

**TRIBAL/STATE  
MINIMUM INTERNAL CONTROL STANDARDS**

**Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians  
Gaming Commission**

**Oregon State Police – Tribal Gaming Section**

**Revision Date: April 11, 2012**

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

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# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## PRELUDE

The Tribal/State Minimum Internal Controls Standards (MICS) are jointly developed by the Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians Gaming Commission (CTGC) and the Oregon State Police – Tribal Gaming Section (TGS) and are in effect as of the revision date on the front cover page. In accordance with the published revision date on the front cover page, the CTGC will ensure that the Gaming Facility will meet or exceed the revised standards set forth herein; no later than September 3, 2012, by which the Gaming Facility must come into compliance with the revised Tribal/State Minimum Internal Control Standards. However, any game or technology, newly introduced, must meet the revised Tribal/State MICS.

The CTGC and TGS jointly recognize the need to revisit the MICS at least annually or as needed due to changing technology in the gaming industry to ensure the minimums are adequate and if necessary, make amendments jointly.

If TGS and a Gaming Commission not listed on the front cover page agree to a different version of the Tribal/State MICS in the future; TGS agrees to offer in writing the revised or alternate standard to the respective Gaming Commissions listed on the front cover, so they can review to consider amending their MICS with the same revised standard. The Gaming Commissions agree to notify TGS in writing of their respective decision to amend with the revised standard or to defer at this time.

Nothing in these MICS shall be construed to authorize any form of gaming not authorized in the applicable Tribal/State compact.

### Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians Gaming Commission

Approved By:

Approved Date:

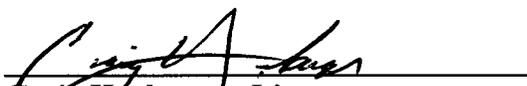
  
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Robert Miller, Chair

  
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Oregon State Police – Tribal Gaming Section

Approved By:

Approved Date:

  
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Craig Heuberger, Lieutenant

  
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## TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

### SECTION 1: WRITTEN SYSTEM OF INTERNAL CONTROLS, REGULATIONS, OR POLICIES AND PROCEDURES

#### 1. Written System of Internal Controls (ICs), Regulations (Regs), or Policies and Procedures (P&Ps)

- 1.1. The written ICs, Regs, or P&Ps will:
  - 1.1.1. Be approved by the Tribal Gaming Commission for the Tribal Gaming Operation, ensuring that they meet the Tribal/State Compact and MICS requirements, respectively; and
  - 1.1.2. Be provided to the Oregon State Police for the purpose of performing monitoring/oversight of Class III Gaming activities within the Tribal Gaming Operation.
- 1.2. The ICs, Regs, or P&Ps will include at a minimum, an organizational chart or description of how the:
  - 1.2.1. Security Department will co-operate with, yet perform independently, of all other departments to ensure the safety of patrons, employees, and the security of the Tribal Gaming Facility;
  - 1.2.2. Surveillance Department will co-operate with, yet perform independently, of all other departments and report to the Tribal Gaming Commission or an entity independent of operations;
  - 1.2.3. Cage Management will co-operate with, yet perform and report independently, of the Class III Gaming Management, Security, and the Surveillance Department;
  - 1.2.4. Information Technology Department, will co-operate with, yet perform, and report independently, of the Class III Gaming Management; and
  - 1.2.5. Directors (or equivalent) and all subordinate positions detailing the reporting structure for each department who participates and/or supports the Class III Tribal Gaming Operation, such as Accounting, Table Games, Video Lottery Terminals, Player Services, Audit, etc.
- 1.3. The written procedures delineated in the ICs, Regs, or P&Ps for Requirements 1.2.1 thru 1.2.5 will be specified to reasonably ensure that they meet or exceed these minimum standards:

- 1.3.1. The designated evidence storage area(s) has controls, assuring the chain-of-possession and integrity of stored evidence as related to the specific department(s);
- 1.3.2. Transactions are executed in accordance with the management's authorization;
- 1.3.3. Transactions are recorded adequately, as necessary, to permit preparation of financial statements in conformity with Generally Accepted Accounting Principles (GAAP), with these standards, and to maintain accountability for assets;
- 1.3.4. Signatory Authority and limits by job title/position;
- 1.3.5. The designated department responsible for maintaining the Signature Cards (hard copy or electronic format) as approved by the Tribal Gaming Commission;
- 1.3.6. The manner in which corrections will be made will include:
  - 1.3.6.1. Ensuring the visibility of the original information; and
  - 1.3.6.2. Initials of the employee and their employee/badge number.
- 1.3.7. Access to Class III Gaming Assets is permitted only in accordance with management's authorization;
- 1.3.8. Access to secured areas is permitted only in accordance with management's authorization and as approved by the Tribal Gaming Commission;
- 1.3.9. Key controls;
- 1.3.10. Recorded accountability for assets is compared with existing assets at reasonable intervals and appropriate action is taken with respect to any differences;
- 1.3.11. Assets are safeguarded to include Found Money Procedures;
- 1.3.12. Personnel will have an understanding of prescribed procedures;
- 1.3.13. Requirements for Age Restrictions are posted, at a minimum, at all entrances and procedures will be in place to ensure minors are not present on the gaming floor;
- 1.3.14. Functions, duties, and responsibilities are appropriately segregated in accordance with sound practices to ensure no employee is in a position to

perpetrate and conceal errors or irregularities in the normal course of his/her duties; and

- 1.3.15. Manual back-up procedures are established for any computerized system related to Class III Gaming activities.

## **2. Training Requirements for ICs, Regs, or P&Ps**

- 2.1. The Tribal Gaming Operation personnel will be trained in all ICs, Regs, or P&Ps relevant to each employee's individual function.

## **3. Handling of Cash**

- 3.1. ICs, Regs, or P&Ps will describe the method of handling currency received, other than tips or gratuities, from a patron in the Tribal Gaming Operation to ensure the immediate security of the currency.

## **4. Acceptance of Tips or Gratuities from Patrons**

- 4.1. ICs, Regs, or P&Ps will prohibit employees from soliciting any tip or gratuity from any player or patron.
- 4.2. ICs, Regs, or P&Ps will prohibit employees whose duties are directly related to gaming managers or higher, accounting/auditing, or surveillance from accepting any tip or gratuity from any player or patron.
- 4.3. The Tribal Gaming Commission shall approve the method and accounting procedures, which will be consistent with Federal or State laws, for all tips received by gaming employees.
- 4.4. ICs, Regs, or P&Ps will include at the minimum, a method for acknowledgement to surveillance upon receipt of a tip by gaming employees from a patron, that he/she received a tip and immediately deposit it.

## **5. Unclaimed Jackpots**

- 5.1. ICs, Regs, or P&Ps will describe the procedures and controls for the handling of unclaimed jackpots.

## **6. Electronic or Manual Forms, Records, Documents, and Retention**

- 6.1. ICs, Regs, or P&Ps will require the following for electronic and manual Forms, Records, and Documents at a minimum:
  - 6.1.1. All forms including the originals, duplicates, and/or triplicate copies will contain the title of the form.

- 6.1.2. All forms including the originals, duplicates, and/or triplicate copies will be distinguishable to ensure comparability for agreement and documenting exceptions, when necessary.
  - 6.1.3. If applicable, forms that are in a locked dispenser, the last copy will remain in a continuous unbroken series in the dispenser until picked up for audit.
  - 6.1.4. The department controlling the issuance of approved required manual forms (with or without serial numbers) will be specified within the ICs, Regs, or P&Ps. Furthermore, the issuance of these manual forms will be appropriately segregated from other departments to prevent the perpetration and concealment of errors or irregularities in the normal course of operations.
  - 6.1.5. ICs, Regs, or P&Ps will identify employee access rights for electronic forms. The employee accessing a system will not have incompatible duties, so as to prevent the perpetration and concealment of errors or irregularities in the normal course of his/her duties.
  - 6.1.6. The department controlling the issuance of approved required manual forms or serial numbered forms will have procedures describing the receipt, issuance, and current inventory of the forms.
  - 6.1.7. All information recorded on a form or document will be in ink, stored data, or other permanent method.
- 6.2. ICs, Regs, or P&Ps will describe the following for electronic and manual retention:
- 6.2.1. Retention location will be approved by the Tribal Gaming Commission in a manner that assures immediate accessibility to the Tribal Gaming Commission and access within 24 hours of a written request by the Oregon State Police.
  - 6.2.2. Retention period will at least be two (2) years or longer as designated by the Tribal Gaming Commission.
  - 6.2.3. Electronic retention will be scanned or directly stored to unalterable media which will be secured as to preclude alteration.
  - 6.2.4. Electronic storage will be maintained with a detailed index, as designated by the ICs, Regs, or P&Ps, as approved by the Tribal Gaming Commission.
  - 6.2.5. ICs, Regs, or P&Ps will ensure the accurate reproduction of records, up to and including the printing of stored documents when necessary.

## **7. Periodic Payments**

- 7.1. If applicable, the Tribal Gaming Commission will approve the method of funding and payment to patrons for periodic payments, providing payment is in full for the amount of the prize won.
- 7.2. If applicable, the Tribal Gaming Commission will designate a method of disclosing payment terms for patrons within the Tribal Gaming Operation.

## **8. Revisions to the ICs, Regs, or P&Ps**

- 8.1. The Tribal Gaming Commission will specify the process for revisions to the ICs, Regs, or P&Ps for the Tribal Gaming operation.
- 8.2. Upon review and approval by the Tribal Gaming Commission a copy of the revised ICs, Regs, or P&Ps will be provided to the Oregon State Police, within 10 days of implementation.

## TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

### SECTION 2: ACCOUNTING / AUDITING

#### 1. Accounting Records

- 1.1. The Tribal Gaming operation will maintain complete, accurate, legible and permanent records of all transactions relating to the revenues and costs of the Tribal Gaming operation. Retention schedule will follow IRS requirements.
- 1.2. General accounting records will be prepared and maintained according to Generally Accepted Accounting Principles (GAAP) on a double entry system of accounting with transactions recorded on the accruals basis, and detailed, supporting, subsidiary records, sufficient to meet the Requirements of 1.4.
- 1.3. The forms of accounts adopted will be of a standard form, which will ensure consistency, comparability, and effective disclosure of financial information.
- 1.4. The detailed, supporting and subsidiary records will include at a minimum:
  - 1.4.1. Statistical game records to reflect drop and win amounts for each station, for each gaming station, for each shift or daily for each type of table game, and individual and statistical game records reflecting similar information for all other games;
  - 1.4.2. Video Lottery Terminals analysis reports comparing actual hold percentages to theoretical hold percentages by each machine;
  - 1.4.3. Records of investments in property and services, including equipment used directly in connection with the operation of Class III Gaming;
  - 1.4.4. Records of accounts payable by the Tribal Gaming Operation;
  - 1.4.5. Records that identify the purchase, receipt, and destruction of gaming chips used in wagering;
  - 1.4.6. Journal entries prepared by the Tribal Gaming Operation;
  - 1.4.7. The records required either by this MICS or the approved ICs, Regs, or P&Ps; and
  - 1.4.8. Any other supporting source documents that are specifically required to be maintained.

## **2. Auditing Financial Statements**

- 2.1. The Tribal Gaming Operation will prepare financial statements covering all financial activities of the Tribal Gaming Operation for each fiscal year.
- 2.2. If, the Tribal Gaming Operation changes its fiscal year, the Tribal Gaming Operation will prepare and submit to the Tribal Gaming Commission audited or reviewed financial statements covering the “stub” period from the end of the previous fiscal year to the beginning of the new fiscal year. The Tribal Gaming Commission will designate the timely manner after the end of the stub period or incorporate the financial results of the stub period in the statements of the new fiscal year.
- 2.3. The annual financial statements will be prepared on a comparative basis for the current and prior calendar or fiscal year and will present the financial position and results of operations in conformity with GAAP.
- 2.4. The Tribal Gaming Operation or the Tribal Gaming Commission will engage an independent accountant licensed to practice within the State of Oregon consistent with the Tribal/State Compact requirements. The following minimum reports will be obtained:
  - 2.4.1. Certified Public Accountant (CPA) Independent Accountant Report for the audited financial statements; and
  - 2.4.2. Any additional reports required by the Tribal Gaming Commission.
- 2.5. Two copies of the audited financial statements, together with the CPA Report, and any additional reports required will be filed with the Tribal Gaming Commission’s office. Tribal Gaming Commission will designate the filing deadline and extensions within their ICs, Regs, or P&Ps.
- 2.6. Upon request by the Oregon State Police, the audited financial statements, together with the CPA Report will be made available for review.
- 2.7. Upon request by the Oregon State Police, any additional reports required by the Tribal Gaming Commission will be made available for review.

## **3. Gross Revenue Calculations**

- 3.1. ICs, Regs, or P&Ps will describe the gross revenue calculation for each type of Class III Gaming station within the Tribal Gaming Operation (Table Games, VLT, etc.).

## **4. Minimum Bankroll Requirements**

- 4.1. The Tribal Gaming Commission will approve, in conformity within these standards, the method for calculating the Minimum Bankroll Requirement (cash or cash equivalents) for the Tribal Gaming Operation to utilize and delineate in their ICs, Regs, or P&Ps.
- 4.2. The methodology approved by the Tribal Gaming Commission for calculating the Minimum Bankroll Requirement will be sufficient to reasonably protect the Tribal Gaming Facility's patrons against defaults in gaming debts owed by the Tribal Gaming Operation.
- 4.3. The Tribal Gaming Operation will immediately notify the Tribal Gaming Commission if the determined Minimum Bankroll Requirement is less than the amount required by this sub-section.
- 4.4. The determined Minimum Bankroll Requirement will be re-evaluated at least annually to ensure the cash or cash equivalents are sufficient to reasonably protect the Tribal Gaming Facility's patrons against defaults in gaming debts owed by the Tribal Gaming Operation.

## **5. Accounting/Audit Standards for Table Games**

- 5.1. ICs, Regs, or P&Ps will describe the process of reviewing the originals and copies of the Table Game's Master Game Report, Request for Fills, Fills, Request for Credits, Credits, and Station Inventory Slips for each gaming day, including but not limited to:
  - 5.1.1. Comparison for agreement with each other, on a test basis, by persons with no recording responsibilities and, if applicable, to triplicates or stored data;
  - 5.1.2. A review on a test basis, for appropriate number of signatures and signatory authority;
  - 5.1.3. A test for proper calculation, summarization, and recording;
  - 5.1.4. Subsequently recorded;
  - 5.1.5. Accounting for by series number, if applicable; and
  - 5.1.6. Maintained and controlled by the Accounting Department.

