated overhead camera covering with sufficient clarity the transaction area;
 - (iii) The cage or vault area in which exchange and transfer transactions occur must be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides coverage with

- sufficient clarity to identify the chip values, cash or cash equivalents and the amounts on the exchange and transfer documentation. Controls provided by a computerized exchange and transfer system constitute an adequate alternative to viewing the amounts on the exchange and transfer documentation;
- (iv) Each transaction window, currency counter, and vault storage area in the cage or vault must be monitored and recorded by a dedicated camera with sufficient clarity to identify transactions; and
 - (v) Audio capability of the cage and vault areas dedicated cameras, as required by this section, must be maintained and recorded.
- (5) Count rooms:
- (i) The surveillance system must monitor and record with sufficient clarity a general overview of all areas where cash or cash equivalents may be stored or counted. Count room must be equipped with a dedicated camera view of all storage racks, all count room doors, all counting machines and all areas where cash or cash equivalents are sorted, stacked, counted, verified, or stored;
 - (ii) The surveillance system must provide coverage of count equipment with sufficient clarity to view any attempted manipulation of the recorded data;
 - (iii) An overhead dedicated camera must monitor and record with sufficient clarity the loading and unloading of all currency counters; and
 - (iv) Audio capability of the count room dedicated cameras, as required by this section, must be maintained and recorded.
- (6) Gaming Promotions and Player Tracking Systems:
- (i) The surveillance system must monitor and record with sufficient clarity a general overview of activities occurring in each area where gaming promotion drawings are conducted;
 - (ii) Where player tracking terminals are used, the surveillance system must monitor and record a general overview of activities to identify with sufficient clarity authorized agents, patrons and staff members processing transactions; and
 - (iii) Each player tracking terminal must be equipped with at least one (1) dedicated overhead camera covering with sufficient clarity the transaction area.
- (7) Kiosks
- (i) The surveillance system must monitor and record with sufficient clarity a general overview of activities at kiosks to identify authorized agents, patrons and staff members processing transactions; and
 - (ii) Each kiosk must be equipped with at least one (1) dedicated overhead camera covering with sufficient clarity the transaction area.
- (8) Other cashiering areas
- (i) The surveillance system must monitor and record with sufficient clarity other cashiering terminals, funded by the cage and vault, to identify authorized agents, patrons, and staff members processing transactions; and
 - (ii) Each terminal must be equipped with at least one (1) dedicated overhead camera covering with sufficient clarity the transaction area.

(d) Reporting requirements (NIGC 543.21 (d))

The gaming operation must adhere to the Tribal Gaming Commission procedures for Reporting Suspected Crimes and Suspicious Activity.

(e) Recording retention (NIGC 543.21(e))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, that include the following:

- (1) All recordings required by this section must be retained for a minimum of thirty (30) days; and
- (2) Suspected crimes, suspicious activity, or detentions by security agents discovered within the initial retention period must be copied and retained for a time period, not less than one year.

(f) Logs (NIGC 543.21 (f))

Logs must be maintained and demonstrate the following:

- (1) Compliance with the storage, identification, and retention standards required in this section;

- (2) Each malfunction and repair of the surveillance system as defined in this section. Such log must state the time, date, and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken;
- (3) Activities performed by surveillance agents as required by the controls in this section. Such log must be maintained by surveillance room agents and stored securely within the surveillance department. At a minimum, the following information must be printed legibly and recorded in such log:
 - (i) Date;
 - (ii) Time commenced and terminated;
 - (iii) Activity observed or performed;
 - (iv) Name and job title of all agents involved in the activity; and
 - (v) The printed name and signature of the surveillance agent.
- (4) At a minimum, the following information must be recorded in a written surveillance room access log:
 - (i) Date;
 - (ii) Time entered and exited room;
 - (iii) Why access was needed;
 - (iv) The name of person(s) gaining access to the room;
 - (v) Surveillance signature of staff signing the person in and out when they enter/leave the surveillance room; and
 - (vi) The signature of the person(s) gaining access to the room attesting to the information.
- (5) Requests for all recordings must be made in writing and documented. Compliance must be demonstrated by maintaining a written video library log that includes the following:
 - (i) Gaming day of the footage;
 - (ii) Date recording was made and released;
 - (iii) Why recording was needed;
 - (iv) Name of requestor;
 - (v) Name of person recording released to; and
 - (vi) Surveillance signature of agent authorizing release of recording.
- (6) Each performance of routine and/or periodic maintenance of surveillance equipment, surveillance system and surveillance MDF/IDF. Such log must state the time, date, and nature of each maintenance.

