

LAGUNA GAMING CONTROL BOARD

NOTICE OF PROPOSED ACTION and 30 DAY COMMENT PERIOD

July 13, 2016

The Laguna Gaming Control Board has proposed an amendment to the Tribal Internal Control Standards (“TICS”) as attached in accordance to LGCB Regulation Rule 702 “Draft Regulation, Comment Period.”

If you wish to submit comments on the proposed amendment, please send your written comments by mail or in person to the address noted below by August 15, 2016:

Mailing Address	Physical Address
PO Drawer 225 Laguna, NM 87026	TGRA Administrative Office 14500 Central Ave I-40 @ Exit 140 Albuquerque, NM 87121 (Building on the Southeast portion of the Route 66 Property)

THE AMEDNED RULE IS POSTED WITHIN AND AT THE FOLLOWING LOCATIONS FOR PUBLIC REVIEW AND THIRTY (30) DAY COMMENT PERIOD

The Security Podium of each Pueblo of Laguna Gaming Facility

The Reception Desk at the Governmental Office of the Pueblo of Laguna

The Reception Desk at the Administration Office of the Laguna Gaming Control Board

The Tribal Gaming Regulatory Authority (“TGRA”) webpage at the Pueblo of Laguna Website
(www.lagunapueblo-nsn.gov/TGRA.aspx)

THIS NOTICE MAY ONLY BE REMOVED BY AN AUTHORIZED REPRESENTATIVE OF THE LAGUNA TRIBAL GAMING REGULATORY AUTHORITY

TICS Section:	Section 00 Table of Contents
TICS Part:	N/A
Reason for Change:	To restructure the TICS section numbers with the proposed removal of sections titled: "Internal Audit Tier A", "Drop Tier C", "Count Tier C", and "Internal Audit Tier C" as a result of the consolidation.

TABLE OF CONTENTS

Section 1 **Definitions**

Section 2 **Bingo**

Section 3 **Card Games**

Section 4 **Pull Tabs**

Section 5 **Table Games**

Section 6 **Gaming Machines**

Section 7 **Cage**

Section 8 **Information Technology**

Section 9 **Complimentary Services or Items**

Section 10 ~~Drop and Count for Tier A~~

Section 11 ~~Count~~ Internal Audit for Tier A

Section 12 **Surveillance**

Section 13 ~~Keno~~ Drop and Count for Tier C

Section 14 ~~Title 31~~ Internal Audit for Tier C

Section 15 ~~Health & Safety~~ (Reserved)

Section 16 ~~Casino Administration~~ Keno

~~**Section 17** **(Reserved)**~~

~~**Section 18** **Title 31**~~

~~**Section 19** **Health and Safety**~~

~~**Section 20** **Casino Administration**~~

TICS Section(s):	Section 1 – Definitions
Reason for Change:	As a result of the consolidation of Class II and Class III Drop & Count, and Internal Audit standards.
<p>TGRA Definitions</p> <p>The definitions in this section shall apply to all sections of the Casino Tribal Internal Control Standards unless otherwise noted.</p> <p>Access Control Card means electronic identification cards, used to enter sensitive gaming areas, based on the authorization level of the user.</p> <p>Account access card means an instrument used to access customer accounts for wagering at a gaming machine. Account access cards are used in connection with a computerized account database. Account access cards are not “smart cards”.</p> <p>Accountability means all items of cash, chips, coins, tokens <u>financial instruments</u>, receivables, and <u>customer patron</u> deposits constituting the total amount for which the bankroll custodian is responsible at a given time.</p> <p>Accumulated credit payout means credit earned in a gaming machine that is paid to a customer manually in lieu of a machine payout.</p> <p>Actual hold percentage means 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.</p> <p>Actual bingo win percentage means the percentage calculated by dividing the bingo win by the bingo sales. Can be calculated for individual prize schedules or type of player interfaces on a per-day or cumulative basis.</p> <p>Agent means an employee or licensed person authorized by the gaming operation, as approved by the tribal gaming regulatory authority, designated for certain authorizations, decisions, tasks and actions in the gaming operation. This definition is not intended to eliminate nor suggest that appropriate management contracts are not required, where applicable, as referenced in 25 U.S.C. 2711.</p> <p>Amount in means the total value of all financial instruments and cashless transactions accepted by the Class II gaming system.</p> <p>Amount out means the total value of all financial instruments and cashless transactions paid by the Class II gaming system, plus the total value of manual payments.</p> <p>Ante means a player’s initial wager or predetermined contribution to the pot before the dealing of the first hand.</p> <p>Automated Payout means a payment issued by a machine.</p> <p>Bank or bankroll means the inventory of cash, coins, chips, checks, tokens, receivables, and customer deposits in the cage, pit area, gaming booths, and on the playing tables, and cash in bank which is used to make change, pay winnings, bets, and pay gaming machine jackpots.</p> <p>Bill acceptor means the device that accepts and reads cash by denomination in order to accurately register customer credits at a gaming machine.</p> <p>Bill acceptor canister means the box attached to bill acceptors used to contain cash received by bill acceptors.</p> <p>Bill acceptor canister release key means the key used to release the bill acceptor canister from the bill acceptor device.</p> <p>Bill acceptor canister storage rack key means the key used to access the storage rack where bill acceptor canisters are secured.</p> <p>Bill acceptor drop means currency contained in bill acceptor canisters.</p> <p>Bill-in meter means a meter included on a gaming machine accepting cash that tracks the number of bills put in the machine.</p> <p>Bingo paper means a consumable physical object that has one or more bingo cards on its face.</p> <p>Bingo sales means the value of purchases made by players to participate in bingo.</p>	

Bingo win means the result of bingo sales minus prize payouts.

Birdcage means a clear plastic container used by security to transport chips to and from the cage and table games pit.

Boxman/Boxperson means the first level supervisor who is responsible for directly participating in and supervising the operation and conduct of the craps game only.

Cage means a secure work area within the gaming operation for cashiers and a storage area for the gaming enterprise bankroll.

Cage accountability form means an itemized list of the components that make up the cage accountability.

Calibration module means the section of a weigh scale used to set the scale to a specific amount or number of coins to be counted.

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

Cashless system means a system that performs cashless transactions and maintains records of those cashless transactions.

Cashless transaction means a movement of funds electronically from one component to another, often to or from a patron deposit account.

Cash-out ticket means an instrument of value generated by a gaming machine, representing a cash amount owed to a customer at a specific gaming machine. This investment may be wagered at other machines by depositing the cash-out ticket in the machine document acceptor.

Chips mean cash substitutes, in various denominations, issued by a gaming enterprise and used for wagering.

Class II gaming means a game as described in 25 U.S.C. 2703(7)(A).

Class II gaming system means all components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games including accounting functions mandated by NIGC 547-9.

Coin-in meter means the meter that displays the total amount wagered in a gaming machine that includes coins in and credits played.

Coin meter count machine means a device used in a coin room to count coin.

Coin room means an area where coins and tokens are stored.

Coin room inventory means coins and tokens stored in the coin room that are generally used for gaming machine department operation.

Cold Box means empty Gaming Machine Bill Validator boxes or empty Table Games drop boxes.

Commission means the National Indian Gaming Commission.