## **6. Accounting/Audit Standards for Video Lottery Terminals**

- 6.1. ICs, Regs, or P&Ps will describe the process of reviewing the originals and copies of the Video Lottery Terminal Final Count Report for each gaming day, including but not limited to:

- 6.1.1. Comparing for agreement with each other, on a test basis, by persons with no recording responsibilities and, if applicable, to triplicates or stored data;
  - 6.1.2. Reviewing on a test basis, for appropriate number of signatures and signatory authority;
  - 6.1.3. Accounting for by series number, if applicable;
  - 6.1.4. Testing for proper calculation, summarization, and recording;
  - 6.1.5. Subsequently recorded; and
  - 6.1.6. Maintained and controlled by the Accounting Department.
- 6.2. ICs, Regs, or P&Ps will describe the process for reviewing all meter readings for reasonability using pre-established parameters.
  - 6.3. ICs, Regs, or P&Ps will describe the process for comparing all “Bill In” and “Ticket In” Meters for computerized Video Lottery Terminal Systems to the actual drop amount recorded by the Soft Count Team.
  - 6.4. ICs, Regs, or P&Ps will describe the method for resolving and documenting discrepancies or variances for Requirement 6.3 prior to generation/distribution of statistical reports.
  - 6.5. ICs, Regs, or P&Ps will describe the process for reviewing and documenting all exception reports for computerized Video Lottery Terminal Systems on a daily basis for propriety of transaction and unusual occurrences.
  - 6.6. ICs, Regs, or P&Ps will describe the procedures performed by the Accounting/Auditing Department for computerized Video Lottery Terminal Systems at intervals set by the Tribal Gaming Commission. Not less than one day per month:
    - 6.6.1. Foot jackpot slips and trace the totals to those produced by the system; and
    - 6.6.2. Review all slips written for continuous sequencing.
  - 6.7. ICs, Regs, or P&Ps will describe the process of reviewing the computerized Video Lottery Terminal Monitoring System Data File.
  - 6.8. ICs, Regs, or P&Ps will describe the procedures performed by the Accounting/Auditing Department for computerized Player Tracking Systems at an interval set by the Tribal Gaming Commission not less than one day per month the following:

- 6.8.1. Foot all documentation for points redeemed and trace the totals to those produced by the system;
- 6.8.2. Review all point addition/deletion authorization documentation for propriety;
- 6.8.3. Review all exception reports including transfers between accounts; and
- 6.8.4. Review all documentation related to access of inactive and closed accounts.

## **7. Keno**

- 7.1. Keno audit function is independent of the Keno Department;
- 7.2. ICs, Regs, or P&Ps will describe the audit process to include, but not limited to the following:
  - 7.2.1. Documentation is maintained evidencing the performance of all Keno audit procedures.
  - 7.2.2. A department independent of Keno Management will review the Keno audit exceptions.
  - 7.2.3. If there are unresolved exceptions then a department independent of Keno Management will investigate and document the results.
  - 7.2.4. At least weekly the random number generator is reviewed for potential numerical patterns.
  - 7.2.5. Compare net cash proceeds to the audited win/loss by shift and investigate any variances in excess of \$25.
  - 7.2.6. Review and re-grade all winning tickets and supporting documentation greater than or equal to \$3,000.
  - 7.2.7. Review the documentation for payout adjustments made outside the computer and investigates large and frequent payments.
  - 7.2.8. When one person operates the Keno game, or a person performs the writer and deskman functions on the same shift:
    - 7.2.8.1. All winning tickets in excess of \$100 and at least five percent (5%) of all other winning tickets will be re-graded and traced to the computer payout report; and

- 7.2.8.2. Recording of rabbit ears is randomly compared to computer draw tickets for at least ten percent (10%) of the races during the shift (not applicable for random number generator).

**8. Pari-Mutuel and Off Track Betting**

- 8.1. The Pari-Mutuel and Off Track Betting accounting and audit procedures shall be performed by personnel who are independent of the transactions being audited.
- 8.2. Documentation shall be maintained evidencing the performance of all accounting and auditing procedures performed.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 3: SURVEILLANCE

### 1. General

- 1.1. Standards referring to Surveillance coverage in this section will collectively apply to digital or analog systems.
- 1.2. ICs, Regs, or P&Ps will describe the Surveillance Department responsibilities and procedures.

### 2. Closed Circuit Television (CCTV) System

- 2.1. The Tribal Gaming Operation will install a CCTV system according to the following specifications, but not limited to:
  - 2.1.1. A matrix-switch or virtual matrix system with the capabilities of pan-tilt-zoom (PTZ) and fixed camera position with the capacity to bring up any camera throughout the gaming facility to a designated monitor to effectively and clandestinely monitor in detail and from various vantage points, all Class III gaming related areas to ensure game integrity and any other areas specified by the Tribal Gaming Commission;
  - 2.1.2. All fixed cameras for Class III Gaming related areas as specifically identified in the Minimum Internal Control Standards will be continuously recorded;
  - 2.1.3. All PTZ cameras will have the capability of recording for what is being monitored;
  - 2.1.4. All video units will have time and date insertion capabilities; and
  - 2.1.5. Lighting will be present in all areas where CCTV coverage is required.
- 2.2. ICs, Regs, or P&Ps will specify the retention requirements for Surveillance Coverage at a minimum of seven (7) days for general coverage.
- 2.3. ICs, Regs, or P&Ps will specify the retention requirements for Surveillance Coverage of an evidentiary value, to include, but not limited to:
  - 2.3.1. Retention requirements for evidentiary value will be retained for a minimum of thirty (30) days in connection with an unresolved Soft Count variance of +/- \$100.

- 2.3.2. Retention requirements for evidentiary value will be retained for a minimum of thirty (30) days by the amount specified in the respective Tribal/State Compact for unresolved Cage variances.
- 2.3.3. Retention requirements associated with a criminal investigation or prosecution, the Surveillance coverage will be retained until the criminal case or prosecution has been concluded.

### **3. Surveillance Logs**

- 3.1. The ICs, Regs, or P&Ps will describe the following requirements to maintain a log of all Surveillance activities. The log will include at a minimum:
  - 3.1.1. Date and time of surveillance;
  - 3.1.2. Person initiating surveillance;
  - 3.1.3. Reason for surveillance;
  - 3.1.4. Time of termination of surveillance;
  - 3.1.5. Summary of the results of the surveillance; and
  - 3.1.6. A record of any equipment or camera malfunction(s).

### **4. Surveillance Room and Communication**

- 4.1. ICs, Regs, or P&Ps will describe the following:
  - 4.1.1. One or more surveillance monitoring rooms in the gaming facility will be in use at all times by the employees of the Surveillance Department assigned to monitor activities in the gaming facility;
  - 4.1.2. Entrances to the monitoring room(s) will not be visible from the Tribal Gaming Facility area;
  - 4.1.3. The monitoring room(s) will remain locked and access will be limited to authorized personnel as defined by the Tribal Gaming Commission;
  - 4.1.4. Access to the Surveillance Room to conduct monitoring and reviews will be granted to members of the Tribal Gaming Commission, Oregon State Police, and any other individuals/agencies as defined by the Tribal Gaming Commission;
  - 4.1.5. The Surveillance Room will be staffed for all shifts and activities in the gaming facility;

- 4.1.6. The primary Surveillance Room and monitors will have override capabilities;
- 4.1.7. If applicable, changing of Surveillance tapes and/or dubs will be performed by personnel not involved in the handling of cash or cash equivalents;
- 4.1.8. The method in which a communications system will be established on the gaming floor that will be capable of immediately alerting Surveillance personnel. Telephones on the gaming floor will have the capability of a direct line or extension to the Surveillance Department;
- 4.1.9. The Surveillance personnel in the Surveillance room will have radio communication with security if security officers have radio communication with each other;
- 4.1.10. The method of alerting Surveillance personnel of money transfers prior to the transfer taking place and a means to advise Surveillance of the location, gaming device/table number, time, date, and amount of transfers, and to whom the transfers will be made.

## **5. Tribal Gaming Facility Perimeter and Elevators**

- 5.1. All internal entrances and exits to the Tribal Gaming Facility, unless continuously alarmed, will be monitored by fixed cameras. These fixed cameras do not have the requirement to be continuously recorded.
- 5.2. External, cameras and/or security in the parking lot will be positioned to enable coverage of the entire Tribal Gaming Facility.
- 5.3. If applicable, interior of elevators used in the transport of cash or cash equivalents and personnel at the same time will be monitored by a fixed camera.

## **6. Cage**

- 6.1. ICs, Regs, or P&Ps will describe the following minimum standards for surveillance requirements of the cashiers' cage:
  - 6.1.1. All of the operations conducted at and in the cashiers cage will be under continuous surveillance;
  - 6.1.2. The entrances and exits to the cage areas will be under continuous Surveillance;
  - 6.1.3. Each cashier station will be equipped with one fixed camera covering the transaction area. That will allow for the identification of all transactions at each cash drawer;

- 6.1.4. The customer areas of the cage will have, at a minimum, one PTZ camera, which can be used as an overview for all transactions. This overview should include the customer, the employee, and the surrounding area;
- 6.1.5. The non-customer areas of the cage will have, at a minimum, two fixed and stationary cross view cameras that prevent any blind spots. Additionally, one PTZ camera which will allow an overview of any transaction area;
- 6.1.6. All stationary banks used by floor personnel on the gaming floor will be covered by a fixed overview camera that covers the bank and the general area;
- 6.1.7. Each fill window will have one fixed color camera covering the transaction area; and
- 6.1.8. The fill window(s) will have one PTZ camera which can be used as an overview for fill transactions.

## **7. Vault**

- 7.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of the Vault:
  - 7.1.1. Each workstation will be equipped with one fixed camera covering the transaction area.
  - 7.1.2. There will be two fixed and stationary cross view cameras that prevent any blind spots.
  - 7.1.3. Each vault will have one PTZ camera.
  - 7.1.4. The entrances and exits to the vault areas will be under continuous surveillance.
  - 7.1.5. The ICs, Regs, or P&Ps will describe requirements for Surveillance observing vault activity to ensure the integrity of the processes.

## **8. Redemption Kiosks**

- 8.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of Redemption Kiosks:
  - 8.1.1. Each Redemption Kiosk will have one overhead fixed camera.
  - 8.1.2. Every Redemption Kiosk located in the Tribal Gaming Facility will be able to be viewed by at least one PTZ camera.

## **9. Count Room**

- 9.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of the Count Room:
- 9.1.1. Effective and detailed audio-video recording capabilities of all activities in the Count Room;
  - 9.1.2. Effective and detailed recording of the count room, including storage cabinets and/or cart/trolleys used to store drop boxes;
  - 9.1.3. Each Count Room will have two or more, fixed and stationary cross view cameras that prevent any blind spots;
  - 9.1.4. Each Count Room workstation will have one fixed overhead camera;
  - 9.1.5. Each Count Room will have one color PTZ camera;
  - 9.1.6. Surveillance will have the capability to monitor the entrances and exits to the count room(s) unless continuously alarmed; and
  - 9.1.7. Surveillance will be notified during non-count times prior to any persons entering the Count Room.

## **10. Soft Count Process**

- 10.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of the Soft Count process:
- 10.1.1. Surveillance will be notified prior to the commencement of the Soft Count;
  - 10.1.2. Surveillance will make an audio/video recording of the entire count process.

## **11. Drop Process**

- 11.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of the Drop process:
- 11.1.1. Surveillance will be notified prior to the commencement of the Drop process;
  - 11.1.2. Surveillance will observe and record the entire drop process;
  - 11.1.3. Surveillance will be notified of all deviations and discrepancies in the Drop process. These will be documented in the surveillance log.

## **12. Table Games**

12.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements for Table Games:

12.1.1. All Table Games and pit areas will have sufficient camera placement to determine/identify:

12.1.1.1. Employees;

12.1.1.2. Patrons;

12.1.1.3. Chip and Token Value;

12.1.1.4. Card Value and suit (except for standard Blackjack);

12.1.1.5. Gaming Station Number;

12.1.1.6. A clear view of podium activity; and

12.1.1.7. A clear view of the playing area.

12.1.2. All class III card games will have a minimum of one fixed camera over the gaming table and PTZ camera coverage that has the capability of the Requirements listed in 12.1.1.

12.1.3. All craps tables will have a minimum of two fixed cross view cameras covering both ends of the table and one dedicated PTZ camera per table.

12.1.4. All roulette tables will at a minimum have one fixed camera covering the roulette wheel, one fixed camera overview of the play on the table, and PTZ camera coverage that has the capability of the Requirements listed in 12.1.1.

12.1.5. All big wheel games will at a minimum have one fixed camera covering the wheel and PTZ camera coverage that has the capability of the Requirements listed in 12.1.1.

## **13. Video Lottery Terminal**

13.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of Video Lottery Terminals:

13.1.1. Every Video Lottery Terminal located in the Tribal Gaming Facility will be able to be viewed by at least one PTZ camera.

- 13.1.2. Attached to each Video Lottery Terminal will be a unique identification number that is readily observable from surveillance to identify the Video Lottery Terminal.
- 13.1.3. Each Video Lottery Terminal will be equipped with a door open light/candle. While the door is open the light/candle will be visible on top of the machine from surveillance.
- 13.1.4. Fixed cameras will be placed to view all in-house progressive electronic gaming devices with base payouts of \$100,000 or more, the view will include:
  - 13.1.4.1. The identity of the game;
  - 13.1.4.2. Game play;
  - 13.1.4.3. Jackpot results;
  - 13.1.4.4. The Surveillance coverage will be recorded on a 24 hour basis to a dedicated recording device.
- 13.1.5. Fixed cameras will be placed to view all wide-area progressive electronic gaming devices with base payouts of \$1.5 million or more, the view will include:
  - 13.1.5.1. The identity of the game;
  - 13.1.5.2. Game play;
  - 13.1.5.3. Jackpot results;
  - 13.1.5.4. The Surveillance coverage will be recorded on a 24 hour basis to a dedicated recording device.

#### **14. Keno**

- 14.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of Keno:
  - 14.1.1. Fixed camera for Rabbit Ears;
  - 14.1.2. Retention standards for winning tickets \$1,500 or more will be maintained for seven days; and
  - 14.1.3. Clearly identify ball numbers when drawn.

#### **15. Sensitive Items**

15.1. ICs, Regs, or P&Ps will describe the following minimum standards for Surveillance requirements of Sensitive Items:

- 15.1.1. Video Lottery Terminal Paper; excluding Tribal Gaming Facilities with an operating online accounting system that will track tickets and immediately validate to prevent duplicate payments.
- 15.1.2. Playing Cards;
- 15.1.3. Dice; and
- 15.1.4. Gaming Chips & Tokens.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 4: SENSITIVE ITEMS

### 1. General

- 1.1. Standards referring to Sensitive Items in this section, will collectively apply to Dice, Cards, Video Lottery Terminal Paper, and Keno Balls. If approved by the Tribal Gaming Commission, Video Lottery Terminal Paper will be excluded for Tribal Gaming Facilities if an operating online accounting system tracks tickets and immediately validates to prevent duplicate payments. This exclusion does not change the respective Tribal/State Compacts regarding Sensitive Procurement for Video Lottery Terminal Paper.
- 1.2. The MICS in this section apply to Sensitive Items only if maintained at the Tribal Gaming Facility.
- 1.3. Additional specific requirements for Table Games and Video Lottery Terminals will be delineated, as applicable.

