



***Nebraska Racing and
Gaming Commission
Minimum Internal
Control Standards***

**NEBRASKA RACING AND GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS
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**NEBRASKA RACING AND GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION A - GENERAL AND ADMINISTRATIVE

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I. **General**

- A. In addition to complying with these Minimum Internal Control Standards (MICS), Authorized Gaming Operators are required to comply with the Nebraska Racetrack Gaming Act and Nebraska Racing and Gaming Commission (NRGC) Adopted Rules.
- B. In addition to written procedures, flowcharts, although not required, may be included in the Internal Control Standards (ICS). Flowcharts must mirror the written procedures, however if there is a difference noted, the written procedures must be the procedures followed.
- C. These MICS include general names for positions and forms. Specific titles and form names must be included in the Authorized Gaming Operator's Internal Controls.
- D. Unless otherwise stated when the term "non-gaming employee" is used throughout these MICS, an approved "non-gaming employee" shall be a member of the accounting, food and beverage, valet, maintenance, housekeeping, hotel operations, retail, and gift shop departments, and other personnel as determined by the NRGC.
- E. The lowest job title of that department with the authority for that duty must be listed in the ICS procedures. Employees with higher authority within the same department may perform these duties, except where specifically noted in the ICS. When a higher job title of that department performs the duties of a lower job title of that department, they may not then perform verification of their own work.
- F. A lower job title may be assigned the job duties of a higher job title within the same department for the gaming day, provided that the assigned job title is within the same NRGC Occupational License Badge Level. An employee temporarily working in the higher job title may not perform verification of their own work. Once assigned to the higher job title, the employee cannot return to their lower job title for the rest of the gaming day. Any lower job title elevated to a supervisory job title cannot accept tips or gratuities while performing the job duties of the higher job title.
- G. Sensitive areas are those areas that management or the NRGC considers sensitive to the Authorized Gaming Operators' operation and therefore require strict control over access (e.g. pits, count rooms, cage, and surveillance rooms).

II. **Internal Control Standards**

The Internal Control Standards must include the following:

- A. Organizational charts for the Authorized Gaming Operators, from the Board of Directors (or equivalent) on down and for all gaming related departments including live games, electronic gaming devices, drop and count, casino cashiering and credit, internal audit, casino accounting, surveillance, security, marketing, purchasing and contract administration, admissions, and management information system;
- B. A detailed description of each position shown on the organizational charts which includes:
 - 1. Duties and responsibilities;
 - 2. Immediate supervisor;
 - 3. Positions directly supervised;

4. Signatory ability, including alternate procedures in cases in which the required signature is unable to perform his duty; and
 5. Access to sensitive assets and areas; and
- C. Type of training employees receive regarding the Nebraska Racetrack Gaming Act, NRGC Adopted Rules and the Authorized Gaming Operators’.
- D. Owners, Board of Directors or officers/executives must not have unaccompanied access to sensitive areas. If a reason exists for such person or persons to access a sensitive area, the NRGC Supervisor/Agent must be notified and give permission prior to access. Security must accompany such person or persons while in a sensitive area. Security must obtain prior NRGC approval before entering surveillance.

III. Signatures

- A. All handwritten signatures must include the employee's first name last name and their NRGC occupational license number.
- B. Electronic signature methods may be used if approved by the NRGC Executive Director. An electronic signature includes a non-handwritten unique means of identifying an individual based upon a system of administrative controls (such as passwords, personal identification codes, and/or bar codes) or biometrics (such as retinal scans, voice prints, hand prints and/or finger prints). An electronic signature must be the legally binding equivalent of a handwritten signature.
- C. If electronic signatures are used, the ICS must include a description of the electronic signature system and its configuration, including:
1. Procedures and controls designed to ensure the authenticity and integrity of electronic signatures and to ensure that the signer cannot readily repudiate the electronic signature as not genuine;
 2. The ability to generate complete copies of records with electronic signatures in readable format suitable for inspection, review, copying and printing; and
 3. Establishment of, and adherence to, written policies that hold individuals accountable and responsible for actions initiated under their electronic signature, in order to deter record and signature falsification.
- D. Electronic signatures that are not based upon biometrics must employ at least two distinct identification components such as an identification code and password and be used only by their genuine owners. Licensees who use electronic signatures based upon use of identification codes in combination with passwords must employ controls to ensure their security and integrity, including:
1. Maintaining the uniqueness of each combined identification code and password, such that no two individuals have the same combination of identification code and password;
 2. Ensuring that identification code and password issuances are periodically and properly checked, revised, and recalled (such as recall immediately after an employee's separation from employment);
 3. Following loss management procedures to electronically deactivate lost, stolen, missing or otherwise potentially compromised cards and other devices that bear or

- generate identification code or password information, and to issue temporary or permanent replacements using suitable, rigorous controls; and
4. Use of transaction safeguards to prevent unauthorized use of passwords and/or identification codes and detect and report in an immediate manner any attempts at their unauthorized use to system security.
- E. Documents that employ electronic signatures must contain information associated with the signing that clearly indicate all of the following:
1. The printed name of the signer as described in the ICS; and
 2. The date and time when the signature was executed.
- F. Electronic signatures and handwritten signatures executed to the electronic documents must be linked to their respective electronic documents to ensure that the signatures cannot be removed, copied or otherwise transferred so as to falsify an electronic document.

IV. **General Procedures for Promotional Coupons and Coupons for Complimentary Cash, Chips, or Electronic Credits**

The ICS must include the following:

- A. A statement that the details for each specific coupon distribution program must be submitted under separate cover to the NRG Executive Director for approval prior to implementation. The Commission will not pre-approve promotions but will audit operators to verify compliance with procedures for designing, implementing, and documenting procedures for promotions and must include the following information:
 1. The aggregate dollar value of promotional coupons, which include match play coupons, cash, chips or electronic credits authorized;
 2. The start and expiration dates of the program;
 3. Details regarding the issuance and controls over the issuance of coupons;
 4. Name of the direct mail house or outbound electronic mailing vendor or an indication that coupons will be printed in-house; and
 5. A sample of the coupon or outbound electronic coupon mailing.
- B. A statement that the NRG Executive Director and the NRG Supervisor/Agent must be notified in writing when any approved coupon program is discontinued prior to the expiration date.
- C. Procedures for ensuring the coupon mailing/distribution list does not include any person within 90 days of mailing on the NRG statewide voluntary self-exclusion list, the Authorized Gaming Operators property based self-exclusion list and the NRG's Board exclusion list.
- D. A statement that coupons may not be redeemed by mail.
- E. A statement that the NRG Supervisor/Agent must be notified immediately of an incident where a coupon is presented for redemption which the system indicates has already been redeemed or there is a coupon which is suspected to be counterfeit, tampered with or altered in any way.

- F. A statement of who is responsible for the review of the internal controls and security measures employed by the direct mail house or outbound electronic mailing vendor.

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I. **General**

- A. Sensitive keys are those keys that either management or the NRGC designates sensitive to the Authorized Gaming Operators' operation and therefore require strict control over storage, duplication, custody, issuance, and return. Sensitive key procedures may be automated and/or manual.
- B. If key rings are used, each key ring and each key on the ring must be individually identified on the key access list maintained at each sensitive keybox. The key ring must have physical control approved by NRGC preventing unauthorized removal of keys from the ring. Sensitive keys must not be passed on at shift change without documenting the exchange according to procedures approved by NRGC.
- C. The Operator Control Standard (ICS) must include the:
 - 1. Location of all sensitive key boxes and whether any of the boxes are portable or controlled by dual locks;
 - 2. Job titles which have authorized access to the sensitive key box key(s) and how the keys to the sensitive key boxes are issued and controlled;
 - 3. Sensitive key name, location, custodian and job titles authorized to sign out each sensitive key; and
 - 4. Location and custodian of duplicate sensitive keys.
- D. Each sensitive key box must be under surveillance coverage and have a clear, transparent door. Clear transparent doors are not required for duplicate sensitive keyboxes.

II. **Automated Key Control Systems**

- A. Automated key control systems must be approved by the NRGC.
- B. If an automated key control system is used, the ICS must include the following:
 - 1. A general description of the automated system and its configuration including how access is controlled, e.g. hand reader, fingerprint, retina scan, password or PIN, etc.;
 - 2. System capabilities to provide scheduled and on-demand reports for a complete audit trail of all access including the identity of the key box, identity of the employee, identity of the key(s), date and time out, date and time returned, as well as unauthorized attempts to access the key box (for non-biometric key control systems) and all entries, changes or deletions in the system and the employee who did so;
 - 3. Procedures to ensure the battery backup or equivalent for the automated key control system must be capable of maintaining accuracy of all information required for 48 hours;
 - 4. Job title in charge of any automated key control system;
 - 5. Job title(s) authorized to enter, modify and delete which keys/job titles are authorized for access;
 - 6. Procedures to ensure there are alarms for overdue keys, open doors, unauthorized attempts to access and any other unusual activities;
 - 7. System override procedures, if any;
 - 8. Immediate notification of an NRGC Supervisor/Agent in the event the automated key control system is not operational or loses power;
 - 9. Procedures to ensure all keys and individuals authorized to access keys in the

automated system are the same as the keys and individuals authorized on the key access list and in the individual employee's job description;

10. Procedures, if any, for the transfer of data from the key box to the computer monitoring system or a standalone system; and
11. Alternative procedures for obtaining sensitive keys if the automated key control system is not operational or loses power.

C. Automated key control systems must utilize a non-random key return.

D. If an automated key control system is used, sensitive keys must not be passed on at shift change.

III. **Sensitive Key Procedures**

A. Each sensitive key box custodian must be issued a key access list noting authorized job titles that may access each key.

B. Whenever two (2) sensitive keys are required to access a controlled area, the keys must be independently issued to different employees.

C. Sensitive keys which require issuance under security or management escort must be identified as such in the key access list.

D. Physical inventories of sensitive keys must be conducted quarterly to ensure that the physical count and the access list count match. The ICS must identify the employee responsible for conducting the physical inventories of sensitive keys.

E. The ICS must identify which management employee has the authority to make changes, deletions and/or additions to the key access list.

IV. **Key Access List**

A current key access list must be maintained at each sensitive key box and a copy given to the NRG Supervisor, which includes:

A. Name of the key and unique ID;

B. Location of the key;

C. Custodian of the key;

D. Quantity of the key(s);

E. Job titles authorized to obtain the key and, if applicable, escort requirements and specific limitations; and

F. Custodian of any duplicate keys.

V. **Manual Sensitive Key Log**

A. All sensitive keys and duplicate keys issued under a manual system will be issued after proper completion of a manual sensitive key log.

- B. Sensitive keys must be returned to the sensitive key box and signed-in by the same employee they were issued to. All controlled keys should be returned to location and checked back out so key logs will always have current custodian of keys listed.
- C. Completed manual sensitive key logs must be forwarded at specified intervals to the accounting department where they will be reviewed and retained.

VI. **Broken, Lost or Missing Keys**

- A. The ICS must identify those sensitive keys which if lost, missing or taken from the premises require immediate changing of the locks. If a key is taken off property, it must be reported to NREGC immediately. The Commission will determine when a rekey is necessary based on circumstances.
- B. Include procedures for the receipt, replacement and disposition of broken keys.
- C. Include procedures to be followed when a sensitive key is lost, missing or taken from the premises.
- D. Include procedures for investigating and reporting missing sensitive keys.

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I. Table Games General

- A. Authorized Gaming Operators and Gaming-Related Vendors shall submit the rules for playing any table games that the Authorized Gaming Operator wants to provide. Each table game, the rules of the game, and associated equipment shall be evaluated by the Commission for the following:
1. Conformance with industry standard rules;
 2. The object of the game and method of play, including what constitutes win, loss, or tie bets;
 3. Physical characteristics of the game, gaming equipment, and gaming table;
 4. Wagers and payout odds for each type of available wager;
 5. The applicable inspection procedures for any of the following required by the game:
 - i. Cards;
 - ii. Dice;
 - iii. Wheels and balls; or
 - iv. Manual and electronic devices used to operate, display the outcome, or monitor live games;
 6. For each game that uses cards, a description of the following:
 - i. Shuffling procedures;
 - ii. Card cutting procedures;
 - iii. Procedures for dealing and taking cards; and
 - iv. Burning cards;
 - v. Procedures for the collection of bets and payouts including requirements for internal revenue service purposes;
 - vi. Procedures for handling suspected cheating or irregularities and immediate notification of Commission gaming agent on duty;
 - vii. Procedures for immediate notification to the Commission gaming agent on duty when equipment is defective or malfunctioning;
 - viii. Procedures to describe irregularities of the game, including dice off the table and soiled cards; and
 - ix. Any other consideration that the Commission deems necessary, including fairness to patrons.
- B. The Commission may require the use of a certified independent testing laboratory to evaluate the proposed table game, its rules, and associated equipment. The cost of such testing shall be paid for by the Authorized Gaming Operator or Gaming-Related Vendor submitting the game for approval.
- C. The Commission may require a trial period to assess the functionality of the table game, rules of the game, and associated equipment in a live gaming environment. The conduct of the trial period shall be subject to compliance by the Authorized Gaming Operator and Gaming-Related Vendor with any conditions that may be required by the Commission, including duration of the trial.
- D. No Authorized Gaming Operator or Gaming-Related Vendor shall install a table game or associated equipment unless the table game, rules of the game, and associated equipment have been approved by the Commission for use at the Gaming Facility.

- E. An Authorized Gaming Operator may only offer Commission-approved table games for play and must operate the games according to the approved rules.
- F. Authorized Gaming Operators shall notify the Executive Director, or their designee in writing and receive written approval in accordance with its Commission-approved Internal Control Standards before installing, moving, or disposing of a table game or associated equipment that has been approved.
- G. Any modification to a table game or the associated equipment may be authorized by the Executive Director on an emergency basis to prevent cheating or malfunction. The emergency request shall be documented by the Authorized Gaming Operator in accordance with the Commission-approved Internal Control Standards.
- H. Each Authorized Gaming Operator shall notify the Commission's gaming agent on duty of any known or suspected defect or malfunction in any table game or associated equipment installed in the Gaming Facility at the time of detection. The Authorized Gaming Operator shall comply with any instructions from the Commission staff for the use of the table game or associated equipment.
- I. An Authorized Gaming Operator may only purchase or lease table games, table game mechanisms, table game layouts, chips, dice, and table game cards from licensed Gaming-Related Vendors.
- J. Transportation of all approved table game mechanisms, gaming chips, cards, dice and related table game equipment must comply with the Authorized Gaming Operator's Commission-approved Internal Control Standards.
- K. An Authorized Gaming Operator shall not:
 - 1. Permit the use of any table game or associated table game equipment that could have been marked, tampered with, or otherwise placed in a condition or operated in a manner that might affect the normal game play and its payouts;
 - 2. Permit known cheating;
 - 3. Permit any cheating device to remain in or upon any Gaming Facility;
 - 4. Conduct, carry on, operate, or deal any cheating or thieving game or device on the Gaming Facility premises;
 - 5. Permit any gambling device that alters the normal random selection of criteria that determines the results of the game or deceives the public in any way to remain in or upon any Gaming Facility; or
 - 6. Permit a patron to possess any calculator, computer, or other electronic, electrical, or mechanical device at any table game that meets any of the following conditions:
 - i. Assists in projecting the outcome of a game;
 - ii. Keeps track of cards that have been dealt;
 - iii. Keeps track of changing probabilities; or
 - iv. Keeps track of playing strategies being utilized, except as permitted by the Commission.
- L. No payoff schedule shall be worded in a manner that misleads the public.

- M. Each Authorized Gaming Operator shall prominently post a summary of the rules and payoff schedules on its website for each table game offered. A sign must be posted in the pit that indicates a copy of the rules and payoff schedules for any table game offered are available upon request by a patron.

II **Mandatory Table Game Procedures**

- A. Each Authorized Gaming Operator's Commission-approved Internal Control Standards shall establish the times when drop boxes will be removed and the contents counted. The removal and counting of contents at other than the designated times shall be prohibited, unless the Authorized Gaming Operator provides advance written notice to the Commission's gaming agent on site of a change in times or the Commission requires a change of authorized times.
- B. Each Authorized Gaming Operator's Commission-approved Internal Control Standards shall establish procedures for the opening and closing of table games. Such procedures shall include, but not be limited to, procedures for reconciling instances when counted inventory differs from the amount recorded on the opener and shall include the name of the table games supervisor or table games manager preparing a table games variance slip, the signatures required, distribution of each part of the form, and the assurance that one part is deposited in the drop box. Each variance of one hundred dollars or more at any table shall be reported immediately by the table games supervisor or table games manager to a Commission gaming agent on duty.
- C. If applicable, each Authorized Gaming Operator shall include in its Commission-approved Internal Control Standards, procedures for identifying the positions that have authority to initiate fills, credits, or enter related data into the Authorized Gaming Operator's automated table system.
- D. Each Authorized Gaming Operator shall include in its Commission-approved Internal Control Standards, procedures allowing for the table game fills and credits to be processed when the primary automated system is unavailable.
- E. All minimum and maximum wagers shall be posted at each table and may be changed between games by posting new table limits.
- F. If the minimum or maximum wager is changed, the sign shall be changed to reflect the new amount. An Authorized Gaming Operator may allow the following bets during a table limit change:
1. Patrons who were playing when minimum table limits were raised may continue to place bets under the old table minimum limit; and
 2. Patrons who were playing when a maximum table limit was lowered may be allowed to continue placing bets under the previous table maximum bet.
- G. Payment on wagers that cannot be made evenly shall be rounded up to the next chip denomination.
- H. A patron may aggregate current bets to satisfy a table game minimum unless the Authorized Gaming Operator posts that aggregation is not permitted.

- I. Unless otherwise approved by the Commission, casino operators shall not accept wagers from anyone other than an individual wagering from a recognized table position.
- J. Each dealer and each box person shall clear that individual's hands in view of all persons in the immediate area and surveillance before and after touching that individual's body and when entering and exiting the game. "Clearing" one's hands shall mean holding and placing both hands out in front of the body with the fingers of both hands spread and rotating the hands to expose both the palms and the backs of the hands to demonstrate that the hands are empty.