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

Count means the act of counting and recording the drop and/or other funds. Also, the total funds counted for a particular game, ~~coin-operated gaming device~~player interface, shift, or other period.

Count room means a secured room where the ~~coin and cash drop from gaming machines, table games, or other games are transported to~~and count is performed in which the cash and cash equivalents are counted.

Count team means personnel that perform either the count of the gaming machine drop and/or the table game drop.

Counter game means a game in which the gaming operation is a party to wagers and wherein the gaming enterprise documents all wagering activity. The term includes, but is not limited to, bingo, keno, and pari-mutuel race books. The term does not include table games, card games, and gaming machines.

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

Credit slip means a form used to record the return of chips from a gaming table to the cage.

~~Currency Cassette means a compartment that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to dispense currency.~~

Dealer means an employee who operates a game, individually or as a part of a crew, administering house rules and making payoffs.

Dedicated camera means a video camera ~~required to~~that continuously records a specific activity.

Document acceptor means the device integrated into each gaming machine that reads bar codes on coupons and cash-out tickets.

Drop means the total amount of financial instruments removed from financial instrument storage components in all gaming systems.

Drop box means a locked container ~~affixed to the gaming table into~~ which ~~the drop is~~cash or cash equivalents are placed ~~at the time of the transaction. Used synonymously with "financial instrument storage component."~~ ~~The game type, table number, and shift are indicated on the box.~~

Drop box contents keys means the key used to open drop boxes.

Drop box release keys means the key used to release drop boxes from ~~a player interface~~tables.

Drop box storage rack keys means the key used to access the storage rack where drop boxes are secured.

~~Drop bucket means a container located in the drop cabinet (or in a secured portion of the gaming machine in coinless/cashless configurations) for the purpose of collecting coins, tokens, cash-out tickets, and coupons from the gaming machine.~~

~~Drop cabinet means the wooden or metal base of the gaming machine that contains the gaming machine drop bucket.~~

Drop period means the period of time that occurs between sequential drops.

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

Electronic funds transfer means a transfer of funds to or from a gaming system through the use of a cashless system, which are transfers from an external financial institution.

EPROM means erasable programmable read-only memory or other equivalent game software media.

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

Fill means a transaction whereby a supply of chips or coins and tokens is transferred from a bankroll to a table game, coin-operated gaming device, bingo, or keno department.

Fill slip means a document evidencing a fill.

Financial instrument means any tangible item of value tendered in game play including but not limited to bills, coins, vouchers, and coupons.

~~Financial instrument acceptor means any component that accepts financial instruments.~~

Financial instrument storage component means any component that stores financial instruments. Used synonymously with "Drop Box."

Flare means the information sheet provided by the manufacturer that sets for the rules of a particular pull tab game and that is associated with a specific deal of pull tabs.

Foot means to add a column of numbers and note the sum at the bottom.

Game server means an electronic selection device, utilizing a random number generator.

Game software means the operational program or programs that govern the play, display of results, and/or awarding of prizes or credits for games.

Gaming equipment means all electronic, electro-mechanical, mechanical or other physical components utilized in the play of games.

Gaming machine Means an electronic or electromechanical machine that allows a player to play games of chance, some of which may be affected by skill, which contains a microprocessor with random number genitor capability for outcome selection or computer terminal that accesses an outcome that is subsequently and randomly selected in drawings that are electronically conducted by central computer or other such methods of chance selection, whether mechanical or electronic. The machine is activated by the insertion of cash or cash equivalents and which awards cash, cash equivalents, merchandise, or a written statement of the player's accumulated credits, which written statements may be redeemable for cash.

Gaming machine analysis report means a report prepared that compares theoretical to actual hold by a gaming machine on a monthly or other periodic basis.

Gaming machine booths and change banks means a booth or small cage in the gaming machine area, used to provide change to players, store change aprons and extra coin, and account for jackpot and other payouts.

Gaming machine count means the total amount of coins, tokens, and cash removed from a gaming machine. The amount counted is entered on the Gaming Machine Count Sheet and is considered the drop; also, the procedure of counting the coins, tokens, and cash or the process of verifying gaming machine coin and token inventory.

Gaming machine fill means the coins or tokens placed in a hopper.

Gaming machine pay table means the reel strip combinations illustrated on the face of the gaming machine that can identify payouts of designated coin amounts.

Gaming promotion means any promotional activity or award that required game play as a condition of eligibility.

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

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

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

Graveyard shift means any hours worked between 11 p.m. and 8 a.m.

Gross gaming revenue means annual total amount of cash wagered on class II and class III games and admission fees (including table or card fees), less any amounts paid out as prizes or paid for prizes awarded.

Hold means the relationship of win to coin-in for gaming machines and win to drop for table games.

Hot Box means full Gaming Machine Bill Validator Boxes or Table Games drop boxes.

Independent means the separation of functions so that the person or process monitoring, reviewing or authorizing the controlled transaction(s) is separate from the persons or process performing the controlled transaction(s).

Internal audit means individuals who perform an audit function of a gaming enterprise that are independent of the department subject to audit. Independence is obtained through the organizational reporting relationship, as the internal audit department shall not report to management of the gaming enterprise. Internal audit activities should be conducted in a manner that permits objective evaluation of areas examined. Internal audit personnel may provide audit coverage to more than one enterprise within a Tribe's gaming enterprise holdings.

Internal auditor means the person(s) who perform an independent audit. Independence is obtained through the organizational reporting relationship, as the internal audit department must not report to management of the gaming operation. Internal audit personnel may provide audit coverage to more than one operation within a tribe's gaming operation holdings.

Inter-tribal prize pool means a fund to which multiple tribes contribute from which prizes are paid to winning players at a participating tribal gaming facility and which is administered by one of the participating tribes or a third party, (e.g. progressive prize pools, shared prize pools, etc.).

Jackpot payout means the portion of a jackpot paid by gaming machine personnel. The amount is usually determined as the difference between the total posted jackpot amount and the coins paid out by the machine. It may also be the total amount of the jackpot.

Kiosk means a device capable of redeeming vouchers and/or wagering credits or initiating electronic transfers of money to or from a patron deposit account.

Lammer means a type of chip used to evidence transfers between table banks and card room banks.

Linked electronic game means any game linked to two (2) or more facilities that are physically separate.

Manual payout means any non-automated payout.

Master game sheet means a form used to record, by shift and day, each table game's winnings and losses. This form reflects the opening and closing table inventories, the fills and credits, and the drop and win.

Mechanical coin counter means a device used to count coins that may be used in addition to or in lieu of a coin weight scale.

Meter means an electronic (soft) or mechanical (hard) apparatus in a gaming machine. May record the number of coins wagered, the number of coins dropped, the number of times the handle was pulled, or the number of coins paid out to winning players.

MICS means the NIGC Minimum internal control standards.

Motion activated dedicated camera means a video camera that, upon its detection of activity or motion in a specific area, begins to record the activity or area.

Multi-game machine means a gaming machine that includes more than one type of game operation.

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

NIGC means the National Indian Gaming Commission.

NMGCB means the New Mexico Gaming Control Board.

Non-cashable credit means credits given by an operator to a patron; placed on a gaming system through a coupon, cashless transaction, or other approved means; and capable of activating play but not being converted to cash.