Section 17:**Auditing Revenue (NIGC 543.24(a))****(a) Supervision (NIGC 543.24(a))**

Supervision must be provided as required for bingo operations by an agent(s) with authority equal to or greater than those being supervised.

(b) Independence (NIGC 543.24 (b))

Audits must be performed by agent(s) independent of the transactions being audited.

(c) Documentation (NIGC 543.24(c))

The performance of revenue audit procedures, the exceptions noted, and the follow-up of all revenue audit exceptions must be documented and maintained for five (5) years.

(d) Revenue audit controls (NIGC 543.24(d))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to audit each of the following operational areas:

(1) Bingo and Electronic Bingo Systems.

- (i) At the end of each month, verify the accuracy of the ending balance in the bingo control log by reconciling it with the bingo paper inventory. Investigate and document any variance noted.
- (ii) Daily, reconcile supporting records and documents to summarized paperwork or electronic records (e.g. total sales and payouts per shift and/or day).
- (iii) At least monthly, review variances related to bingo/electronic bingo systems accounting data in accordance with an established threshold, which must include, at a minimum, variance(s) noted by the Class II gaming system for cashless transactions in and out, electronic funds transfer in and out, external bonus payouts, vouchers out and coupon promotion out. Investigate and document any variance noted.
- (iv) At least monthly, review statistical reports for any deviations of more than three (3) percent from the mathematical expectations. Investigate and document any deviations compared to the mathematical expectations required to be submitted per §547.4.
- (v) At least monthly, take a random sample, foot the vouchers redeemed and trace the totals to the totals recorded in the voucher system and to the amount recorded in the applicable cashier's accountability document.
- (vi) At least monthly, randomly test 5% of the floor in accordance with procedures approved by the Tribal Gaming Commission. Electronic bingo systems software media must be verified to changes in the electronic bingo systems analysis reports.
- (vii) For each drop period, compare the bill-in meter reading to the actual drop amount. Discrepancies must be investigated and documented prior to generation/distribution of Class II gaming system statistical reports.
- (viii) For each drop period, compare the bill-in meter reading to the total canister drop amount for the period. Discrepancies must be investigated and documented before the generation/distribution of statistical reports.
- (ix) Follow-up must be performed for any one electronic bingo terminal having an unresolved variance between actual currency drop and a bill-in meter reading in excess of an amount that is more than \$25 of the actual currency drop. The follow-up performed and results of the investigation must be documented, maintained for inspection, and provided to the Tribal Gaming Commission upon request.
- (x) At least weekly, foot all jackpot vouchers equal to or greater than \$1,200.00 and trace totals to those produced by the host validation system.

(2) Pull tabs.

- (i) Daily, verify the total amount of winning pull tabs redeemed each day.
- (ii) At the end of each month, verify the accuracy of the ending balance in the pull tab control log by reconciling the pull tabs on hand. Investigate and document any variance noted.
- (iii) At least monthly, compare for reasonableness the amount of pull tabs sold from the pull tab control log to the amount of pull-tab sales.
- (iv) At least monthly, review statistical reports for any deviations of three (3) percent.