III **Table Game Pit Areas and Supervision**

- A. Pit areas may be on multiple levels or locations within a Gaming Facility. Pit areas shall be described by Authorized Gaming Operators in their Commission-approved Internal Control Standards at a minimum by their locations, configurations, and restrictions on access.
- B. Each Authorized Gaming Operator shall maintain staffing of table games supervisors or similar positions as approved by the Executive Director.
- C. The table games supervisors and the oversight of their assigned table games and pit operations shall be directly supervised by either a table games manager or casino shift manager.
- D. The casino shift manager shall assign table games managers specific responsibilities regarding activities associated with specific tables.

VI **Disposal of Live Gaming Devices and Other Gaming Equipment**

- A. The Authorized Gaming Operators' must notify the NRGC Executive Director and the NRGC Supervisor in writing and receive written approval from the NRGC Executive Director prior to disposing of or removing from the premises Live Gaming Devices.
- B. The Authorized Gaming Operators' must notify the NRGC Supervisor in writing and receive written approval from the NRGC Supervisor prior to disposing of or removing from the premises other Gaming Equipment.

V **Table Inventory**

- A. Chips and tokens must only be added or removed from the table inventory:
 - 1. In exchange for cash or vouchers presented by the patron;
 - 2. For payment of winning wagers or collection of losing wagers made at the table;
 - 3. Through table fill and credit procedures;
 - 4. In exchange with patrons for gaming chips of equal value; and
 - 5. Through alternative means which must be detailed in the ICS and approved by the Executive Director.
- B. The transfer or exchange of chips, tokens and/or currency between table games must be strictly prohibited.

- C. Table inventories must be maintained in trays, which are covered with a transparent, locking lid when the tables are closed. The information on the table inventory slip must be placed inside the transparent locking lid and be visible from the outside of the cover.
- D. The table inventory slip must be at least a two-part form, one is the "opener" and the other is the "closer". Include the sequence of the required signatures and the distribution of each part of the form.

VI **Opening of Gaming Tables**

- A. Immediately prior to opening the table for gaming and in the presence of the dealer assigned to the table, a live games supervisor must unlock the transparent table tray lids.
- B. The dealer must count the chips and tokens by denomination in the presence of a live games supervisor and agree the count to the "opener" removed from the table tray.
- C. Signatures attesting to the accuracy of the information are recorded on the "opener" by the dealer and the live games supervisor.
- D. Once signed, the dealer must immediately deposit the "opener" into the drop box attached to the gaming table.
- E. Include procedures followed when the counted inventory differs from the amount recorded on the "opener". These must include the live games supervisor preparing a table error form, the signatures required and distribution of each part of the form and ensuring that one part is deposited in the drop box.

VII **Shift Change at Gaming Tables**

Authorized Gaming Operators' that elect to perform a table inventory and drop at shift change must include shift change procedures, ensuring that the live games drop and closing of gaming table MICS are followed.

VIII **Closing of Gaming Tables**

- A. When a gaming table is closed, chips and tokens remaining at the table must be counted by the dealer and verified by the live games supervisor.
- B. A table inventory slip must be prepared.
- C. After the table inventory slip is signed by the dealer and live games supervisor, the dealer must immediately deposit the "closer" in the drop box.
- D. The live games supervisor must place the "opener" on the table tray in a manner that the amounts on the "opener" may be read through the cover and lock the transparent table tray lid in place.

IX **During 24-Hour Gaming**

During 24-hour gaming, a table inventory "closer" must be prepared to coincide with the table drop for that gaming day. All activity at the table must be temporarily ceased to allow sufficient time to accurately count the table inventory.

X **Table Fills**

- A. A live games supervisor at the pit must initiate the request for fill process. Include the steps followed for the request process.
- B. The ability to input data into the casino system from the pit is restricted to live games supervisors and pit clerks.
- C. Table fill slips, which are at least three-part forms, must be generated at the casino cage. Include the steps followed for the table fill slip preparation and verification.
- D. The cashier must prepare, verify, and dispatch the fill in a chip carrier and the table fill slip to the appropriate table via security who verifies the fill prior to transportation.
- E. Include the sequence of the required signatures and the distribution of each part of the table fill slip, ensuring that one part stays in the casino cage, and after all required signatures are obtained one part is dropped in the drop box by the dealer
- F. The chips are broken down and counted by the dealer in the presence of the live games supervisor and security before they are placed in the table tray.

XI. **Table Credits**

- A. A live games supervisor must initiate the request for credit. Table credit is initiated with the return of chips from a table to the cage and must include the steps followed for the request for credit, ensuring that the chips removed are documented on a table credit slip.
- B. Table credit slips must be at least a three-part form and are generated at the casino cage. Include the steps followed for preparation of the table credit slip, including the verification of the credit, sequence of the required signatures and the distribution of each part of the form. Ensure that one part stays on the table until the transaction is completed. After all required signatures are obtained, one part is returned to the casino cage and one part is dropped in the drop box by the dealer.
- C. The dealer must break down and count the credit in view of the live games supervisor and place it in a chip carrier for transfer to the casino cage by security.

XII **Accepting Cash at Gaming Tables**

- A. Cash and/or vouchers must not be used as a wager.
- B. The purchase of chips may only be permitted at a gaming table or a casino cage.
- C. Foreign currency must not be accepted at gaming tables.
- D. Whenever cash is presented by a patron at a gaming table for exchange for chips, the dealer must:
 - 1. Spread the cash on top of the gaming table in full view of the patron who presented it;
 - 2. Verbalize the amount of cash in a tone of voice calculated to be heard by the patron

- who presented the cash and a live games supervisor; and
3. Break down and count an equivalent amount of chips or tokens for the patron. Promptly place the cash or appropriate copy of the marker into the drop box attached to the gaming table.

XIII **Promotional Coupons**

- A. The ICS procedures for promotional coupons, which include match play coupons, must include:
 1. Details for printing coupons in-house or the receipt of coupons from an outside vendor and the inventory, storage, and distribution of the coupons, including the completion of a coupon inventory log; and/or
 2. A statement that the printing of and distribution of coupons will be completed by a direct mail house or outbound electronic mailing vendor.

- B. Match play coupons must be presented at a table game along with a matching wager of value chip(s). Match play coupons will only be accepted at a table game. Match play coupons must clearly state the terms and conditions for use and have the following attributes:
 1. Be designed and printed so that the denomination and type of coupon is clearly visible from the surveillance system;
 2. Include the casino and/or Authorized Gaming Operators' name;
 3. Clearly state the face value and amount of the required minimum matching wager;
 4. Clearly state that the match play coupon has no cash value;
 5. Contain an area designated for the placement of the required gaming chip wager, which must not obscure the visibility of the type and denomination of the coupon;
 6. Contain a unique validation number if distributed by a direct mail house or outbound electronic mailing vendor or be sequentially numbered if distributed in-house;
 7. Include the start and expiration dates of the program; and
 8. Include any limitation to specific table games and/or wagers.

- C. Include procedures for what occurs when a match play coupon and chip(s) are presented at an authorized gaming table, including:
 1. A listing of the live games and specific bets (if applicable) where match play coupons will be accepted;
 2. A statement that the match play coupon must be placed underneath the gaming chip(s) wagered by the patron in the appropriate betting area of the gaming table;
 3. Procedures for what happens when the amount of chips wagered is less than the stated value of the match play coupon;
 4. A statement that only one match play coupon may be used with a wager;
 5. A statement that winning wagers must be paid as if the coupon was a value chip;
 6. A statement that in the event of a tie or push, the match play coupon is not affected and is returned to the patron; and
 7. A statement that once the dealer settles a winning or losing wager, the dealer must immediately deposit the match play coupon into the drop box attached to the gaming table.

- D. Promotional coupons must be presented at a table game. Promotional coupons will only be accepted at a table game. Promotional coupons must clearly state the terms and conditions for use and have the following attributes:
1. Be designed and printed so that the denomination and type of coupon is clearly visible from the surveillance system;
 2. Include the casino and/or Authorized Gaming Operators' name;
 3. Clearly state the face value;
 4. Clearly state that the promotional coupon has no cash value;
 5. Contain a unique validation number if distributed by a direct mail house or outbound electronic mailing vendor or be sequentially numbered if distributed in-house;
 6. Include the start and expiration dates of the program; and
 7. Include any limitation to specific table games and/or wagers
- E. Include procedures for what occurs when a promotional coupon is presented at an authorized gaming table, including:
1. A listing of the live games and specific bets (if applicable) where promotional coupons will be accepted;
 2. A statement that winning wagers must be paid as if the coupon was a value chip;
 3. A statement that in the event of a tie or push, the promotional coupon is not affected and is returned to the patron; and
 4. A statement that once the dealer settles a winning or losing wager, the dealer must immediately deposit the coupon into the drop box attached to the gaming table
- F. Include procedures for canceling, counting, recording, verifying, and auditing coupons. Ensure that coupons are included in the computation of Adjusted Gross Receipts for table games.
- G. Include procedures for issuing replacement coupons, if applicable.

XIV **Card and Dice.**

- A. The Authorized Gaming Operator's Commission-approved Internal Control Standards shall contain procedures for:
- B. The receipt, storage and use of cards and dice;
- C. The inventorying of cards and dice;
- D. The transportation of cards and dice;
- E. The inspection of cards and dice before put into use;
- F. The cancellation of cards and dice; and
- G. Any other accounting, security, or surveillance procedures deemed necessary by the Executive Director.

XV Cards and Dice Specifications

- A. Unless otherwise approved by the NRGCC, all playing cards utilized by an Authorized Gaming Operator shall comply with all of the following specifications:
1. All decks of cards shall be one complete standard deck of 52 cards in four suits. The four suits shall be hearts, diamonds, clubs, and spades. Each suit shall consist of all the following numerical cards:
 - i. Two to 10.
 - ii. A jack.
 - iii. A queen.
 - iv. A king.
 - v. An ace.
 2. The backs of each card in a deck shall be identical and no card shall contain any marking, symbol, or design that will enable an individual to know the identity of any element printed on the face of the card or that will differentiate the back of that card from any other card in the deck.
 3. All edges shall be perfectly square with each side at a precise 90-degree angle to each adjacent side of the card.
 4. The radius of all four corners shall be exactly the same.
 5. All new card decks shall arrive wrapped in cellophane, shrink wrap packaging, or with a tamper-resistant security seal.
 6. The card supplier's identification name shall be placed on each box.
- B. Unless otherwise approved by the NRGCC, all dice utilized by an Authorized Gaming Operator shall comply with all of the following specifications:
1. Each die shall be formed in the shape of a perfect cube and of a size no smaller than 0.750 inches on each side nor larger than 0.775 inches on each side.
 2. Each die shall be transparent and made exclusively of cellulose, except for the following:
 - i. Spots.
 - ii. Name, trade name, or logo of the Authorized Gaming Operator.
 - iii. Serial number or letters, or both.
 3. The surface of each side of the die shall be perfectly flat and the spots contained in each side of the die shall be perfectly flush with the area surrounding the spots.
 4. The edges and corners of each die shall be perfectly square and form 90-degree angles with each adjacent side.
 5. The texture and finish of each side shall be identical to the texture and finish of all other sides.
 6. The weight of each die shall be equally distributed throughout the cube, and no side of the cube may be heavier or lighter than any other side of the cube.
 7. Each die shall have six sides bearing white circular spots from one to six, respectively, with the diameter of each spot equal to the diameter of every other spot on the die.
 8. Each die shall have spots arranged so that all the following provisions are satisfied:
 - i. The side containing one spot is directly opposite the side containing six spots.
 - ii. The side containing two spots is directly opposite the side containing five spots.

- iii. The side containing three spots is directly opposite the side containing four spots.
- 9. Each spot shall be placed on the die by drilling, or the equivalent, into the surface of the cube and filling the drilled-out portion with a compound that is equal in weight to the weight of the cellulose drilled out and that forms a permanent bond with the cellulose cube.

XVI Cards and Dice Control

- A. When cards and dice are received from the supplier, the packages are inspected for quantity and obvious damage by at least two employees from different departments. Prior to the opening, the NRGC must be notified of any shipment. The cards and dice must be recorded in the card/dice inventory ledgers. Any deviation between invoice/packing list amount and/or any defects found must be promptly reported to the NRGC Executive Director and the NRGC Supervisor/Agent.
- B. Describe the procedures for issuing cards and dice.
- C. Describe the procedures for control and maintenance of card and dice inventories, including who maintains the inventory ledger.
- D. Authorized Gaming Operators' must remove any cards or dice if there is any indication of tampering, flaws, scratches, marks, or other defects that might affect the integrity of the game. The NRGC Supervisor/Agent must be immediately notified of the removal. Cards and dice must be removed at the request of the NRGC.
- E. Describe the procedures for the pick-up of used cards and dice, including the preparation of the card and dice pick-up and cancellation log.
- F. Include procedures for inspecting used cards and dice, ensuring that the NRGC Supervisor/Agent is notified immediately, along with a security incident report to follow, of any flaws, suspect or missing cards and dice which are noted.
- G. Describe the procedures for canceling cards and dice ensuring they are cut, notched, drilled, or destroyed.

**XVII Chips
Chip Specifications**

- A. Authorized Gaming Operators may use both value and non-value chips.
- B. Each value and non-value chip shall be designed, manufactured, and constructed so as to prevent counterfeiting.
- C. Each value and non-value chip shall have its center portion impressed, engraved, imprinted, or inlaid with the name of the Gaming Facility that is issuing the chip.
- D. Each value chip issued by a casino operator shall have the following characteristics:
 - 1. Be round;

2. Have its center portion impressed, engraved, imprinted, or inlaid with the value of the chip;
 3. Have, at least on one side of the chip, the name of the city or other locality and the state in which the Gaming Facility is located and either the manufacturer's name or a distinctive logo or other mark identifying the manufacturer;
 4. Utilize a different center shape for each denomination; and
 5. Be designed so that the specific denomination of a chip can be determined on surveillance camera monitors when placed in a stack of chips of other denominations.
 6. Unless otherwise authorized by the Executive Director, value chips may be issued by Authorized Gaming Operators in denominations of one dollar, two dollars and fifty cents, five dollars, twenty dollars, twenty-five dollars, one hundred dollars, five hundred dollars, one thousand dollars, five thousand dollars, ten thousand dollars, and twenty-five thousand dollars. Each Authorized Gaming Operator shall have the discretion to determine the denominations to be utilized at its Gaming Facility and the amount of each denomination necessary for the conduct of gaming operations.
- E. Unless otherwise authorized by the Executive Director, value chips worth equal to or less than five hundred dollars shall have a diameter of thirty-nine millimeters, and value chips worth greater than five hundred dollars shall have a diameter of forty three millimeters.
- F. Each denomination of value chip shall have a different primary color from every other denomination of value chip. Unless otherwise approved by the Executive Director, value chips shall have the colors specified in this paragraph when the chips are viewed both in daylight and under artificial light. In conjunction with these primary colors, each shall utilize contrasting secondary colors for the edge spots on each denomination of value chip. Unless otherwise approved by the Executive Director, no Authorized Gaming Operator shall use a secondary color on a specific denomination of chip identical to the secondary color used by another Gaming Facility in this state on that same denomination of value chip. The primary color to be utilized by each Gaming Facility for each denomination of value chip shall be as follows:
1. For one dollar, white;
 2. For two dollars and fifty cents, pink;
 3. For five dollars, red;
 4. For twenty dollars, yellow;
 5. For twenty-five dollars, green;
 6. For one hundred dollars, black;
 7. For five hundred dollars, purple;
 8. For one thousand dollars, fire orange;
 9. For five thousand dollars, grey;
 10. For ten thousand dollars, burgundy; and
 11. For twenty-five thousand dollars, blue.
- G. Each non-value chip utilized by a casino operator for roulette shall meet the following conditions:
1. Contain a design, insert, or symbol differentiating it from the non-value chips being used at every other roulette table in the Gaming Facility; and

2. Have "Roulette" impressed on it.
 3. Non-value chips issued at a roulette table shall be used only for gaming at that table and shall not be redeemed or exchanged at any other location in the Gaming Facility. When so presented, the dealer at the issuing table shall exchange these chips for an equivalent amount of value chips.
- H. Authorized Gaming Operators may request approval from the Executive Director for the use of special occasion, limited edition, promotional, and tournament chips. Approval must be granted in writing and may contain terms and conditions for use, including an expiration date for the use of the chips.
- I. No Authorized Gaming Operator or its employees shall allow any patron to remove non-value chips from the roulette table from which the chips were issued.
- J. No person at a roulette table shall be issued or permitted to wager with non-value chips that are identical in color and design to value chips or to non-value chips being used by another person at the same table. When a patron purchases non-value chips, a non-value chip of the same color shall be placed in a slot or receptacle attached to the outer rim of the roulette wheel. At that time, a sign denoting the value of a stack of twenty chips of that color shall be placed in the slot or receptacle.
- K. Each Authorized Gaming Operator shall have the discretion to permit, limit, or prohibit the use of value chips in wagering at roulette. Each Authorized Gaming Operator shall be responsible for keeping an accurate account of the wagers being made at roulette with value chips so that the wagers made by one player are not confused with those made by another player at the table.

XVIII Submission of Chips for Review and Approval.

- A. Authorized Gaming Operators shall submit a sample of each denomination of value chips and non-value chips to the Executive Director for approval. No Authorized Gaming Operator shall utilize these chips for gaming purposes until approved in writing by the Executive Director.
- B. In requesting approval of any chips, a casino operator shall submit to the Commission a detailed schematic of its proposed chips and a sample chip. The detailed schematic shall show the front, back, and edge of each denomination of value chip and each non-value chip and the design and wording to be contained on the chip. If the design schematics or chip is approved by the Executive Director, no value chip or non-value chip shall be issued or utilized unless a sample of each denomination of value chip and each color of non-value chip is also submitted to and approved by the Executive Director.

XIX Primary and Secondary Sets of Gaming Chips.

- A. Unless otherwise authorized by the Executive Director, each Authorized Gaming Operator shall have a primary set of value chips, and a separate secondary set of value chips which shall conform to the color and design specifications set forth in this chapter. Authorized Gaming Operators may use non-value chips for roulette or certain player against player contests.