Order for credit means a form that is used to request the transfer of chips or markers from a table to the cage. The order precedes the actual transfer transaction that is documented on a credit slip.

Par percentage means the percentage of each dollar wagered that the house wins (i.e. gaming enterprise advantage).

Par sheet means a specification sheet for a gaming machine that provides machine hold percentage, model number, hit frequency, reel combination, number of reels, number of coins that can be accepted, and reel strip listing.

Patron means a person who is a customer or guest of the gaming operation and may interact with a Class II or Class III game. Also may be referred to as a "player."

Patron deposit account means an account maintained on behalf of a patron, for the purpose of depositing and withdrawing cashable funds for the primary purpose of interacting with a gaming activity.

PIN means the personal identification number used to access a player's account.

Pit podium means a stand located in the middle of the tables used by gaming enterprise supervisory personnel as a workspace and a record storage area.

Pit Supervisor means the employee who supervises all games in a pit.

Player interface means any component(s) of a ~~Class II~~ gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds, fixed units, etc.), that directly enables player interaction in a ~~Class II~~ game.

Player tracking system means a system typically used by a gaming operation to record the amount of play of an individual patron.

Prize payout means a transaction associated with a winning event or qualifying event.

~~PIN means the personal identification number used to access a player's account.~~

~~Pit podium means a stand located in the middle of the tables used by gaming enterprise supervisory personnel as a workspace and a record storage area.~~

~~Pit Supervisor means the employee who supervises all games in a pit.~~

~~Player interface means any component(s) of a gaming system, including an electronic or technological aid (not limited to terminals, player stations, handhelds, fixed units, etc.) that directly enable(s) player interaction in a game.~~

~~Player tracking system A system typically used by a gaming operation to record the amount of play of an individual patron.~~

Primary and secondary jackpots means promotional pools offered at certain card games that can be won in addition to the primary jackpot.

~~Prize payout means a transaction associated with a winning event.~~

Prize schedule means a set of prizes available to players for achieving pre-designated patterns in game(s).

Progressive gaming machine means a gaming machine, with a payoff indicator, in which the payoff increases as it is played (i.e. a deferred payout). The payoff amount is accumulated, displayed on a machine, and will remain until a player lines up the jackpot symbols that result in the progressive amount being paid.

Progressive prize means a prize that increases by a selectable or predefined amount based on play of games.

Progressive table games means table games that offer progressive jackpots.

Promotional account means a file, record, or other data structure that records transactions involving a patron or patrons that are not otherwise recorded in a patron deposit account.

Promotional prize payout means the merchandise or awards given to players by the gaming operation which is based on gaming activity.

Promotional payout means merchandise or awards given to players by the gaming enterprise based on a wagering activity.

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

Rabbit ears means a device, generally V-shaped, that hold the numbered balls selected during a keno or bingo game so that the numbers are visible to players and employees.

Rake means a commission charged by a house for maintaining or dealing a game such as poker.

Rake circle means the area of a table where rake is placed.

Random number generator (RNG) a software module, hardware component or combination of these designed to produce outputs that are effectively random.

Real time means recording at 30 fps (frames per second).

Reel symbols means symbols listed on reel strips of gaming machines.

Runner means a gaming employee who transports chips/cash to or from a gaming table and a cashier.

Series number means the unique identifying number printed on each sheet of bingo paper that identifies the bingo paper as a series or packet. The series number is not the free space or center space number located on the bingo paper.

Server means a computer which controls one or more applications or environments.

Shift means a time period, unless otherwise approved by the tribal gaming regulatory authority, not to exceed 24 hours.

Shill means an agent financed by the gaming operation and acting as a player.

Short pay means the payment of the unpaid balance of an incomplete payout by a player interface.

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

Slot/Slots mean gaming machine/gaming machines.

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

Soft count means the count of the contents in a drop box or a bill acceptor canister.

Statistical drop means total amount of money, chips, and tokens contained in the drop boxes, plus pit credit issued, minus pit credit payments in cash in the pit.

Statistical win means closing bankroll, plus credit slips for cash, chips, or tokens returned to the cage, plus drop, minus opening bankroll, minus fills to the table, plus marker credits.

Sufficient clarity means use of monitoring and recording at a minimum of thirty (30) frames per second and at a resolution sufficient to clearly identify the intended activity, person, object, or location. ~~Multiplexer tape recordings are insufficient to satisfy the requirements of sufficient clarity.~~

Surveillance operating room(s) means the secured area(s) where surveillance takes place and/or where active surveillance equipment is located.

Surveillance system means a system of video cameras, monitors, recorders, video printers, switches, selectors, and other ancillary equipment used for surveillance.

Table games means games that are banked by the house or a pool whereby the house or the pool pays all winning bets and collects from all losing bets.

Table inventory means the total coins and chips at a table.

Table inventory form means the form used by gaming enterprise supervisory personnel to document the inventory of chips, coins, and tokens on a table at the beginning and ending of a shift.

Table tray means the container located on gaming tables where chips, coins, or cash that are used in the game are stored.

TGRA means the Tribal Gaming Regulatory Authority.

Theoretical hold means the intended hold percentage or win of an individual gaming machine as computed by reference to its payout schedule and reel strip settings or EPROM.

Theoretical hold worksheet means a worksheet provided by the manufacturer for all gaming machines that indicate the theoretical percentages that the gaming machine should hold based on adequate levels of coin-in. The worksheet also indicates the reel strip settings, number of credits that may be played, the payout schedule, the number of reels and other information descriptive of the particular type of gaming machine.

TICS means Tribal Internal Control Standards established by the TGRA that are at least equal to or exceeds the NIGC MICS in this document.

Tier A means gaming enterprises with annual gross gaming revenues of more than \$1 million but not more than \$5-8 million.

Tier B means gaming enterprises with annual gross gaming revenues of more than \$5-8 million but not more than \$15 million.

Tier C means gaming enterprises with annual gross gaming revenues of more than \$15 million.

Tokens means a coin-like cash substitute, in various denominations, used for gambling transactions.

~~TGRA means the Tribal Gaming Regulatory Authority~~ means, which is the entity authorized by tribal law to regulate gaming conducted pursuant to the Indian Gaming Regulatory Act.

Vault means a secure area where cash and cash equivalents are stored.

Voucher means a financial instrument of fixed wagering value, usually paper, that can only be used to acquire an equivalent value of cashable credits or cash through interaction with a voucher system.

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

~~Weigh/count means the value of coins and tokens counted by a weigh machine.~~

~~Weigh scale calibration module means the device used to adjust a coin weigh scale.~~

~~Weigh scale interface means a communication device between the weigh scale used to calculate the amount of funds included in drop buckets and the computer system used to record the weigh data.~~

~~Weigh tape means the tape where weighed coin is recorded.~~

Wide area progressive gaming machine means a progressive gaming machine that is linked to machines in other operations, and play on the machines affect the progressive amount. As wagers are placed, the progressive meters on all of the linked machines increase.

Win means the net win resulting from all gaming activities. Net win results from deducting all gaming losses from all wins prior to considering associated operating expenses.

Win-to-write hold percentage means win divided by write to determine hold percentage.