- (3) Card games.
- (i) Daily, reconcile the amount indicated on the progressive sign/meter to the cash counted or received by the cage and the payouts made for each promotional progressive pot and pool. This reconciliation must be sufficiently documented, including substantiation of differences and adjustments.
 - (ii) At least weekly, review all payouts for the promotional progressive pots, pools, or other promotions to verify payout accuracy and proper accounting treatment and that they are conducted in accordance with conditions provided to the patrons.
 - (iii) At the conclusion of each contest/tournament, reconcile all contest/tournament entry and payout forms to the dollar amounts recorded in the appropriate accountability document.
- (4) Gaming promotions and player tracking.
- (i) At least weekly, review promotional payments, drawings, and giveaway programs to verify payout accuracy and proper accounting treatment in accordance with the rules provided to patrons.
 - (ii) At least weekly, for computerized player tracking systems, perform the following procedures:
 - (A) Review authorization documentation for all manual point additions/deletions for propriety;
 - (B) Review exception reports, including transfers between accounts; and
 - (C) Review documentation related to access to inactive and closed accounts.
 - (iii) At least monthly, all computerized player tracking systems must be reviewed by agent(s) independent of the individuals that set up or make changes to the system parameters. The review must be performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization. Document and maintain the test results.
- (5) Complimentary services or items. At least monthly, review the reports required in §543.13(d). These reports must be made available to those entities authorized by the Tribal Gaming Commission or by tribal law or ordinance.
- (6) Patron deposit accounts.
- (i) At least weekly, reconcile patron deposit account liability (deposits ± adjustments—withdrawals = total account balance) to the system record.
 - (ii) At least weekly, review manual increases and decreases to/from player deposit accounts to ensure proper adjustments were authorized.
- (7) Lines of credit.
- (i) At least quarterly, an agent independent of the cage, credit, and collection functions must perform the following review:
 - (A) Select a sample of twenty-five (25) accounts or ten (10) percent, whichever is greater, of line of credit accounts;
 - (B) Ascertain compliance with credit limits and other established credit issuance procedures;
 - (C) Reconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts receivable listing to individual credit records and physical instruments.; and
 - (D) Examine line of credit records to determine that appropriate collection efforts are being made and payments are being properly recorded.
 - (E) For at least five (5) days during the review period, subsequently reconcile partial payment receipts to the total payments recorded by the cage for the day and account for the receipts numerically.
 - (ii) At least monthly, perform an evaluation of the collection percentage of credit issued to identify unusual trends.
- (8) Drop and count.
- (i) At least quarterly, unannounced currency counter and currency counter interface (if applicable) tests must be performed, and the test results documented and maintained. All denominations of currency and all types of cash out tickets counted by the currency counter must be tested. This test will be performed by the Tribal Gaming Commission. The result of these tests must be documented and signed by the agent(s) performing the test.
 - (ii) At least quarterly, unannounced weigh scale and weigh scale interface (if applicable) tests must be performed, and the test results documented and maintained. This test will be performed by the Tribal Gaming Commission. The result of these tests must be documented and signed by the agent(s) performing the test.
 - (iii) For computerized key security systems controlling access to drop and count keys, perform the following procedures:

- (A) At least quarterly, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes users' access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide adequate control over the access to the drop and count keys. Also, determine whether any drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized;
- (B) At least quarterly, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual drop and count key removals or key returns occurred; and
- (C) At least quarterly, review a sample of users that are assigned access to the drop and count keys to determine that their access to the assigned keys is appropriate relative to their job position.
- (iv) At least quarterly, an inventory of all controlled keys must be performed and reconciled to records of keys made/purchased, issued, and destroyed. Investigations must be performed for all keys unaccounted for, and the investigation documented. Reconciliations and investigations must be forwarded to the Tribal Gaming Commission.
- (9) Cage, vault, cash, and cash equivalents.
 - (i) At least monthly, the cage accountability must be reconciled to the general ledger with supporting documentation.
 - (ii) At least monthly, trace the amount of cage deposits to the amounts indicated in the bank statements.
 - (iii) Twice annually, a count must be performed of all funds in all gaming areas (i.e. cages, vaults, and booths (including reserve areas), kiosks, cash-out ticket redemption machines, and change machines. Count all chips and tokens by denomination and type. Count individual straps, bags, and imprest banks on a sample basis. Reconcile all amounts counted to the amounts recorded on the corresponding accountability forms to ensure that the proper amounts are recorded. Maintain documentation evidencing the amount counted for each area and the subsequent comparison to the corresponding accountability form. The count must be completed within the same gaming day for all areas.
 - (A) Counts must be observed by an individual independent of the department being counted. It is permissible for the individual responsible for the funds to perform the actual count while being observed.
 - (B) Internal audit will observe the two counts.
 - (iv) At least quarterly, select a sample of invoices for chips and tokens purchased, and trace the dollar amount from the purchase invoice to the accountability document that indicates the increase to the chip or token inventory to ensure that the proper dollar amount has been recorded.
 - (v) At each business year end, create and maintain documentation evidencing the amount of the chip/token liability, the change in the liability from the previous year, and explanations for adjustments to the liability account including any adjustments for chip/token float.
 - (vi) At least monthly, review a sample of returned checks to determine that the required information was recorded by cage agent(s) when the check was cashed.
 - (vii) At least monthly, review exception reports for all computerized cage systems for propriety of transactions and unusual occurrences. The review must include, but is not limited to, voided authorizations. All noted improper transactions or unusual occurrences identified must be investigated and the results documented.
 - (viii) Daily, reconcile all parts of forms used to document increases/decreases to the total cage inventory, investigate any variances noted, and document the results of such investigations.
 - (ix) At least quarterly, unannounced currency counter and currency counter interface (if applicable) tests must be performed, and the test results documented and maintained. All denominations of currency and all types of cash out tickets counted by the currency counter must be tested. This test will be performed by the Tribal Gaming Commission. The results of these tests must be documented and signed by the agent(s) performing the test.
- (10) Inventory.
 - (i) At least monthly, verify receipt, issuance, and use of controlled inventory, including, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.
 - (ii) Periodically perform minimum bankroll calculations to ensure that the gaming operation maintains cash in an amount sufficient to satisfy the gaming operation's obligations.