- B. The secondary set of value chips shall have different secondary colors than the primary set for all denominations of twenty-five dollars and higher.
- C. An Authorized Gaming Operator shall remove a set of value or non-value chips from active play if any one of the following conditions are met:
 - 1. A determination is made by the Authorized Gaming Operator that the Gaming Facility is receiving a significant number of counterfeit chips;
 - 2. Any impropriety or defect in the utilization of a set of value or non-value chips makes removal of the set necessary; or
 - 3. The Executive Director orders the removal of any set of chips.
- D. An approved secondary set of value chips shall be placed into active play when the primary set of value chips is removed.
- E. If a set of non-value chips is removed it must be replaced with a different set of approved non-value chips or the game must be closed for play.
- F. Authorized Gaming Operators shall promptly notify a Commission gaming agent when a counterfeit chip is discovered and shall deliver the counterfeit chip to the Commission gaming agent.

XX Exchanging Chips.

- A. Chips shall only be issued to a patron and only at the request of that patron.
- B. Chips shall only be issued at cashiers' cages, live table games, and any other location approved by the Executive Director.
- C. Chips shall only be redeemed at cashiers' cages and any other location approved by the Executive Director.
- D. Chips shall only be redeemed for cash, digital currency, or check dated the day of the redemption, except when the chips were obtained or used unlawfully.
- E. Any Authorized Gaming Operator may demand the redemption of its chips from any person in possession of them.
- F. An Authorized Gaming Operator 's Internal Control Standards shall detail the procedure for the redemption or exchange of gaming chips from other Gaming Facilities, including the logging of the foreign chip exchanges.
- G. Authorized Gaming Operators shall not allow patrons to wager, exchange, use, or redeem gaming chips issued by another Gaming Facility unless the Authorized Gaming Operator's Internal Control Standards detail a procedure for doing so.

XXI Chip Inventory Procedures.

- A. All value chip and non-value chip movements to and from the main chip inventory, reserve chip inventory, and secondary chip inventory shall be documented in the chip inventory ledger, including the following:

1. Chips as they are received from the manufacturer;
 2. Chips moved between the main inventory, reserve inventory, or secondary inventory; and
 3. Chips permanently removed from inventory for destruction or retirement.
- B. Chip movements into, between, or out of inventories shall be conducted in the presence of at least two licensed employees from different departments. The denominations, number, and amount of chips taken or returned shall be recorded in the chip inventory ledger, together with the date and signatures of the two licensed employees carrying out this process.
- C. The Authorized Gaming Operator's accounting department shall monthly complete a physical inventory count of all chips at the Gaming Facility and record the results in the chip inventory ledger. Each employee who inspected and counted the chips shall sign either the inventory ledger or other supporting documentation.
- D. The Authorized Gaming Operator's accounting department shall then compute and record the unredeemed liability for each denomination of chips and record the result in the chip inventory ledger.
- E. The procedures to be utilized to compute the unredeemed liability and to inventory chips shall be submitted in the Internal Control Standards to the Commission for approval.
- F. The physical inventory of chips in the secondary and reserve inventories shall only be required annually if the inventory procedures incorporate a Commission-sealed, locked storage compartment. Seals shall be removed only by a Commission agent, with each violation of this requirement reported upon discovery to a Commission gaming agent on duty.
- G. All chips in the possession of the Authorized Gaming Operator shall be stored in the chip bank, vault, or locked compartment in a cashier's cage, except that chips may be locked in a transparent compartment on closed gaming tables or kept in the open compartment on open gaming tables.
- H. Damaged chips must not be used and shall be stored until they can be removed from inventory and destroyed.

XXII

Destruction of Chips.

- A. Authorized Gaming Operators may, with the approval of the Commission, destroy chips that have been removed from inventory according to the requirements of this chapter.
- B. At least seven days before the anticipated destruction of chips, an Authorized Gaming Operator shall notify the Commission in writing of the following:
1. The date on which and the location at which the destruction will be performed;
 2. The denomination of the chips to be destroyed;
 3. The number and amount of value chips to be destroyed;
 4. The description and number of non-value chips to be destroyed; and

5. A detailed explanation of the method of destruction.
- C. The Gaming Facility's surveillance staff and a Commission gaming agent shall be notified before the commencement of destruction.
 - D. The destruction of chips shall occur in a room monitored by surveillance for the duration of destruction.

XXIII **Control Over Table Layouts**

- A. All table game layouts shall be meet the following requirements:
 1. Markings on the layout shall be of a size that can be adequately seen by the surveillance;
 2. The odds of winnings and payouts shall be included in markings on the layout when required by the Executive Director;
 3. The designs shall not contain any feature that tends to create a distraction from the game;
 4. All other components of the game on the layout shall be of a size that can be adequately seen by surveillance; and
 5. A colored depiction of the table shall be submitted to the Executive Director for approval before being placed into play.
- B. Prior to table layouts being received the NRCG must be notified.
- C. When table layouts are received from the supplier, they must be inspected for quantity and obvious damage by at least two employees from different departments. The layouts must be recorded in the table layout inventory ledger by game type. Any deviation between the invoice/packing list amount and/or any defects found must be promptly reported to the NRCG Executive Director and the NRCG Supervisor/Agent.
- D. Include the procedures for control over table layouts, including who maintains the table layout inventory ledger.
- E. Include the procedures for obtaining approval from the NRCG Supervisor and notifying the NRCG Supervisor prior to removal and destruction of table layouts. Include the method of destruction.

XXIV **Statistics**

- A. Records must be maintained reflecting statistical drop, statistical win, and statistical win to drop percentage for each gaming table and type of game. These records must be maintained by day, cumulative month-to-date, and cumulative year-to-date.
- B. Statistical reports must be distributed to casino management above pit level personnel on at least a monthly basis. Unusual fluctuations as defined by casino management in the ICS must be investigated and the results must be documented in writing, retained and a copy given to the NRCG Supervisor.
- C. Each day a report must be given to the NRCG Supervisor of daily table game drop, win/loss, and percentage win/loss. In addition, if casino management has prepared an analysis of

specific table wins or loses or unusual fluctuations, such reports must also be given to the NRCG Supervisor.

XXV

Payout for Progressive Table Games.

Each table game that includes progressive manual payouts shall have a progressive meter visible to patrons. Table games where a “hidden meter” increments as a result of wagers must display signage in the immediate area of the game in public view to explain the existence of a “hidden meter” for funding a secondary jackpot.

**NEBRASKA RACING AND GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION D - RULES OF THE GAME

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I. **General**

Detailed procedures for each game that the Authorized Gaming Operator implements must be included in the ICS, ensuring that the following controls are addressed:

- A. For each game, include the possible maximum number of concurrent players;
- B. Object of the game and method of play including what constitutes win, loss, or tie bets;
- C. Physical characteristics of the game, gaming equipment and gaming table;
- D. Wagers and payout odds for each type of available wager:
 - 1. Describe the permissible wagers and payout odds;
 - 2. Minimum and maximum wagers must be posted on a sign at each table; and
 - 3. Maximum table payouts, if any, must be posted at each table and must not be less than the maximum bet times the maximum odds.
- E. For each game that uses the following, describe inspection procedures for:
 - 1. Cards;
 - 2. Dice;
 - 3. Wheels and balls;
 - 4. Manual and electronic devices used to operate, display the outcome, or monitor live games; and
 - 5. Cards or punchboards.
- F. For each game that uses cards describe:
 - 1. Shuffling procedures;
 - 2. Card cutting procedures;
 - 3. Procedures for dealing and taking cards; and
 - 4. Burning cards.
- G. For the game of roulette, ensure the dealing procedures include statements that the dealer:
 - 1. Must not speed up or slow down the roulette wheel when the ball is spinning; and
 - 2. Must look away from the roulette wheel before spinning the ball.
- H. Describe procedures for the collection of bets and payouts;
- I. Describe procedures for dispute arbitration including documenting disputes. A copy of these reports must be given to the NRGC Supervisor;
- J. Describe procedures for handling suspected cheating or irregularities and immediate notification of the NRGC Supervisor/Agent;
- K. Describe procedures for dealers being relieved; and
- L. Provide procedures for immediate notification to the NRGC Supervisor/Agent when equipment is suspected to be defective or malfunctioning.

II. **Tournaments, Enhanced Payouts and Give-aways**

Each tournament, enhanced payout and give-away game will entail a different set of rules and conditions, which must be submitted under separate cover to the NRGC Executive Director for approval prior to implementation.

III. **Patron Charging Stations for Electronic Devices**

The ICS must include a statement that the Authorized Gaming Operator must notify the NRGC Supervisor in writing and receive written approval from the NRGC Supervisor of the exact location of each patron charging station for electronic devices prior to the installation or movement of any patron charging station.

**NEBRASKA RACING AND GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

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I. **General**

- A. All EGDs must comply with the NRGC Adopted Rules.
- B. All access to EGDs must be documented on an EGD/machine entry access log, which must be kept inside the EGD at all times.
- C. Changes to the EGD Computer Monitoring System or programs must be tested by the Authorized Gaming Operator prior to implementation. The NRGC Supervisor must be notified prior to the implementation of such changes.
- D. The ICS must include detailed procedures to ensure that all EGDs linked to progressive jackpot systems comply with the NRGC Adopted Rules. The Authorized Gaming Operator must notify the NRGC Executive Director and NRGC Supervisor in writing, of the progressive increment rate allocation, and receive written approval from the NRGC Executive Director or their designee prior to modification.
- E. There must be procedures to permit the recovery of the RAM of EGDs for forensic analysis. Such recovery techniques must be satisfactory to the NRGC. Any deviation from this standard must be approved in writing by the NRGC Executive Director.

II. **EGD Hand-Paid Payouts (Jackpot Payouts and Cancelled Credit Payouts)**

- A. The following requirements for all single event jackpots and credit meter payouts shall apply:

Jackpot Amount	Payer	*Witness/Verifier	W-2G required	NRGC notification required	NRGC Security Seal Verification	Surveillance notification required	Security escort required
Less than \$1,200	Slot Attendant or higher	Security, Slot Technician or higher, Casino Managers, Directors/VP	no	no	no	no	no
\$1,200 – 9,999.99	Slot Attendant or higher	Security, Slot Technician or higher, Casino Managers, Directors/VP	yes	no	no	yes	no
\$10,000 – \$14,999.99	Slot Attendant or higher	Slot Floor Supervisor or Supervisor thereof	yes	no	no	yes	yes

\$15,000– \$49,999.99	Slot Floor Supervisor or Supervisor thereof	Employee of Supervisory or higher status independent of the Slot Department	yes	yes, must approve clearing the reel position	yes	yes	yes
\$50,000 or more	Slot Floor Supervisor or Supervisor thereof	Employee of Supervisory or higher status independent of the Slot Department	yes	yes, must approve clearing the reel position	yes, and NRGCCPSD verification	yes	yes

- B. Describe the steps followed for a request for an EGD hand-paid payout, including the procedures for when the payout originates at the cage. The initiation of an EGD hand-paid payout must be described in the Authorized Gaming Operator’s ICS
- C. Surveillance must be notified prior to an EGD hand-paid payout.
- D. EGD Hand-paid payout forms must be at least a two-part form and must contain the following signatures:
1. Signature of the EGD employee making the payment; and
 2. Signature of at least one other licensed employee attesting to the accuracy of the form.
- E. Include the steps followed for the EGD hand-paid payout form preparation (paid from the cage, , or dispensed by a Jackpot Kiosk), sequence of required signatures and distribution of each part of the form.
1. If the payout is initially paid from the casino cage, ensure that one part of the EGD hand-paid payout form remains in the casino cage, and one part accompanies the payout to the patron.
- F. Include signature requirements for different payout amounts.
- G. The EGD hand-paid payout must be made by an EGD employee and/or witnessed and verified by a other licensed employee who is independent of the transaction as follows:
1. If the EGD hand-paid payout is less than or equal to \$2,000.00, only the EGD employee making the payout is required to witness and verify the transaction;
 2. If the EGD hand-paid payout it greater than \$2,000.00, the payout must be witnessed and verified by a other licensed employee who is independent of the transaction; and
 3. If the Authorized Gaming Operator’s Monitoring and Control System are not fully operational, the payout must be witnessed and verified by a other licensed employee who is independent of the transaction.
- H. Include procedures when an override or adjustment is required for an EGD hand-paid payout.

- I. Include procedures for clearing the winning reel positions or video display from the EGD:
 1. If the EGD hand-paid payout is less than or equal to \$2,000.00, only the EGD employee is required to witness the clearing of the winning reel positions or video display from the EGD;
 2. If the EGD hand-paid payout is greater than \$2,000.00, the clearing of the winning reel positions or video display from the EGD must be witnessed by a other licensed employee who is independent of the transaction; and
 3. If the Authorized Gaming Operator's Monitoring and Control System are not fully operational, the clearing of the winning reel positions or video display from the EGD must be witnessed by a other licensed employee who is independent of the transaction.
- J. Ensure that the appropriate federal and state tax forms are prepared for all payouts which exceed the statutory limits, and that the patron's identification is verified.

III. **Other EGD Occurrences**

- A. Include procedures for EGD short pays/no pays. These procedures must ensure that a slot technician is notified and performs diagnostic tests. If the diagnostic test does not verify a short pay/no pay, the patron must not be paid. If the diagnostic test verifies that a malfunction exists, the EGD must be taken out of service until it is repaired. If the diagnostic test verifies the malfunction, a short pay/no pay of more than \$20.00 is processed following the hand-paid payout procedures. Authorized Gaming Operators must develop procedures for short pays/no pays of \$20.00 or less, which may differ per denomination, ensuring the EGD employee records the amount on the EGD/machine entry access log, as well as a description of the malfunction and the results of the diagnostic tests.
- B. Include procedures for the handling of unredeemed credits found remaining on an EGD after the completion of patron play.

IV. **Installation, Conversion, Movement or Removal of EGDs**

- A. Include the procedures followed when an EGD is installed, converted, moved to another location or removed, ensuring the NREGC Supervisor/Agent is given prior notification. Include the procedures for notifying surveillance, removing the contents of the bill validator and labeling the contents; transporting and storing the contents in a locked location; and counting and recording the contents.
- B. Include procedures for tracking the installation, conversion, movement, and removal of all EGDs in an EGD control log.
- C. The EGD must be tested by the NREGC prior to use.

V. **Resetting/Clearing the Random Access Memory (RAM)**

- A. In the event of an EGD malfunction that necessitates the services of an EGD technician, all efforts to correct the problem must be taken without resetting or clearing the RAM.
- B. For situations necessitating resetting or clearing the RAM, the following steps must be taken:

1. The EGD supervisor must be summoned and is required to witness the following actions prior to clearing any RAM;
 2. The Authorized Gaming Operator's ICS must include procedures to permit the recovery of the RAM of EGDs for forensic analysis. Any deviation from the approved ICS procedures must be approved in writing by the NRGC Executive Director.
 3. The EGD technician must record, on at least a three-part RAM clearing slip, all audit functions of the EGD. These functions must include, but are not limited to:
 - i. Reel positions or video display of, at least, the previous two game outcomes prior to the malfunction or dispute. Photographs of reel positions or video display properly identified and attached to each part of the RAM clearing slip satisfies this requirement;
 - ii. The actual meter readings from the soft system meters for currency in, coupons in, vouchers in and out by quantity and dollar amount, and jackpots paid; and
 - iii. The display in the progressive jackpot indicator if the EGD is linked to a progressive jackpot; and
 4. One copy of this form must remain inside the EGD, and one copy must be forwarded and maintained on file with the EGD supervisor.
- C. In the event that the RAM has been corrupted to the extent that last game recall is unobtainable, the EGD supervisor must be summoned and is required to witness as the EGD technician records, in triplicate, on the RAM clearing slip a description of what happened to the EGD (i.e., video display went blank), a notation that a RAM corruption existed and the actual meter readings obtainable. The EGD technician and EGD supervisor will sign the RAM clearing slip.
- D. In the event of a patron dispute the value of the dispute should be determined as to the criteria. If the dispute is less than \$25,000 the operator shall resolve the dispute according to its approved ICS. If above the \$25,000 threshold, then the procedures below would be sufficient:
1. Surveillance must be notified to photograph the customer and the front of the EGD in question, including reel positions or video display;
 2. The NRGC Supervisor/Agent must be notified. The internal computer processing unit's logic board containing the CPSD of the disputed EGD must be removed and secured by the NRGC Supervisor/Agent. This, along with one copy of the RAM clearing slip (noting the meter readings and internal audit/diagnostic observations) must be forwarded to an appropriate independent laboratory for defect determination, if any; and
 3. The EGD in question may be placed back in play after an approved substitute logic board has been examined, installed and sealed by the NRGC.

VI. **EGD Statistics**

- A. Records must be maintained reflecting the actual currency in, coupons in, vouchers issued, vouchers redeemed, EGD drop, EGD win, EGD win to EGD drop and theoretical payout percentage for each EGD by day, cumulative month and year-to-date.

- B. The statistical reports must be distributed to EGD department management, management employees independent of the EGD department and the NRGC Supervisor on a monthly basis.
- C. Unusual fluctuations as defined by casino management in their ICS must be investigated and the results must be documented in writing, retained and a copy given to the NRGC Supervisor.

VII. **Critical Gaming Systems**

Critical Gaming Systems as used in this section means all regulated components of systems hardware and software, application software (e.g., Monitoring and Control Systems, Voucher Systems, Bonusing Systems, Cashless Wagering Systems), and database software that individually or in combination are used for regulated gaming operations.