~~Wrap means the method of storing coins after the count process has been completed, including, but not limited to, wrapping, racking, and bagging. May also refer to the total amount or value of the counted and stored coins.~~

Write means the total amount wagered in bingo and pull tab operations.

Writer means an employee who writes keno or bingo tickets. A keno writer usually also makes payouts.

TICS Section:	Section 7 – TICS for Cage
Part(s):	I. Documentation Standards IX. Kiosks
Reason for Change:	To consolidate the Class II and Class III Drop and Count standards (NIGC 542.21, 542.31, 542.41 and 543.17) as one Drop section (10A) and one Count section (10B).

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction. Corrected information shall remain legible.

...

IX. Kiosks:

- A. Kiosks must be maintained on the cage accountability and must be counted independently by at least two agents, documented, and reconciled for each increase or decrease to the kiosk inventory.
- B. Currency cassettes must be counted and filled by an agent and verified independently by at least one agent, all of whom must sign each cassette.

C. Controls must be established and procedures implemented to ensure that currency cassettes contain the correct denominations and have been properly installed.

~~CD.~~ Currency cassettes must be secured with a lock or tamper resistant seal and, if not placed inside a kiosk, must be stored in a secured area of the cage/vault.

~~DE.~~ The TGRA or the gaming operation, subject to the approval of the TGRA, must develop and implement physical security controls over the kiosks that include the following:

- 1. Forced entry;
- 2. Evidence of any entry; and
- 3. Protection of circuit boards containing programs.

~~EF.~~ With regard to cashless systems, the TGRA or the gaming operation, subject to the approval of the TGRA, must develop and implement procedures to ensure that communications between the kiosk and system are secure and functioning.

~~FG.~~ The following reconciliation reports must be available upon demand for each day, shift, and drop cycle (this is not required if the system does not track the information, but system limitation(s) must be noted):

- 1. Starting balance dollar amount per financial instrument;
- 2. Starting balance number of items per financial instrument;
- 3. Dollar amount per financial instrument issued;
- 4. Number of items per financial instrument issued;
- 5. Dollar amount per financial instrument issued;
- 6. Number of items per financial instrument redeemed;
- 7. Dollar amount per financial instrument increases;
- 8. Number of items per financial instrument increases;
- 9. Dollar amount per financial instrument decreases;
- 10. Number of items per financial instrument decreases;
- 11. Ending balance dollar amount per financial instrument; and
- 12. Ending balance number of items per financial instrument.

~~GH.~~ For Controls must be established and procedures implemented to ensure that drop box and currency cassettes are securely removed from Kiosk-kiosks that must include the following Replenishment:

- 1. Surveillance shall be notified to monitor and record at the beginning of the kiosk replenishment process.
- 2. Cage employee shall call security to be present for the entire replenishment process.
- 3. Cage employee and security shall both sign out sensitive keys to all kiosk machines.
- 4. Cage employee shall be precluded from having simultaneous access to the bill acceptor canister contents keys and the release keys.
- 5. The authorized cage employee shall exit the cage with full cassettes for replenishment at which point security will provide escort to all kiosks.
- 6. The authorized cage employee shall enter the kiosk machine with sensitive keys and:
 - a. Sign the meal ticket;
 - b. Use his/her username and password to print reconciliation report;
 - c. Remove hot ~~bill validator~~drop box and insert cold one;

- d. Remove diverter box and replace with an empty one. If a currency cassette has a separate section for diverted cash this will not apply;
- e. Remove currency cassettes and insert full cassettes;
- f. Empty coin dispensers and replenish coins; and
- g. Reset the kiosk.

H. The authorized cage employee shall return to the main bank with pulled cassettes.

J. Access to stored full kiosk drop box and currency cassettes must be restricted to:

1. Authorized agents; and

2. In an emergency, authorized persons for the resolution of a problem.

K. The kiosk count must be performed in a secure area, such as the cage or count room.

L. If counts from various revenue centers and kiosks occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from the kiosks with any revenue centers.

M. The kiosk drop box and currency cassettes must be individually emptied and counted to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded.

1. Coupons or other promotional items not included in gross revenue (if any) may be recorded on a supplemental document. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.

2. Redeemed vouchers and pulltabs (if applicable) collected from the kiosk must be secured and delivered to the appropriate department (cage or accounting) for reconciliation.

O. Corrections to kiosk drop box and currency cassettes count documentation must be verified by two agents.

P. The gaming ~~enterprise~~operation, as approved by the TGRA shall establish emergency canister replacement procedures.

TICS Section:	Section 10A – TICS for Tier A Drop
Reason for Change:	To consolidate the Class II and Class III Drop and Count standards (NIGC 542.21, 542.31, 542.41 and 543.17) as one Drop section (10) and one Count section (11).

Tribal Internal Control Standards for ~~Tier A~~ Drop

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error, writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- A. For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the TGRA, will be acceptable.

III. Sensitive Area Access:

- A. All employees who are authorized to enter a restricted area must use their access control card, if applicable, even if two (2) or more authorized persons are entering at the same time.

IV. Personnel Standards:

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

~~V.~~ Emergency Drop Procedure Standards:

- A. Emergency drop procedures shall be developed by the gaming enterprise and approved by the TGRA that includes notification to surveillance and the TGRA before the drop is conducted, recording the date, time, and signature of employee signing out/in the release keys.

~~VI.~~ Mantrap Standards:

- A. Gaming enterprise mantraps shall be of sufficient size to accommodate all drop trolleys to be utilized within each casino operation.
- B. Mantrap doors shall operate in a manner that ensures that the first set of doors closes completely before the second set of doors is opened.

VII. General Drop Standards:

- A. Surveillance must be notified when any drop is to begin so that surveillance may monitor the activities.
- B. The drop shall be performed in a manner that provides protection of both the monetary and equipment assets.
- C. At least three (3) agents must be involved in the removal of locked drop boxes, at least one of whom is from security.
- D. All drop boxes may be removed only at the time previously designated by the gaming operation and reported to the TGRA.
- E. Once the drop process has begun, it must continue until finished. This includes the setting out of empty drop boxes.
- F. Security must be provided for the drop boxes removed from player interfaces and awaiting transport to the count room.
- G. Locked drop boxes must be removed by an agent independent of the gaming department being dropped, then transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.

- H. Transportation of drop boxes must be performed by a minimum of two (2) agents, at least one of whom is security.
- I. All drop boxes must be posted with a number corresponding to a permanent number on the player interface to indicate, if applicable, game, table number and shift.
- J. Procedures shall be developed and implemented to ensure that unauthorized access to empty drop boxes shall not occur from the time the boxes leave the storage racks until they are placed on the player interface.
- K. The involvement of at least two (2) agents independent of the cage department shall be required to access stored empty drop boxes.
- L. For Table Games and Card Games:
 - 1. At the end of each shift:
 - a. All locked drop boxes shall be removed from the tables by security;
 - b. A separate drop box shall be placed on each table opened at any time during each shift or a gaming operation may utilize a drop box with separate openings and compartments for each shift; and
 - c. Upon removal from the tables, the drop boxes shall be transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.
 - 2. All tables that were not open during a shift and therefore not part of the drop must be documented.