### 2. Sensitive Items

- 2.1. ICs, Regs, or P&Ps will describe the process for the following:
  - 2.1.1. Receiving new Sensitive Items;
  - 2.1.2. Adding Sensitive Items into Secured Storage;
  - 2.1.3. Removing Sensitive Items from Secured Storage; and
  - 2.1.4. Destruction of Sensitive Items.
- 2.2. ICs, Regs, or P&Ps will describe the process of recording the perpetual inventory for all Sensitive Items.

### 3. Secured Storage

- 3.1. Notification to Surveillance prior to entering and exiting.
- 3.2. Access through a locking door.
- 3.3. Dual access at a minimum.
- 3.4. A sign-in and sign-out sheet will be filled out by individuals entering and exiting, except by the Tribal Gaming Commission and Oregon State Police personnel.

3.5. A closed circuit television recording system as delineated in Section 3: Surveillance.

#### **4. Additional Table Games Requirements**

- 4.1. Sensitive Items issued to the Pit will be maintained in a secure location with camera coverage to prevent unauthorized access and to prevent tampering.
- 4.2. Inventory records will be maintained at the Pit for Sensitive Items issued from Secure Storage.
- 4.3. As approved by the Tribal Gaming Commission, in conformity with these standards, ICs, Regs, or P&Ps will specify the playing cycle for Table Games Sensitive Items.
- 4.4. ICs, Regs, or P&Ps will describe the process of removing from play Table Games Sensitive Items if damaged or marked, as defined by the Tribal Gaming Commission.
- 4.5. ICs, Regs, or P&Ps will describe the manner in which Table Games Sensitive Items are maintained in a secured location until permanently destroyed.
- 4.6. As approved by the Tribal Gaming Commission, in conformity with these standards, ICs, Regs, or P&Ps will specify the destruction process and time requirements for Cards and Dice being taken out of service, at a minimum not more than seven (7) days.
- 4.7. All Class III Cards and Dice must be accounted for prior to destruction. Any discrepancies will be immediately investigated and a report forwarded to the Tribal Gaming Commission.
- 4.8. Requirement 4.6, shall not apply to Table Games Sensitive Items retained for investigation. If applicable, upon investigation the Table Games Sensitive Items will be destroyed after such investigation is completed.
- 4.9. Camera coverage is required, if the destruction process is performed by the Tribal Gaming Operation.

#### **5. Additional Video Lottery Terminal Requirements**

- 5.1. If approved by the Tribal Gaming Commission, Video Lottery Terminal Paper will be excluded for Tribal Gaming Facilities if an operating online accounting system tracks tickets and immediately validates to prevent duplicate payments for Requirements 5.3.
- 5.2. If the operating online accounting system that performs the tracking and immediately validates tickets for payments malfunctions, the Tribal Gaming Commission shall ensure the alternative process conforms to these standards.

5.3. Tribal Gaming Facilities without an operating online accounting system as described in Requirement 5.1, shall:

5.3.1. Sensitive Items issued to the designated area for Video Lottery Terminal Paper will be maintained in a secure location to prevent unauthorized access and prevent tampering.

5.3.2. Inventory records will be maintained at the designated area in the ICs, Regs, or P&Ps when issued from Secure Storage.

5.3.3. ICs and Regs will describe the process for issuing Video Lottery Terminal Paper to be used in the machines.

5.3.4. As approved by the Tribal Gaming Commission, in conformity with these standards, ICs, Regs, or P&Ps will specify the destruction process of Video Lottery Terminal Paper.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 5: INFORMATION TECHNOLOGY

### 1. General

- 1.1. The Independent Gaming Test Laboratory will be designated by the Tribal Gaming Commission chosen from the respective Tribal/State Compact Approved Vendor List.
- 1.2. The technical standards used by the selected Independent Gaming Test Laboratory will be at least as rigorous as those of the other approved laboratories on the Approved Vendor List for all Class III Gaming Equipment, Hardware and Software Components, and any associated device/systems that support Class III Gaming.

### 2. Management of Information Systems (MIS)

- 2.1. ICs, Regs, or P&Ps will ensure the information technology personnel will be independent of the gaming areas (e.g. cage, pit, count rooms, etc.).
- 2.2. ICs, Regs, or P&Ps will include a description of all procedures for all gaming computer systems used or computer systems that interface with gaming computer systems that track, control or monitor gaming activity, including but not limited to:
  - 2.2.1. Authorization process and specific time requirements for activating user account, changing user account, and disabling user account;
  - 2.2.2. Password configuration at the strongest level, specifies time interval of changing passwords, and restrictions on re-using the same password;
  - 2.2.3. Back-up files;
  - 2.2.4. Protect files, if applicable off-site storage of back-up files;
  - 2.2.5. Physical access to server room/s housing critical IT systems and equipment (i.e. servers, switches and firewalls) will have restricted access and locked doors.
    - 2.2.5.1. Access to the areas housing critical IT systems and equipment shall be restricted to authorized IT personnel. Non-IT personnel, including vendors of the gaming computer equipment, shall only be allowed access to the areas housing critical IT systems and equipment when authorized by IT Management and monitored by IT personnel during each access; and

- 2.2.6. Tracking of non-IT personnel shall be maintained by IT Management to include at a minimum:
  - 2.2.6.1. Name of visitor(s);
  - 2.2.6.2. Company or organization;
  - 2.2.6.3. Time and date of entry;
  - 2.2.6.4. Reason for visit;
  - 2.2.6.5. Name of IT personnel authorizing the access;
  - 2.2.6.6. Name of person escorting the visitor(s); and
  - 2.2.6.7. Time and date of visitor departure.
- 2.2.7. Proposed changes to the computer monitoring system by the Tribal Gaming Operation management shall seek approval from the Tribal Gaming Commission;
- 2.2.8. Maintenance of the computerized Video Lottery Terminal monitoring system data files will consist of one of the following:
  - 2.2.8.1. Performed by a department independent of the Video Lottery Terminal Department; or
  - 2.2.8.2. Performed by a Supervisor of the Video Lottery Terminal Department, provided sufficient documentation is generated and it is randomly verified by employees independent of the Video Lottery Terminal Department on a monthly basis; and
- 2.2.9. Ensure updates to the computerized Video Lottery Terminal monitoring system to reflect additions, deletions or movements of Video Lottery Terminal are made at least weekly prior to token-in meter readings.

### **3. Network Security**

- 3.1. As approved by the Tribal Gaming Commission, in conformity with these standards, ICs, Regs, or P&Ps will describe the Network Security for the Tribal Gaming Facility ensuring adequate logical segregation.
- 3.2. If applicable, ICs, Regs, or P&Ps will describe the adequate logical segregation for a guest network (such as networks that provide internet access for patrons or hotel guests) from the network used to serve access to gaming and financial related applications and systems.

#### **4. Remote Access**

- 4.1. Adequate remote access solution and written logical security procedures approved by the Tribal Gaming Commission for Class III Gaming Vendors seeking remote access to gaming related servers will be in place.
- 4.2. If applicable, Class III Gaming Vendors seeking to set-up remote access abilities shall provide adequate written logical security procedures to the Tribal Gaming Commission for approval.
- 4.3. If applicable, Class III Gaming Vendors approved for remote access will provide any revisions of the written logical security procedures to the Tribal Gaming Commission within 30 days of the revision or annually, which ever comes first.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 6: CAGE

### 1. General

- 1.1. The Tribal Gaming Operation will establish on, or immediately adjacent to, the gaming floor a physical structure known as the cashier cage to house the cashiers. The cashier cage will serve as the central location for the following:
  - 1.1.1. The custody of cage inventory comprised of currency, coin, patron checks, gaming chips, forms, documents, and records normally associated with the operation of a cage;
  - 1.1.2. The receipt, distribution, and redemption of gaming chips in conformity with these standards; and
  - 1.1.3. Such other functions normally associated with the operation of a cage.
- 1.2. The cage will be designed and constructed to provide maximum security including, at a minimum, the following:
  - 1.2.1. A fully enclosed structure except for openings through which items such as the gaming chips, cash, records, and documents can be passed to service the public and gaming stations;
  - 1.2.2. Manually triggered silent alarm systems that are immediately available to each cage cashier work station and that are connected directly to the surveillance or security department office;
  - 1.2.3. Access through a locked door; and
  - 1.2.4. Include a CCTV recording system, as delineated in Section 3: Surveillance.

### 2. Controls within the Cashier Cage

- 2.1. The ICs, Regs, or P&Ps will describe the cage cashier functions to ensure appropriate segregation of duties and all assets are adequately protected, including but not limited to:
  - 2.1.1. Identification of all document forms and/or reports used as a part of the cage cashier functions;
  - 2.1.2. End of shift procedures and reconciling total closing inventory with the opening inventory incorporating a “Blind” count process;

- 2.1.3. Designation of an imprest bank/cash drawer(s) and amount;
- 2.1.4. Designation of a floating bank/cash drawer(s) for applicable service fees;
- 2.1.5. Description of the method for effectively canceling gaming station's cash slips;
- 2.1.6. Description of the process of gaming chips removed from gaming stations in exchange for the issuance of a Credit;
- 2.1.7. Description of the process of requests for disbursal of gaming chips for the issuance of a Fill;
- 2.1.8. Description of the process of receiving currency and/or gaming chips from the Count Room;
- 2.1.9. Description of the process of receiving currency and/or gaming chips from the patrons;
- 2.1.10. Description of the preparation and closing the end of the gaming day activity process for the identified forms and/or reports;
- 2.1.11. Description of the method of delivery to the accounting department and/or describes the secured location of the identified forms and/or reports to be retrieved by a designated individual; and
- 2.1.12. Description of the process of counting down the Cage and Vault inventories by at least two persons independently from each other as evidenced by their signatures on the identified forms and/or reports.

### **3. Title 31 Anti-Money Laundering/Cash Transaction Reporting**

- 3.1. ICs, Regs, or P&Ps will describe the method in which the Tribal Gaming Operation will comply with all applicable laws regarding anti-money laundering and cash transactions reporting.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 7: REDEMPTION KIOSK

### 1. General

- 1.1. The Minimum Internal Controls Standards (MICS) in this section apply to Redemption Kiosks only if utilized at the Tribal Gaming Facility.
- 1.2. Redemption Kiosks and their associated components shall be tested and certified by as delineated in Section 5: Information Technology.
- 1.3. Redemption Kiosks Surveillance requirements are delineated in Section 3: Surveillance.
- 1.4. ICs, Regs, or P&Ps will describe the process for the following to ensure Redemption Kiosk Integrity and appropriate segregation of duties, but not limited to:
  - 1.4.1. Storage of Cassettes;
  - 1.4.2. Loading Cassettes with Currency;
  - 1.4.3. Filling the Kiosk with Cassettes;
  - 1.4.4. Retrieving the Cassettes;
  - 1.4.5. Reconciling the Cassettes; and
  - 1.4.6. Redemption Kiosk Machine Integrity.
- 1.5. Access to Keys shall comply with Section 8: Key Integrity.
- 1.6. ICs, Regs, or P&Ps will describe the Accounting/Auditing Procedures to ensure the integrity of the Redemption Kiosk.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 8: KEY INTEGRITY

### 1. General

- 1.1. The Minimum Internal Control Standards (MICS) in this section apply to keys, combination locks, or electronic scan devices, which are collectively referred to as “Keys.”
- 1.2. The MICS in this section apply to Keys that are housed at the Tribal Gaming Facility.
- 1.3. The MICS in this section apply to a Manual or Automated Key Tracking System(s) that are utilized at the Tribal Gaming Operation.
- 1.4. ICs, Regs, or P&Ps will include, but are not limited to the following:
  - 1.4.1. Procedures for any of the following events for a Sensitive Key:
    - 1.4.1.1. Broken;
    - 1.4.1.2. Lost or missing; and/or
    - 1.4.1.3. Removed from the Tribal Gaming Facility.
  - 1.4.2. The location of each sensitive Key Box (manual or automated);
  - 1.4.3. Positions which have authorized access to the sensitive Key Box Key(s) and how the Keys to the sensitive Key Boxes are issued and controlled;
  - 1.4.4. Sensitive Key name, location, custodian and job titles authorized to sign out each sensitive Key;
  - 1.4.5. A Key Log (manual or automated) which will include the following:
    - 1.4.5.1. Date;
    - 1.4.5.2. Key Number or Ring Number;
    - 1.4.5.3. Individual/automated Key Box issuing Key;
    - 1.4.5.4. Individual receiving Key;
    - 1.4.5.5. Time Key Signed Out;

- 1.4.5.6. Time Key Signed In;
  - 1.4.5.7. Individual Returning Key; and
  - 1.4.5.8. Individual/automated Key Box Receiving Returned Key.
- 1.4.6. The location and custodian of duplicate sensitive Key Boxes;
  - 1.4.7. Positions which have authorized access to the duplicate sensitive Key Box Key(s) and how the Keys to the duplicate sensitive Key Boxes are issued and controlled;
  - 1.4.8. Duplicate Key Log with similar standards as in Requirement 1.4.5; and
  - 1.4.9. Duplicate Key Inventory controls as approved by the Tribal Gaming Commission.
- 1.5. The following descriptions of Keys and/or equivalent function of these Keys will be considered sensitive, at a minimum (this is not intended to identify keys with a name):
- 1.5.1. Video Lottery Terminal Logic Compartment Key;
  - 1.5.2. Video Lottery Terminal Keys that allow access to sensitive components;
  - 1.5.3. Video Lottery Terminal Drop Box Door Key;
  - 1.5.4. Video Lottery Terminal Progressive Controller and Compartment Key;
  - 1.5.5. Video Lottery Terminal Multi-Player Stations Access Key;
  - 1.5.6. Table Games Tray/Cover Inventory Key;
  - 1.5.7. Table Game Progressive Controller Key;
  - 1.5.8. All Keys relating to Drop Boxes and their contents;
  - 1.5.9. All Keys relating to Card, Dice, Keno Balls and Video Lottery Terminal Paper storage areas;
  - 1.5.10. If applicable, Keys to Whiz Machines
  - 1.5.11. Keno Keys to sensitive computer hardware and/or software;
  - 1.5.12. All Keys related to Keno Game Number selection hardware;

- 1.5.13. Keno community, writer, and/or runner Keys;
- 1.5.14. All Keys related to Redemption Kiosks;
- 1.5.15. Access door key to any sensitive or controlled area (Cage, Count Room, etc.);
- 1.5.16. All Keys related to Cage functions;
- 1.5.17. All Keys related to the Vault;
- 1.5.18. All Soft Count Keys;
- 1.5.19. Accounting/Audit Secured Box Key;
- 1.5.20. Enclosed Locked Storage Cart Key for Drop;
- 1.5.21. Toke/Tip Box Key; and
- 1.5.22. Any additional Keys not listed as required by the Tribal Gaming Commission.