- A. The NRGC Executive Director must approve any Critical Gaming System prior to utilization by an Authorized Gaming Operator.
- B. All of the hardware, software, logic or code, calculations, and interfaces of the Critical Gaming System which affects regulated operations must be subject to testing by the NRGC and/or an independent testing laboratory designated by the NRGC. The Authorized Gaming Operator, prior to installation of a Critical Gaming System or any modification thereto, must provide documentation acceptable to the NRGC Executive Director or their designee that all hardware on which the CWS resides and any non-operating system or non-utility software operating thereon, as well as all associated hardware and software interfaced with the Critical Gaming System, has been reviewed for and has no known vulnerabilities which may compromise the Critical Gaming System, its integrity, or functionality. A list of known vulnerabilities outlining any previously identified system anomalies must be provided to the NRGC Executive Director along with the expected timeline to remedy. The list must be updated at least monthly.
- C. Requests to waive modifications or upgrades to an existing Critical Gaming System must be approved by the NRGC Executive Director prior to implementing any proposed modification or upgrade. Modifications or upgrades to an existing Critical Gaming System must include, without limitation:
 - 1. A description of the reasons for the proposed modification(s);
 - 2. A list of the computer component(s) and programs(s) or version(s) to be added, modified or replaced;
 - 3. Copies of all current independent testing laboratory certification letter(s);
 - 4. A description of any functionality changes to any screen(s), menu(s), report(s) or operating processes that will be affected;
 - 5. The method to be used to complete the proposed modification(s);
 - 6. The method to be used to reverse the proposed modification(s) should the proposed modification(s) fail;
 - 7. The date and time the proposed modification(s) will be installed and the estimated time for completion. If the proposed modification is subject to waiver, this information must be reviewed by the NRGC prior to issuing the waiver;
 - 8. The name, title, NRGC license number, corporate employee number (if applicable),

- and employer of the person(s) scheduled to perform the modification(s);
9. Procedures for inactivating access of the person(s) implementing the modification(s) to the Critical Gaming System once the upgrade has been completed, not to exceed fifteen business days following the departure of support personnel;
 10. A diagrammatic representation of the proposed hardware design change locally and at any offsite facility;
 11. Restriction on update access to the production code to the person implementing the modification(s);
 12. Procedures to ensure the user and operator manuals are updated to reflect changes in policies and procedures resulting from the proposed modification(s);
 13. A list of all support personnel who will be accessing restricted areas associated with the modification(s). The Authorized Gaming Operator must include detailed procedures for the “resetting” of key codes and/or deactivation of access card(s); and
 14. Plan for user acceptance testing and the method for documenting the results of testing.
- D. All components of the Critical Gaming Systems must be located in secure locations, with access permitted only to authorized personnel. All such proprietary software and hardware must only be supplied by an NRGC Licensed Supplier, with the exception of the printer paper used by the voucher printer.
- E. The MIS Department must maintain a log of system problems. The log entry must contain the date and time of the problem, description of the problem and name of the person making the entry. The log must be made readily available to any NRGC Agent.
- F. The MIS Department, Surveillance Department and/or the Security Department must immediately notify an NRGC Supervisor/Agent of any malfunction that threatens the integrity of any Critical Gaming Systems.
- G. Remote Access to a Critical Gaming System is prohibited unless the NRGC Executive Director has approved internal controls that specifically address Remote Access procedures.
- H. Each Authorized Gaming Operator shall, within ninety (90) days after commencing operations in Nebraska, and annually thereafter, have an integrity and security assessment of the Critical Gaming Systems conducted by an independent professional selected by the Authorized Gaming Operator and subject to approval of the NRGC.
1. The scope of the integrity and security assessment is subject to approval of the NRGC and must include, at a minimum, all of the following:
 - i. A vulnerability assessment of digital platforms, mobile applications, internal, external, and wireless networks with the intent of identifying vulnerabilities of all devices, the Critical Gaming Systems, and applications transferring, storing, and/or processing personal identifying information and/or other sensitive information connected to or present on the networks;
 - ii. A penetration test of all digital platforms, mobile applications, internal, external, and wireless networks to confirm if identified vulnerabilities of all

- devices, the Critical Gaming Systems, and applications are susceptible to compromise;
- iii. A review of the firewall rules to verify the operating condition of the firewall and the effectiveness of its security configuration and rule sets performed on all the perimeter firewalls and the internal firewalls;
 - iv. A technical security control assessment against the provisions adopted in GLI- 27 and these MICS with generally accepted professional standards and as approved by the NRGC;
 - v. An evaluation of information security services, cloud services, payment services (financial institutions, payment processors, etc.), and any other services which may be offered directly by the permittee or involve the use of third parties; and
 - vi. Any other specific criteria or standards for the integrity and security assessment as prescribed by the NRGC.
2. The full independent professional’s report on the integrity and security assessment must be submitted to the Commission no later than thirty (30) days after the assessment is conducted and must include all the following:
- i. Scope of review;
 - ii. Name and company affiliation of the individual or individuals who conducted the assessment;
 - iii. Date of assessment;
 - iv. Findings;
 - v. Recommended corrective action, if applicable; and
 - vi. Authorized Gaming Operator’s response to the findings and recommended corrective action.

VIII. Vouchers

- A. Signs must be posted in the casino by the Authorized Gaming Operator notifying patrons where vouchers may be redeemed.
- B. No voucher may be accepted as payment for any goods or services.
- C. Vouchers must not be used as tips for any casino employee.
- D. A casino cage cashier must not redeem a voucher that has the word “void” printed on the voucher.
- E. A voucher that is missing all or part of a bar code but has the actual bar code number printed at one end of the ticket, may be manually entered into the Voucher System for redemption by a casino cage cashier.
- F. The ICS must describe procedures for verifying vouchers that are found to be questionable.
- G. The ICS must describe procedures for verifying, validating and redeeming vouchers at a casino cage when casino cage employees are unable to communicate with the Voucher System for any reason.
- H. If a voucher is found to be not valid, or cannot be verified at the casino cage, Kiosks or

EGDs linked to a Voucher System, the ICS must describe procedures for documenting the incident. The documentation must include all details of verification procedures used, patron's name and complete address, date and time and all personnel involved. The NRG Supervisor/Agent will be immediately notified, and the documentation will be submitted to the NRG Supervisor/Agent within 3 business days.

- I. The ICS must describe procedures for "found" vouchers that no patron has a legitimate claim to.

IX. **Kiosks**

- A. Automated Teller Machines ("ATM") may be used in conjunction with Redemption Kiosks. A Kiosk may allow for ATM functionality for patron cash withdrawals only where the material components of such functionality and any accompanying remote access communications are logically segregated from any other functionality. "Kiosk" as used in this section does not apply to devices used for the redemption of promotional points for merchandise and/or services or for the display of marketing information to players.
- B. Each Kiosk utilized by an Authorized Gaming Operator must be monitored and continuously recorded by a dedicated surveillance camera.
- C. Kiosks utilized by an Authorized Gaming Operator must be maintained by the Main Bank/Vault or the casino cage on an imprest basis. The Kiosk must be counted down and reconciled each time the Kiosk is reimpressed which must be at least every seven days. The U.S. coin must be counted down at a minimum of every 30 days, the total utilized for the reconciliation may be taken from the system reports.
- D. Access to the logic area of the Redemption Kiosk must be outlined in the Authorized Gaming Operator's ICS.
- E. All sensitive keys associated with the Kiosk must be maintained in accordance with the Authorized Gaming Operator's ICS.
- F. All Kiosk sensitive keys must be different from keys used for EGDs.
- G. All access to Kiosks must be documented by the individual employee who opened the Kiosk on an entry access log, which must be kept inside the Kiosk at all times. The individual employee who opens the Kiosk and signs the entry access log is responsible for all activity conducted inside the Kiosk during that time period. The individual employee who opens the Kiosk must be present the entire time the door is open.
- H. The ICS must include procedures for the following occurrences associated with a Kiosk:
 - 1. Power loss or power reset;
 - 2. Voucher System and Redemption Kiosk not communicating;
 - 3. Machine jam;
 - 4. Incomplete transactions (e.g., nonpayment by the Redemption Kiosk);
 - 5. Bill validator drop box full;
 - 6. Maintenance; and
 - 7. Customer disputes.

- I. Include a statement that the NRG Supervisor must be notified in writing of the exact location of each Kiosk and must also be notified in writing of any change in location prior to the movement of a Kiosk.

X. **Coupons for Complimentary Electronic Credits**

Coupons for Electronic Credits may be redeemed only at approved locations by NRG, as detailed in the ICS.

- A. Prior to using coupons in an EGD or Kiosk, an NRG agent must test the EGD to ensure the EGD meters are incrementing correctly, and information is communicating correctly.
- B. The ICS procedures for coupons for complimentary electronic credits must include:
 1. Details for printing coupons for complimentary electronic credits in-house or the receipt of coupons for complimentary electronic credits from an outside vendor and the inventory, storage and distribution of the coupons, including the completion of a coupon inventory log; and/or
 2. A statement that the printing of and distribution of coupons for complimentary electronic credits will be completed by a direct mail house or outbound electronic mailing vendor.
- C. If casino cage cashiers issue coupons, include procedures to ensure that all coupons are accounted for.
- D. Include casino cage procedures addressing what occurs when an invalid coupon is presented, including notification to the casino cage cashier that the validation number cannot be found on file, the coupon has already been redeemed or the amount on the coupon differs from the amount on file;
- E. If the system is not functioning when a patron attempts to redeem a coupon at an EGD, include procedures for redemption at the casino cage, including:
 1. Ensuring the coupon is valid;
 2. Ensuring the patron is not on the NRG Board exclusion list, the NRG statewide voluntary self-exclusion list or the Authorized Gaming Operator's property based self-exclusion list;
 3. Manually voiding the coupons;
 4. Segregating these coupons;
 5. Electronically verifying and cancelling the coupons in the system when the system is restored following manual override procedures; and
 6. Forwarding coupons redeemed at the casino cage to accounting daily.
- F. Include procedures for issuing replacement coupons, if applicable.

XI. **Promotions**

"Promotion" as used in this section means cashless credits based on predefined criteria outlined by the rules of the promotion.

- A. The Authorized Gaming Operator must maintain a record of all promotions to facilitate the NRG's tracking of promotional activity which must address, at a minimum, all of the following:

1. Unique identification for each promotion;
 2. The date and time the promotion was or is scheduled to be available;
 3. The terms of the promotion; and
 4. The date and time the promotion was or is scheduled to be decommissioned.
- B. Before activating a promotional account, the Authorized Gaming Operator must;
1. Require patrons to present valid government-issued photo identification;
 2. Verify the photo on the identification matches the physical characteristics of the patron presenting the photo identification;
 3. Verify the patron is not on the NRGC exclusion list, the NRGC statewide voluntary self-exclusion list, or the Owner Licensee's property based self-exclusion list; and
 4. The patron must independently and confidentially enter a secure PIN a minimum of two times. The two PINs must successfully match each time entered.
- C. The Authorized Gaming Operator must maintain a segregation of duties between employees that can issue promotions and any employee that can open/activate a patron account and any employee that can directly access the CPSDs of an EGD.
- D. All promotions must be reviewed and approved by someone other than the employee that entered the promotion into the database. The ICS must include the job titles of those employees allowed to enter a promotion into the database and the job titles of those employees allowed to approve a promotion.
- E. The ICS must include a statement that promotions must be submitted under separate cover to the NRGC Executive Director for approval prior to implementation and must include the following information:
1. The estimated aggregate dollar value of the promotions. If the promotions contain restricted wagering credits, the estimated number and non-cash value must be included;
 2. The start and expiration dates of the promotions;
 3. Details regarding the issuance and controls over the issuance of the promotions;
 4. Name of the direct mail house or outbound electronic mailing vendor that will provide the patron notification of the promotions or an indication that the patron will be notified of the promotions directly by the Authorized Gaming Operator; and
 5. A sample of the notification.
- F. All promotions must be stated in clear and unambiguous terms and must be accessible to the patron. Promotion terms and the record of all promotions must include all of the following at a minimum:
1. The date and time presented;
 2. The date and time the promotion is active and expires;
 3. Patron eligibility, including any limitations on participation;
 4. Any restriction on withdrawals of funds;
 5. Wagering requirements and limitations on games or wager types;
 6. How the patron is notified when they have received a promotional award;
 7. The order in which funds are used for wagers;
 8. Eligible games or wager types; and
 9. Rules regarding cancellation.

- G. The Authorized Gaming Operator must provide a clear and conspicuous method for a patron to cancel his or her participation in a promotion that utilizes restricted wagering credits that cannot be cashed out until a wagering requirement or other restrictions associated with the credits is met.
 - 1. Upon request for cancellation, the Authorized Gaming Operator shall inform the patron of the amount of unrestricted funds that will be returned upon cancellation and the value of restricted wagering credits that will be removed from the patron account.
 - 2. If a patron elects to proceed with cancellation, unrestricted funds remaining in a patron account must be returned according to the terms of the promotion.
- H. Once a patron has met the terms of the promotion, the Authorized Gaming Operator must not limit winnings earned while participating in the promotion.
- I. The ICS must include a statement of who is responsible for the review of the internal controls and security measures employed by the direct mail house or outbound electronic mailing vendor.
- J. The ICS must include procedures to ensure that the promotion does not include any person on the NRGC statewide voluntary self-exclusion list, the Authorized Gaming Operator's property based self-exclusion list, and the NRGC's Board exclusion list.
- K. The ICS must include a statement that an approved promotion may not be altered or cancelled without the prior written approval of the NRGC Executive Director.
- L. The ICS must include procedures for altering or cancelling an approved promotion for all patrons and for groups or individual patrons including documentation and approval. The ICS must include the job titles of those individuals who are allowed to alter or cancel a promotion.
- M. The ICS must include a statement that any anomaly or deviation from the approved promotion or any equipment malfunction that occurs must be reported immediately to the NRGC Supervisor/Agent.
- N. The ICS must include procedures for tracking redeemed and expired promotions.
- O. The ICS must include accounting procedures for tracking all aspects of a promotion from issuance to redemption.

XII Disposal of Electronic Gaming Devices and other Gaming Equipment

- A. The Authorized Gaming Operator must notify the NRGC Executive Director and the NRGC Supervisor in writing and receive written approval from the NRGC Executive Director prior to disposing of or removing from the premises Electronic Gaming Devices.
- B. The Authorized Gaming Operator must notify the NRGC Supervisor in writing and receive written approval from the NRGC Supervisor prior to disposing of or removing from the premises other Gaming Equipment.

**NEBRASKA RACING AND GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION F –LIVE GAMES (TABLE GAMES) AND DROPS AND COUNTS

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I. **General**

- A. The minimum controls in this section include the drops and counts of table drop boxes and EGD bill validator drop boxes which are collectively referred to as "drop boxes".
- B. Although these minimums have been combined, the Authorized Gaming Operator will prepare separate drop and count procedures for each type of drop in their ICS.

II. **Table Game Drop Box Characteristics**

- A. Each gaming table in the casino must have an attached drop box into which currency, coupons, all drop box copies of table game transaction documents, and mutilated chips will be deposited,
- B. Each table game drop box must have:
 - 1. A separately keyed lock that secures the drop box to the gaming table;
 - 2. A separately keyed lock that secures the contents inside the drop box;
 - 3. A slot opening through which all currency, match play coupons, documents, etc. will be inserted;
 - 4. A mechanical device that must automatically close and lock the slot opening upon removal of the drop box from the gaming table; and
 - 5. A marking that is permanently imprinted and clearly visible that identifies the game name and table number to which it is attached.

III. **Bill Validator Drop Box Characteristics**

- A. EGDs and Kiosks will have bill validators into which a patron may insert currency, vouchers, or coupons in exchange for an equal value of electronic credits on the EGD or Kiosk. Each such bill validator must have a container known as a bill validator drop box. Authorized Gaming Operators may propose technical solutions for bill validation processes according to procedures included in their ICS, subject to approval by the Executive Director.
- B. Each bill validator drop box must:
 - 1. Be housed in a locked compartment separate from any other compartment of the EGD and keyed differently than any other EGD compartment;
 - 2. Have a slot opening through which vouchers, currency or coupons may be inserted;
 - 3. Be identifiable to the EGD or Kiosk from which it is removed by permanently imprinted, clearly visible markings; and
 - 4. Have a separately keyed lock for access to the contents of the bill validator drop box.

IV. **Emergency Table Game and Bill Validator Drop Boxes**

- A. The Authorized Gaming Operator must maintain emergency table game and bill validator drop boxes with the same physical characteristics as noted above, except for the permanently imprinted markings. These drop boxes will be permanently marked with the word "EMERGENCY" and temporarily marked with a clearly visible game name and table number for table game drop boxes and the EGD or Kiosk number for bill validator drop boxes.

- B. Emergency drop boxes must be maintained in a secured area. The storage location, controls and authorized access must be described.
- C. The retrieval and exchange of the emergency drop boxes and the location and safekeeping of the replaced drop boxes will be described.
- D. Each emergency drop box collection, including the transportation of the emergency drop boxes, must be video taped/digitally recorded and monitored by surveillance.
- E. Include a statement in the ICS that the NRG Supervisor/Agent must be notified prior to the exchange of the emergency drop boxes.

V. **Collection/Transportation of Drop Boxes**

- A. The collection procedures shall be described.
- B. The collection of table game drop boxes must be performed at least at the end of the gaming day. Each bill validator must be dropped at least once every four (4) days. When all bill validators are not dropped at the end of the gaming day, the tax must be calculated using the computer monitoring system reports. The times of the drops must be submitted to the NRG Executive Director under separate cover.
- C. The ICS will state which job titles participate in each drop, ensuring that:
 - 1. For EGDs and Kiosks: There are at least two (2) employees who are independent of the EGD department, one who will be a non-gaming employee; and
 - 2. For Table Games: There are at least two (2) employees, one who will be a non-gaming employee. The actual removal of the drop boxes from the gaming tables will be performed by an employee independent of the table games department.
- D. The storage and transportation of table game and bill validator drop boxes will be performed in locked storage carts which must be escorted by a security officer.
- E. The transportation procedures of drop boxes will be described including alternative procedures for malfunctions or emergencies.
- F. Access to stored drop boxes that have contents is restricted to authorized members of the drop and count teams.
- G. Each drop box collection process, including transportation of drop boxes, must be video taped/digitally recorded and monitored by surveillance
- H. Drop team members, except security officers, assigned to the collection of bill validator drop boxes must wear a designated one piece, pocketless jumpsuit.
- I. Security personnel must be present to observe the drop procedures and the drop boxes from the time they are removed from the gaming device until they are secured in the count room.
- J. The drop team must only have access to the EGD or Kiosk compartment which holds the bill validator drop boxes.

- K. Describe the procedures when currency, vouchers and/or coupons are found outside the bill validator drop box by the drop team.
- L. Describe security procedures when, because of space limitation in the count room, the storage drop carts must be stored elsewhere.