VIII. General Key Control Standards:

- A. All duplicate keys shall be maintained in a manner that provides the same degree of control as is required for the original keys.
- B. Records shall be maintained for each key duplicated that indicate the number of keys made and destroyed.
- C. Logs shall be maintained by the custodian of sensitive keys to document authorization of personnel accessing keys
- D. Quarterly, an inventory of all controlled keys must be performed and reconciled to records of keys made, issued, and destroyed. Investigations shall be performed for all keys unaccounted for, with the investigation being documented.

~~VIX.~~ Bill Acceptor Canister Drop Box Storage Rack Key Standards:

- A. An agent independent of the gaming department being dropped shall be required to accompany the drop box storage rack keys and observe each time drop boxes are removed from or placed in storage racks.
- AB. Persons authorized to obtain ~~bill-acceptor canister~~ drop box storage rack keys shall be precluded from having simultaneous access to ~~bill-acceptor canister~~ drop box contents keys, with the exception of the count team.

~~VIX.~~ Bill Acceptor Canister Drop Box Release Key Standards:

- A. Drop box release keys shall be separately keyed from the contents keys.
- AB. A department independent of the ~~gaming machine~~ gaming departments requiring box drops shall maintain the ~~bill-acceptor canister~~ drop box release keys.
- BC. Only the ~~persons~~ agents authorized to remove ~~bill-acceptor canisters~~ drop boxes from the ~~gaming machines~~ player interface shall be allowed access to the release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table games or card games drop boxes.
- CD. ~~Persons~~ Agents authorized to remove ~~the bill-acceptor canisters~~ drop boxes shall be precluded from having simultaneous access to the ~~bill-acceptor canister~~ drop box contents keys and the release keys.
- DE. For situations requiring access to a ~~bill-acceptor canister~~ drop box at a time other than the scheduled drop, the date, time, signature of employee signing out/in the release key, and the reason for access must be documented.

~~VIII.~~ Gaming Machine Computerized Key Security System Standards:

- A. Computerized key security systems which restrict access to ~~the gaming machine~~ drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 10A.~~IXVI~~, 10A.~~VII-X~~ and 10B11.~~IXVII~~. Note: This standard does not apply to the system administrator. The system administrator is defined in paragraph ~~VIII~~~~XI~~.B.1 below.
- B. For computerized key security systems, the following additional ~~gaming machine~~ key control procedures apply:

1. Management personnel independent of the ~~gaming machine gaming departments requiring box drops~~ assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that gaming machine drop and count keys are restricted to authorized employees.
 2. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing ~~the gaming machine~~ drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
 3. The custody of the keys issued pursuant to paragraph ~~VIII~~.B.2 above requires the presence of two persons from separate departments from the time of their issuance until the time of their return.
 4. Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the ~~gaming machine~~ drop and count keys only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual keys(s).
- C. For computerized key security systems controlling access to ~~gaming machine~~ drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:
1. ~~At least Daily~~quarterly, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transaction completed by the system administrator provide an adequate control over the access to ~~the gaming machine~~ drop and count keys. Also, determine whether any ~~gaming machine~~ drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.;
 2. ~~For a~~At least ~~one day each month~~quarterly, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual ~~gaming machine~~ drop and count key removals or key returns occurred.;
 3. At least quarterly, review a sample of users that are assigned access to ~~the gaming machine~~ drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.
 4. All noted improper transaction or unusual occurrences are investigated with the results documented.
- ~~D. Quarterly, an inventory of all count room, drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigation being documented.~~

~~**IX. Gaming Machine Bill Acceptor Drop Standards:**~~

- ~~A. Surveillance shall be notified when the drop is to begin so that the drop activities are monitored and recorded.~~
- ~~B. A minimum of three employees shall be involved in the removal of the gaming machine drop, at least one of who is independent of the gaming machine department.~~
- ~~C. The drop shall be performed in a manner that provides protection of both the monetary and equipment assets.~~
- ~~D. All bill acceptor canisters shall be removed only at the time previously designated by the gaming enterprise and reported to the TGRA, except for emergency drops.~~
- ~~E. The bill acceptor canisters shall be removed by a person independent of the gaming machine department, then transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.~~
- ~~F. Security shall be provided over the bill acceptor canisters removed from the gaming machines and awaiting transport to the count room.~~
- ~~G. The transporting of bill acceptor canisters shall be performed by a minimum of two persons, at least one of who is a member of the security department.~~
- ~~H. All bill acceptor canisters shall be posted with a number corresponding to a permanent number on the gaming machine.~~

~~**X. Table Games Drop Box Key Control Standards:**~~

- ~~A. Procedures shall be developed and implemented to ensure that unauthorized access to empty table games drop boxes shall not occur from the time the boxes leave the storage racks until they are placed on the tables.~~
- ~~B. The involvement of at least two (2) persons independent of the cage department shall be required to access stored empty table games drop boxes.~~

- C. ~~The release keys shall be separately keyed from the contents keys.~~
- D. ~~At least two (2) count team members shall be present at the time count room and other count keys are issued for the count.~~
- E. ~~All duplicate keys shall be maintained in a manner that provides the same degree of control as is required for the original keys. Records shall be maintained for each key duplicated that indicate the number of keys made and destroyed.~~
- F. ~~Logs shall be maintained by the custodian of sensitive keys to document authorization of personnel accessing keys.~~

XI. ~~Table Games Drop Box Storage Rack Key Standards:~~

- A. ~~A person from security shall be required to accompany the table games drop box storage rack keys and observe each time table games drop boxes are removed from or placed in storage racks.~~
- B. ~~Persons authorized to obtain table games drop box storage rack keys shall be precluded from having simultaneous access to tables games drop box contents keys, with the exception of the count team.~~

XII. ~~Table Games Drop Box Release Key Standards:~~

- A. ~~The table games drop box release keys shall be maintained by a department independent of the pit department.~~
- B. ~~Only the persons authorized to remove table games drop boxes from the tables shall be allowed access to the table games drop box release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table games drop boxes.~~
- C. ~~Persons authorized to remove table games drop boxes shall be precluded from having simultaneous access to the table games drop box contents keys and release keys.~~
- D. ~~For situations requiring access to a table games drop box at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key, and the reason for access must be documented.~~

XIII. ~~Table Games Computerized Key Security System Standards:~~

- A. ~~Computerized key security systems which restrict access to the table game drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 10A.X, 10A.XI, 10AXII and 10B.VII. Note: This standard does not apply to the system administrator. The system administrator is defined in paragraph XIII.B.1 below.~~
- B. ~~For computerized key security systems, the following additional gaming machine key control procedures apply:~~
 - 1. ~~Management personnel independent of the table game department assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that table game drop and count keys are restricted to authorized employees.~~
 - 2. ~~In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a override key), used to access the box containing the table game drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. The date time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).~~
 - 3. ~~The custody of the keys issued pursuant to paragraph XIII.B.2 above requires the presence of two persons from separate departments from the time of their issuance until the time of their return.~~
 - 4. ~~Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the table game drop and count keys only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual keys(s).~~
- C. ~~For computerized key security systems controlling access to table game drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:~~
 - 1. ~~Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transaction completed by the system administrator provide an adequate control over the access to the table game drop and count keys. Also, determine whether any table game drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.~~