Section 18:

Audit and Accounting (NIGC 543.23)

(a) Conflicts of standards (NIGC 543.23(a))

When establishing SICS, the gaming operation should review, and consider incorporating, other external standards such as GAAP, GAAS, and standards promulgated by GASB and FASB. In the event of a conflict between the MICS and the incorporated external standards, the external standards prevail.

(b) Accounting (NIGC 543.23(b))

Controls must be established and procedures, as approved by the Tribal Gaming Commission, implemented to safeguard assets and ensure each gaming operation:

- (1) Prepares accurate, complete, legible, and permanent records of all transactions pertaining to gaming revenue and activities for operational accountability.
- (2) Prepares general accounting records on a double-entry system of accounting, maintaining detailed, supporting, subsidiary records, and performs the following activities:
 - (i) Record gaming activity transactions in an accounting system to identify and track all revenues, expenses, assets, liabilities, and equity;
 - (ii) Record all markers, IOU's, returned checks, held checks, or other similar credit instruments;
 - (iii) Record journal entries prepared by the gaming operation and by any independent accountants used;
 - (iv) Prepare income statements and balance sheets;
 - (v) Prepare appropriate subsidiary ledgers to support the balance sheet;
 - (vi) Prepare, review, and maintain accurate financial statements;
 - (vii) Prepare transactions in accordance with the appropriate authorization, as provided by management;
 - (viii) Record transactions to facilitate proper recording of gaming revenue and fees (such as NIGC's sample fees worksheet), and to maintain accountability of assets;
 - (ix) Compare recorded accountability for assets to actual assets at periodic intervals, and take appropriate action with respect to any variances;
 - (x) Segregate functions, duties, and responsibilities;
 - (xi) Prepare minimum bankroll calculations; and
 - (xii) Maintain and preserve all financial records and relevant supporting documentation for a minimum of five (5) years or as required by external standards (such as GAAP, GAAS, and standards promulgated by GASB and FASB). At a minimum, the following must be retained:
 - (A) Casino cage documents;
 - (B) Documentation supporting the calculation of electronic bingo systems win;
 - (C) Documentation supporting the calculation of revenue received from the games of bingo, pull-tabs, card games, and all other gaming activities offered by the gaming operation;
 - (D) Electronic bingo systems statistical analysis reports;
 - (E) Bingo and pull-tabs statistical reports;
 - (F) Internal audit documentation and reports;
 - (G) Documentation supporting the write-off of gaming credit instruments and named credit instruments;
 - (H) All other books, records and documents pertaining to the conduct of wagering activities that contain original signature(s) attesting to the accuracy of the gaming related transaction.
 - (I) Unless otherwise specified in this part, all other books, records, and documents must be retained until such time as the accounting records have been audited by the gaming operation's independent certified public accountants.
 - (J) The above definition applies without regards to the medium by which the book, record or document is generated or maintained (paper, computer-generated, magnetic media, etc.).