## **2. Key Access List**

- 2.1. A current and accurate Key access list will be maintained for each sensitive Key Box (excluding duplicate Key Boxes). The list shall be posted at the Key Box for non-automated key tracking systems. The list will include the:
  - 2.1.1. If applicable, Key Ring Number;
  - 2.1.2. Key identifier/stamp on the Key (must be unique for each Key name);
  - 2.1.3. Name of the Key;
  - 2.1.4. Location of the Key;
  - 2.1.5. Custodian of the Key;
  - 2.1.6. Quantity of the Key(s); and
  - 2.1.7. Job titles authorized to sign out the Key.

## **3. Key Access Authorizations and Restrictions**

- 3.1. The ICs, Regs, or P&Ps will describe the Key access authorizations and restrictions by department and job title to ensure appropriate segregation of duties and all assets are adequately protected.

- 3.2. Table Game personnel Key restrictions, will be at a minimum:
  - 3.2.1. Precluded from maintaining Table Game Keys;
  - 3.2.2. Precluded from Drop Box Release Key;
  - 3.2.3. Precluded from Drop Box Contents Key; and
  - 3.2.4. Table Game Station Inventory Tray Key access only to Table Game Supervisor or someone of higher authority.
- 3.3. Video Lottery Terminals personnel Key restrictions, will be at a minimum:
  - 3.3.1. Precluded from maintaining Video Lottery Terminal Keys;
  - 3.3.2. Precluded from Drop Box Release Key;
  - 3.3.3. Precluded from Drop Box Contents Key;
  - 3.3.4. Access to Video Lottery Terminal Drop Box contents Keys at other than scheduled count times shall require the involvement of at least three persons from separate departments, including management, and the reason for access shall be documented with signatures of all participants and observers; and
  - 3.3.5. Video Lottery Terminal personnel, excluding technicians and as approved by the Tribal Gaming Commission ensuring adequate segregation, are precluded from maintaining or having access to the Logic Compartment Keys.
  - 3.3.6. The ICs, Regs, or P&Ps will describe the access for technicians for repairing damaged drop boxes.
- 3.4. Keno personnel restrictions for Keys, will be at a minimum:
  - 3.4.1. Precluded from maintaining Keno Keys;
  - 3.4.2. Precluded from having access to Keys to the sensitive Keno computer hardware;
  - 3.4.3. ICs, Regs, or P&Ps will designate personnel independent from the Keno Department to accompany sensitive Keno computer hardware keys.
- 3.5. Drop Team personnel Key restrictions, will be at a minimum:
  - 3.5.1. Precluded from having access to have the Drop Box Contents Key while the Drop is in progress.

- 3.5.2. As approved by the Tribal Gaming Commission, in conformity with these standards, one of the following requirements shall be in place at the time Drop Keys are signed out for Video Lottery Terminal Drop:
  - 3.5.2.1. At least three Drop Team personnel are required to accompany these Keys and observe each time Video Lottery Terminal drop cabinets are accessed; or
  - 3.5.2.2. Surveillance is notified each time Keys are signed out and Surveillance observes the person throughout the process of the entire drop.
- 3.6. Soft Count Team personnel Key restrictions, will be at a minimum:
  - 3.6.1. At least three Count Team members are required to be present at the time all Keys for the count are signed for, and returned.
- 3.7. Redemption Kiosk personnel Key restrictions, will be at a minimum:
  - 3.7.1. As approved by the Tribal Gaming Commission, in conformity with these standards, one of the following requirements shall be in place at the time Keys are signed out for Redemption Kiosk:
    - 3.7.1.1. At least two different department personnel are required to accompany these Keys and observe each time Redemption Kiosks cassettes are accessed; or
    - 3.7.1.2. Surveillance is notified each time Keys are signed out and Surveillance observes the person throughout the process.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 9: DROP TABLE GAMES AND VIDEO LOTTERY TERMINALS

### 1. General

- 1.1. The Minimum Internal Controls Standards in this section apply to drop boxes for Table Games and Video Lottery Terminal “Drop Boxes.”
- 1.2. The MICS in this section apply to Table Games and Video Lottery Terminals that are offered at the Tribal Gaming Facility.
- 1.3. The MICS in this section referencing to Emergency Drop Boxes and Drop, only apply to Tribal Gaming Facilities, who are authorized by the Tribal Gaming Commission to perform an Emergency Drop.

### 2. Drop Boxes – Table Games

- 2.1. Each Table Game will have an attached drop box for deposited cash, all Fills and Credits documents, and Station Inventory Forms.
- 2.2. IC or Regs will describe the storage location, authorized access, and the characteristics of the Table Games’ Drop Boxes, to include, but not limited to:
  - 2.2.1. One separate lock securing the contents placed into the drop box, the key to which will be different from any other key;
  - 2.2.2. A separate lock securing the drop box to the Table Game station, the key to which will be different from the key to the lock securing the contents of the drop box;
  - 2.2.3. Access to keys shall be delineated in Section 8: Key Integrity;
  - 2.2.4. A marking that is permanently imprinted and clearly visible that identifies the Table Game and table number to which is attached;
  - 2.2.5. Identifying all Table Game Drop Boxes, not attached to a Table Game stations, that will be stored in a secured location as approved by the Tribal Gaming Commission and in a manner which assures accountability of the drop boxes; and
  - 2.2.6. Identifying at least two persons by job title and department who have access to stored empty Table Game Drop Boxes.

- 2.3. If applicable, ICs, Regs, or P&Ps will describe the storage location, authorized access, and the procedures for handling replacement drop boxes other than scheduled drop.

### **3. Drop Boxes – Video Lottery Terminals**

- 3.1. Each Video Lottery Terminal will have an attached drop box for deposited cash, coupons, and/or ticket cash slips.
- 3.2. ICs, Regs, or P&Ps will describe the storage location, authorized access, and the characteristics of the Video Lottery Terminals' Drop Boxes, to include, but not limited to:
  - 3.2.1. One separate lock securing the contents placed into the drop box, the key to which will be different from any other key;
  - 3.2.2. A separate lock securing the drop box to the Video Lottery Terminal, the key to which will be different from the key to the lock securing the contents of the drop box;
  - 3.2.3. Access to keys shall be delineated in Section 8: Key Integrity;
  - 3.2.4. Describing the method of the Video Lottery Terminal Drop Box being identifiable to the corresponding machine from which it is removed from (i.e., permanently marked with a Video Lottery Terminal number, bar coded labels, computer printed tags).
    - 3.2.4.1. If the Video Lottery Terminal is identified with a removable tag, the ICs or Reg shall describe if the tag shall be placed in or attached to the drop box.
  - 3.2.5. Identifying that all Video Lottery Terminal Drop Boxes, not attached to a Video Lottery Terminal, will be stored in a secured location as approved by the Tribal Gaming Commission and in a manner which assures accountability of the drop boxes; and
  - 3.2.6. Identifying at least two persons by job title and department who has access to stored empty Video Lottery Drop Boxes.
- 3.3. ICs, Regs, or P&Ps will describe the storage location, authorized access, and the procedures for handling replacement drop boxes other than scheduled drop.

#### **4. Collection and Transportation of Drop Boxes**

- 4.1. The ICs, Regs, or P&Ps will describe the entire collection and transportation process for Table Games and Video Lottery Terminals to ensure appropriate segregation of duties and that all assets are adequately protected, including but not limited to:
  - 4.1.1. Notification to Surveillance prior to the commencement of the drop for Table Games and Video Lottery Terminals and notification to Surveillance at the conclusion of the drop for Table Games and Video Lottery Terminals;
  - 4.1.2. The entire drop process for Table Games and Video Lottery Terminals will be continuously monitored by Surveillance personnel and recorded;
  - 4.1.3. Identifying for Table Games drop by job title and department, there are at least two (2) employees, one (1) of whom will be a security employee or a Tribal Gaming Commission member ensuring the employees are independent of Table Games;
  - 4.1.4. Identifying for Video Lottery Terminals drop by job title and department, there are at least three (3) employees, one (1) of whom will be a security employee or a Tribal Gaming Commission member ensuring the employees are independent of Video Lottery Terminals;
  - 4.1.5. Collection and transportation of the drop boxes will be conducted using a locked storage cart;
  - 4.1.6. The locked storage cart will be escorted by a security officer at all times ensuring the full and empty Drop Boxes are not co-mingled;
  - 4.1.7. Drop Team members who will also be performing the Soft Count will wear coveralls or smocks as delineated in Section 10: Count, Requirement 2.4 while performing the count;
  - 4.1.8. Drop Team members for Video Lottery Terminals will only have access to the compartments that hold the drop boxes;
  - 4.1.9. Immediately after the drop of Table Games and Video Lottery Terminals, the locked storage cart will be stored in the Count Room or in another designated secure storage as approved by the Tribal Gaming Commission because of space limitation in the Count Room; and
  - 4.1.10. The Tribal Gaming Commission shall approve alternative procedures for malfunctions or emergencies during the drop process.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 10: COUNT STANDARDS

### TABLE GAMES AND VIDEO LOTTERY TERMINALS

#### **1. General Count Room Standards**

- 1.1. The Count Room(s) will be designed and constructed to provide maximum security and room integrity, including at a minimum, the following:
  - 1.1.1. Access through a locked door;
  - 1.1.2. Count Room(s) will be hardwired and supported by an Uninterrupted Power Source (UPS) system;
  - 1.1.3. Emergency lighting as back up to the UPS system;
  - 1.1.4. Count Room(s) painted in a light single color as approved by the Tribal Gaming Commission;
  - 1.1.5. Count Room(s) base floor shall be in a color contrasting with currency;
  - 1.1.6. Tribal Gaming Commission shall approve the use of cushion mats. ICs, Regs, or P&Ps will be implemented upon approval to ensure room integrity;
  - 1.1.7. If applicable, a bathroom within the Count Room(s) shall be limited to:
    - 1.1.7.1. Toilet;
    - 1.1.7.2. Sink;
    - 1.1.7.3. Soap;
    - 1.1.7.4. Toilet Paper;
    - 1.1.7.5. Electric Hand Dryer; and
    - 1.1.7.6. Any other items as approved by the Tribal Gaming Commission.
  - 1.1.8. The Count Room(s) table and/or workstations will be of a clear material to clearly observe the floor beneath the table and/or workstations; and
  - 1.1.9. A closed circuit television recording system as delineated in Section 3: Surveillance.

## **2. General Count Team Standards**

- 2.1. Count Room(s) will be free from all personal items. ICs, Regs, or P&Ps will describe the use of items and/or supplies for conducting the count to ensure Count Room integrity;
- 2.2. No music in the Count Room(s);
- 2.3. Notification will be made to Surveillance prior to entering the Count Room(s) during non-count times;
- 2.4. ICs, Regs, or P&Ps for Count Room coveralls or smocks at a minimum will be:
  - 2.4.1. The Tribal Gaming Commission, in conformity with these standards, will approve the type of coveralls or smocks to be worn during the entire count process to ensure Count Room integrity. They will have no pockets, no cuffs, no collars, loosely fitted sleeves, zip in the front, and fully close;
  - 2.4.2. Specific as to when and where coveralls or smocks should be put on before the count commences and when the coveralls should be removed after the count concludes; and
  - 2.4.3. Specific as to where coveralls or smocks are stored.
- 2.5. ICs, Regs, or P&Ps will describe the manner of inspecting and removing Count Room trash by a designated individual independent of the count and count team personnel;
- 2.6. ICs, Regs, or P&Ps will include the rotation of Count Team members so they are not the same for more than seven (7) consecutive days;
- 2.7. Immediately prior to opening any drop boxes, the doors to the Count Room will be securely locked;
- 2.8. ICs, Regs, or P&Ps will describe the process and limitations of entry and exit of Count Room personnel while count is in process and unverified cash is present;
- 2.9. ICs, Regs, or P&Ps will describe the procedures in case of an emergency of a Count Team member needing to be replaced by a new member after the count has commenced; and
- 2.10. ICs, Regs, or P&Ps will define who will have immediate access to the Count Room during the scheduled count process.

## **3. Standards for Counting and Recording Soft Count**

- 3.1. The ICs, Regs, or P&Ps will describe the entire counting and recording process for Table Games and Video Lottery Terminals to ensure appropriate segregation of duties and that all assets are adequately protected, including but not limited to:
  - 3.1.1. Identifying all document forms and/or reports used as a part of the Count Team functions for Table Games and Video Lottery Terminals;
  - 3.1.2. Specifying all information recorded on all document forms and/or reports to be permanent;
  - 3.1.3. Ensuring that Count Team will be a minimum of three personnel;
  - 3.1.4. Notifying Surveillance prior to the commencement of the count and notifying Surveillance at the conclusion of the count;
  - 3.1.5. If applicable, describing the process for testing all useable machines that count currency, tickets, and coupons on an interval approved by the Tribal Gaming Commission;
  - 3.1.6. If applicable, describing the alternative process for conducting the counts if any counting machine or casino computer system is not operational;
  - 3.1.7. Describing the process of emptying and counting separately, each drop box, within full view of the closed circuit television recording system on the Count Room table in a manner to prevent the commingling of funds;
  - 3.1.8. Describing the process of second verification of all contents that have been removed from drop box, locked, and placed into the secure storage area for drop boxes;
  - 3.1.9. Describing the process of recording the following minimum information for Table Game Master Game Report for each drop box and aggregate total:
    - 3.1.9.1. The total amount of currency counted;
    - 3.1.9.2. The amount of the opener;
    - 3.1.9.3. The amount of the closer;
    - 3.1.9.4. The serial number and amount of each fill;
    - 3.1.9.5. The total amount of all fills;
    - 3.1.9.6. The serial number and amount of each credit;

- 3.1.9.7. The total amount of all credits; and
- 3.1.9.8. The win or loss.
- 3.1.10. Describing the process for recording and preparing the Video Lottery Terminal Final Count Report by each drop box identifier and aggregate total;
- 3.1.11. Describing the process of reporting any unreconciled discrepancies of +/- \$100 or more to the attention of the controller and a report generated to the Tribal Gaming Commission;
- 3.1.12. Specifying the surveillance recording of the count will be secured by surveillance until the discrepancy is resolved;
- 3.1.13. Describing the process after completion and verification of the Table Game's Master Game Report or the Video Lottery Terminal's Final Count Report, each Count Team member will sign the reports attesting to the accuracy and information recorded thereon;

**4. Standards for Conclusion of the Soft Count**

- 4.1. The ICs, Regs, or P&Ps will describe the entire conclusion process for Table Games and Video Lottery Terminals to ensure appropriate segregation of duties and all assets are adequately protected, including but not limited to:
  - 4.1.1. Describing the process of a second count by a cashier without prior knowledge of the Count Team's recorded amount for Table Games or Video Lottery Terminals;
  - 4.1.2. Cashiers signing the report for Tables Games and/or Video Lottery Terminals evidencing the fact that the Count Team and the Cashier agreed on the total amount counted;
  - 4.1.3. Describing the process of reporting any unreconciled variance of +/- \$100 or more if found by notifying surveillance and a cashier independent of the first cashier;
  - 4.1.4. Describing the process of recounting the currency by a cashier independent of the first cashier and the Count Team;
  - 4.1.5. If there is still a variance, a member of the Tribal Gaming Commission will be called to investigate the variance; and
  - 4.1.6. Describing the method of delivery to the Accounting Department and/or describing the secured location of all identified document forms and/or reports to be retrieved by a designated individual from the Accounting Department.

## TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

### SECTION 11: CHIPS AND TOKEN INTEGRITY

#### 1. Chips and Tokens

- 1.1. Chips and Tokens are solely representative of value which evidence a debt owed to their custodian by the Tribal Gaming Facility that issued them and are not the property of anyone other than the Tribal Gaming Facility.
- 1.2. The ICs, Regs, or P&Ps will describe the parameters of usage of Chips or Tokens at its Tribal Gaming Operation, including but not limited to:
  - 1.2.1. Issuing Chips or Tokens only to patrons of its Tribal Gaming Facility;
  - 1.2.2. Promptly redeeming its Chips and Tokens from its patrons by cash or check drawn on account of the Tribal Gaming Operation;
  - 1.2.3. Posting signage requirements within the Tribal Gaming Operation notifying patrons of the following:
    - 1.2.3.1. Using Chips or Tokens outside the facility for any monetary purpose whatever is prohibited; and
    - 1.2.3.2. Chips or Tokens issued by the Tribal Gaming Operation are the sole property of the Tribal Gaming Facility.
  - 1.2.4. Promotional Chips and Tokens used for promotions and tournaments are permitted as long as each Chip or Token (with numerical figure) conspicuously bears the inscription "No Cash Value".

#### 2. Redemption and Disposal of Discontinued Chips and Tokens

- 2.1. ICs, Regs, or P&Ps will describe the process and time limitations for redeeming outstanding or discontinued Chips or Tokens when permanently removed from use, replaced, or if the Tribal Gaming Operation ceases;
- 2.2. ICs, Regs, or P&Ps will describe the process of destroying or defacing Chips and Tokens to ensure the process is witnessed by representatives of the Tribal Gaming Operations Management, Security, and Accounting Department; and
- 2.3. ICs, Regs, or P&Ps will specify the period of time, not less than three years, designated by the Tribal Gaming Commission to maintain the documentation evidencing the destruction of the Chips or Tokens.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 12: KENO

### 1. General

- 1.1. The Minimum Internal Controls Standards (MICS) in this section apply to Computerized Keno, if offered at the Tribal Gaming Facility.
- 1.2. System Security Standards will conform to Section 5: Information Technology, where applicable.

### 2. Game Play Standards

- 2.1. ICs, Regs, or P&Ps will describe the process for the following to ensure the Integrity of Keno games with appropriate segregation of duties, but not limited to:
  - 2.1.1. Maintenance planned to service Keno equipment and all program updates, hardware servicing, and Keno Ball selection equipment;
  - 2.1.2. Keno equipment maintenance (excluding Keno Balls) is independent of the Keno Department;
  - 2.1.3. Keno maintenance reports irregularities to management personnel independent of Keno;
  - 2.1.4. Ticket Generation;
  - 2.1.5. Voiding Tickets;
  - 2.1.6. Number Selection (Random Number Generator or Rabbit Ears);
  - 2.1.7. Winning Ticket Verification;
  - 2.1.8. Payment;
  - 2.1.9. Winning Ticket of \$1,500 and over will be verified additionally by:
    - 2.1.9.1. Evidenced by their signature a department supervisor independent of Keno;
    - 2.1.9.2. Retention of the Surveillance Coverage;

- 2.1.9.3. Documentation of the performance of all the above on a ball check (or proof of win) form. If the computer adequately records the above, the resulting documentation may be substituted.
- 2.1.10. Payoff schedules will be made available to the public.
- 2.1.11. A player is eligible to receive only the highest prize per game played on a ticket.
- 2.1.12. Incoming and outgoing banks will be independently verified.
- 2.1.13. Adequate documentation of all pertinent Keno information is generated by the computer system.
- 2.1.14. The documentation will be restricted to authorized personnel.
- 2.1.15. Ensures that Keno personnel are aware of multi-race tickets still in process at the end of a shift.

### **3. Keno Performance**

- 3.1. ICs, Regs, or P&Ps will describe how records are maintained which will include the win and write by either individual writer for each shift or for each race during the shift.
- 3.2. Records will include the win, write, and win-to-write hold percentage for:
  - 3.2.1. Each Shift;
  - 3.2.2. Each Day;
  - 3.2.3. Month-to-Date; and
  - 3.2.4. Year-to-Date.
- 3.3. Management Independent of Keno will review the Keno Statistical information at least on a monthly basis and investigate any large or unusual statistical fluctuations. Investigations are documented with results and maintained.

## TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

### SECTION 13: PARI – MUTUEL & OFF TRACK BETTING STANDARDS

#### 1. General

- 1.1. The Minimum Internal Controls Standards (MICS) in this section apply to Pari-Mutuel and Off Track Betting (OTB), if offered at the Tribal Gaming Facility.
- 1.2. System Security Standards will conform to Section 5: Information Technology, where applicable.

#### 2. Game Play Standards

- 2.1. ICs, Regs, or P&Ps will describe the process for the following to ensure the Integrity of Pari-Mutuel and OTB games with appropriate segregation of duties, but not limited to:
  - 2.1.1. Procedures for hardware failure, power failure, fire, etc.
  - 2.1.2. Ticket Generation;
  - 2.1.3. Voiding Tickets;
  - 2.1.4. Winning Ticket Verification;
  - 2.1.5. Payment and Cancellation Procedures;
  - 2.1.6. Incoming and outgoing banks will be independently verified;
  - 2.1.7. Adequate documentation of all pertinent Pari-Mutuel and OTB information is generated by the computer system; and
  - 2.1.8. The documentation will be restricted to authorized personnel.

#### 3. Pari-Mutuel and OTB Performance

- 3.1. ICs, Regs, or P&Ps will describe how records are maintained and the statistical reports generated and reviewed.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 14: TABLE GAMES

### 1. General

- 1.1. As defined and authorized by the respective Tribal/State Compacts, Table Games in this section, shall conform to these Minimum Internal Control Standards (MICS).
- 1.2. The MICS in this section apply to Table Games that are offered at the Tribal Gaming Facility.
- 1.3. Additional specific requirements for Electronic Table Games will be delineated, as applicable.
- 1.4. Addition(s) of Authorized Games at the Tribal Gaming Facility shall conform to respective Tribal/State Compacts.
- 1.5. A reference to Table Games Supervisor is not intended to change actual position titles at the Tribal Gaming Operation, but to distinguish a higher level of authority than a dealer.
- 1.6. The transfer or exchange of chips or currency between individual Table Games is prohibited.
- 1.7. ICs, Regs, or P&Ps in conformity with the respective Tribal/State Compacts will be established for each type of Table Game offered at the Tribal Gaming Facility to include at a minimum:
  - 1.7.1. Procedures of play;
  - 1.7.2. Shuffling, cutting and dealing techniques, as applicable;
  - 1.7.3. Payout odds on each form of wager;
  - 1.7.4. Procedures to be followed on occurrence of irregularities; and
  - 1.7.5. Prohibitions on side betting between and against player and against the house.
- 1.8. Minimum and Maximum wagers will be posted at each Table Game station.

## **2. Accepting Cash at Table Games**

- 2.1. ICs, Regs, or P&Ps will describe the manner in which cash is presented by a patron at a Table Game in exchange for chips. Dealer/Boxperson shall at a minimum:
  - 2.1.1. Spread the cash on top of the Table Game in full view of the patron who presented it;
  - 2.1.2. Verbalize the amount of cash in a tone of voice calculated to be heard by the patron and the Table Game Supervisor assigned to the table, if \$100 or over; and
  - 2.1.3. Count and appropriately break down an equivalent amount of chips for the patron, then promptly place the cash into the Drop Box attached to the Table Game followed by the Dealer/Boxperson clearing their hands.
- 2.2. ICs, Regs, or P&Ps will describe the manner in which coupons are presented by a patron at a Table Game.

## **3. Table Game Station Inventories**

- 3.1. ICs, Regs, or P&Ps will delineate the manner approved by the Tribal Gaming Commission for Table Game Station Inventories to be added or removed from the Table Game station.
- 3.2. Table Games Station Inventories shall be maintained in trays (or equivalent), which are covered with transparent locking lid(s) when the tables are closed.
- 3.3. The information on the Table Game Station Inventory Slip will be placed inside the transparent locking lid and will be visible from the outside of the cover.
- 3.4. ICs, Regs, or P&Ps will describe the storage location of the trays during non-gaming hours. If transferred to the Cage, the ICs, Regs, or P&Ps will describe the process to ensure accountability.
- 3.5. Access to the Keys to the Table Game Station Inventory Tray shall be delineated in Section 8: Key Integrity.
- 3.6. ICs, Regs, or P&Ps will describe the process of securing Table Game Station Inventory if an emergency (i.e. power outage, medical emergency at the table, etc.) occurs until normal play resumes.
- 3.7. The Table Game Inventory Slip will be at least two-part form; one of which is designated as the "Opener" and the other the "Closer."

#### **4. Opening of Table Games**

- 4.1. ICs, Regs, or P&Ps will describe the process of Opening the Table Games ensuring appropriate segregation of duties, with all assets adequately protected, and inspection of cards, dice, or applicable gaming equipment, including but not limited to:
  - 4.1.1. Table Games Supervisor unlocking the Station Inventory in the presence of the Dealer/Boxperson;
  - 4.1.2. The Dealer/Boxperson and Table Games Supervisor independently counting the chips by denomination and verifying the count to the “opener”;
  - 4.1.3. Once signed by the Dealer/Boxperson and the Table Games Supervisor, the Dealer/Boxperson will immediately deposit the “opener” in the Drop Box attached to the Table Game station; and
  - 4.1.4. Procedures to be followed when the counted inventory differs from the amount recorded on the “opener” and notification and report process to the Tribal Gaming Commission.

#### **5. Closing of Table Games**

- 5.1. ICs, Regs, or P&Ps will describe the process of Closing of the Table Games to ensure appropriate segregation of duties, all assets are adequately protected, and proper disposal of the cards, dice, etc., that were in play, including but not limited to:
  - 5.1.1. Chips remaining at the Table Game will be independently counted and verified evidenced by signature, by one of the following:
    - 5.1.1.1. Two Table Games Supervisors; or
    - 5.1.1.2. A Table Games Supervisor and a Dealer/Boxperson.
  - 5.1.2. The Table Games Supervisor will prepare the Table Game Inventory Slip.
  - 5.1.3. After the Table Games Inventory Slip is signed as stated in Requirement 5.1.1, the Dealer/Boxperson will immediately deposit the “closer” in the Drop Box.
  - 5.1.4. The Table Games Supervisor will place the “opener” under the table tray lid in a manner that allows for the amounts on the “opener” to be read, with the lid locked in place.

#### **6. Shift Changes for Table Games**

- 6.1. As approved by the Tribal Gaming Commission, in conformity with these standards, the Shift Changes for Table Games, will at a minimum:
  - 6.1.1. Ensure independent count of the outgoing shift and the incoming shift; and
  - 6.1.2. Ensure adequate documentation of the shift change, i.e. Date, Identification of the shift ended, game, and station number, total value of each denomination of gaming chips remaining at the station, signatures of the Table Games Supervisors, and documentation deposited in the Drop Box attached to the Table Game station.

## **7. Table Games Fills**

- 7.1. ICs, Regs, or P&Ps will describe the type of Table Game Fill System used and the process of “Requesting the Fill,” preparation of the “Fill Slip,” and delivering the Fill to the Table Game station, to include, but not limited to:
- 7.2. Notification to the Surveillance Department when there is a Fill transaction.
  - 7.2.1. Manual Fill Systems:
    - 7.2.1.1. The “Request for Fill” form will be restricted to Table Games Supervisors.
    - 7.2.1.2. The Table Games Supervisor will prepare a two-part “Request for Fill” in ink entering the following information:
      - 7.2.1.2.1. The date, time, and shift of preparation;
      - 7.2.1.2.2. The amount of each denomination;
      - 7.2.1.2.3. Total amount;
      - 7.2.1.2.4. Game and table number; and
      - 7.2.1.2.5. Signature.
    - 7.2.1.3. The “Request for Fill” will be taken by a Security Officer to the Casino Cage. A copy of the “Request for Fill” will be placed on top of the Table requesting the Fill.
    - 7.2.1.4. “Fill Slips” will be triplicate and serially pre-numbered forms that will be used in sequential order. All originals and duplicates of void “Fill Slips” will be marked “Void” and will require the signature of the Cage Cashier.

- 7.2.1.5. The locked dispenser (Whiz Machine or equivalent) will permit the original and duplicate to discharge, while the triplicate remains.
- 7.2.1.6. Access to the triplicate copy of the form will be restricted to the department responsible for controlling and accounting for the unused supply of Fills.
- 7.2.1.7. The Cage Cashier will prepare the “Fill Slip” in ink by entering the following information:
  - 7.2.1.7.1. The date, time, and shift of preparation;
  - 7.2.1.7.2. The amount of each denomination;
  - 7.2.1.7.3. Total amount;
  - 7.2.1.7.4. Game and table number; and
  - 7.2.1.7.5. Signature of preparer.
- 7.2.1.8. The Security Officer will agree to the accuracy of the “Request for Fill” to the “Fill Slip” evidenced by the Security Officer’s signature.
- 7.2.1.9. The original “Request for Fill” will be maintained at the Cage. The Original “Fill Slip” will be transported in the container made of a clear material for transporting gaming chips.
- 7.2.2. Computerized Fill System:
  - 7.2.2.1. The ability to input data into the casino computer system from the pit will be restricted to Table Games Supervisors and pit clerks.
  - 7.2.2.2. “Request for Fills” will be conformity with manual standards.
  - 7.2.2.3. “Fill Slips” will be a two-part computer generated form. The “Fill Slips” will be numbered by the computer in a manner that ensures every Fill in a given calendar year has a unique sequential number.
  - 7.2.2.4. Two copies of the computerized Fill Slips will be printed simultaneously, and a record of the transaction shall be stored within the computer database.
  - 7.2.2.5. “Fill Slips” will be completed in conformity with the manual standards.
- 7.2.3. Receiving Fills (computerized or manual):

- 7.2.3.1. After the Dealer and Table Game Supervisor verify the accuracy of the Fill they will sign the original "Fill Slip."
- 7.2.3.2. The Table Games Supervisor and Security Officer will observe the Dealer/Boxperson place the chips in the inventory tray and deposit the "Fill Slips" in the Drop Box.