2. ~~For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual table game drop and count key removals or key returns occurred.~~
 3. ~~At least quarterly, review a sample of users that are assigned access to the table game drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.~~
 4. ~~All noted improper transaction or unusual occurrences are investigated with the results documented.~~
- D. ~~Quarterly, an inventory of all count room, drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigation being documented.~~

XIV. ~~Table Games Drop Standards:~~

- A. ~~The pit department shall document which tables were open during the shift.~~
- B. ~~Surveillance shall be notified to monitor activities when the drop is to begin.~~
- C. ~~The setting out of empty table games drop boxes and the drop shall be a continuous process.~~
- D. ~~At the end of each shift:~~
 1. ~~All locked table games drop boxes shall be removed from the tables by security.~~
 2. ~~A separate drop box shall be placed on any table opened at any time during the shift, or the gaming enterprise may utilize a single drop box with separate openings and compartments for each shift.~~
 3. ~~Upon removal from the tables, table games drop boxes shall be transported directly to the count room and locked in a secure manner until the count takes place.~~
- E. ~~Two persons from security shall perform the transporting of table games drop boxes.~~
- F. ~~All table games drop boxes shall be posted with a number corresponding to a permanent number on the gaming table and marked to indicate table number.~~

TICS Section:	Section 10B – TICS for Tier A Count
Reason for Change:	To consolidate the Class II and Class III Drop and Count standards (NIGC 542.21, 542.31, 542.41 and 543.17) as one Drop section (10) and one Count section (11).

Tribal Internal Control Standards for ~~Tier A~~ Count

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to information originally recorded by the count team on soft count documentation shall be made by drawing a single line through the error, writing the correct figure above or below the original figure, and then obtaining the initials of at least two (2) count team members who verified the change. Corrected information shall remain legible.

II. Computer Applications:

- A. For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the TGRA, will be acceptable.

III. Sensitive Area Access:

- A. Controls must be established and procedures implemented to:
 1. Restrict physical access to the count room to count team agents, designated staff, and other authorized persons; and
 2. Limit transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the count room.
- AB. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- BC. Authorized persons entering or exiting the soft count room are required to complete the soft count room access log which will include, but not be limited to:
 1. Date;
 2. Time In;
 3. Printed Name;
 4. Signature;
 5. Gaming License number;
 6. Reason;
 7. Escort Name;
 8. Escort Gaming License number; and
 9. Time Out.
- CD. Doors with magnetic locks, where authorized employees are required to use their access control card to enter and exit, and if the magnetic swipe system has the capability to log employees entering and exiting, the standard in III.B above shall not apply.
- DE. In the event of a magnetic door system failure, the standard in III.CB above shall apply.
- EE. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

IV. Mantrap Standards:

- A. Gaming enterprise mantraps shall be of sufficient size to accommodate all drop trolleys to be utilized within each casino operation.
- B. Mantrap doors shall operate in a manner that ensures that the first set of doors closes completely before the second set of doors is opened.

V. ~~Soft~~ Count Room Standards:

- A. ~~The soft count room shall be kept clear of supplies and equipment that are not required for the drop box counting of the gaming machine and table games drop.~~
- B. ~~Surveillance shall view the count, live, or on video recording and/or digital record, within seven (7) days of the count.~~

VI. ~~Soft~~ Count Room Personnel Standards:

- A. ~~Supervision must be provided for the count as needed by agents(s) with authority equal to or greater than those being supervised.~~
- B. ~~Controls must be established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud that include:~~
 - 1. ~~For Tier A and B operations:~~
 - a. ~~All counts must be performed by at least two (2) agents;~~
 - b. ~~At no time during the count can there be fewer than two (2) count team agents in the count room until the drop proceeds have been accepted into the cage/vault accountability;~~
 - c. ~~Count team agents must be rotated on a routine basis such that the count team is not consistently the same two (2) agents more than four days per week. This standard not apply to gaming operations that utilize a count team of more than two (2) agents.~~
 - 2. ~~For Tier C operations:~~
 - a. ~~All counts must be performed by at least three (3) agents;~~
 - b. ~~At no time during the count can there be fewer than three (3) count team agents in the count room until the drop proceeds have been accepted into the cage/vault accountability;~~
 - c. ~~Count team agents must be rotated on a routine basis such that the count team is not consistently the same three (3) agents more than four days per week. This standard does not apply to gaming operation that utilize a count team of more than three (3) agents.~~
 - 3. ~~Functions performed by count team agents must be rotated on a routine basis.~~
 - 4. ~~Count team agents must be independent of the department being counted.~~
 - a. ~~A cage/vault agent may be used if they are not the sole recorder of the count and do not participate in the transfer of drop proceeds to the cage/vault.~~
 - b. ~~An accounting agent may be used if there is an independent audit of all count documentation.~~
- A. ~~The table games soft count and gaming machine bill acceptor count shall be performed by a minimum of two employees.~~
- B. ~~Surveillance shall view the count, live, or on video recording and/or digital record, within seven (7) days of the count.~~
- C. ~~Count Room personnel shall not be allowed to exit or enter the count room during the count except for emergencies or scheduled breaks, and at no time during the count shall there be fewer than two employees in the count room until the drop proceeds have been accepted into cage/vault accountability.~~
- D. ~~Surveillance shall be notified when count room personnel exit or enter the count room for emergencies or scheduled breaks during the count.~~
- E. ~~Count team members shall be rotated on a routine basis such that the count team is not consistently the same two persons more than four (4) days per week.~~
- F. ~~The count team shall be independent of transactions being reviewed and counted. The count team shall be independent of the cage/vault department(s).~~

VII. ~~Table Games~~ Drop Box Contents Key Standards:

- A. The physical custody of the keys needed for accessing stored, full ~~table games~~ drop box contents shall require the involvement of persons from two (2) separate departments, with the exception of the count team.
- B. Access to the ~~table games~~ drop box contents keys at other than scheduled count times will require the involvement of at least three (3) persons from separate departments, one of whom must be a supervisor. The reason for access shall be documented with the signatures of all participants and observers.
- C. Only count team members shall be allowed access to ~~tables games~~ drop box content keys during the count process.