VI. **Count Room(s) Characteristics**

- A. Include the location and general design of the count room(s).
- B. The count room(s) must provide maximum security for the material housed and activities conducted therein and must have:
 - 1. A metal door capable of being locked from the inside by the count team;
 - 2. No windows on the outside walls;
 - 3. All vents and ducts secured;
 - 4. An ingress/egress log that contains date, name, signature, time in and out and reason for entry for each individual entering or leaving the count room except NRGC personnel;
 - 5. A clear, glass-like count table for emptying, sorting, and counting the contents of the drop boxes;
 - 6. A description of currency counting equipment used;
 - 7. Closed circuit monitoring system as required by the NRGC Adopted Rules;
 - 8. A description of the computer terminal and printer, if applicable; and
 - 9. A telephone for required and emergency calls.
- C. The count room(s) must not be used for the storage of non-related supplies and equipment.

VII. **Count Standards**

- A. The times of each count must be submitted to the NRGC Executive Director under separate cover.
- B. The count team will consist of at least three (3) employees who are independent of the transactions being counted and subsequent accountability of the count proceeds.
- C. Describe procedures detailing how count team members will be rotated in such a way that each count team is not consistently the same group of employees.
- D. Everyone who enters the count rooms to perform the count process must wear one piece, pocketless jumpsuits. The count process is deemed to be complete when the count is ready to be verified by the cashier. Any exceptions must have prior approval from the NRGC Executive Director through the NRGC Supervisor/Agent.
- E. No persons in the count room during the counts will be permitted to carry a pocketbook or other container unless such container is transparent. Non-transparent containers may be permitted in the rooms if they remain in the count rooms during and after the count and must be inspected when removed.

- F. No person, except for NRGC personnel, external and internal auditors and repair personnel will be permitted to enter or leave the count room until the count is completed, except during normal work breaks or in an emergency. In the case of normal work breaks or emergencies, the count must be discontinued and everyone must exit the count room.

VIII. **Counting and Recording Drops**

- A. The count team must enter the count room together, lock the door from the inside and notify surveillance that the count is about to begin.
- B. Surveillance must digitally record video and audio while monitoring the count process.
- C. Include procedures for testing all machines used that count currency, vouchers, and coupons prior to the start of the count.
- D. Include alternative procedures for conducting the count if the counting machines or casino computer system are not operational.
- E. Count team members may not remove their hands from or return them to a position on or above the count table unless the backs and palms of their hands are first held straight out and exposed to other members of the count team and the surveillance cameras.
- F. Prior to the opening of the first table game drop box, a preliminary master game report must be generated.
- G. The label on the drop box must be shown to the surveillance camera.
- H. The procedures for opening and emptying the drop boxes and keeping the contents segregated per drop box must be described.
- I. The inside of the empty drop box must be held up for full view by the surveillance camera and another member of the count team.
- J. The slot on the drop box is reset if applicable, the door to the drop box relocked, and the drop box is returned to the storage cart.
- K. Describe the detailed steps of the count procedures, including the count of currency, vouchers, and coupons. Ensure that the count of each drop box is recorded on the count slip/currency count tape or into the computer system, prior to commingling the contents with contents from other drop boxes.
- L. Include a description of all forms that are prepared manually or through the computer system during the count. Include a description of what happens to the documents removed from the drop boxes and how the documents are recorded on the count forms and/or verified through the computer system.
- M. If a currency counting machine is not used, the contents of the drop boxes are manually counted and verified by at least two team members who must independently record their counts on count slips. Describe procedures for resolving differences.

- N. After counting and recording all drop boxes, a team member will prepare/generate a final count report(s).
- O. Each member of the count team must sign the final count report attesting to the accuracy of the information recorded.
- P. The cashier enters the count room and counts the drop without prior knowledge of the count team's recorded amounts. The cashier's count is compared to the applicable final count report and variances reconciled. Once in agreement, the cashier accepts accountability for the drops.
- Q. Before the count team is dismissed, all storage carts must be locked.
- R. A count team member must notify surveillance that the count is complete.
- S. The final count reports and all supporting count documents, including vouchers and coupons, will be promptly delivered to the accounting department.

**NEBRASKA GAMING AND RACING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION G - CASINO CASHIERING AND CREDIT

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I. **General**

- A. Casino cage procedures for table fills and credits are included in Section C of the MICS.
- B. Casino cage procedures for EGD hand-paid payouts are included in Section E of the MICS.
- C. Casino cage procedures for the purchase of the drops are included in Section F of the MICS.

II. **Location and Functions**

- A. The ICS must include a description of the locations, functions, and controls of all casino cashiering areas (e.g., casino cages, main bank/vault, Kiosks).
- B. The functions must include a description of the various types of transactions performed by each casino cage area.
- C. Authorized Gaming Operators are prohibited from redeeming gift certificates at casino cages or in conjunction with any gambling related activity, unless otherwise approved by NRGC.

III. **Casino Cage Accountability**

- A. The assets for which the casino cage cashiers are responsible are maintained on an imprest basis and protected from unauthorized access.
- B. At the end of each shift, the casino cage cashiers assigned to the outgoing shift must record on a cashier's count sheet the total of each casino cage cashier's inventory items counted and the total of the opening and closing cashier's inventories and must reconcile the opening inventory to the closing inventory.
- C. Overages and shortages must be documented and must be investigated.
- D. Both the outgoing and incoming casino cage cashier must sign the completed cashier's count sheet attesting to the accuracy of the information. If there is no incoming casino cage cashier, the countdown and verification and signatory requirements must be performed by a supervisor.
- E. Either the main bank/vault or the casino cage must account for the change bank funds which are maintained on an imprest basis.
- F. Either the main bank/vault or the casino cage must account for the Kiosks which are maintained on an imprest basis. Include procedures for the reimprestment of the Kiosks.
- G. All net changes in outstanding casino receivables are summarized on a casino cage accountability form on a per shift basis.
- H. The casino cage cashier count sheets must be forwarded to the main bank/vault at the end of each shift.

IV. **Main Bank/Vault Accountability**

- A. All transactions that flow through the casino cage must be summarized on a main bank/vault accountability form on a per shift basis.
- B. All net changes in outstanding casino receivables are summarized on a main bank/vault accountability form on a per shift basis.
- C. Increases and decreases to the main bank/vault inventory are supported by documentation.
- D. Either the main bank/vault or the casino cage must account for the change bank funds which are maintained on an imprest basis.
- E. Either the main bank/vault or the casino cage must account for the Kiosks which are maintained on an imprest basis. Include procedures for the reimprestment of Kiosks.
- F. Copies of the main bank/vault accountability form and cashier count sheets and related documentation must be forwarded to the accounting department.

V. **Even Exchanges**

Procedures must be established for an even exchange of funds between two casino cage areas or between a casino cage area and change banks which include the following:

- A. The designation of those employees who may process even exchange transactions;
- B. Type of items exchanged; and
- C. The sequence of the required signatures and the distribution of each part of at least a two-part even exchange form.

VI. **Chip and Token Inventories**

- A. Procedures must be established for the receipt, inventory, storage and destruction of gaming chips and tokens.
- B. The NRG Supervisor/Agent must be notified prior to the delivery, of the time, date and location of delivery of any gaming chips or tokens.
- C. At least two (2) employees from separate departments must open and check the chips or tokens received. Identify the departments involved in this process.
- D. Any deviation between the invoice/packing slip amount or denomination and the actual chips or tokens received or any defects found in such chips must be promptly reported to the NRG Executive Director.
- E. Chip and token inventory ledgers must be maintained to record the receipt, disbursement and destruction of primary active, primary reserve and secondary gaming chips and tokens by denomination and non-value chips by color. Signature requirements attesting to the accuracy of the information recorded in the ledgers must be included in the procedures.
- F. Identify the storage areas for the primary active, primary reserve, secondary and non-value gaming chips.

- G. Chips must be taken from or returned to the primary reserve chip inventory or the secondary set of chips in the presence of at least two (2) employees. Identify the employees involved in this process.
- H. Inventories of chips in primary reserve and secondary set of chips must be made on a monthly basis and the results of such inventories must be recorded in the chip inventory ledger. Physical inventories may be performed annually if the inventory procedures incorporate the sealing of locked compartments. Include procedures for sealing and accessing these locked compartments.
- I. During non-gaming hours all chips must be stored and locked in the casino cages, main bank/vault or in locked table trays at the gaming tables.
- J. Prior to the destruction of chips and tokens the Authorized Gaming Operator must notify the NRG Executive Director in writing of the date and the location at which the destruction will be performed, the denomination, numbers and amount of chips and tokens and the description and number of non-value chips to be destroyed and an explanation of the method of destruction.
- K. The destruction of chips and tokens must be performed in the presence of at least two (2) individuals, one of whom must be an NRG Agent, unless otherwise authorized by the NRG Executive Director.

VII. Safekeeping Deposits and Withdrawals

- A. The following types of safekeeping deposits are allowed:
 - 1. A deposit made by a patron to withdraw at a later time; A deposit of a jackpot which could not be paid to the patron because the patron did not provide the required identification;
 - 2. A deposit of an EGD jackpot of \$1,200 or more when the winner of the jackpot is unknown or the jackpot was abandoned by the patron;
 - 3. A deposit of a table games jackpot when the winner of the jackpot is unknown or the jackpot was abandoned by the patron;
 - 4. A deposit made by the casino for funds owed to a patron whose identity is known (e.g., wire transfers); and
 - 5. A deposit of a partial payment on a counter check received by mail.
- B. Only cash and cash equivalents will be accepted from customers for the purpose of a customer deposit.
- C. Procedures must be established for the verification and documentation of the patron's identity.
- D. A file for each patron must be prepared prior to acceptance of a deposit.
- E. The receipt or withdrawal of a customer deposit must be evidenced by at least a two-part form with one part going to the patron and one part remaining in the casino cage file. Include procedures for the distribution of the various parts of the customer receipt or withdrawal form and any voided forms.

- F. Describe the sequence of the required signatures attesting to the accuracy of the information contained on the customer deposit or withdrawal form ensuring that the form is signed by the casino cage cashier.
- G. All customer deposit and withdrawal transactions at the casino cage are recorded on a casino cage accountability form on a per shift basis.

VIII. **Check Cashing Privileges**

- A. Policies and procedures must be established for the authorization and issuance of check cashing privileges. These procedures must include the approval process for establishing check cashing privileges and establishing and/or changing check cashing limits.
- B. Only the following types of negotiable instruments may be cashed at a casino cage:
 - 1. Personal checks;
 - 2. Cashier's checks;
 - 3. Money orders;
 - 4. Traveler's checks; and
 - 5. Wire transfer service checks.
- C. Third party checks, including but not limited to payroll checks, must not be cashed.
- D. Procedures must address how personal checks will be processed through a check guarantee service or cashed by the Authorized Gaming Operator. The procedures must include the job title(s) involved in the approval and payment process and the following:
 - 1. If a check guarantee service approves payment of a personal check, the procedures required by the check guarantee service may replace the policies and procedures established for the authorization and issuance of check cashing privileges for patrons who cash individual personal checks. This is only applicable to the authorized maximum approval amount negotiated with the check guarantee service; and
 - 2. Page 1 of the casino check cashing application must be completed and signed before the Authorized Gaming Operator may cash any personal check that:
 - i. is not processed for payment by a check guarantee service; or
 - ii. is not approved for payment by a check guarantee service.Note: The ICS must include procedures for cashing personal checks that have been denied for payment by a check guarantee service, the criteria used to pay those personal checks and the job titles involved in approving payment of those personal checks.
- E. The casino cage cashier will perform the following for all negotiable instruments cashed:
 - 1. Examine the patron's valid government issued picture identification (i.e., driver's license or other government issued picture identification);
 - 2. Record a driver's license number or other government issued picture identification number on the negotiable instrument;
 - 3. Determine if the patron's available check cashing limit is sufficient to cover the amount of the personal check that is not processed or approved for payment by the check guarantee service;

4. Immediately stamp the negotiable instrument "for deposit only";
 5. Date and time stamp the negotiable instrument;
 6. Initial and include the last six numbers of his/her NRGC Occupational License number on the negotiable instrument; and
 7. Count out, in full public view, funds equaling the value of the negotiable instrument.
- F. An Authorized Gaming Operator must not pay a personal check presented by a patron if:
1. The patron's check cashing privileges have been limited pursuant to the MICS sections "Property Based Self-Exclusion Program", "NRGC Statewide Voluntary Self-Exclusion Program" or "Limiting Check Cashing, and Promotional Services";
 2. The patron has reached his/her approved check cashing limit; and/or
 3. The patron is currently in default:
 - a. on any credit or personal check obligation to the Owner Licensee; or
 - b. on any personal check obligation to the check guarantee service.
- G. Failure to deposit the receipt of personal checks for collection by the next banking day will be considered an extension of credit.
- H. Procedures must address the buy-back of personal checks.

IX. **Returned Checks**

- A. Procedures must be established for collecting and recording checks returned to the Authorized Gaming Operator after deposit. Procedures must also address the re-deposit of checks returned to the Authorized Gaming Operator.
- B. All checks returned to the Authorized Gaming Operator must be documented on a returned check log by the accounting department.
- C. A continuous record of all checks returned to the Authorized Gaming Operator must be maintained by the collections department. The records must contain the following information:
1. Original date of the check;
 2. Name and address of the drawer of the check;
 3. Amount of the check;
 4. Date the check was dishonored; and
 5. Date(s) and amount(s) of any collections received on the check after being returned by a bank.
- D. Authorized Gaming Operator must notify the check guarantee service of the following:
1. Checks returned to the Authorized Gaming Operator that were paid by the Authorized Gaming Operator; and
 2. Checks returned to the Authorized Gaming Operator that were approved for payment by the check guarantee service.
- E. Procedures must address the notification of the casino cage/credit departments of all checks returned to the Authorized Gaming Operator. The patron's check cashing privileges must immediately be suspended until such time as the returned instrument has been paid in full.

F. All checks paid by the Authorized Gaming Operator and returned to the Authorized Gaming Operator must be considered the issuance of credit.

X. Debit Cards

A. The internal Control System shall include the procedures for authorizing and processing debit transactions.

B. Prior to completing debit transactions at the cage, the Cashier shall:

1. Verify the patron's government issued photo identification is valid and non-expired;
2. Confirm the name, signature and other identifying information contained on the card, identification, and transaction record all match;
3. Confirm the patron's photo, physical description and identifying information on the photo identification matches the patron presenting the card; and
4. Verify the patron is not an Excluded Person.

C. The patron's identification, the debit card, and the transaction documentation shall be placed on the counter face up to ensure surveillance coverage is obtained. The Cashier shall count out the cash to the patron in full public view.

XI. Other Cash Transactions

Procedures must be established and documented in the ICS for foreign currency acceptance, electronic fund transfers, etc.

XII. Exchange and Storage of Foreign Chips

A. Foreign chips inadvertently received in the table drop shall be recorded as revenue for tax remittal purposes.

B. Foreign chips shall be separated from the casino operator's chips and stored in a locked compartment in the Main Bank/Vault. The Internal Control System shall describe procedures for the storage and accountability concerning foreign chips.

C. Foreign chips exchanged with other Nebraska Authorized Gaming Operators must be transported annually to the appropriate casino by an employee who is independent of the transaction (for example, a representative of the security department).

D. Foreign chips must only be exchanged for an equal value of the Authorized Gaming

E. The Authorized Gaming Operator must maintain documentation of the exchange of foreign chips. The documentation shall include the signatures of all the individuals involved in the exchange and an inventory of all the items exchanged.

XIII. Coupons for Complimentary Cash or Chips

A. The ICS procedures for coupons for complimentary cash or chips must include:

1. Details for printing coupons for complimentary cash or chips in-house or the receipt of coupons for complimentary cash or chips from an outside vendor and the inventory, storage and distribution of the coupons, including the completion of a coupon inventory log; and/or

2. A statement that the printing of and distribution of coupons for complimentary cash or chips will be completed by a direct mail house or outbound electronic mailing vendor.

B. Each coupon for cash or chips must include the following:

1. A unique validation number if distributed by a direct mail house or outbound electronic mailing vendor or be sequentially numbered if distributed in-house;
2. The name of the casino and/or the Authorized Gaming Operator;
3. The value of the coupon and whether it may be redeemed for chips and/or cash; and
4. The expiration date and/or valid dates.

C. Each series of coupons distributed in-house by the casino must be distributed in sequential order.

D. If casino cage cashiers issue coupons, include procedures to ensure all coupons are accounted for.

E. Include casino cage procedures for the redemption of coupons for cash or chips.

F. Include procedures for issuing replacement coupons, if applicable.

G. Include procedures for canceling, counting, recording, and verifying coupons for cash or chips.

XIV. **Redemption of Chips and Tokens at Casino Cages**

Provide procedures for the redemption of chips and tokens by cash or by check dated the day of such redemption.

XV. **Limiting Check Cashing and Promotional Services**

Authorized Gaming Operator are required to adopt policies and procedures that allow patrons to limit access to check cashing, and/or promotional services. The ICS must include a description of the following:

- A. Procedures by which a patron's name and address is flagged so that he/she is removed from all check cashing, and/or promotional services offered by the Authorized Gaming Operator. Identify the employees of the Authorized Gaming Operator responsible for reviewing and effectuating the removal;
- B. Procedures by which the spouse of a patron can submit a written request to the Authorized Gaming Operator for a temporary cessation of check cashing Authorized Gaming Operator services to a patron, that, at a minimum, results in a temporary stop to such services until a written determination on the request is made by the Authorized Gaming Operator. A copy of the written request must be provided to the NRG Supervisor/Agent within two days of the request. A copy of the written determination must be provided to the NRG Supervisor/Agent within two days of issuance of the determination; and
- C. A statement that the Authorized Gaming Operator will make available, in written form at each casino cage and credit location, information explaining these procedures.

XVI. **Vouchers Issued at Casino Cages**

- A. Vouchers issued through an approved voucher printer linked to the voucher system at a casino cage must comply with NRGC Rule.
- B. The ICS must include procedures for the issuance of a voucher at the casino cage.
- C. The ICS must include procedures to ensure that a voucher is not issued to any person on the NRGC statewide voluntary self-exclusion list, the Authorized Gaming Operator's property based self-exclusion list, and the NRGC's Board exclusion list.
- D. The ICS must include a statement that a voucher can be issued from an approved voucher printer at a casino cage with a value of no more than \$3,000.00.
- E. The ICS must include casino cashiering procedures for tracking and reconciling vouchers issued at a casino cage. Variances must be documented and investigated.
- F. All documentation and reports pertaining to the issuance of a voucher at a casino cage must be forwarded to the accounting department by the end of the gaming day.