## **8. Table Games Credits**

- 8.1. ICs, Regs, or P&Ps will describe the type of Table Game Credit System used and the process of "Requesting the Credit," preparation of the "Credit Slip," and delivering the Credit to the Table Game station, to include, but not limited to:
  - 8.2. Notification to the surveillance department when there is a Credit transaction.
    - 8.2.1. Manual Credit Systems:
      - 8.2.1.1. The "Request for Credit" form will be restricted to Table Games Supervisors.
      - 8.2.1.2. The Table Games Supervisor will prepare a two-part "Request for Credit" in ink, entering the following information:
        - 8.2.1.2.1. The date, time, and shift of preparation;
        - 8.2.1.2.2. The amount of each denomination;
        - 8.2.1.2.3. The total amount;
        - 8.2.1.2.4. Game and table number; and
        - 8.2.1.2.5. Signature.
      - 8.2.1.3. The "Request for Credit" will be taken by a Security Officer to the Casino Cage. A copy of the "Request for Credit" will be placed on top of the Table requesting the Credit.
      - 8.2.1.4. "Credit Slips" will be triplicate and serially pre-numbered forms that will be used in sequential order. All originals and duplicates of void "Credit Slips" will be marked "Void" and will require the signature of the Cage Cashier.
      - 8.2.1.5. The locked dispenser (Whiz Machine or equivalent) will permit the original and duplicate to discharge, while the triplicate remains.

- 8.2.1.6. Access to the triplicate copy of the form will be restricted to the department responsible for controlling and accounting for the unused supply of Credits.
- 8.2.1.7. The Cage Cashier will prepare the “Credit Slip” in ink by entering the following information:
  - 8.2.1.7.1. The date, time, and shift of preparation;
  - 8.2.1.7.2. The amount of each denomination;
  - 8.2.1.7.3. Total amount; and
  - 8.2.1.7.4. Game and table number.
- 8.2.1.8. The Security Officer will take the “Credit Slip” to the Table Game and a copy of the “Request for Credit” will be retained at the Cage.
- 8.2.1.9. The Dealer/Boxperson will count the chips in full view of the Table Games Supervisor, the Security Officer, and Surveillance.
- 8.2.1.10. Signatures attesting to the accuracy of the information contained on the duplicate copy of a “Credit Slip” will be at a minimum, the following personnel at the following times:
  - 8.2.1.10.1. Cage Cashier upon receipt of Credit;
  - 8.2.1.10.2. Security Officer transporting the Credit;
  - 8.2.1.10.3. Dealer/Boxperson upon preparation of the Credit; and
  - 8.2.1.10.4. Table Games Supervisor upon preparation of the Credit.
- 8.2.1.11. Upon meeting Requirement 8.2.1.10; Dealer/Boxperson will immediately deposit the “Credit Slip” and “Request for Credit” in the Drop Box.
- 8.2.1.12. Security Officer will transport the Credit in a container made of clear material for transporting gaming chips.
- 8.2.2. Computerized Credit System:
  - 8.2.2.1. The ability to input data into the casino computer system from the pit will be restricted to Table Games Supervisors and pit clerks.
  - 8.2.2.2. “Request for Credit” will be in conformity with manual standards.

- 8.2.2.3. “Credit Slips” will be a two-part computer generated form. The “Credit Slips” will be numbered by the computer in a manner that ensures every Credit in a given calendar year has a unique sequential number.
- 8.2.2.4. Two copies of the computerized Credit Slips will be printed simultaneously, and a record of the transaction shall be stored within the computer database.
- 8.2.2.5. “Credit Slips” will be completed in conformity with the manual standards.

**9. Table Games Performance**

- 9.1. ICs, Regs, or P&Ps will describe the process for calculating the hold percentage and reporting the following information at a minimum:
  - 9.1.1. Statistics by Table and Type of Game;
  - 9.1.2. Shift;
  - 9.1.3. By day;
  - 9.1.4. Cumulative month-to-date; and
  - 9.1.5. Cumulative year-to-date.
- 9.2. Reports will be reviewed by Management independent of Table Games or the Tribal Gaming Commission, on at least a monthly basis.
- 9.3. At a minimum, investigations are performed by independent Management or Tribal Gaming Commission, for all statistical percentage fluctuations from the base level for a month in variation of more than +/-5%.
- 9.4. Results of the investigation will be documented and maintained.

## TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

### SECTION 15: VIDEO LOTTERY TERMINALS - CONVENTIONAL

#### 1. General

- 1.1. As defined and authorized by the respective Tribal/State Compacts, Video Lottery Terminals in this section, shall conform to these Minimum Internal Control Standards (MICS).
- 1.2. The MICS in this section apply to Video Lottery Terminals that do not comprise of Server Based Gaming, Server Supported Gaming, or Mobile Gaming Systems.
- 1.3. Standards referring to Video Lottery Terminals in this section, will collectively apply to Multi-Player Stations, In-House Progressives, Wide Area Progressives, and Conventional Video Lottery Terminals.
- 1.4. Standards referring to Software in this section, will collectively apply to one or more of the following EPROM types, but not limited to: USB Drives, Compact Flash, CDs, Hard Drive, Game Media etc. for Video Lottery Terminals.
- 1.5. The MICS in this section do not constitute as standards for Mobile Gaming Systems (MGS) or Electronic Funds Transfers (EFT) from a financial institution to a Video Lottery Terminal. Specific Standards for MGS and EFT to a Video Lottery Terminal shall require a MICS Revision.

#### 2. Independent Gaming Test Laboratory

- 2.1. Video Lottery Terminals, hardware, software, and any associated device/system will be tested by the designated Independent Gaming Test Laboratory as delineated in Section 5: Information Technology.
- 2.2. At the conclusion of testing for all Video Lottery Terminals, hardware, software, and any associated device/system a report of the test results will be provided or made available to the Oregon State Police and to the Tribal Gaming Commission. The report will include, but not be limited to:
  - 2.2.1. Pass or fail result;
  - 2.2.2. If failed result, the report may contain recommendations for modifications that can be made which would bring the Video Lottery Terminals, hardware, software, and any associated device/system into compliance; or
  - 2.2.3. A report from the Independent Gaming Test Laboratory stating that the Video Lottery Terminals, hardware, software, and any associated device/system is

eligible for application to the Oregon State Police for shipment within the State of Oregon.

- 2.3. No modification to the assembly or operational functions of any Video Lottery Terminals, hardware, software, and any associated device/system may be made after testing and installation unless the Independent Gaming Test Laboratory certifies to the Tribal Gaming Commission that the modified Video Lottery Terminals, hardware, software, and any associated device/system conforms to the standards set herein.

### **3. Video Lottery Terminal and Software Shipment Authorizations**

- 3.1. The Oregon State Police – Gaming Enforcement Division – Tribal Gaming Section, will issue the required authorizations for all incoming, outgoing, and/or transfers of Video Lottery Terminals. The Oregon State Police will publish all requirements on the Section’s website and requirements are subject to change at the discretion of Oregon State Police.
- 3.2. Approved Software must be shipped separately from the Video Lottery Terminal, excluding hard drive technology where the game can not initialize without the boot chips installed. If approved by the Tribal Gaming Commission, hard drive technology software can be shipped with the Video Lottery Terminals, if the following conditions are met:
  - 3.2.1.1. Boot chips are shipped separately to the Tribal Gaming Commission; and
  - 3.2.1.2. Boot chips shall meet Requirement 7 of this Section.
- 3.3. Video Lottery Terminals that will be transported off Tribal Lands to be destroyed will require a Video Lottery Terminal Shipment Authorization from the Oregon State Police. The requirements on the Section’s website will apply.

### **4. Video Lottery Terminal Decal Requirements**

- 4.1. Each Video Lottery Terminal on the gaming floor will have a unique identification number visible on the machine.
- 4.2. All Tribal Gaming Inventory Decals shall be the responsibility of the Tribal Gaming Commission to maintain, affix, and remove.
- 4.3. Each Tribal Gaming Inventory Decal shall contain a unique identification number.
- 4.4. Each Video Lottery Terminal certified for placement in the Tribal Gaming Facility will display a Tribal Gaming Inventory Decal which certifies it conforms to the exact

specifications of Video Lottery Terminal prototypes tested and certified for the State of Oregon.

- 4.5. The Tribal Gaming Inventory Decal will be affixed to the Video Lottery Terminal prior to the Video Lottery Terminal being placed into play.
- 4.6. Multi-Player Station(s) that have free standing end-user terminals will have a Tribal Gaming Inventory Decal.
- 4.7. Only the Tribal Gaming Commission or their authorized agents may affix or remove the Tribal Gaming Inventory Decals.
- 4.8. No Video Lottery Terminal may be transported off Tribal Land until the Tribal Gaming Inventory Decal has been removed.
- 4.9. The Tribal Gaming Inventory Decal shall not be transferred to another machine.
- 4.10. Tribal Gaming Inventory Decal Records will be maintained for affixing and/or removing from Video Lottery Terminals, to include at a minimum:
  - 4.10.1. The type of Video Lottery Terminal;
  - 4.10.2. The Video Lottery Terminal serial number;
  - 4.10.3. The Video Lottery Terminal manufacturer; and
  - 4.10.4. The Tribal Gaming Inventory Decal number.

## **5. Security of Video Lottery Terminals**

- 5.1. ICs, Regs, or P&Ps for the Video Lottery Terminal Department functions shall ensure appropriate segregation of duties and the security of all Video Lottery Terminals are adequately protected, including but not limited to:
  - 5.1.1. Protection of the system from unauthorized access;
  - 5.1.2. Access is logged on a Machine Entry Access Log (MEAL) that will include, but not be limited to:
    - 5.1.2.1. Date;
    - 5.1.2.2. Time;
    - 5.1.2.3. Reason for access; and
    - 5.1.2.4. Initials and legible badge number of the employee gaining access.

- 5.1.3. MEAL document will be maintained by the Tribal Gaming Operation and securely stored for at least one (1) year.
- 5.1.4. Maintenance procedures;
- 5.1.5. Video Lottery Terminal accuracy;
- 5.1.6. Ensuring the door open light or candle on top of the machine is operational to be visible to Surveillance cameras;
- 5.1.7. Ensuring the progressive display is constantly updated to display the accumulated progressive jackpot amount(s); and
- 5.1.8. Ensuring each progressive controller, system server, or equivalent must be housed in a secure compartment requiring locking entry and MEAL logs.

## **6. Video Lottery Terminal Storage, Relocation, and Destruction**

- 6.1. The manner and site of storage will be consistent with the requirements in each respective Tribal/State Compact. Oregon State Police will have access to any storage areas for Video Lottery Terminals.
- 6.2. ICs, Regs, or P&Ps will describe the process for the Tribal Gaming Operation if Video Lottery Terminals are moved, taken out of service, placed back in service, or if there is a change in the denomination.
- 6.3. ICs, Regs, or P&Ps will describe the process for the Tribal Gaming Operation to notify the Accounting Department of the changes and to take meter readings and forward them to Accounting Department.
- 6.4. ICs, Regs, or P&Ps will describe the process for Drop and Count for Video Lottery Terminals that are moved, taken out of service, placed back in service, or if there is a change in the denomination that will be in conformity with the respective sections for Drop and Count in this Minimum Internal Controls Standards.
- 6.5. ICs, Regs, or P&Ps will describe the process of returning or destruction of Video Lottery Terminal Paper to secure storage as described in Section 4: Sensitive Items meeting Requirement 5.
- 6.6. ICs, Regs, or P&Ps will describe the storage and relocation security requirements for Video Lottery Terminals, hardware, software, and any associated device/system.
- 6.7. ICs, Regs, or P&Ps will describe the storage and relocation perpetual inventory requirements for Video Lottery Terminals, hardware, software, and any associated device/system.

- 6.8. ICs, Regs, or P&Ps will describe the destruction process and documentation requirements for any associated device/system for Video Lottery Terminals.
- 6.9. Tribal Gaming Commission will notify the Oregon State Police in writing within 10 days after destruction of Video Lottery Terminals, at a minimum the following:
  - 6.9.1. Serial Numbers for each Video Lottery Terminal;
  - 6.9.2. Quantity of Video Lottery Terminals; and
  - 6.9.3. Date of destruction.

## **7. Records and Security of Software**

- 7.1. All software shall be the responsibility of the Tribal Gaming Commission to include at a minimum:
  - 7.1.1. Access to software is secured through a locking device (i.e. safe, tool chest, file cabinet, designated room, etc.)
  - 7.1.2. Dedicated camera coverage or if software is stored at a location other than the Tribal Gaming Facility and camera coverage is not provided, then the site and manner of storage needed to ensure software security will be defined by the Tribal Gaming Commission and provided to the Oregon State Police for concurrence;
  - 7.1.3. Maintaining perpetual inventory; and
  - 7.1.4. Maintaining accurate and complete records including the following at a minimum:
    - 7.1.4.1. The serial number of the Video Lottery Terminal the Software being installed in and/or removed from;
    - 7.1.4.2. Date of installation and/or removal;
    - 7.1.4.3. The Video Lottery Terminal manufacturer;
    - 7.1.4.4. Software type;
    - 7.1.4.5. Approved Software signature result;
    - 7.1.4.6. The name of the person conducting the test; and
    - 7.1.4.7. Tribal Gaming Inventory Decal number.

- 7.2. Prior to being installed or replaced and placed into play in a Video Lottery Terminal, the Tribal Gaming Commission or representative of the Oregon State Police, will verify the software internal signature as assigned by the manufacturer and verified by the independent laboratory is accurate.
- 7.3. The software will be installed and secured with a lock inside the Video Lottery Terminal under the direct supervision of the Tribal Gaming Commission or an Oregon State Police representative.
- 7.4. The software will be secured with a uniquely numbered tape or wire seal by the Tribal Gaming Commission or the Oregon State Police.

## **8. Software Duplication**

- 8.1. If duplication of Video Lottery Terminal Software is performed, the Tribal Gaming Commission shall ensure the process conforms to these standards.

## **9. Minimum Hardware and Software Requirements**

- 9.1. All aspects of a Video Lottery Terminals and any associated device/system, including all hardware and software, will meet or exceed the requirements of the designated Independent Gaming Test Laboratory Technical Standards, as delineated in Section 5: Information Technology.