(c) Internal audit (NIGC 543.23(c))

Controls must be established and procedures implemented to ensure that:

- (1) Internal auditor(s) perform audits of each department of a gaming operation, at least annually, to review compliance with MICS, SICS, and these TICS, which include at least the following areas:
 - (i) Bingo and electronic bingo systems, including supervision, bingo cards, bingo card sales, draw, prize payout; cash and equivalent controls, technologic aids to the play of bingo, operations, vouchers, and revenue audit procedures;
 - (ii) Pull tabs, including, supervision, pull tab inventory, pull tab sales, winning pull tabs, pull tab operating funds, statistical records, and revenue audit procedures;
 - (iii) Card games, including supervision, exchange or transfers, playing cards, shill funds, reconciliation of card room bank, posted rules, and promotional progressive pots and pools;
 - (iv) Gaming promotions and player tracking procedures, including supervision, gaming promotion rules and player tracking systems;
 - (v) Complimentary services or items, including procedures for issuing, authorizing, redeeming, and reporting complimentary service items;
 - (vi) Patron deposit accounts and cashless systems procedures, including supervision, patron deposit accounts and cashless systems, as well as patron deposits, withdrawals and adjustments;
 - (vii) Lines of credit procedures, including establishment of lines of credit policy;
 - (viii) Drop and count standards, including supervision, count room access, count team, card game drop standards, electronic bingo terminal and financial instrument drop standards, card game count standards, electronic bingo terminal financial instrument count standards, and controlled keys;
 - (ix) Cage, vault, cash and cash equivalent procedures, including supervision, cash and cash equivalents, personal checks, cashier's checks, traveler's checks, payroll checks, and counter checks, cage and vault accountability, kiosks, patron deposited funds, promotional payouts, drawings, and giveaway programs, chip and token standards, and cage and vault access;
 - (x) Information technology, including supervision, class II gaming systems' logical and physical controls, independence, physical security, logical security, user controls, installations and/or modifications, remote access, incident monitoring and reporting, data back-ups, software downloads, and verifying downloads;
 - (xi) Accounting standards, including accounting records, maintenance and preservation of financial records and relevant supporting documentation;
 - (xii) Surveillance standards, including supervision, surveillance equipment and control rooms, additional surveillance requirements, reporting requirements, recording retention, and logs;
 - (xiii) Title 31 standards, including standard for compliance, Anti-Money Laundering Program, and standards for the retention of records; and
 - (xiv) Any other internal audits as required or deemed necessary by the Tribal Gaming Commission.
- (2) Internal auditor(s) are independent of gaming operations with respect to the departments subject to audit (auditors internal to the operation, officers of the Tribal Gaming Commission, or outside CPA firm may perform this function).
- (3) Internal auditor(s) report directly to the Tribal Gaming Commission.
- (4) Documentation such as checklists, programs, reports, etc. is prepared to evidence all internal audit work and follow-up performed as it relates to compliance with TICS, SICS, and these MICS, including all instances of noncompliance. Documentation must be retained for five (5) years.
- (5) Audit reports are maintained and made available to NIGC upon request and must include the following information:
 - (i) Audit objectives;
 - (ii) Audit procedures and scope;
 - (iii) Findings and conclusions;
 - (iv) Recommendations, if applicable; and
 - (v) Management's response.
- (6) All material exceptions identified by internal audit work are investigated and resolved and the results are documented.
- (7) Internal audit findings are reported to management, responded to by management stating corrective measures to be taken, and included in the report delivered to management and the Tribal Gaming Commission.
- (8) Follow-up observations and examinations are performed to verify that corrective action has been taken regarding all instances of non-compliance. The verification is performed within six (6) months following the date of notification of non-compliance. Documentation must be retained for five (5) years.