XVII. **Redemption of Vouchers at Casino Cages**

The procedures concerning the redemption of a voucher presented by a patron are as follows:

- A. At the beginning of the casino cage cashier's shift, he/she must log into the Voucher System. This will allow for the redemption and validation of vouchers;
- B. When the voucher is presented to a casino cage cashier to be redeemed, the casino cage cashier scans the bar code, or enters the voucher number manually. The voucher at that point will be validated in the Voucher System and changed from an unpaid status to a paid status;
- C. The casino cage cashier must then pay the patron by cash or by check dated the day of such redemption; and
- D. All vouchers must be forwarded to the accounting department at the end of each gaming day for reconciliation and retention.

XVIII. **Kiosks – Fund Accountability Procedures**

- A. Procedures surrounding the impressment of a Kiosk must be described in detail in the Authorized Gaming Operator's ICS.
- B. Surveillance must be notified in order to monitor and video tape/digitally record the impressment, drop, count, and reconciliation of a Kiosk.
- C. Currency cassettes must be imprest by either a casino cage cashier or by a count room representative and verified by a different casino cage cashier or a count room representative.

- D. The casino cage cashier(s) or count room representative(s) who reconcile a Kiosk cannot be the same casino cage cashier(s) or count room representative(s) who reimprest the cassettes to be loaded in a Kiosk.
- E. The impressment of a Kiosk, including the drop of the vouchers and currency accepted by the bill validator, must be performed in the presence of a security officer.
- F. Currency cassettes that have been imprest must be secured with a lock or tamper resistant seal, and if not placed inside a Kiosk, must be stored in the main bank/vault or other secured area as described in the Authorized Gaming Operator's ICS.
- G. Procedures pertaining to the reconciliation of the Kiosk must be described in the Authorized Gaming Operator's ICS. Include a description of the reports to be utilized in the reconciliation process.
- H. If, upon reconciliation, there is a variance, a cage supervisor or count room supervisor will notify their manager. The variance will be documented and investigated.
- I. All documentation pertaining to the impressment (funds transfer and vouchers), reconciliation and/or variance associated with a Redemption Kiosk must be forwarded to the accounting department by the end of the gaming day.

XIX. Charitable Donations

- A. Each donation box must be under surveillance coverage.
- B. Each donation box must be transparent and have a lock securing the donations placed into the box and a slot opening through which currency, coin, vouchers, and chips may be deposited into the box.
- C. A sign identifying the charitable organization must be displayed by the donation box. The NRG Supervisor/Agent must be notified in writing of any change to the charitable organization.
- D. The sensitive key(s) associated with the donation box must be maintained in accordance with the Authorized Gaming Operator ICS.
- E. The times of the drop and count must be submitted to the NRG Supervisor/Agent under separate cover.
- F. Surveillance must be notified in order to monitor and video tape/digitally record the drop and count of a donation box.
- G. The drop of the donation box must be performed in the presence of a security officer.
- H. Include detailed procedures for the drop and count of the donation box. The procedures must include the location of the count and the job titles of the employees participating in the drop and count of the donation box.

- I. Expired vouchers deposited into the donation box must be treated in accordance with Voucher Audit and Accounting Procedures for expired vouchers as required by the NRGC's Casino Accounting MICS.
- J. The results of the charitable donation count must be recorded on at least a two-part Charitable Donation Form. Include procedures for the preparation, sequence of required signatures, and distribution of each part of the form. The Charitable Donation Form must be signed by the employee who performed the count and a different employee who verified the count.
- K. The final count reports and all supporting count documents, including vouchers must be promptly delivered to the accounting department by the end of the gaming day.
- L. A general ledger liability account must be utilized to record collections and payments of charitable donations.
- M. Include procedures for remitting donations to the charitable organization.
- N. The NRGC Supervisor/Agent must be notified in writing of the exact location of each donation box and must also be notified in writing of any change in location prior to the movement of a donation box.
- O. Found vouchers that no patron has a legitimate claim to are prohibited from being placed in a charitable donation box.

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- I. **General**
The accounting records maintained by each Authorized Gaming Operator must comply with requirements of the NREGC Adopted Rules.
- II. **Controls Over Locked Accounting Box**
The ICS must include control procedures over the locked accounting box which include a description of the following:
 - A. Location of locked accounting box(es), ensuring it is (they are) in an area which is accessible to those employees who are required to deposit documents; and
 - B. The designation of the accounting employees authorized to access the locked accounting box and remove the contents contained therein.
- III. **Storage of Unused Forms**
The ICS must include procedures for the following:
 - A. Receipt, issuance, and inventory of all prenumbered forms which must be controlled by accounting; and
 - B. Securing of blank prenumbered forms in a locked storage area.
- IV. **Signature Records**
 - A. Dated signature cards must be maintained by the accounting department or another department as designated by the Authorized Gaming Operator for each employee who is required to sign company documents.
 - B. The signature cards must be updated promptly to reflect changes in employment status, (i.e., promotions, transfers, terminations, etc.). The date the change became effective must be recorded on the signature card.
- V. **Manual Sensitive Key Logs or Automated Reports**
 - A. Describe procedures for the retention of completed manual sensitive key logs or automated reports by the accounting department.
 - B. Describe procedures for reviewing the completed manual sensitive key logs or automated reports to ensure compliance. Include procedures for documenting any instances of noncompliance.
- VI. **Complimentary Services**
 - A. Each Authorized Gaming Operator must maintain detailed records supporting the accumulation of the costs of complimentary services and items.
 - B. A complimentary service or item provided to patrons in the normal course of business must be recorded at full retail price.

VII. **Procedures for Monitoring and Reviewing Gaming Operations**

- A. Procedures must be established for monitoring and reviewing daily gaming transactions for:
1. Live games;
 2. EGDs;
 3. Casino cashiering;
 4. Coupons;
 5. Currency transaction reporting;
 6. Sensitive key access; and
 7. Reconciliation of numerical sequence of forms used, matching, and reviewing all copies of forms, matching computer monitoring system reports with actual fill and payout forms and examination of voided forms.
- B. If the EGD bill validator is not dropped each day, the tax must be accounted for daily to reflect an accurate representation of day's gaming transactions and play using the amounts on the computer monitoring system. When the EGDs are dropped and counted, the amounts reported on the tax return (per the monitoring and control system) must be reconciled and adjusted.
- C. Accounting must compare the monitoring and control system amounts to the actual amounts counted for all EGDs. If the total variance is 3% or greater, it must be investigated and brought to the attention of the NRG C Supervisor.
- D. Document the procedures for resolving questions raised during the review and monitoring of daily gaming transactions.
- E. Document the criteria for determining deviations from expected results of gaming operations that require further investigations and the procedures for conducting and recording the results of such investigations.
- F. Casino accounting must run the applicable reports to verify the totals of all match play coupons, coupons for cash or chips and coupons for electronic credits and reconcile the reports back to the paperwork generated by the casino cages and/or soft count. Casino accounting must ensure the coupons for electronic credits verified through the soft count process are recorded as part of the EGD drop. The match play coupons verified through soft count must be processed as part of the table game drop.

VIII. **Casino Accounts Receivable**

- A. All net changes in outstanding casino accounts receivable which are included on a main bank/vault accountability form must be summarized and posted to the accounting records on at least a monthly basis.
- B. A casino accounts receivable aged trial balance, including the name of the patron and current balance must be prepared on at least a monthly basis.
- C. The casino accounts receivable aged trial balance must be reconciled to the general ledger monthly.

D. The date for the aging of a patron's account in the case of consolidation of indebtedness must be the date of the oldest debt included in the consolidation.

IX. **Monthly Reporting Requirements**

All monthly reports required by the NRGC which are the responsibility of the accounting department must be prepared and submitted following the format prescribed by the NRGC Executive Director.

X. **Voucher Audit and Accounting Procedures**

A. The ICS must describe procedures to reconcile the daily redemption of all vouchers.

B. The ICS must describe casino accounting procedures for the validation and reconciliation of vouchers that were issued at the casino cage.

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**SECTION I – CURRENCY TRANSACTION REPORTING AND SUSPICIOUS ACTIVITY
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I. **General**

- A. Each Authorized Gaming Operator must ensure that the reporting and retention requirements for Currency Transaction Reports (CTR) and Suspicious Activity Reporting (SAR) are satisfied.
- B. Compliance with the MICS does not release the Authorized Gaming Operator from its obligation to comply with all applicable State and Federal Regulations.
- C. Procedures for tracking patron play as it relates to CTR reporting must be described in the ICS.
- D. All CTRs and SARs must be properly filed in accordance with Federal Regulations. A copy of each CTR and SAR must be forwarded to the NRGC Supervisor no later than when they are filed with the IRS.

II. **Logging Cash Transactions In Excess of \$3,000**

- A. Single cash transactions in excess of \$3,000 must be logged in the appropriate casino cage/casino multiple transaction logs. These logs will cover the entire gaming day.
- B. Once a patron's aggregated cash activity in the same directional flow has exceeded \$3,000, all additional cash transactions of \$500 or more in the same directional flow must be logged regardless of location.
- C. The employee witnessing/generating the transaction is responsible for completing the casino cage/casino multiple transactions log.
- D. Casino cage, live games and EGD personnel are responsible for communicating with other personnel to ensure all such transactions are properly logged and any necessary CTRs are completed.
- E. Incoming shift personnel must review the casino cage/casino multiple transaction logs at the beginning of their shift to familiarize themselves with the cash activity that has occurred during the gaming day.
- F. The completed multiple transactions logs are submitted to accounting on a daily basis.

III. **Identification Requirements**

- A. If the patron is unable to provide an acceptable form of identification, the transaction must be refused until the necessary information has been obtained.
- B. If a patron refuses to provide proper identification, all cash transactions will be stopped and the patron will be barred from any further gaming activity until satisfactory identification is provided.
- C. If the denied transaction involves redemptions or payment of winnings, and the patron is unable to provide adequate identification in order to verify the patron's identity and address, the patron has the option of keeping the items sought to be redeemed or placing them on deposit. This is one instance in which a casino cage cashier will be allowed to accept a

safekeeping deposit without immediately verifying the patron's identification. However, identification information must be obtained verbally from the patron. A surveillance photo of the individual must be obtained and attached to the casino's copy of the deposit receipt. These deposits will not be refunded until proper identification is provided and verified and will only be refunded to the individual in the surveillance photo. The casino cage supervisor must approve both the deposit and refund by initialing the deposit receipt before the transaction is completed. Also, identification provided for verification must be recorded on the deposit refund receipt and the CTR.

IV. **Circumvention of Currency Transaction Reporting Requirements**

- A. All employees are prohibited from providing any information to patrons in an effort to assist the patron in circumventing the reporting requirements.
- B. Employees are responsible for preventing a patron from circumventing the reporting requirements if the employee has knowledge, or through reasonable diligence in performing his or her duties should have knowledge, of the patron's attempt.

V. **Surveillance Photographs**

For each CTR, a clear copy of the photo identification used to verify the patron's identity (either the one in the system or the one presented) shall be kept on file with the CTR. If a clear copy of photo identification is not available, Surveillance shall be notified prior to the completion of the qualifying transaction and the surveillance employee shall obtain at least one photograph of the patron from the surveillance camera. The surveillance photo of the patron shall be kept on file with the CTR. The photograph or the image file shall be labeled with the patron's name. If the need for a CTR is not determined until the end of the day compilation process has occurred, a photo or a copy of the patron's identification from existing records may be used even if the identification is expired

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I. **General**

The internal audit department must report directly to the Audit Committee of the Board of Directors or equivalent unless otherwise approved by the NREGC Executive Director.

II. **Required Internal Audits**

Whenever possible, the observations are unannounced and are not performed at a consistent time of day or day of the month.

The ICS must ensure that the following internal audit procedures are conducted on a semiannual basis and must include:

A. Live Games

1. Observe and review opening, closing and shift change procedures;
2. Observe and review fill and credit procedures;
3. Observe and review drop box removal procedures;
4. Observe and review count procedures and the subsequent transfer of funds;
5. Observe and review location and control over sensitive keys;
6. Trace source documents to summarized documentation and reconcile to restricted copies;
7. Observe and review on-line fill, credit, and count system for compliance; and
8. Observe and review card and dice control procedures.

B. Electronic Gaming Devices

1. Observe and review hand-paid payout procedures;
2. Observe and review EGD drop procedures;
3. Observe and review count procedures and the subsequent transfer of funds;
4. Trace source documents to summarized documentation and reconcile to restricted copies;
5. Observe and review location and control over sensitive keys;
6. Test EGD case/cabinet access;
7. Test on-line EGD meter reading system; and
8. Compare and test the bill validator drop to the monitoring and control system and investigate significant differences.

C. Casino Cashiering

1. Reconcile the change in cash accountability;
2. Observe and review the countdown procedures and verify documented count;
3. Reconcile summary sheets i.e., returned checks and customer deposits/withdrawals, to physical instruments on a sample basis;
4. Observe and review casino cage accountability to the general ledger;
5. Observe and review casino cage accountability to main bank/vault and change banks;
6. Observe and review location and control over sensitive keys;
7. Review check cashing procedures;
8. Review processing of payments on returned checks.

D. Currency Transaction Reporting

1. Review reporting of certain cash transactions in the live games, EGD and casino cage departments.

E. Purchasing and Contract Administration

1. Test normal purchasing and contracting procedures;
2. Review procedures for approval of capital expenditures;
3. Review procedures for related party transactions and contracts; and
4. Determine that contracts entered into are at fair market value.

F. Remote Access

1. Review remote access requests and approvals;
2. Trace request forms to security tables to ensure that access was timely removed;
3. Review remote access security features;
4. Review system audit logs; and
5. Determine that the MIS Department is reviewing audit logs and extended access requests.

G. Critical Systems

1. Review access to gaming systems;
2. Review change control procedures;
3. Review backup and recovery procedures;
4. Review network security;
5. Review physical security;
6. Review the NRGC's approval for all changes made to critical gaming systems; and
7. Review audit/system logs.

H. Patron Accounts

1. Observe the opening of a patron's account;
2. Compare the NRGC's Board Exclusion List, the NRGC's statewide voluntary self-exclusion list, and the Authorized Gaming Operator's property based self-exclusion list to the active patron list;
3. Review the dispute logs;
4. Review patron account activity; and
5. Review the procedures for disabling an inactive patron account.

I. Promotions

1. Review recent promotions;
2. Determine whether promotions were approved by the NRGC Executive Director prior to implementation;
3. Review the process used to ensure that promotions do not include any person on the NRGC's Board exclusion list, the NRGC's statewide voluntary self-exclusion list, and the Authorized Gaming Operator's property based self-exclusion list; and
4. Review accounting procedures for promotions, expired promotions, and redeemed promotions.

J. Coupons (Gaming Only)

1. Review recently issued coupons;
2. Determine whether the NRGC Executive Director has approved the Coupon Distribution Program;
3. Review accounting procedures for coupons;
4. Review coupon inventories;

5. Review the process for canceling or voiding coupons;
6. Review patron account activity; and
7. Review the process used to ensure that the coupon mailing/distribution list does not include any person on the NRGC's Board exclusion list, the NRGC's statewide voluntary self-exclusion list, and the Authorized Gaming Operator's property based self-exclusion list.

K. Such other audits which may be required by the audit committee, management or the NRGC Executive Director.

III. **Reporting Guidelines**

Quarterly reports are required for all of the aforementioned internal audits and any other internal audits relating to gaming operations performed during the quarter. Authorized Gaming Operators are responsible to see that all internal audit procedures are conducted within each quarterly period.

The report must include the following information:

- A. A title page containing the Authorized Gaming Operator's legal name, the name of the report, the reporting period and the report number as approved by the NRGC.
- B. A table of contents listing the subject headings and their respective pages; and
- C. The contents of the report. Each audit must be subdivided into the following sections:
 1. Audit objectives;
 2. Audit procedures and scope, which include:
 - i. Whether the test was performed by inquiry, observation, or examination;
 - ii. The scope of each observation, review and test including the sample sizes and dates tested; and
 - iii. The population from which the sample is selected for testing purposes, including all transactions occurring subsequent to the prior period's test dates through the current period's test date. For example, if the test date for the first quarter was February 5, the population for the second quarter's audit must include all transactions from February 6 through June 30;
 3. Findings and conclusions. The page number references to ICS procedures which correspond to findings must be included along with the specific number of exceptions noted. If there are no findings, the report must indicate that no audit findings were noted. All findings relating to the required internal audits and any other internal audits relating to gaming operations must be reported.
 4. Recommendations, if applicable. All recommendations must be discussed with management prior to the report being submitted to the NRGC;
 5. Observations. Exceptions noted that are not ICS violations but relate to gaming operations must be included; and
 6. Management's response. This must include the specific corrective actions to be taken, implementation dates and the employees responsible for implementation and subsequent follow-up. Responses are required for findings. Responses are only required for observations if required by casino policy.

- D. The internal audit reports are due no later than three months after the last day of the reporting period. One copy of the report must be delivered to the NRG Executive Director or their designee. In addition, an electronic version (PDF) of the same report must be forwarded by email to the NRG as instructed under separate cover.
- E. If the internal audit report fails to address any of the required audits, the NRG will assume the audit was not performed.
- F. Any additional audits of gaming operations performed must be included in that quarter's respective internal audit report. In addition to the regular audit procedures, special audits may be performed at the request of the audit committee, management, or the NRG Executive Director.
- G. Internal auditors must immediately notify the NRG Executive Director in writing of any material weaknesses noted.

IV. **Review of Changes to the ICS**

A Compliance Officer must review changes to the ICS for ongoing compliance with the MICS prior to their submission for approval to the NRG.