VIII. ~~Table Games Soft~~ Count Standards:

- A. Access to stored full drop boxes must be restricted to:
1. Authorized members of the drop and count teams; and
 2. In an emergency, authorized persons for the resolution of a problem.
- AB. The ~~table games soft~~ count shall be performed in ~~the soft~~ count room or other equivalently secure area with comparable controls.
- BC. Access to the count room during the count shall be restricted to members of the count team, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.
- CD. If counts from various revenue centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers.
- E. The count team must not have access to amount-in or bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability.
- F. Count equipment and systems must be tested, with the results documented, at minimum before the count begins to ensure the accuracy of the equipment.
- DG. The ~~table games~~ drop boxes shall be individually emptied and counted in such a manner to prevent the commingling of funds between boxes until the count of the box has been recorded.
- E1. For counts that do not utilize a currency counter, a second count must be performed by A-a member of the count team, who did not perform the initial count, ~~shall perform a second count.~~ Separate counts of chips and tokens must always be performed by members of the count team.
2. Coupons or other promotional items not included in gross revenue must be recorded on a supplemental document by either the count team members or accounting personnel. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.
 3. If a currency counter interface is used:
 - a. It must be restricted to prevent unauthorized access; and
 - b. The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.
- FH. If ~~cash currency~~ counters are utilized ~~and the count room table is used only to empty boxes and sort/stack contents~~, a count team member shall be able to observe the loading and unloading of all cash at the ~~cash currency~~ counter, including rejected ~~cash currency~~. ~~At the beginning of the count, the cash counter shall be tested by running a predetermined amount of cash through each machine.~~
- I. Two (2) counts of the currency rejected by the currency counter must be recorded per table or interface terminal, as well as in total. Rejected currency must be posted to the table or player interface from which it was collected. Posting rejected currency to a nonexistent table or player interface is prohibited.
- GJ. ~~Table games~~ ~~d~~Drop boxes, when empty, shall be shown to another member of the count team, or to another ~~person agent~~ who is observing the count, and to surveillance, provided that the count is monitored in its entirety by a person independent of the count.
- HK. Fill/credit orders (if applicable) shall be matched to the fill/credit slips. Fills and credits should be traced to or recorded on the count sheet.
- HL. The opening/closing table inventory forms (if applicable) shall either be:
1. Examined and traced to or recorded on the count sheet; or-
 2. If a computerized system is used, accounting personnel can trace the opening/closing table inventory forms to the count sheet. Variances shall be investigated with the findings documented and maintained for inspection.
- JM. A count team member, who shall not function as the sole recorder, shall reconcile the count sheet to the total drop and variances must be reconciled and documented.
- KN. All members of the count team shall sign the count ~~document sheet~~ or a summary report to attest to their participation in the count.
- O. A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by at least two (2) agents, one of whom is a supervisory count team member, and one a count team agent.
1. Final verification must include a comparison of currency counted totals against the currency counter/system report, if any counter/system is used.
 2. Any unresolved variances must be documented, and the documentation must remain part of the final count record forwarded to accounting.
 3. This verification does not require a complete recount of the drop proceeds, but does require a review sufficient to verify the total drop proceeds being transferred.
 4. The two (2) agents must sign the report attesting to the accuracy of the total drop proceeds verified.

~~U.~~ All drop proceeds and cash equivalents that were counted shall be turned over to the cage or vault ~~cashier agent, who must be independent of the count team,~~ or to an ~~authorized person/employee agent~~ independent of the revenue generation ~~source~~ and the count process, for verification. ~~Such person~~The agent shall certify, by signature, ~~the amount as to the accuracy~~ of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by accounting/revenue audit.

- ~~P.~~ After verification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
- ~~1.~~ The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
 - ~~2.~~ The cage/vault agent must have no knowledge or record of the drop proceeds total before it is verified.
 - ~~3.~~ All count records must be forwarded to accounting or secured and accessible only by accounting agents.
 - ~~4.~~ The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assume accountability of the drop proceeds, ending the count.
 - ~~5.~~ Any unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer must be documented and investigated.

~~MQ.~~ A count team member or a person independent of the cashier's department shall deliver~~†~~The count sheet, with all supporting documents, must be delivered to the accounting department by a count team member or an agent independent of the cage/vault. Alternatively, it may be adequately secured ~~in a locked container, to which only accounting personnel have access, until retrieved by the~~so that it is only accessible to accounting departmentagents.

~~N.~~ Access to stored, full table games drop boxes shall be restricted to authorized members of the drop and count teams.

IX Variance Standards:

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

X. Revenue Audit:

- ~~A.~~ At least quarterly, unannounced currency counter and currency counter interface (if applicable) tests must be performed, and the test results documented and maintained by agent(s) independent of the drop and count.
- ~~B.~~ All denominations of currency and all types of cash out tickets counted by the currency counter must be tested.
- ~~D.~~ The result of these tests must be documented and signed by the agent(s) performing the test.

~~IX.~~ Bill Acceptor Canister Contents Key Standards:

- ~~A.~~ The physical custody of the keys needed for accessing stored, full bill acceptor canister contents shall require the involvement of persons from two separate departments, with the exception of the count team.
- ~~B.~~ Access to the bill acceptor canister contents key at other than scheduled count times shall require the involvement of at least three persons from separate departments, one of whom must be a supervisor. The reason for access shall be documented with the signatures of all participants and observers.
- ~~C.~~ Only the count team members shall be allowed access to bill acceptor canister contents keys during the count process.

~~X.~~ Gaming Machine Bill Acceptor Count Standards:

- ~~A.~~ Surveillance shall be notified when the count is to begin.
- ~~B.~~ The gaming machine bill acceptor count shall be performed in a soft count room.
- ~~C.~~ Access to the count room during the count shall be restricted to members of the count team, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.
- ~~D.~~ If counts from various revenue centers occur simultaneously in the count room, procedures shall be in effect that prevent commingling of funds from different revenue centers.
- ~~E.~~ Entry into the computer for the recordation of drop proceeds shall be restricted and controlled in a manner to prevent manipulation of data by one or more count team members.

- F. ~~The bill acceptor canisters shall be individually emptied and counted in such a manner to prevent the commingling of funds between canisters until the count of the canister has been recorded.~~
 - 1. ~~A second count by the count team is not necessary if an on-line system is utilized.~~
 - 2. ~~In the event that there is a failure of the computer to record the bill in by machine, a second count shall be performed by an employee on the count team who did not perform the initial count.~~
- G. ~~If cash counters are utilized and the count room table is used only to empty canisters and to sort/stack contents, a count team member shall be able to observe the loading and unloading of all cash at the cash counter, including rejected cash.~~
- H. ~~At the beginning of the count, the cash counter shall be tested by running a predetermined amount of cash through each machine.~~
- I. ~~Canisters, when empty, shall be shown to another member of the count team, or to another person who is observing the count and to surveillance.~~
- J. ~~A count team member who shall not function as the sole recorder shall reconcile the count sheet to the total drop.~~
- K. ~~All members of the count team shall sign the count document or a summary report to attest to their participation in the count.~~
- L. ~~All drop proceeds and cash equivalents that were counted shall be turned over to the cage or vault cashier (who shall be independent of the count team) or to an authorized person/employee independent of the revenue generation and the count process for verification. Such person shall certify, by signature, as to the verification of the accuracy of the drop proceeds delivered and received.~~
- M. ~~A count team member or a person independent of the cashier's department shall deliver the count sheet, with all supporting documents, to the accounting department. Alternatively, it may be adequately secured (e.g. locked container to which only accounting personnel can gain access) until retrieved by the accounting department.~~
- N. ~~Access to stored bill acceptor canisters, full or empty, shall be restricted to:~~
 - 1. ~~Authorized members of the drop and count teams; and~~
 - 2. ~~Authorized personnel in an emergency for resolution of a problem.~~

TICS Section:	TICS for Casino Administration
TICS Part:	IX. Accounting Standards
Reason for Change:	To consolidate the Class II and Class III Internal Audit standards (NIGC 542.22, 542.32, 542.42 and 543.23) and to restructure the TICS section numbers with the proposed removal of sections titled: "Internal Audit Tier A", "Drop Tier C", "Count Tier C", and "Internal Audit Tier C" as a result of the consolidation.