(d) Annual requirements (NIGC 543.23 (d))

- (1) Agreed upon procedures. A CPA must be engaged to perform an assessment to verify whether the gaming operation is in compliance with the MICS, and/or the TICS or SICS if they provide at least the same level of controls as the MICS. The assessment must be performed in accordance with agreed upon procedures and the most recent versions of the Statements on Standards for Attestation Engagements and Agreed-Upon Procedures Engagements (collectively "SSAEs"), issued by the American Institute of Certified Public Accountants.
- (2) The tribe must submit two copies of the agreed-upon procedures report to NIGC within 120 days of the gaming operation's fiscal year end in conjunction with the submission of the annual financial audit report required pursuant to 25 CFR part 571. The CPA must submit a copy of the report to the Tribe, Tribal Gaming Commission, and PCI Gaming.
- (3) Review of internal audit.
 - (i) The CPA must determine compliance by the gaming operation with the internal audit requirements in this paragraph (d) by:
 - (A) Completing the internal audit checklist;
 - (B) Ensuring that the internal auditor completed checklists for each gaming department of the operation;
 - (C) Verifying that any areas of non-compliance have been identified;
 - (D) Ensuring that audit reports are completed and include responses from management; and
 - (E) Verifying that appropriate follow-up on audit findings has been conducted and necessary corrective measures have been taken to effectively mitigate the noted risks.
 - (ii) If the CPA determines that the internal audit procedures performed during the fiscal year have been properly completed, the CPA may rely on the work of the internal audit for the completion of the MICS checklists as they relate to the standards covered by this part.
- (4) Report format. The SSAEs are applicable to agreed-upon procedures engagements required in this part. All noted instances of noncompliance with the MICS and/or the TICS or SICS, if they provide the same level of controls as the MICS, must be documented in the report with a narrative description, the number of exceptions and sample size tested.

Section 19: Lines of Credit (NIGC 543.15)

(a) Supervision (NIGC 543.15 (a))

Supervision must be provided as required for lines of credit by an agent(s) with authority equal to or greater than those being supervised.

(b) Establishment of lines of credit policy (NIGC 543.15 (b))

(1) If a gaming operation extends lines of credit, controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, to safeguard the assets of the gaming operation. Such controls must include a lines of credit policy including the following:

- (i) A process for the patron to apply for, modify, and/or re-establish lines of credit, to include required documentation and credit line limit;
- (ii) Authorization levels of credit issuer(s);
- (iii) Identification of agents authorized to issue lines of credit;
- (iv) A process for verifying an applicant's credit worthiness;
- (v) A system for recording patron information, to include:
 - (A) Name, current address, and signature;
 - (B) Identification credential;
 - (C) Authorized credit line limit;
 - (D) Documented approval by an agent authorized to approve credit line limits;
 - (E) Date, time and amount of credit issuances and payments; and
 - (F) Amount of available credit.
- (vi) A process for issuing lines of credit to:
 - (A) Verify the patron's identity;
 - (B) Notify the patron of the lines of credit terms, including obtaining patron's written acknowledgment of the terms by signature;
 - (C) Complete a uniquely identified, multi-part, lines of credit issuance form, which includes the terms of the lines of credit transaction;
 - (D) Obtain required signatures;
 - (E) Determine the amount of the patron's available lines of credit;
 - (F) Update the credit balance record at the time of each transaction to ensure that lines of credit issued are within the established limit and balance for that patron; and
 - (G) Require the agent issuing the lines of credit to be independent of the agent who authorized the lines of credit.
- (vii) A policy establishing credit line limit exceptions to include the following:
 - (A) Identification of the agent(s) authorized to permit a credit line limit to be exceeded;
 - (B) Authorization thresholds; and
 - (C) Required documentation.
- (viii) A policy governing increases and decreases to a patron's lines of credit account balances to include the following:
 - (A) Documentation and record keeping requirements;
 - (B) Independence between the department that receives the payment and the department that maintains custody of the credit balance for payments made by mail;
 - (C) Collections;
 - (D) Periodic audits and confirmation of balances; and
 - (E) If a collection agency is used, a process to ensure documentation of increases and decreases to the lines of credit account balances.
- (ix) A policy governing write-offs and settlements to include:
 - (A) Identification of agent(s) authorized to approve write-offs and settlements;
 - (B) Authorization levels for write-offs and settlements of lines of credit instruments;
 - (C) Required documentation for write-offs and settlements;
 - (D) Independence between the agent who established the lines of credit and the agent writing off or settling the lines of credit instrument; and

(E) Necessary documentation for the approval of write-offs and settlements and transmittal to the appropriate department for recording and deductibility.