## **10. Video Lottery Terminal Records**

- 10.1. ICs, Regs, or P&Ps will identify an independent department of the Video Lottery Terminal Department to maintain the Video Lottery Terminal Records; or
- 10.2. Requirement 10.1 may be performed by a Video Lottery Terminal Supervisor employee if sufficient documentation is generated and randomly verified by employees independent of the Video Lottery Terminal Department on a monthly basis.
- 10.3. ICs, Regs, or P&Ps will describe the process in which the record requirements for the Video Lottery Terminals will be maintained and identifies which department will keep the following information:
  - 10.3.1. A current comprehensive list of all Video Lottery Terminals (leased or owned) with the date of arrival and/or date of removal or destruction;
  - 10.3.2. Date of installation on the gaming floor;
  - 10.3.3. Date of removal from the gaming floor;

- 10.3.4. Video Lottery Terminal's Serial Number;
- 10.3.5. Manufacture's Name;
- 10.3.6. Program Number(s) selected from the installed Software;
- 10.3.7. Current denomination of Video Lottery Terminal;
- 10.3.8. Theoretical Hold Percentage(s) selected from the installed Software or recalculations of the Theoretical Hold Percentage with documentation;
- 10.3.9. Any changes to the Video Lottery Terminal unique machine identification number with reason for the change (i.e. denomination, conversion, etc.);

## **11. Video Lottery Terminal Performance**

- 11.1. Accurate and current theoretical hold worksheets are maintained or readily available for each payable on a Video Lottery Terminal machine.
- 11.2. ICs, Regs, or P&Ps will describe the manner, when initially received from the manufacturer, that the program number and par percentage are verified to the theoretical hold worksheet.
- 11.3. The Tribal Gaming Commission will approve, in conformity with these standards, the method for mathematical weighted average adjustment justification for changing the selected theoretical hold percentage on the worksheet from the manufacturer for the Tribal Gaming Operation to utilize.
- 11.4. ICs, Regs, or P&Ps will delineate the methodology approved by the Tribal Gaming Commission for the mathematical weighted average adjustment justification, as stated in Requirement 11.3.
- 11.5. ICs, Regs, or P&Ps will describe the entire process of meter recording, manually or electronically, to ensure appropriate segregations of duties, accuracy, and integrity, at a minimum the following:
  - 11.5.1. Specifying who will record, manually or electronically, the Video Lottery Terminal Meters. If manually recorded, the Video Lottery Terminal Meters, will be taken by personnel independent of the Soft Count Team;
  - 11.5.2. Describing the intervals of recording, manually or electronically, the Video Lottery Terminal Meters at least weekly immediately prior to or subsequent to a Video Lottery Terminal Drop. (Exception: 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 days.); and

- 11.5.3. Describing the process of prior to finalizing the statistical reports, the meter readings that do not appear reasonable are reviewed by the Video Lottery Terminal Department conjointly with the Accounting Department with exceptions documented.
- 11.6. ICs, Regs, or P&Ps will describe the process report generation of the Video Lottery Terminal +/-4% Analysis Report(s) to include at a minimum for each Video Lottery Terminal:
  - 11.6.1. At least monthly;
  - 11.6.2. Month-to-Date Actual Hold Percentage compared to the machine's Theoretical Hold Percentage;
  - 11.6.3. Year-to-Date Actual Hold Percentage compared to the machine's Theoretical Hold Percentage; and
  - 11.6.4. If practicable, the report should include the Actual Hold Percentage for the entire time the machine has been in operation.
- 11.7. ICs, Regs, or P&Ps will describe that the Video Lottery Terminal +/-4% Analysis Report(s) is to be reviewed by Management from two separate departments. One of which will be independent of the Video Lottery Terminal Department Management.
- 11.8. As approved by the Tribal Gaming Commission, variances in +/- 4% between Theoretical Hold and Actual Hold shall be investigated and resolved in a timely manner by a department independent of the Video Lottery Terminal Department. Findings will be documented and provided to the Tribal Gaming Commission.

## **12. Method for Payment of Prizes for Video Lottery Terminals**

- 12.1. The Tribal Gaming Commission will approve, in conformity with these standards, the manner in which Payment of Prizes for Video Lottery Terminals to ensure conformity within the respective Tribal/State Compacts and these standards.
- 12.2. ICs, Regs, or P&Ps will delineate the manner approved by the Tribal Gaming Commission for Payment of Prizes for Video Lottery Terminals.

## **13. Jackpot Payout Requirements**

- 13.1. ICs, Regs, or P&Ps will describe the Jackpot procedures and documentation requirements for manual or electronic forms, at a minimum the following:
  - 13.1.1. Date and Time;
  - 13.1.2. Machine Number;

- 13.1.3. Dollar Amount of Payout (both alpha and numeric):
- 13.1.4. If manual form, brief description of winning combination (i.e. 7 out of 7 keno, 5 bumblebees, etc);
- 13.1.5. Preprinted or concurrently printed sequential number;
- 13.1.6. Signatures of at least two employees verifying and witnessing the payout; and
- 13.1.7. Additional signatory requirements as delineated by the Tribal Gaming Commission for Requirement 12, which at least includes a signature of a supervisor or higher position independent of the Video Lottery Terminal Department.

**14. Short Pay Requirements**

- 14.1. ICs, Regs, or P&Ps will describe the Short Pay procedures and documentation requirements for manual or electronic forms, at a minimum the following:
  - 14.1.1. Date and Time;
  - 14.1.2. Machine Number;
  - 14.1.3. Dollar Amount of payout (alpha and numeric); and
  - 14.1.4. Signatures of at least two employees verifying and witnessing the payout.

## TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

### SECTION 16: VIDEO LOTTERY TERMINALS SERVER SUPPORTED GAMING & SERVER BASED GAMING MACHINES

#### **1. General**

- 1.1. As defined and authorized by the respective Tribal/State Compacts, Video Lottery Terminals in this section, shall conform to these Minimum Internal Control Standards (MICS).
- 1.2. The MICS in this section apply to Video Lottery Terminal Client Stations used with Server Supported Gaming (SSG) or a Client Station used with Server Based Gaming (SBG), if installed on the gaming floor at the Tribal Gaming Facility.
- 1.3. MICS Section 15 will also apply to this section if SSG or SBG offered at the Tribal Gaming Facility.
- 1.4. Standards referring to Software in this section, will collectively apply to SSG or SBG game programs.
- 1.5. Standards referring to Socket ID in this section, will collectively apply to one or more of the following Identification types, but not limited to: Unique Machine Number, Machine Serial Number, Port Identification Number, Electronic Gaming Devices (EGD) Identification Number, etc. for SSB/SBG. The reference to Socket ID in this section is not intended to change or require this verbiage at the Tribal Gaming Operation, but to refer to this type of Identification.
- 1.6. MICS in this section do not constitute standards for, and shall not be construed to authorize, Electronic Funds Transfers (EFT) from a financial institution to a Video Lottery Terminal or to a Video Lottery Terminal with SBG. Specific Standards for EFT to a Video Lottery Terminal with SBG shall require a MICS Revision.
- 1.7. MICS in this section do not constitute standards for, and shall not be construed to authorize, Mobile Gaming Systems (MGS) utilizing software downloadable applications to patron's personal devices. MICS for Mobile Gaming Systems for casino hand held devices are delineated in Section 17.
- 1.8. The MICS in this section include additional requirements under subparagraph 2 for Accounting/Auditing for SSG and SBG, if SSG or SBG offered at the Tribal Gaming Facility.

#### **2. Additional Accounting/Auditing Requirements**

- 2.1. Daily, a designated individual independent of the process of authorizing adding, deleting, or changing game programs will review the SSG/SBG report indicating the results of the automated execution in validating program components.
- 2.2. All noted invalid program components, improper transactions or unusual occurrences are investigated by personnel approved by the Tribal Gaming Commission and the results documented and forwarded to the Tribal Gaming Commission.
- 2.3. In addition to the Requirements Section 2, Sub-Section 6, auditing and reporting procedures will be identified by Socket Identification (ID).
- 2.4. Requirement 2.1 and 2.2 shall not apply if the Tribal Gaming Commission executes the downloading of games and configuration files for SSG/SBG. Upon request from the Oregon State Police, the Tribal Gaming Commission shall provide the reports described in Requirements 2.1 and 2.2 for monitoring/oversight purposes.

### **3. Additional Security of Software**

- 3.1. The Tribal Gaming Commission shall ensure at least annually, at an interval determined by the Tribal Gaming Commission that all SSG and SBG game programs are unaltered, reviewed for improper changes, reviewed for improper transactions, and/or reviewed for unusual occurrences. Results are documented and maintained at the Tribal Gaming Commission Office.

### **4. Additional Software Duplication**

- 4.1. It is not considered Software Game Program Duplication when game programs are transferred from a SSG game server to client stations.

### **5. Additional Video Lottery Terminal Storage, Relocation, and Destruction**

- 5.1. All storage, relocation, and destruction will be recorded by Socket ID and reported to the Accounting Department by Socket ID.

### **6. Additional Video Lottery Terminal Records**

- 6.1. Records are maintained for each Video Lottery Terminal by each Socket ID installed on the gaming floor at the Tribal Gaming Facility.

### **7. Additional Video Lottery Terminal Performance**

- 7.1. The Tribal Gaming Commission will approve, in conformity with these standards, the method for mathematical weighted average adjustment justification for changing the selected theoretical hold percentage on the worksheet from the manufacturer for the Tribal Gaming Operation to utilize by Socket ID.

- 7.2. ICs, Regs, or P&Ps will delineate the methodology approved by the Tribal Gaming Commission for the mathematical weighted average adjustment justification, as stated in Requirement 7.1.
- 7.3. Meter Recordings will be by identified Socket ID.
- 7.4. Video Lottery Terminal +/- 4% Analysis Report(s) will be identified by Socket ID.

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## SECTION 17: MOBILE GAMING SYSTEMS

### CASINO HAND HELD DEVICES

**Note: The Tribal Gaming Commissions and the Oregon State Police are continuing to develop this section as a joint effort.**

#### **1. General**

- 1.1. Mobile Gaming Devices in this section, shall conform to these Minimum Internal Control Standards (MICS), as defined and authorized by the respective Tribal/State Compacts under the definition of Video Lottery Terminals.
- 1.2. Each active Mobile Gaming Device shall count as one Video Lottery Terminal. The combination of Video Lottery Terminals and active Mobile Gaming Devices shall not exceed the amount of authorized machines allowed on the gaming floor per respective Tribal/State Compacts. Inactive Mobile Gaming Devices shall not count as one Video Lottery Terminal.
- 1.3. Tribal Gaming Facilities offering Mobile Gaming Devices agree to provide a report detailing how many active devices are currently installed on the server, upon request from the Oregon State Police.
- 1.4. The MICS in this section apply to all Mobile Gaming Devices used with Server Based Gaming (SBG) technology, if Mobile Gaming Devices are installed on the gaming floor at the Tribal Gaming Facility.
- 1.5. Standards referring to Software in this section, will apply to SBG game programs.
- 1.6. Mobile Gaming Devices may be operated in the following areas within the Tribal Gaming Facility:
  - 1.6.1. The gaming floor where Class III Video Lottery Terminals are permitted for play; or
  - 1.6.2. A designated area off the gaming floor that meet the following requirements:
    - 1.6.2.1. The designated area will have Surveillance coverage;
    - 1.6.2.2. The designated area will have ICs, Regs, or P&Ps that has been approved by the Tribal Gaming Commission that ensures the Fairness, Integrity, Security, and Honesty; and
    - 1.6.2.3. The designated area will have concurrence from the Oregon State Police.

- 1.7. Wagering Accounts for cashless wagering is limited to patron deposits only and withdrawals of cash or cash equivalents at a designated area of accountability complying with MICS Section 6: Cage.
- 1.8. Mobile Gaming Systems are limited to applicable MICS requirements in Section 15 and 16 where the same conditions exist. The Tribal Gaming Commission shall approve ICs, Regs, or P&Ps written for the applicable requirements within conformity of the applicable standards in Section 15 and 16.

Note: Due to terminology differences for Video Lottery Terminals and Mobile Gaming Devices, ICs, Regs, or P&Ps will reflect the terminology substitutions for Mobile Gaming Systems.

- 1.9. The MICS in this section include additional requirements under subparagraph 4 for Accounting/Auditing for Mobile Gaming Devices, if Mobile Gaming Devices are offered at the Tribal Gaming Facility.
- 1.10. The MICS in this section do not constitute standards for, and shall not be construed to authorize Mobile Gaming Systems (MGS) utilizing software downloadable applications to patron's personal devices or Electronic Funds Transfers (EFT) from a financial institution to a Video Lottery Terminal or to a Video Lottery Terminal with SBG. Specific Standards for MGS downloadable applications and EFT to a Video Lottery Terminal with SBG shall require a MICS Revision.

## **2. Applicable MICS in Section 15**

- 2.1. Subsection 2: Independent Gaming Test Laboratory
- 2.2. Subsection 4: Video Lottery Terminal Decal Requirements
- 2.3. Subsection 5: Security of Video Lottery Terminals
- 2.4. Subsection 6: Video Lottery Terminal Storage, Relocation, and Destruction
- 2.5. Subsection 7: Records and Security of Software
- 2.6. Subsection 9: Minimum Hardware and Software Requirements
- 2.7. Subsection 10: Video Lottery Terminal Records
- 2.8. Subsection 11: Video Lottery Terminal Performance
- 2.9. Subsection 12: Method for Payment of Prizes for Video Lottery Terminals
- 2.10. Subsection 13: Jackpot Payout Requirements

2.11. Subsection 14: Short Pay Requirements

**3. Applicable MICS in Section 16**

3.1. Subsection 3: Additional Security of Software

3.2. Subsection 5: Additional Video Lottery Terminal Storage, Relocation, and Destruction

3.3. Subsection 6: Additional Video Lottery Terminal Records

3.4. Subsection 7: Additional Video Lottery Terminal Performance

**4. Additional Accounting/Auditing Requirements**

**5. Wager Account Requirements**

# TRIBAL/STATE MINIMUM INTERNAL CONTROL STANDARDS

## GLOSSARY

**NOTE:** Definitions in this section are not all inclusive and are not intended to change the names of items currently in use at the Tribal Gaming Operation. For additional detail refer to the respective Tribal/State Compact and/or Internal Controls and Regulations as approved by the Tribal Gaming Commissions.

### **Actual Hold Percentage**

The percentage calculated by dividing the win by the drop or coin-in (number of credits wagered). Can be calculated for individual tables or gaming machines, type of table games, or gaming machines on a per day or cumulative basis.

### **Assets**

Items of ownership convertible into cash or total resources of a person or business, as cash, notes and accounts receivable, securities, inventories, fixtures, machinery, or real estate (opposed to liabilities).

### **Associated Device/System**

Any Video Lottery Terminal hardware, software, or computerized element including but not limited to: USB Drives, Compact Flash, CDs, Hard Drives, and Games Media that was or could be used in a Video Lottery Terminal to store game program information.

### **Bank (Bankroll)**

The inventory of currency, coins, chips and tokens in the cage, pit area, change booths, electronic gaming devices and on the playing tables used to make change and pay winning bets.