**NEBRASKA RACING GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION K – SURVEILLANCE

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I. **General**

- A. The close circuit monitoring equipment in both the surveillance and the NRGC surveillance rooms must meet or exceed the minimum standards specified in the NRGC Adopted Rules and must be routinely maintained and checked.
- B. The Authorized Gaming Operator must provide for the exclusive use of the NRGC Agent and surveillance employees, rooms in each operation and for surveillance, monitoring and recording purposes.
- C. The surveillance director must report to the Board of Directors unless otherwise approved by the NRGC Executive Director.
- D. The ICS must include a statement that remote access to an Authorized Gaming Operator's surveillance system is prohibited.

II. **Surveillance Room Access and Control**

- A. Describe the general location of the surveillance room(s) and ensure the interior is not visible to the public and other employees. Normal access to the surveillance room is restricted to surveillance and NRGC personnel. If any other person wants to access the surveillance room, they must obtain prior permission of the NRGC Supervisor/ Agent.
- B. All ingress and egress of the surveillance room must be recorded in a surveillance access log, except for ingress and egress of NRGC and surveillance personnel.
- C. Surveillance employees must have no other gaming related duties within the gaming operation.
- D. The surveillance equipment in the NRGC surveillance room must be able to monitor and record without being over-ridden by anyone else.
- E. Include the minimum number of monitors each surveillance and NRGC surveillance rooms will be equipped with and the fact that each room must have the appropriate switching capabilities to secure access to all surveillance cameras.
- F. A segregated telephone communication system must be provided for use by NRGC Agents in all NRGC surveillance rooms.

III. **Daily Operations**

- A. Describe the procedures to be followed by surveillance employees during their shift including inspection of equipment, testing procedures, digital surveillance record maintenance and release, preparation of forms, surveillance shift logs and surveillance incident reports.
- B. Surveillance must video tape/digitally record and monitor the following:
 - 1. Soft and bill validator drop, count, verification, and transfer, including emergency drops;
 - 2. Tip drop, count, verification, and transfer of tips for all employees identified in the Tips and Gratuities section of the MICS; and
 - 3. Past Due Support transaction(s) from the point of notification until the completion of the transaction(s)

- C. Release of original digital surveillance records must not be allowed to casino departments. Release of a copy of tapes/digital surveillance records to any person other than surveillance employees and NRGC personnel must not be allowed without obtaining the prior approval of the NRGC Supervisor. A surveillance digital surveillance record release log must be maintained recording who receives a copy of digital surveillance records, surveillance incident reports and/or surveillance logs.
- D. Include a description of the type of media used to store digitally recorded information, ensuring compliance with the NRGC records retention schedule. Specify where and how digitally recorded information will be stored if it is kept longer than the minimum retention period and include the procedures for preparing the surveillance digital surveillance record retention log.

IV. **Chain of Evidence**

- A. Include the procedures for maintaining, copying, and releasing any tapes/digital surveillance records which contain illegal and/or suspected illegal activities. Ensure that the NRGC Executive Director is notified immediately of the illegal and/or suspected illegal activity and of the digital surveillance record's existence.

The ICS must include a statement that the viewing of any digital recording other than by NRGC staff or designated surveillance employees of an Authorized Gaming Operator is prohibited unless specifically approved by the NRGC Executive Director or his or her designee, or pursuant to a lawful subpoena. Ensure that the NRGC Executive Director is immediately notified of any lawful subpoena.

**NEBRASKA RACING GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION L - SECURITY

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I. **General**

- A. The Security Department must not report to gaming personnel.
- B. The NRG Director of Enforcement must be immediately notified of all criminal activity, suspected or confirmed, and emergencies. The NRG Director of Enforcement must be promptly notified of all communication with law enforcement officials and all inquiries made concerning the conduct of a licensee.

II. **Reporting**

- A. Security personnel shall promptly report to the NRG Gaming Representative on duty as well as their supervisor any facts which the licensee has reasonable grounds to believe indicate a violation of law (other than minor traffic violations), or NRG rules to include state regulations, MICS, ICSs, and other orders of the Commission, committed by licensees, their employees or others, including, without limitation, the performance of licensed activities different from those permitted under their license. The NRG Gaming Representative agent on duty shall also be immediately notified of all inquiries made by law enforcement or other government officials concerning the conduct of a licensee.

The NRG Gaming Representative may request a copy of the Security Incident Log of all Security Incident Reports generated during the gaming day.

- B. The ICS must contain detailed procedures for control over the following situations and activities, including who participates in each activity, their duties and responsibilities, forms completed and distribution thereof, signatory responsibilities and all applicable controls:
 - 1. Case number system and preparation of security incident reports;
 - 2. Issuing temporary badges, including preparation of the temporary badge log;
 - 3. Issuing visitor/vendor badges, including preparation of the visitor/vendor badge log;
 - 4. Fund transfer control;
 - 5. Power failure/camera outage;
 - 6. Enforcement of gambling restrictions;
 - 7. Firearms prohibition;
 - 8. Alcoholic beverages and intoxicated patrons;
 - 9. Disorderly/disruptive patrons;
 - 10. Trespass policy;
 - 11. Emergencies; and
 - 12. Eviction procedures.

III. **Casino Access Control**

A person who has not attained 21 years of age may not play or operate a slot machine, table game or have access to the casino floor. Proof of Age may be required at any time to enter the casino floor.

- A. Persons who are visibly intoxicated shall not be permitted access to or allowed to remain on the casino floor or to place wagers
- B. All persons, regardless of age, must have their approved government-issued photo identification scanned at the point of entry to the casino floor.

- C. The ICS shall contain detailed procedures for control over the following situations and activities, including who participates in each activity, their duties and responsibilities, forms completed, signatory responsibilities, and all applicable controls for the following:
 - 1. enforcement of entry and gambling restrictions for visibly intoxicated persons;
 - 2. employee access to controlled areas;
 - 3. lost employee access badges and gaming licenses;
 - 4. issuance and return of temporary badges; and
 - 5. trespassing, including Self-Excluded and Excluded Persons.

- D. Using a method detailed in the ICS, the Authorized Gaming Operator shall inform visitor/vendors who may be on the Self-Excluded list of their responsibility to notify the NRG office at the facility of their status and the expected duration of their presence on the property.

- E. Visitor/vendor badges shall meet the following criteria. Badges shall be:
 - 1. reusable and made of a permanent, durable material such as plastic, metal, or laminated cardstock;
 - 2. capable of being securely attached to all common clothing types and styles by means of a secure mechanical device so as to prevent loss of the badge during normal activities;
 - 3. individually numbered used in conjunction with the Visitor/Vendor Log;
 - 4. unique in design, color, and construction; easily identifiable as a valid visitor/vendor badge at that facility; and to make duplication or counterfeiting difficult; and
 - 5. displayed on the visitor/vendor's person in a clearly visible manner at all times while on the gaming floor or in non-public areas.

- F. The ICS shall include detailed procedures for the issuance of and accounting for visitor/vendor badges on a daily basis. If badges for contractors or vendors are issued for more than one gaming day special procedures shall also be submitted in the ICS.

IV. **Protection of Assets & Card and Dice Integrity**

- A. The ICS shall contain detailed procedures for security's role in the following activities and events, including who participates, their duties and responsibilities, forms completed, signatory responsibilities, and all applicable controls:
 - 1. power failure/camera outage;
 - 2. card and dice:
 - i. inventory;
 - ii. inspection; and
 - iii. cancellation and destruction;
 - 3. panic alarm activations and monthly testing;
 - 4. facility lockdown; and
 - 5. drops.

- B. Security personnel shall not conduct cash transactions or chip or ticket redemptions without approval of the NRG Gaming Representative on duty.

- C. A Security escort shall be required for the movement of all unredeemed tickets, chips, or cash of \$100 or more, except:
1. EGD hand-paid jackpots less than \$5,000;
 2. transfers between the poker table banks and poker room bank; and
 3. non-gaming transfers.

**NEBRASKA RACING AND GAMING COMMISSION
MINIMUM TECHNICAL STANDARDS**

SECTION M – TECHNICAL STANDARDS

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I. **Technical Standards for Electronic Gaming Equipment and Systems**

- A. Electronic Gaming Equipment and Systems must meet the latest version of the following technical standards (or their equivalent as approved by the NRGC):
1. GLI-11 – Gaming Devices
 2. GLI-12 – Progressive Gaming Devices
 3. GLI-13 – Monitoring and Control Systems and Validation Systems
 4. GLI-16 – Cashless Systems
 5. GLI-17 – Bonusing Systems
 6. GLI-18 – Promotional Systems
 7. GLI-20 – Kiosks
 8. GLI-21 – Client Server Systems
 9. GLI-24 – Electronic Table Game Systems
 10. GLI-25 – Dealer Controlled Electronic Table Game Systems
 11. GLI-26 – Wireless Systems
 12. GLI-27 – Network and System Security
 13. GLI-28 – Patron User Interface Systems
 14. GLI-29 – Card Shufflers and Dealer Shoes
- B. Technical standards therein are subject to review and revision by the NRGC and must not be construed to either allow or disallow other technologies because they do not conform to these standards.

II. **Electronic Gaming Devices (EGDs)**

- A. EGDs submitted for approval shall employ a verification mechanism which allows remote validation of all Critical Program Storage Devices (CPSDs).
1. The verification mechanism shall be readily accessible via a communication port and utilize the Game Authentication Terminal (GAT) protocol v3.50 or higher, or an equivalent protocol approved by the NRGC.
 2. The communication port shall be located within the EGD and allow connectivity without requiring access to the locked logic area. If the port is located on the backplane of the interior cabinet, an extension cable shall be permanently mounted to allow connection of the required cable towards the front interior of the cabinet.
 3. The EGD must provide on-demand authentication of CPSDs. This function shall not require the power to be cycled and the execution time shall not exceed twenty (20) minutes.
 4. The EGD must generate a unique signature for each CPSD utilizing secure hashing algorithm-1 (SHA-1) with hash-based message authentication code (HMAC), as defined by the National Institute of Standards and Technology (NIST), Hashing methodologies will be continually reevaluated by the NRGC.
 5. The EGD must provide support for escrowing and retrieving verification results. Verification results shall be preserved and retrievable pending a subsequent verification request or a loss of power.
 6. The EGD must allow an authentication to be sent to the machine then after a disconnect of communications, retrieved later. During the disconnect of communications it is recommended that the EGD be capable of being put back into a playable state. If this is not possible, the EGD must at least be capable of being placed into a disabled state.

- B. The EGD shall be designed to permit a copy of critical non-volatile (NV) memory to be extracted utilizing tools and procedures approved by the NRCG and which shall be provided by the manufacturer. The independent test laboratory, prior to EGD approval, shall verify that such tools and procedures exist, for the purpose of forensic examination.
- C. The RNG used in the determination of game outcomes in an EGD shall be cryptographically strong. “Cryptographically strong” means that the RNG is resistant to attack or compromise by an intelligent attacker with modern computational resources, and who may have knowledge of the source code of the RNG.
- D. No game on an EGD may function similarly to or bear any outward appearance to any game regulated by Department of Lottery, which includes lotteries, raffles, pickle cards, bingo, keno, or games which produce an outcome predominantly caused by skill and not chance. This should not preclude the use of games of chance with skill-based features or games based on traditional casino games (e.g., poker, blackjack, etc.).

III. Cashless Wagering Systems

- A. A Cashless Wagering System allows patrons to participate in cashless gaming using an approved, securely protected authentication method, which accesses a Patron Account at the Cashless Wagering System of the operator or another account of the patron provided that it allows for the identification of the patron and the source of funds and that is linked in a secure manner to the Cashless Wagering System of the operator and the Patron Account on that Cashless Wagering System.
 - 1. A Cashless Wagering System may also support the functionality to communicate promotional awards to participating Patron Accounts based upon predefined patron activity criteria established by the parameters of the system. Promotional awards are additional features that entitle patrons to special promotional awards based on patrons play activity or awards gifted by the casino to guests. In this section, unless otherwise specified the term “cashless” shall be used to refer to both promotional and non-promotional functionality.
 - 2. A Cashless Wagering System may be entirely integrated into an existing system, such as a monitoring and control system, or exist as an entirely separate entity. If the Cashless Wagering System is comprised of multiple computer systems at various sites, the system as a whole and all communication between its components shall conform to the applicable technical requirements of this section.
- B. The Cashless Wagering System shall uniquely identify each Cashless Device connected to the system. “Cashless Devices” as used in this section means EGDs, Kiosks, and any other equipment used in a cashless environment.
- C. Each cashless transactions between a supporting Cashless Device and the Cashless Wagering System must be secured using a method of authentication, such as debit instrument or card insertion or “tap” (contactless) capacity on the patron identification component and secure personal identification code/PIN entry, a similar approved process that allows for the identification of the patron and the source of funds when an approved third-party secure interface that uses a defined protocol, or similar software application on a patron’s device (such as a smartphone or tablet) is used, or a secure alternative means (e.g. finger-print recognition).

- D. Cashless Wagering Systems shall cause a relevant, informative message to be displayed to the patron whenever any cashless transaction is being processed.
1. The Cashless Device, or the patron's device with a secure interface that uses a defined protocol, must be capable of providing confirmation or denial of every cashless transaction initiated.
 2. If a patron initiates a cashless transaction and that transaction exceeds cashless device configured limits including the credit limit or transaction limit, the transaction may only be processed provided that the patron is clearly notified that the patron has received or deposited less than requested to avoid patron disputes.
- E. Where credits are transferred between the Patron Account and the Cashless Device:
1. After the patron's identity is confirmed, the Cashless Device must present transfer options to the patron. Such options may include how many credits the patron wishes to withdraw and be placed on the Cashless Device. A system may move either a predefined amount or the patron's entire balance to the cashless device for play.
 2. A transfer shall not be accepted if the transfer will cause the patron to have a negative balance;
 3. The account balance is to be debited when the transfer is accepted;
 4. Once play is complete the patron may have the option to move some of the credits back to the account or cash out some or all of the credits. A system may require that the entire currency value of the credit balance be transferred back to the system.
- F. Where credits are NOT transferred between the Patron Account and the Cashless Device:
1. A wager shall not be accepted that could cause the patron to have a negative balance; and
 2. The account balance is to be debited when the wager is accepted.
- G. Any Cashless Device that holds information relating to cashless transactions in its memory shall not have means to compromise the information and shall not allow the removal of its information until that information has been successfully transferred and acknowledged by the Cashless Wagering System.
- H. The Cashless Wagering System shall be able to produce logs for all pending and completed cashless transactions including:
1. Patron Account ID or unique transaction ID, either of which can be used to authenticate the source of the funds;
 2. Type of transaction including any restrictions;
 3. Transaction amount;
 4. Time and date of the transaction;
 5. Cashless Device number or other relevant location information; and
 6. Status of the transaction
- I. The following minimal internal controls shall be implemented to identify and flag suspect Patron Accounts to prevent unauthorized use including:
1. Establishing a maximum number of three successive incorrect authentication attempts before account logout;

2. Flagging of hot accounts where cards or authentication credentials have been stolen;
3. Monitoring Cashless Devices for funds transferred into the Cashless Device from one Patron Account then transferred out to another Patron Account; and
4. Monitoring Patron Accounts for opening and closing in short time frames and for deposits and withdrawal without associated game play transactions.

IV. **Client Server Systems**

- A. The Client Server System shall not be capable of altering any component on any connected EGD that would interrupt, or affect the functions, game outcome, or configurable options of a game in progress on any EGD connected to the Client Server System; provided however, that a Client Server System may suspend a game theme or disable a EGD at any time if there is a valid reason to do so.
- B. Software shall not be activated, deactivated, added to, modified or removed from an EGD while an error or tilt condition, or hand pay lockup exists on the EGD, except as necessary to rectify the error condition.
- C. The EGD shall be in the idle mode with no activity, no credits, no door open, and no error condition for at least two (2) minutes prior to the change in the active software unless the change is the direct result of a patron request, or a qualifying event that is not an identifier, which may include, but is not limited to, the number of games played, or the cumulative amount wagered by a patron during a game or series of games as provided for in the rules of play. Active software consists of the following:
 1. All the games currently available for play by the patron on the EGD that do not first require additional software or a change in game configuration such as denomination, maximum wager, return to patron, etc.; and
 2. Any software in which a change will interrupt normal game play (e.g., operating system software and peripheral firmware).

**NEBRASKA RACING GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION N – TIPS AND GRATUITIES

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I. **Tips and Gratuities - General**

- A. No dealer will accept currency or vouchers as a tip or gratuity from a patron. Only chips, tokens, and gaming vouchers will be accepted.
- B. No gaming operation key person, boxperson, floorperson or any other employee who serves in a supervisory position will accept tips or gratuities from a patron.
- C. No employee will solicit any tip or gratuity.
- D. Tip bets placed by the patron for the dealer must not remain in action, but if the bet is won must immediately be placed in the tip drop box by the dealer.
- E. EGD, cage and security employees permitted to accept tips and gratuities must immediately deposit their tips into a transparent tip box. The ICS will define those positions permitted to accept tips and gratuities.
- F. Vouchers are prohibited from being accepted as a tip or gratuity. Vouchers found in a tip box must be treated as a found voucher.
- G. Tips must be placed in a pool for pro rata distribution for dealers, EGD, cage and security personnel.
- H. Distribution of tips and gratuities must be made following the Authorized Gaming Operator's payroll accounting practices and will be subject to all applicable state and federal withholding taxes.

II. **Tips and Gratuities - Dealers**

Tip Box Characteristics

- A. Each gaming table will have attached to it a transparent locked tip box in which tips or gratuities received by the dealer must be immediately deposited.
- B. Each tip box and locked holding container must be under surveillance coverage.
- C. Each tip box must have a lock securing the tips placed into the box and a slot opening through which chips may be deposited into the box.

Drop and Count of Tip Box Contents

- A. Tip boxes may be emptied into locked holding containers located within the pit area. This function must be performed by at least two employees, of which one must be a dealer. Surveillance must be notified prior to emptying the tip boxes.
- B. The drop and count of tip boxes and holding containers must be performed by one or more randomly selected dealer(s) and a non-gaming employee who is independent of the verification process and subsequent accountability of the tip count proceeds. The drop and count of tip boxes and holding containers must not be performed simultaneously or conflict with any other tips and gratuities drop and count. The schedules for the tip drop and count and the location of the count of the tips must be submitted under separate cover to the NRGCE Executive Director for written approval.