(c) Variances (NIGC 543.15)

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

(1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Section 20:

Title 31 (BSA)

(a) Standard for Compliance

The gaming operation must assure and monitor compliance with Title 31 (31 Code of Federal Regulations Chapter X) of the Bank Secrecy Act (BSA) governed by the Financial Crimes Enforcement Network (FinCEN), U.S. Department of Treasury and any regulations promulgated thereunder.

(b) Anti-Money Laundering Program

The gaming operation must develop and implement a written program, as approved by the Tribal Gaming Commission, designed to assure and monitor compliance with the requirements set forth in 31 CFR Chapter X and the standards contained in this section. The program must include but is not limited to the following:

- (1) The development of internal policies, procedures, and controls that establish such parameters as gaming day, sample forms, identification gathering, player tracking, employee procedures, etc., as approved by the Tribal Gaming Commission, will be acceptable.
- (2) Designation of a compliance officer who will ensure day-to-day compliance with all Title 31 standards. Officer must ensure new Title 31 requirements promulgated by paragraph (a) of this section are implemented.
- (3) External and/or Internal independent testing for compliance with Title 31. The Tribal Gaming Commission may require both an external and internal audit of Title 31, as determined by the risks identified in the risk assessment performed in (b)(12) of this section.
- (4) Employee training for all new gaming operation employees on Title 31 requirements. In addition, ongoing and continuous (no less than quarterly) Title 31 training is mandatory for all employees of the following departments and extensions thereof:
 - (i) Cage/Vault;
 - (ii) Surveillance;
 - (iii) Security;
 - (iv) Electronic Bingo Systems;
 - (v) Player tracking and
 - (vi) Any department responsible for day-to-day Title 31 compliance
- (5) Procedures for verifying and recording the identity of a patron prior to conducting a transaction in respect to Title 31 requirements. Procedures must include at a minimum the following:
 - (i) Using all available information to determine name, address, and SSN to verify the identity of a patron.
 - (ii) Prohibiting the mere notation of "known customer" on a report.
- (6) Procedures for using all available information to determine any transactions or patterns of transaction required to be reported.
- (7) Procedures for using all computer systems available to the gaming operation for compliance with Title 31.
- (8) Procedures for reporting currency transactions as required by Title 31.
- (9) Procedures for reporting suspicious activity to the extent and in the manner required by Title 31. In addition, procedures for filing a report of any suspicious transaction that the gaming operation believes is relevant to the possible violation of any law or regulation but whose reporting is not required by Title 31.
- (10) Procedures for tracking monetary instruments and multiple transactions as required by Title 31, including the retention of either the original or copy of all records and/or logs which are prepared or used by the gaming operation to monitor a patron's gaming activity.
- (11) Procedures for recording patron deposit accounts and lines of credit as required by Title 31.
- (12) The performance and documentation of an annual risk assessment of Title 31. A risk assessment report must be provided to gaming operation management, the gaming board, and the Tribal Gaming Commission.

(c) Standards for the retention of records

All records that are required by this section must be retained for a period of five (5) years or as required by external standards. All such records must be filed or stored in such a way as to be accessible within a reasonable period of time, taking into consideration the nature of the record, and the amount of time expired since the record was made.

Section 21:

Card Games (NIGC 543.10)

(a) Supervision (NIGC 543.10(a))

Supervision must be provided as required during the card room operations by an agent(s) with authority equal to or greater than those being supervised.

- (1) A supervisor may function as a dealer without any other supervision if disputes are resolved by supervisory personnel independent of the transaction or independent of the card games department; or
- (2) A dealer may function as a supervisor if not dealing the game.

(b) Exchanges or transfers (NIGC 543.10(b))

- (1) Exchanges between table banks and the main card room bank (or cage, if a main card room bank is not used) must be authorized by a supervisor. All exchanges must be evidenced by the use of a lammer unless the exchange of chips, tokens, and/or cash takes place at the table. If table banks are maintained at an imprest level and runners are used for the exchanges at the table, no supervisory authorization is required.
- (2) Exchanges from the main card room bank (or cage, if a main card room bank is not used) to the table banks must be verified by the card room dealer and the runner.
- (3) Transfers between the main card room bank and the cage must be properly authorized and documented. Documentation must be retained according to the revenue audit requirements in these standards.