### **Base Jackpot**

The fixed, minimum, payout amount of a Progressive Video Lottery Terminal jackpot combination.

### **Base Level**

The table games hold percentages that are calculated from historical information or the gaming industry standard and are used to compare current table game hold percentages.

### **“Blind”/Independent Count**

A count that is completed without prior knowledge or access to the amounts being counted.

### **Boxman**

A pit supervisor assigned to an individual craps table.

### **Cashier Cage**

A physical structure within the gaming facility that houses Cage Cashiers which serves as the central location for transactions as set forth in these standards.

**Cash Equivalent**

A treasury check, personal check, travelers check, wire transfer of funds, money order, certified check, cashiers check, a check drawn on the tribal gaming operation payable to the patron or to the tribal gaming operation, a voucher recording cash drawn against a credit card or charge card, Video Lottery Terminal Ticket, or Kiosk receipts for cash.

**Change Booth**

A booth or small cage in the gaming area that is used to provide change to customers, store change banks, make electronic gaming device fills, account for jackpot payouts, and make gaming receipt payouts.

**Change Person**

A person who has an imprest fund of coins, tokens and currency for making change for customers.

**Chip**

A non-metal or partly metal representative of value which evidence a debt owed to their custodian and is issued by the Tribal Gaming Operation for use at the Table Gaming Stations.

**Chip and Token Float**

The dollar value of chips and tokens held by customers.

**Class III**

Class III gaming as defined in the Indian Gaming Regulatory Act.

**Closer**

The original of the Table Game Inventory Slip upon which each table inventory is recorded at the end of each shift.

**Coins-In**

The total amount wagered which includes physical coins-in and credits played.

**Compact Flash**

A mass storage device format used in portable electronic devices.

**Count Room**

A physical structure within the Tribal Gaming Facility which serves as the central location for transactions as set forth in these standards.

**Credit**

1. Video Lottery Terminal - smallest unit of value that may be used to play a game on a Video Lottery Terminal or that may be redeemed in currency.
2. Table Games - A transaction in which a supply of chips, coins and tokens is transferred from a Table Game to the Cashier's Cage.

**Credit Slip**

Is the document reflecting the removal of gaming chips from a gaming station in accordance with these standards.

**Dealer**

An employee who operates a table game in a gaming facility.

**Decal**

A sticker that is affixed to a Video Lottery Terminal which certifies it conforms to the exact specifications of Terminal prototypes tested and certified by the Independent Gaming Test Laboratory. The placement of the decal constitutes documentation that the certification has been and will be kept on file.

**Drop**

The process in which Drop Boxes are removed from Table Games and Video Lottery Terminals to be taken to Soft Count.

**Drop Box**

1. Table Games - the container attached to a Table Game used to deposit cash and coupons in exchange for chips. Table Games Drop Boxes are collectively referred to as Drop Boxes and may have one or more slots to insert the cash or coupons as approved by the Tribal Gaming Commission.
2. Video Lottery Terminal - the container attached inside the Video Lottery Terminal used to deposit cash and Video Lottery Terminal Tickets in exchange for credits. Video Lottery Terminal Drop Boxes and Bill Validator Cans are collectively referred to as Drop Boxes.

**Dub**

Similar to a video clip. Dubs are produced by using digital equipment.

**EPROM**

Erasable, Programmable, Read-only Memory.

**Electronic Funds Transfers (EFT)**

The paperless act of transferring money through a computer network.

**Fill**

A transaction whereby a supply of chips, coins and tokens is transferred from the Cashier's Cage to a Table Game.

**Fill Slip (known as a "fill")**

Is the document reflecting the distribution of gaming chips to a gaming station as provided in these standards.

**Fiscal Year**

The annual period used by a Tribal Gaming Operation for internal accounting for its gaming operations.

**Floating Bank**

A bank that is maintained on a non-impres basis for services such as check cashing fees, etc.

**Foot**

An accounting term meaning to add or recalculate.

**Imprest Basis**

The basis in which a cash bank is maintained at a fixed amount.

**Incompatible Function**

A function, for accounting and internal control purposes, that places any person or department in a position to both perpetrate and conceal errors or irregularities in the normal course of his or her duties. For example, anyone both recording transactions and having access to the relevant assets is in a position to perpetrate errors or irregularities.

**Independent Accountant**

A professional accountant qualified and independent to act as auditor of the Tribal Gaming Operation in accordance with these standards.

**Jackpot Payout**

The portion of a jackpot paid by gaming facility personnel. The amount is usually determined as the difference between the total posted jackpot amount and the machine payout. May also be the total amount of the jackpot.

**Jackpot Payout Slip**

A form on which the portion of a jackpot paid by gaming facility personnel is recorded.

**Kiosk**

A booth providing a computer related service, such as an ATM, or the payout of Ticket-In-Ticket-Out (TITO) tickets.

**Logs**

Document used for recording and tracking information and activity.

**Machine Payout**

The amount paid out to the customer by a Video Lottery Terminal as the result of a winning combination.

**Matrix**

Computer operated unit used to receive video signals from a camera and then routes those signals to a viewing monitor.

**Meter**

An electronic or mechanical apparatus in a Video Lottery Terminal used to record the number of transactions on a Video Lottery Terminal i.e. Coin In, Bills In, Ticket In, Ticket Out, etc.

**MICS**

Minimum Internal Control Standards as defined by the respective Tribal/State Compacts.

**Mobile Gaming Systems (MGS)**

A Mobile Gaming System is a system comprised of a central game server that connects via a secure and encrypted air interface to multiple handheld units. These units function as display-only devices. Game content and game determinations are stored in the central server and wirelessly transmitted to the end-user devices assuming they are properly registered with the server. There may also be additional security components to ensure that only authorized users/players are permitted to utilize the handheld device, for example, Radio Frequency ID (RFID) bracelets and a limited broadcast range.

**Monitor**

Television type viewing unit used specifically for Closed Circuit Television Systems; or  
A representative of Oregon State Police/Tribal Gaming Section performing monitoring/oversight functions as defined in the respective Tribal/State Compacts.

**Multi-Player Stations**

A gaming device that consists of more than one (1) physical player terminal or player interface and which are typically connected to a central game server via a simple TCP/IP network or other local area network. The terminals allow for player interaction with the device (e.g., game play functions, wagering, TITO, Bill acceptance, etc). One example would be an electronic roulette game with a central video roulette wheel and a central game server, with multiple player terminals surrounding the video wheel.

**Off-Track Betting (OTB)**

Pari-mutuel wagering conducted on a race at a location other than the race course where the race is actually held.

**Off-Track Facility, Intrastate Wagering Facility or Extended Wagering Facility**

Physical premises utilized for the conduct of pari-mutuel wagering on racing events being run elsewhere.

**Opener**

The duplicate copy Table Game Inventory Slip upon which each table inventory is recorded at the end of each shift and serves as the record of each table inventory at the beginning of the next succeeding shift.

**Oregon State Police**

The members of the Oregon State Police, or their designated agents, specifically assigned by the Superintendent of State Police to tribal gaming regulatory duties.

**Paid In**

A term used to record funds being “paid in” to the cage or funds returned to the cage. For example, test money returned from Video Lottery Terminal tests.

**Paid Outs**

A term used to record funds disbursed by the cage. For example, test money for Video Lottery Terminal tests.

**Pan-Tilt-Zoom (PTZ)**

A camera that has the capabilities of panning 360 degrees right to left, up and down, and focusing closer to specific area.

**Par Sheet**

A document, provided by the electronic gaming device manufacturer, which depicts the possible outcomes from the play of an electronic gaming device, the probability of occurrence of each, and the contribution of each winning outcome to the payback percentage of the electronic gaming device.

**Payout**

The amount paid out on a winning wager.

**Payout Schedule**

A statement printed on cards, paper, Plexiglas, or available on digital media of the payoffs or awards applicable to a particular game or device.

**Perpetual Inventory**

A method of inventory control in which running records are kept of all additions and subtractions..

**Pit**

The area enclosed or encircled by an arrangement of Table Gaming Stations in which gaming facility personnel administer and supervise the games played at Table Games by the patrons located on the outside perimeter of the area.

**Pit Podium**

A stand located in the table games pit area used by Table Games personnel as a workspace and/or secured storage for sensitive items to be circulated onto a Table Game.

**Pit Supervisor**

The employee who supervises all games in the pit.

**Player**

One person who is playing any game at the Tribal Gaming Facility.

**Program Number**

The number or numbers available to be selected from gaming Software for various play options on a Video Lottery Terminal.

**Progressive Controllers**

A controller that links two or more Video Lottery Terminals together and deducts a predetermined percentage from each wager and applies it to the progressive meter.

**Progressive Jackpot**

Deferred payout from a progressive gaming machine.

**Progressive Electronic Gaming Machine**

A Video Lottery Terminal with a payoff indicator, in which the payoff increases as it is played.

**Race**

The individual pari-mutuel race event or an individual Keno game.

**Race Meet**

The duration of a pari-mutuel race season at each individual racetrack.

**Randomness**

The unpredictability and absence of a pattern in the outcome of an event or sequence of events.

**Random Number Generator**

Hardware, software, or combination of hardware and software devices for the generating number values that exhibit characteristics of randomness.

**Recording Device**

Hardware used to record video and/or audio footage from a camera.

**Re-grade**

A method of comparing Keno tickets back to the payment schedule to ensure the payout is accurate.

**Request for Credit**

A document prepared by a pit supervisor to authorize the preparation of a Credit Slip for removal of gaming chips from a Table Gaming Station.

**Request for Fill**

A document prepared by a pit supervisor reflecting the request for the distribution of gaming chips to a Table Gaming Station in conformity with these standards.

**Secured Areas**

Authorize access to areas of the Gaming Facility related to Class III gaming and which are not otherwise open to the public.

**Server Based Gaming (SBG)**

One possible implementation of Server-Based gaming is a topology whereby the game is actually played on a server and the result is simply displayed on a terminal. Class II bingo games are a notable example. In this environment, the client terminals and system work collectively, such that the client is incapable of functioning when the system is disconnected. This is also commonly referred to as a “thin client” solution. An alternative implementation is where the game is played on the machine, but the result is determined by a central computer and displayed on the machine’s screen. A good example of this model is an electronic version of “pull tabs” where players compete for a central pool of prizes.

**Server Supported Gaming (SSG)**

Server-Supported Gaming is also commonly-called “Downloadable Gaming” and involves a topology whereby the game is played on the machine and the result is determined by the machine. Game content is downloaded by the server to the machine, thereby changing the game theme on the machine. Other features may also be included in this download scenario, such as the ability to change game configurable options from a central server. In a server-supported configuration, the client terminals only depend upon the server for the download phase of operations, but the clients function independently once the download completes. This is commonly referred to as a “thick client” solution.

**Shift**

A shift is a quantity of hours determined by the Tribal Gaming Operation and approved by the Tribal Gaming Commission.

**Short Pay**

A payoff from an electronic gaming device that is less than the listed amount.

**Signature Cards**

In a manner in which an employee signature is maintained on either a electronic or hardcopy format as determined by the Tribal Gaming Commission in which their signatures can be compared to the documents they sign in the course of their normal work day. The format of the signature on record either a card or list shall be approved by the Tribal Gaming Commission.

**Simulcast or Simulcasting**

Live audiovisual electronic signals emanating from a race meeting and transmitted simultaneously with the running of the racing events at that meeting, and includes the transmission of pari-mutuel wagering odds, amounts wagered and payoff on such events, and other racing programming relating to the race animals or participants.

**Socket Identification (SI)**

A network address that consists of an IP address and port number. The format is <IP Address>:<Port Number>. Example: A website running on IP Address 41.199.222.3, the socket corresponding to the server for that site would possibly read as 41.199.222.3:80.

**Software**

Collectively applies to, but is not limited to, USB drives, Compact Flash, Media, Hard Drives, CD's, etc that are required to operate a Video Lottery Terminal and all fall under the heading Software as allowed in the respective Tribal/State Compact and in conformity with these standards. This definition excludes hardware or media which has no effect on the outcome of the game.

**Stationary Camera**

A camera fixed into a set position and can only be moved manually.

**System of Internal Control**

Is the plan of organization beginning with the respective Tribal/State Compacts and descending through the Tribal Gaming Operations standard operating procedures and all of the coordinated methods and measures adopted within a business to safeguard its assets, check the accuracy and reliability of its accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies.

**Table Game**

Any Class III game allowed under the respective Tribal/State Compact except video lottery games, keno, off-race course mutual wagering, and race and sports book.

**Table Game Station Inventory**

Total coins and value chips at a Table Game Station.

**Table Game Station Inventory Tray**

The container used to hold coins and chips at Table Game Station.

**Table Limit**

The minimum and maximum amounts that a customer may wager at a particular table.

**Theoretical Hold**

The intended hold percentage or win of an individual Video Lottery Terminal as computed by reference to its payout schedule and reel strip settings.

**Theoretical Hold Sheet (Par Sheet)**

A form provided by the manufacturer that lists the characteristics of an individual electronic gaming device, such as reel settings, award schedule, number of coins that may be played, number of reels, theoretical hold based on adequate levels of coin-in, and other data applicable to a Video Lottery Terminal.

**Token**

A non-metal or partly metal representative of value which evidence a debt owed to their custodian and is issued by the Tribal Gaming Operation for use at the Table Gaming Stations

**Tribal Gaming Operation**

The economic entity that is licensed by the Tribe, operates the games, receives the revenues, issues the prizes, and pays the expenses involving the Class III games authorized under the respective Tribal/State Compact. A gaming operation may be operated by a tribe directly; by a management contractor; or, under certain conditions, by another person or other entity.

**Tribe**

The respective federally recognized Tribe, Band, Nation, Pueblo, Rancheria or any of its authorized entity(s), body(s), official(s), agent(s) or representative(s).

**USB**

Universal Serial Bus (USB), a standard for connection sockets on computer or other electronic equipment.

**Vault**

A secure area within the gaming facility where currency, coins, chips and other sensitive items are stored.

**Video Lottery Terminal**

Gaming equipment collectively referred to as Video Lottery Terminals, Slot Machines, Multi-Player Stations, In-House Progressives, Wide Area Progressives, Server Based Game, Server Supported, Mobile Gaming Devices, and Electronic Gaming Device all fall under the heading Video Lottery Terminal as allowed in the respective Tribal/State Compact and in conformity with these standards.

**Video Lottery Terminal Final Count Report**

A report generated by the Soft Count Team during the count process for Video Lottery Terminal Drop Boxes to record the total dropped for each drop box and each aggregate total.

**Wager**

A sum of money or thing of value risked on an uncertain occurrence.

**Win/Loss**

The calculation to determine how a Table Game is performing. The calculation is (Opener – Closer + fills – Credits) – Drop = Win/Loss.

**Work Papers**

Documents containing the evidence to support the auditors or Compact compliance review findings, options, conclusions, and judgments.