



Date: November 15, 2022

Re: Discussion with Arizona Tribal Gaming Regulatory Alliance on MICS Guidance and KE/PMO Terms

The NIGC Region Director for the Phoenix Region, Francisco Olea, and I had the opportunity to meet with the Arizona Tribal Gaming Regulator Alliance. Our in-person discussion was a welcome post-pandemic return to the vibrant network of tribal regulators across Arizona.

We discussed process-related considerations that would be relevant to a potential update to the NIGC's model guidance for Class III minimum internal control standards. I believe that the process should:

- Build on past Agency lessons learned when consulting on Minimum Internal Control Standards (MICS) including adequate roles for NIGC consultation with tribal leaders and insights from subject matter experts who are tribal representatives.
- Consider at its outset the scope for new topics not currently addressed by the guidance, but that tribes may already be addressing in a tribal ordinance or state compact.
- Consider industry trends in both Indian gaming and the commercial gaming industry.
- Contemplate how future training and technical assistance in NIGC's statutory mandate will enhance tribal regulatory bodies' capacity to meet any potential new guidance.
- Promote opportunities for tribal leadership to articulate local tribal-level policy goals and objectives around those topics covered in the MICS guidance.

We also discussed ongoing efforts to update existing NIGC regulations on tribes' background and licensing practices for Key Employee (KE) and Primary Management Officials (PMO). Attached is a post-meeting summary of highlights from the NIGC portion of our discussion on this topic.

Visit www.NIGC.gov to learn more about the NIGC 3 For 35 Project— a year-long project emphasizing the importance of conversations among the tribal gaming regulatory community about workforce preparedness.





NATIONAL INDIAN GAMING COMMISSION

CHAIR'S NOTICE - Chairman E. Sequoyah Simermeyer

Thank you to the Arizona gaming regulators' engagement on these important topics. It was great to see everyone in person and I look forward to additional conversations.

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