(c) Playing cards (NIGC 543.10(c))

- (1) New and used playing cards must be maintained in a secure location, with appropriate surveillance coverage, and accessible only to authorized agents.
- (2) Used playing cards that are not to be re-used must be properly cancelled and removed from service to prevent re-use. The removal and cancellation procedure requires Tribal Gaming Commission review and approval.
- (3) Playing cards associated with an investigation must be retained intact and outside of the established removal and cancellation procedure.

(d) Shill funds (NIGC 543.10 (d))

Controls must be established and procedures implemented, as approved by the Tribal Gaming Commission, for the use of shill funds.

- (1) Issuance of shill funds must be recorded and have the written approval of the supervisor.
- (2) Returned shill funds must be recorded and verified by a supervisor.
- (3) The replenishment of shill funds must be documented.

(e) Standards for reconciliation of card room bank (NIGC 543.10 (e))

Two agents—one of whom must be a supervisory agent—must independently count the table inventory at the opening and closing of the table and record the following information:

- (1) Date;
- (2) Shift;
- (3) Table number;
- (4) Amount by denomination;
- (5) Amount in total; and
- (6) Signatures of both agents.

(f) Posted rules (NIGC 543.10 (f))

The rules must be displayed or available for patron review at the gaming operation, including rules governing contests, prize payouts, fees, the rake collected, and the placing of antes.

(g) Promotional progressive pots and pools (NIGC 543.10(g))

- (1) All funds contributed by players into the pools must be returned when won in accordance with posted rules, and no commission or administrative fee may be withheld.
 - (i) The payout may be in the form of personal property, such as a car.
 - (ii) A combination of a promotion and progressive pool may be offered.

- (2) The conditions for participating in current card game promotional progressive pots and/or pools must be prominently displayed or available for patron review at the gaming operation.
- (3) Individual payouts for card game promotional progressive pots and/or pools must be documented at the time of the payout to include the following:
 - (i) Patron's name and player tracking number or personal I.D. number;
 - (ii) Date of payout;
 - (iii) Dollar amount of payout and/or nature and dollar value of any non-cash payout;
 - (iv) The signature of the agent completing the transaction attesting to the disbursement of the payout; and
 - (v) Name of contest/tournament.
- (4) Rules governing current promotional pools must be conspicuously posted in the card room and/or available in writing for patron review. The rules must designate:
 - (i) The amount of funds to be contributed from each pot;
 - (ii) What type of hand it takes to win the pool;
 - (iii) How the promotional funds will be paid out;
 - (iv) How/when the contributed funds are added to the pools; and
 - (v) Amount/percentage of funds allocated to primary and secondary pools, if applicable.
- (5) Promotional pool contributions must not be placed in or near the rake circle, in the drop box, or commingled with gaming revenue from card games or any other gambling game.
- (6) The amount of the pools must be conspicuously displayed in the card room.
- (7) At least once each day that the game is offered, the posted pool amount must be updated to reflect the current pool amount.
- (8) At least once each day that the game is offered, agents independent of the card room must reconcile the increases to the posted pool amount to the cash previously counted or received by the cage.
- (9) All decreases to the pool must be properly documented, including a reason for the decrease.
- (10) Promotional funds removed from the card game must be placed in a locked container.
 - (i) Agents authorized to transport the locked container are precluded from having access to the contents keys.
 - (ii) The contents key must be maintained by a department independent of the card room.
 - (iii) At least once a day, the locked container must be removed by three agents, one of whom is independent of the card games department, and transported directly to the cage or other secure room to be counted, recorded, and verified, prior to accepting the funds into cage accountability.

(h) Variances (543.10(h))

The operation must establish, as approved by the Tribal Gaming Commission, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.

- (1) All variances must be maintained and reported to the Tribal Gaming Commission according to Procedures for Variances.

Signature on PDF for read only
Tribal Gaming Commission Administrator

Date _____

Signature on PDF for read only
Tribal Gaming Commission Chairman

Date _____

