



PARTICIPANT GUIDE

The Commission is promoting four emphasis areas in the agency’s work commitment to assist in being more engaged and accountable to the Indian gaming industry and Indian Country.

Industry Integrity

Protecting the valuable tool of Indian gaming that in many communities creates jobs, is the lifeblood for tribal programs, and creates opportunities for tribes to explore and strengthen relationships with neighboring jurisdictions.

Agency Accountability

Meeting the public’s expectation for administrative processes that uphold good governance practices and support efficient and effective decision making to protect tribal assets.

Preparedness

Promoting tribes’ capacity to plan for risks to tribal gaming assets including natural disaster threats, the need to modernize and enhance regulatory and gaming operation workforces, or public health and safety emergencies.

Outreach

Cultivating opportunities for outreach to ensure well-informed Indian gaming policy

development through diverse relationships, accessible resources, and government-to-government consultation.

This training reinforces these four emphasis areas and the agency's commitment to the Indian gaming industry and Indian Country.



Course Objectives

- **Identify Minimum Internal Controls Standards (MICS)**
- **Identify barriers to effective operation**
- **How to go beyond the MICS**

PARTICIPANT GUIDE

- Identify Minimum Internal Controls Standards (MICS) located at <https://www.nigc.gov/general-counsel/commission-regulations>
- Identify barriers to effective operation
- How to go beyond the MICS



Poll



**Does your Surveillance fall under the
TGRA or Operations?**

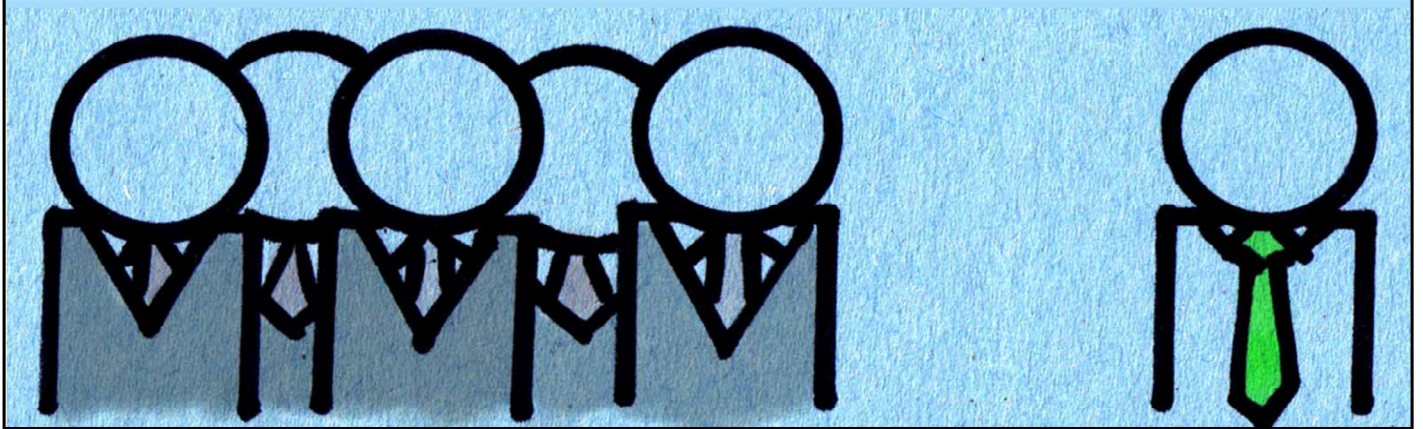
PARTICIPANT GUIDE

What are the pros and cons of each?



Surveillance Department

Effective oversight requires functional separation between the Surveillance and casino employees



PARTICIPANT GUIDE

Effective oversight requires functional separation between the surveillance and casino employees. Independence is the foundation of Part 543.21 (a) and (b).

§543.21 What are the minimum internal control standards for surveillance?

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

(b) *Surveillance equipment and control room(s).* Controls must be established and procedures implemented that include the following:

(1) For Tier A, the surveillance system must be maintained and operated from a secured location, such as a locked cabinet. For Tiers B and C, the surveillance system must be maintained and operated from a staffed surveillance operation room(s).

(2) The surveillance operation room(s) must be secured to prevent unauthorized entry.

(3) Access to the surveillance operation room(s) must be limited to surveillance agents and other authorized persons.



Prime Parking Space?



PARTICIPANT GUIDE

This altercation is all about the best parking spot.



That escalated quickly?

20

03/12/2016 19:56:37 Sat.



PARTICIPANT GUIDE

Road rage and verbal confrontations can escalate anywhere.



Video Retention-Reactive Responses

- **Digitally record and store footage for 14 to 30 days or more.**
- **Minimum 20 frames per second.**



PARTICIPANT GUIDE

§543.21 What are the minimum internal control standards for surveillance? (<https://www.nigc.gov/general-counsel/commission-regulations>)

(e) *Recording retention.* Controls must be established and procedures implemented that include the following:

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

§543.2 What are the definitions for this part? (<https://www.nigc.gov/general-counsel/commission-regulations>)

Sufficient clarity. The capacity of a surveillance system to record images at a minimum of 20 frames per second or equivalent recording speed and at a resolution sufficient to clearly identify the intended activity, person, object, or location.



Funny Money





Beyond the MICS - Monitoring

- **Food and beverage areas?**
- **Maintenance shops?**
- **Back of house?**
- **Time clocks?**



PARTICIPANT GUIDE

How many of you monitor...



Medical



1/29/2019 5:42:28 PM
Pacific Standard Time

PARTICIPANT GUIDE

Common issues throughout gaming operations are medical issues occurring in the front, back and around the gaming operations. Having the appropriate coverage can help with claims for both patrons and employees.



There Was a Camera?



PARTICIPANT GUIDE

False claims are not uncommon and can occur in the front or back of the house. Having coverage of the area where issues may occur, can reduce the liability to the operation. Operation spend large amounts on insurance claims annually, having proper coverage in the front and back of the house can help minimize false claims.



Suspicious Behavior

- **Excessive lingering**
- **Shuffling chips, obscuring chips**
- **Frequent variance issues**
- **Dealer/patron at same table**

PARTICIPANT GUIDE



Three seconds?



PARTICIPANT GUIDE

Theft occurs rather quickly – there are 86,400 seconds in a day.

§543.21 What are the minimum internal control standards for surveillance?
(<https://www.nigc.gov/general-counsel/commission-regulations>)

(e) *Recording retention.* Controls must be established and procedures implemented that include the following:

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



PARTICIPANT GUIDE

Sharing a variance report with surveillance personnel can provide you some insight as to why the bank was exactly \$100.00 short.



Operational Barriers

- Budgets problems
- Lack of response
- Communication
- Conflicting priorities



PARTICIPANT GUIDE

- Budgets problems: Lack of equipment, lack of maintenance, employees and training
- Lack of response or action on surveillance reports
- Communication with TGRA and Operations
- Conflicting priorities



Potential Solutions

- Sufficient clarity and camera locations
- Monthly reports
- Identify reporting methods
- Identify priorities



PARTICIPANT GUIDE


-
-
-
-



Questions?

Contact Information:

TrainingInfo@nigc.gov



PARTICIPANT GUIDE

If you have any questions about this training please email TrainingInfo@nigc.gov