IX. Accounting Standards:

- A. When establishing SICS, the gaming operation should review, and consider incorporating, other external standards such as GAAP, GAAS, and standards promulgated by GASB and FASB. In the event of a conflict between the MICS and the incorporated external standards, the external standards prevail.
- B. Controls must be established and procedures implemented to safeguard assets and ensure each gaming operation:
1. Prepares accurate, complete, legible, and permanent records of all transactions pertaining to gaming revenue and activities for operational accountability.
 2. Prepares general accounting records on a double-entry system of accounting, maintaining detailed, supporting, subsidiary records, and performs the following activities:
 - a. Record gaming activity transactions in an accounting system to identify and track all revenues, expenses, assets, liabilities, and equity;
 - b. Record all markers, IOU's, returned checks, held checks, or other similar credit instruments;
 - c. Record journal entries prepared by the gaming operation and by any independent accountants used;
 - d. Prepare income statements and balance sheets;
 - e. Prepare appropriate subsidiary ledgers to support the balance sheet;
 - f. Prepare, review, and maintain accurate financial statements;
 - g. Prepare transactions in accordance with the appropriate authorization, as provided by management;
 - h. Record transactions to facilitate proper recording of gaming revenue and fees, and to maintain accountability of assets;
 - i. Compare recorded accountability for assets to actual assets at periodic intervals, and take appropriate action with respect to any variances;
 - j. Segregate functions, duties, and responsibilities;
 - k. Prepare minimum bankroll calculations; and
 - l. Maintain and preserve all financial records and relevant supporting documentation.
- C. Controls must be established and procedures implemented to ensure that:
1. Internal auditor(s) perform audits of each department of a gaming operation, at least annually, to review compliance with TICS, SICS, and these MICS, which include at least the following areas:
 - a. Bingo, including supervision, bingo cards, bingo card sales, draw, prize payout; cash and equivalent controls, technologic aids to the play of bingo, operations, vouchers, and revenue audit procedures;
 - b. Pull tabs, including, supervision, pull tab inventory, pull tab sales, winning pull tabs, pull tab operating funds, statistical records, and revenue audit procedures;
 - c. Card games, including supervision, exchange or transfers, playing cards, shill funds, reconciliation of card room bank, posted rules, and promotional progressive pots and pools;
 - d. Table games, including, fill and credit procedures; location and control over sensitive keys; and tracing source documents to summarized documentation and accounting records and reconciliation to restricted copies.
 - e. Gaming Machines, including, jackpot payout and gaming machine fill procedures (if applicable); tracing of source documents to summarized documentation and accounting records; reconciliation to restricted copies; location and control over sensitive keys; and compliance with TICS procedures for gaming machines that accept currency or coin(s) and issue cash-out tickets or gaming machines that do not accept currency or coin(s) and do not return currency or coin(s);
 - df. Gaming promotions and player tracking procedures, including supervision, gaming promotion rules and player tracking systems;
 - eg. Complimentary services or items, including procedures for issuing, authorizing, redeeming, and reporting complimentary service items;

~~f. Gaming machines;~~

gh. Drop and count standards, including supervision, count room access, count team, card game drop standards, player interface and financial instrument drop standards, card game count standards, player interface financial instrument count standards, and controlled keys;

hi. Cage, vault, cash and cash equivalent procedures, including supervision, cash and cash equivalents, personal checks, cashier's checks, traveler's checks, payroll checks, and counter checks, cage and vault accountability, kiosks, patron deposited funds, promotional payouts, drawings, and giveaway programs, chip and token standards, and cage and vault access;

ij. Information technology, including supervision, ~~class II gaming systems'~~ logical and physical controls, independence, physical security, logical security, user controls, installations and/or modifications, remote access, incident monitoring and reporting, data back-ups, software downloads, and verifying downloads; and

k. Surveillance, including supervision, surveillance equipment and control room standards, surveillance over gaming machines, bingo, card games, table games; cage and vault, fills and credits, count room, kiosks, change booths, and surveillance logs;

jl. Accounting standards, including accounting records, maintenance and preservation of financial records and relevant supporting documentation; ~~and-~~

m. Any other internal audits as required by the Tribe, TGRA, audit committee or other entity designated by the Tribe.

2. Internal auditor(s) are independent of gaming operations with respect to the departments subject to audit (auditors internal to the operation, officers of the TGRA, or outside CPA firm may perform this function).
3. Internal auditor(s) report directly to the Tribe, TGRA, audit committee, or other entity designated by the Tribe.
4. Documentation such as checklists, programs, reports, etc. is prepared to evidence all internal audit work and follow-up performed as it relates to compliance with TICS, SICS, and these NIGC MICS, including all instances of noncompliance.
5. Audit reports are maintained and made available to the Commission upon request and must include the following information:
 - a. Audit objectives;
 - b. Audit procedures and scope;
 - c. Findings and conclusions;
 - d. Recommendations, if applicable; and
 - e. Management's response.
6. All material exceptions identified by internal audit work are investigated and resolved and the results are documented.
7. Internal audit findings are reported to management, responded to by management stating corrective measures to be taken, and included in the report delivered to management, the Tribe, TGRA, audit committee, or other entity designated by the Tribe for corrective action.
8. Follow-up observations and examinations is performed to verify that corrective action has been taken regarding all instances of non-compliance. The verification is performed within six (6) months following the date of notification of non-compliance.
9. Whenever possible, internal audit observations shall be performed on an unannounced basis (i.e. without the employees being forewarned that their activities will be observed).

D. Annual requirements:

1. Agreed upon procedures. A CPA must be engaged to perform an assessment to verify whether the gaming operation is in compliance with these NIGC MICS, and/or the TICS or SICS if they provide at least the same level of controls as the Class II MICS. The assessment must be performed in accordance with agreed upon procedures and the most recent versions of the Statements on Standards for Attestation Engagements and Agreed-Upon Procedures Engagements (collectively "SSAEs"), issued by the American Institute of Certified Public Accountants.
2. The tribe must submit two copies of the agreed-upon procedures report to the Commission within 120 days of the gaming operation's fiscal year end in conjunction with the submission of the annual financial audit report required pursuant to 25 CFR Part 571.
3. Review of internal audit.
 - a. The CPA must determine compliance by the gaming operation with the internal audit requirements in this paragraph (D) by:
 - i. Completing the internal audit checklist;

- ii. Ensuring that the internal auditor completed checklists for each gaming department of the operation;
 - iii. Verifying that any areas of non-compliance have been identified;
 - iv. Ensuring that audit reports are completed and include responses from management; and
 - v. Verifying that appropriate follow-up on audit findings has been conducted and necessary corrective measures have been taken to effectively mitigate the noted risks.
 - b. If the CPA determines that the internal audit procedures performed during the fiscal year have been properly completed, the CPA may rely on the work of the internal audit for the completion of the MICS checklists as they relate to the standards covered by this part.
4. Report format. The SSAEs are applicable to agreed-upon procedures engagements required in this part. All noted instances of noncompliance with the MICS and/or the TICS or SICS, if they provide the same level of controls as the MICS, must be documented in the report with a narrative description, the number of exceptions and sample size tested.