- C. The results of the tip count must be recorded on at least a two-part gratuity deposit form and signed by the tip count team prior to verification by a casino cage cashier.
- D. The tip drop must be transferred to the casino cage by the casino cage cashier who verified the tip count and security, if verification of the count is performed at a gaming table. If verification of the count is performed at the casino cage, the tip drop must be transported to the casino cage by the tip count team.
- E. A casino cage cashier must, in the presence of the tip count team, verify the tip count, without prior knowledge of the results of the tip count team's recorded count, sign the gratuity deposit form, retain one part for accountability and return a signed copy to the tip count team.

III. **Tips and Gratuities – EGD, Cage and Security**

Tip Box Characteristics

- A. Tip boxes must be permanently labeled with the name of the respective department.
- B. Each tip box and locked holding container must be under surveillance coverage. Describe the location of permanently affixed tip boxes and/or locked holding containers for each department.
- C. Each tip box must have a lock securing the tips placed into the box and a slot opening through which chips and currency may be deposited into the box.

Drop and Count of Tip Box Contents

- A. Provide procedures for the drop and count of tip boxes. Procedures must include the employees involved in the drop and count of the tip boxes. If employees from more than one department share tips, a representative from each department must participate in the drop and count of the tips. The schedules for the tip drop and count and the location of the count of the tips must be submitted under separate cover to the NRGCE Executive Director for written approval.
- B. Tip boxes may be emptied into locked holding containers. This function must be performed by at least two employees, of which one must be independent of the department tips being emptied. Surveillance must be notified prior to emptying the tip boxes.
- C. The drop and count of the tip boxes or holding containers must be performed by one or more randomly selected employee(s) from each department that shares tips and an additional employee from a different department as an observer who is independent of the verification process and subsequent accountability of the tip count proceeds. The drop and count of the tips boxes or holding containers must not be performed simultaneously or conflict with any other tips and gratuities drop and count.
- D. The results of the tip count must be recorded on at least a two part gratuity deposit form, and signed by the tip count team prior to verification by a casino cage cashier.

- E. If verification of the count is not performed at the casino cage, the tip drop must be transferred to the casino cage by the casino cage cashier who verified the tip count and security. If verification of the count is performed at the casino cage, the tip drop must be transported to the casino cage by the tip count team.
- F. A casino cage cashier, independent of the count, must, in the presence of the tip count team, verify the tip count without prior knowledge of the results of the tip count team's recorded count, sign the gratuity deposit form, retain one part for accountability and return a signed copy to the tip count team.

IV. **Redemption of Gratuities for Other Non - Gaming Employees**

The ICS must include a statement that policies and procedures must be established for the redemption of gratuities received by non-gaming employees, other than cage and security as addressed in this section, which follow the Authorized Gaming Operator's payroll accounting practices and are subject to all applicable state and federal withholding taxes.

**NEBRASKA RACING AND GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS**

SECTION O – PATRON ACCOUNT SPECIFICATIONS

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I. **Patron Registration**

- A. An Authorized Gaming Operator may offer the ability to establish patron accounts. A patron account may be established with Authorized Gaming Operator through registration procedures approved by the NRGC.
- B. Only an individual who is twenty-one (21) years of age or older and not a prohibited person may create a patron account. The Authorized Gaming Operator must deny the ability to create a patron account to any individual who is under twenty-one (21) years of age or is a prohibited person. This section shall not be construed to prevent a restricted patron from creating a patron account and depositing funds to such an account even if they are prohibited from placing certain wagers.
- C. An Authorized Gaming Operator must collect the following personal identifying information from the individual for each patron
1. The patron's full legal name;
 2. The patron's date of birth;
 3. The patron's principal residential address. A post office box is not acceptable;
 4. Any other information collected from the patron used to verify their identity and to prove the patron is at least twenty-one (21) years of age
- D. During the registration process, the patron shall:
1. Be denied the ability to register for a patron account if they submit a birth date which indicates that they are under the age of twenty-one (21);
 2. Be informed on the account application which information fields are "required," which are not, and what will be the consequences of not filling in the required fields;
 3. Agree to the terms and conditions and privacy policies of the Authorized Gaming Operator;
 4. Acknowledge that they are prohibited from allowing any unauthorized person to access or use their patron account;
 5. Consent to the monitoring and recording of the use of their patron account by the Authorized Gaming Operator and the NRGC; and
 6. Affirm that the information the patron is providing to open the patron account is accurate.
- E. Unless otherwise noted on the account application, the address provided on the application to establish the account is deemed the address of record for mailing correspondence. It is the responsibility of the patron to notify the Authorized Gaming Operator of any address change.
- F. An Authorized Gaming Operator must maintain an electronic patron file, which must, at a minimum, include the following for each patron, as applicable:
1. Unique patron ID and username (if different);
 2. The information indicated in subsection (1) to register a patron and create the account;
 3. Encrypted government issued identification number, authentication credential, and personal financial information;
 4. The date and method of identity verification, including, where applicable, the document number of the government issued identification credential examined and

its date of expiration, if applicable. If a government issued identification credential is not required for registration, the electronic record that details the process used to confirm the patron's identity must be recorded;

5. The date of patron agreement to the terms and conditions and privacy policies;
6. Account details and current balance, including any restricted wagering credits and unrestricted funds. All restricted wagering credits and unrestricted funds that have a possible expiration shall be maintained separately;
7. Previous patron accounts, if any, and reason for de-activation;
8. The date and method from which the patron account was registered;
9. The date and time the account is accessed by any person, including IP Address or gaming establishment location as applicable; and
10. The current status of the patron account (e.g., active, inactive, closed, suspended, excluded, etc.).

G. An Authorized Gaming Operator shall allow the patron to update authentication credentials, registration information and the account used for financial transactions. A multi-factor authentication process shall be employed for these purposes.

II. **Age and Identity Verification**

- A. The Authorized Gaming Operator shall employ electronic verification with respect to each patron's name, date of birth and government issued identification number, at the time of account establishment by a NRGC-approved national independent reference company or another independent technology approved by the NRGC which meets or exceeds the reliability, security, accuracy, privacy and timeliness provided by individual reference service companies.
- B. The Authorized Gaming Operator shall refuse to establish an account if it is found that any of the information supplied is untrue or incomplete.
- C. The Authorized Gaming Operator must use commercially available and demonstrable standards to confirm that an individual attempting to create a patron account is not a prohibited person.
- D. The Authorized Gaming Operator must periodically re-verify a patron's identification upon reasonable suspicion that the patron's identification has been compromised.

III. **Terms and Conditions and Privacy Policies**

- A. All terms and conditions and privacy policies for patron accounts must be included in the ICS of the Authorized Gaming Operator and shall be readily accessible to the patron before and after registration and noticed when materially updated beyond any grammatical or other minor changes.
- B. All terms and conditions must address all aspects of the patron account operation, including, but not limited to all of the following:
 1. A statement that no underage individuals are permitted to participate in games of chance;
 2. Advice to the patron to keep their authentication credentials (e.g., password and username) secure;

3. All processes for dealing with lost authentication credentials, forced password changes, password strength and other related items as required by the NRGC;
 4. Full explanation of all rules applicable to inactive accounts, including the conditions under which an account is declared inactive and what actions will be undertaken on the account once this declaration is made;
 5. Information about timeframes and limits regarding deposits to and/or withdrawals from the patron account, including a clear and concise explanation of all fees, if applicable; and
 6. Statements indicating that the Authorized Gaming Operator has the right to:
 - i. Refuse to establish a patron account for what it deems good and sufficient reason;
 - ii. Refuse deposits to and/or withdrawals from patron accounts for what it deems good and sufficient reason; and
 - iii. Unless there is a pending investigation or patron dispute, suspend or close any patron account at any time pursuant to the terms and conditions between the Authorized Gaming Operator and the patron.
- C. All privacy policies must address all aspects of the personal identifying information protection collected for the patron account, including, but not limited to all of the following:
1. The information required to be collected;
 2. The purpose and legal basis for information collection;
 3. The period in which the information is stored, or, if no period can be possibly set, the criteria used to set this;
 4. The conditions under which information may be disclosed;
 5. An affirmation that measures are in place to prevent the unauthorized or unnecessary disclosure of the information; and
 6. Any other privacy requirements specified by the NRGC.

IV. **Patron Access.**

- A. Authentication credentials, such as a username and a password or a secure alternative means shall be utilized to assure that only the patron has access to the patron account. Allowable authentication credentials are subject to the discretion of the NRGC as necessary. The requirement does not prohibit the option for more than one method of authentication being available for a patron to access their account. A patron may change their authentication credential at any time.
- B. If the authentication credentials are not recognized when entered, an explanatory message must be provided to the patron that prompts them to try again. The error message must be the same regardless of which authentication credential is incorrect.
- C. Where a patron has forgotten their authentication credentials, a multi-factor authentication process shall be employed for the retrieval or reset of their forgotten authentication credentials.

- D. Current account balance information, including any restricted wagering credits and unrestricted funds, and transaction options shall be available to the patron once authenticated. All restricted wagering credits and unrestricted funds that have a possible expiration shall be indicated separately.
- E. An account must be locked in the event that suspicious activity is detected, such as three consecutive failed access attempts in a 30-minute period. A multi-factor authentication process shall be employed for the account to be unlocked.

V. **Financial Transactions.**

- A. The patron shall provide confirmation/denial of every financial transaction initiated, including:
 - 1. The type of transaction (deposit/withdrawal);
 - 2. The transaction value; and
 - 3. For denied transactions, a descriptive message as to why the transaction did not complete as initiated.
- B. A patron account may be funded using approved methods which shall produce a sufficient audit trail for verification of the source of the wagers.
- C. Approved methods for funding accounts include:
 - 1. Cash or voucher deposits;
 - 2. Charges made to an account holder's debit card;
 - 3. Bonus or promotional credit;
 - 4. Electronic funds transfer (EFT) from an account with a financial institution in the name of the account holder;
 - 5. Credit for winnings from wagers placed with funds in the account;
 - 6. Adjustments made by the Authorized Gaming Operator with documented notification to the patron; and
 - 7. Any other means approved by the NRG.
- D. For debit cards and EFTs, the patron may be liable for any charges imposed by the transmitting or receiving Authorized Gaming Operator and the charges may be deducted from their account.
- E. Any funds deposited pursuant to this section are available for use in accordance with the financial institution's policy regarding funds availability;
- F. Where financial transactions are conducted through EFT, the Authorized Gaming Operator shall have security measures and controls to prevent EFT fraud. A failed EFT attempt is not considered fraudulent if the patron has successfully performed an EFT on a previous occasion with no outstanding chargebacks. Otherwise, the Authorized Gaming Operator shall do all of the following:
 - 1. Temporarily block the patron account for investigation of fraud after 5 consecutive failed EFT attempts within a 10-minute period. If there is no evidence of fraud, the block may be vacated; and
 - 2. Suspend the patron account after five (5) additional consecutive failed EFT attempts within a 10-minute period.

- G. A patron must be allowed to withdraw the funds maintained in his or her patron account, whether the account is open or closed, except as otherwise provided in these rules, or any other applicable state or federal laws.
- H. An Authorized Gaming Operator must employ a mechanism that can detect and prevent any withdrawal activity initiated by a patron that would result in a negative balance of the patron account.
- I. An Authorized Gaming Operator shall not allow a patron account to be overdrawn unless caused by payment processing issues outside the control of the Authorized Gaming Operator.
- J. An Authorized Gaming Operator must honor the patron's request to withdraw funds within five (5) business days after the request, unless the conditions set forth in subsection (d) are met.
- K. The Authorized Gaming Operator may decline to honor a patron's request to withdraw funds only if the Authorized Gaming Operator believes in good faith that the patron engaged in either fraudulent conduct or other conduct that would put the Authorized Gaming Operator in violation of the statutes and these rules. In such cases, the Authorized Gaming Operator must do all of the following:
 - 1. Provide notice to the patron of the nature of the investigation of the patron account; and
 - 2. Conduct its investigation in a reasonable and expedient fashion, providing the patron additional written notice of the status of the investigation every tenth(10th) business day starting from the day the original notice was provided to the patron.
- L. For purposes of this rule, a request for withdrawal is considered honored if it is processed by the Authorized Gaming Operator notwithstanding a delay by a payment processor, credit card issuer, or the custodian of a financial account.
- M. All adjustments to patron accounts for amounts of five hundred dollars (\$500.00) or less must be periodically reviewed by supervisory personnel as set forth in the Authorized Gaming Operator's internal controls. All other adjustments must be authorized by supervisory personnel before being entered.

VI. **Account Statements.**

- A. Upon request of the patron, the Authorized Gaming Operator shall provide to each patron a statement of their patron account activity for the past year. Statements provided shall include sufficient information to allow patrons to reconcile the statement against their own financial records.
- B. Unless the Authorized Gaming Operator receives written notice disputing the statement within 30 days of the date the statement is forwarded, it shall be deemed to be correct.

VII. **Responsible Gaming Limits.**

- A. An Authorized Gaming Operator shall allow the patron to set the following responsible gaming limits set forth below on their patron account.
 - 1. A deposit limit, which shall be offered on a daily, weekly and monthly basis and shall specify the maximum amount of money a patron may deposit into his or her patron account outside of credits won during game play during a particular period of time.
 - 2. A wager limit, which shall be offered on a daily, weekly and monthly basis and shall specify the maximum amount of patron account funds that may be put at risk during a particular period of time.
- B. Any decrease to these limits shall be effective immediately or at the point in time (e.g., next login, next day) that was clearly indicated to the patron.
- C. Any increase to these limits shall become effective only after the time period of the previous limit (e.g., day, week, month, etc.) has expired and the patron reaffirms the requested increase.

VIII. **Suspension and Restoration of Accounts.**

- A. An Authorized Gaming Operator must employ a mechanism that places a patron account in a suspended mode.
- B. The suspended mode shall be activated under the following conditions:
 - 1. When requested by the patron for a specified period of time, which must not be less than seventy-two (72) hours;
 - 2. When required by the NRGC;
 - 3. Upon a determination that a patron is a prohibited person; or
 - 4. When initiated by an Authorized Gaming Operator that has evidence that indicates any of the following:
 - i. Illegal activity;
 - ii. A negative account balance; or
 - iii. A violation of the terms and conditions has taken place on an account.
- C. When a patron account is in a suspended mode, the Authorized Gaming Operator must:
 - 1. Prevent the patron from making wagers;
 - 2. Prevent the patron from depositing funds unless the account is suspended due to having a negative patron account balance but only to the extent the patron account balance is brought back to zero dollars;
 - 3. Prevent the patron from withdrawing funds from his or her patron account, provided that the Authorized Gaming Operator acknowledges that the funds have cleared, and that the reason(s) for exclusion would not prohibit a withdraw;
 - 4. Prevent the patron from making changes to his or her patron account;
 - 5. Prevent the removal of the patron account from the system; and
 - 6. Prominently indicate to the patron that their account is in a suspended mode, the restrictions placed on the account, and any further course of action needed to remove the suspended mode.

- D. A suspended account may be restored for any of the following reasons:
 - 1. Upon expiration of the time period established by the patron if solely the result of a self-exclusion request;
 - 2. If authorized by the NRGC;
 - 3. When the patron is no longer a prohibited person; or
 - 4. When the Authorized Gaming Operator has lifted the suspended status.
- E. Each Authorized Gaming Operator shall, on a monthly basis, provide the NRGC with a list of suspended accounts, including the reasons why the account is in suspended mode.

IX. **Patron Account Closure.**

- A. An Authorized Gaming Operator must provide a conspicuous and readily accessible method for a patron to close his or her patron account through the account management or similar page or through the Authorized Gaming Operator's customer support team.
- B. Any balance remaining in a closed patron account must be refunded pursuant to the Authorized Gaming Operator's ICS.

X. **Inactive Accounts.**

- A. The Authorized Gaming Operator may close any account with no activity for at least three (3) years, including making a wager, making an account deposit, or withdrawing funds.
- B. The Authorized Gaming Operator shall have procedures in place to:
 - 1. Allow access to a patron's inactive account only after performing additional identity verifications;
 - 2. Protect inactive accounts that contain funds from unauthorized access, changes or removal; and
 - 3. Deal with unclaimed funds from inactive accounts and return any remaining funds to the patron where possible.
- C. No licensee may charge an administration fee or maintenance fee for any inactive account.
- D. The licensee shall treat inactive accounts as unclaimed property and comply with the provision of the Nebraska Racing and Gaming Regulations.

XI. **Securing Payment Methods.**

- A. ICS must be in place to ensure all financial transactions are conducted in accordance with federal regulations and the NRGC's rules
- B. Collection of sensitive information directly related to financial transactions must be limited to the information strictly needed for such transaction;
- C. Adequate measures must be taken to protect any type of payment from a fraudulent use;
- D. The Authorized Gaming Operator shall verify that the payment processors ensure the protection of the patron's data, including any sensitive information given by the patron, or transaction related data;

- E. There must be an established procedure for assuring a match of ownership between the payment type holder and the patron account holder;
- F. The licensee shall generate all transactional records of patron accounts. The data recorded must allow the licensee to trace a single financial transaction of a patron from another transaction; and
- G. All financial transactions must be reconciled with financial institutions and payment processors daily or as otherwise specified by the NRGC.

XII. Personal Identifying Information Security.

- A. Any information about patron accounts that is not subject to disclosure pursuant to the privacy policies must be kept confidential, except where the release of that information is required by law.
- B. No employee or agent of the Authorized Gaming Operator may divulge any confidential information related to the placing of a wager or any confidential account information related to the operation of the Authorized Gaming Operator, pursuant to a court order, state or federal law, or NRGC order. This includes, but is not limited to:
 - 1. The amount of money credited to, debited from, or present in any particular patron account;
 - 2. The amount of money wagered by a particular patron on any game of chance or series of games of chance;
 - 3. The unique patron ID or username and authentication credentials that identify the patron;
 - 4. The identities of particular games of chance on which the patron is wagering or has wagered; and
 - 5. Unless otherwise authorized by the patron, the name, address, and other information in possession of the Authorized Gaming Operator that would identify the patron to anyone other than the NRGC or the Authorized Gaming Operator.
- C. A violation of this section is grounds for disciplinary action.

END OF DOCUMENT