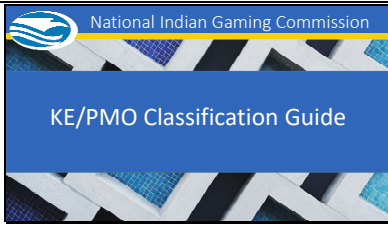


Slide 1



**PARTICIPANT GUIDE**

Chairman Simermeyer promotes four emphasis areas in the Agency’s work, and he is committed to 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.

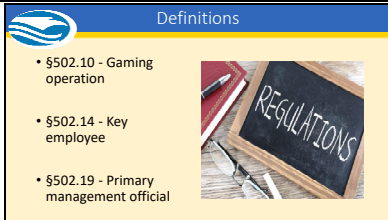
Preparedness

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.

Slide 2



**PARTICIPANT GUIDE**

Who gets licensed as a key employee and or a primary management official?

The hyperlink to Part 502 can be found on the NIGC website at <https://nigc.gov/general-counsel/commission-regulations>

**§502.10 Gaming operation.**

*Gaming operation* means each economic entity that is licensed by a tribe, operates the games, receives the revenues, issues the prizes, and pays the expenses. A gaming operation may be operated by a tribe directly; by a management contractor; or, under certain conditions, by another person or other entity.

**§502.14 Key employee.**

*Key employee* means:

(a) A person who performs one or more of the following functions:

- (1) Bingo caller;
- (2) Counting room supervisor;
- (3) Chief of security;
- (4) Custodian of gaming supplies or cash;
- (5) Floor manager;
- (6) Pit boss;
- (7) Dealer;
- (8) Croupier;
- (9) Approver of credit; or
- (10) Custodian of gambling devices including persons with access to cash and accounting records within such devices;

(b) If not otherwise included, any other person whose total cash compensation is in excess of \$50,000 per year; or,

(c) If not otherwise included, the four most highly compensated persons in the gaming operation.


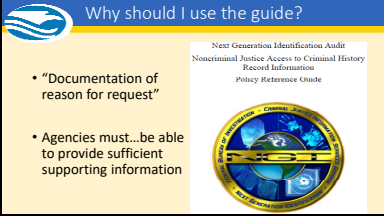
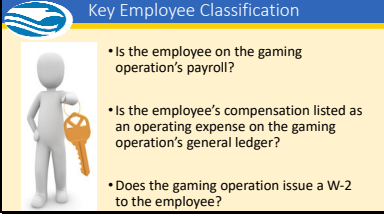
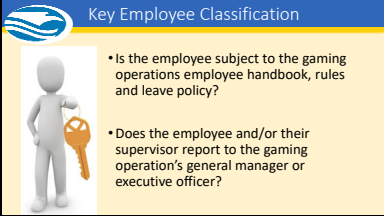
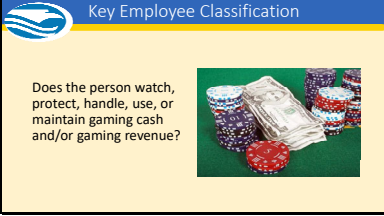
(d) Any other person designated by the tribe as a key employee.




(d) Any other person designated by the tribe as a key employee.

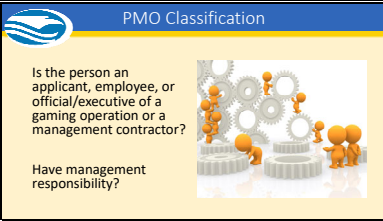
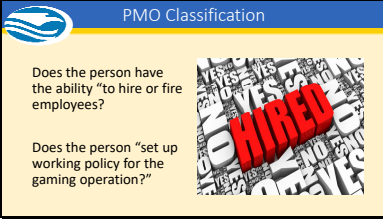
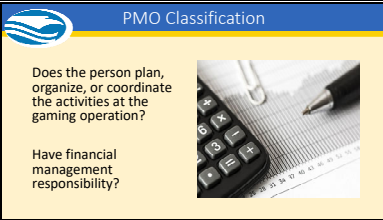
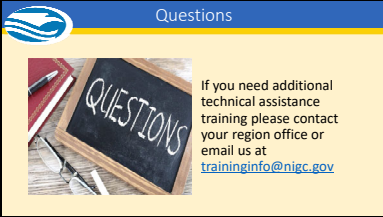
**§502.19 Primary management official.**

*Primary management official* means:

- (a) The person having management responsibility for a management contract;

		<p>(b) Any person who has authority:</p> <p>(1) To hire and fire employees; or</p> <p>(2) To set up working policy for the gaming operation; or</p> <p>(c) The chief financial officer or other person who has financial management responsibility.</p> <p>(d) Any other person designated by the tribe as a primary management official.</p>
Slide 3	 <p><b>CHRI MOU</b></p> <ul style="list-style-type: none"> <li>Fingerprint submissions</li> <li>Parts 502.14 (a-c) and 502.19 (a-c)</li> <li>CJIS Security Policy</li> </ul>	<p><b>PARTICIPANT GUIDE</b></p> <p>The CHRI Memorandum of Understanding (MOU) documents the agreed-upon responsibilities and functions of the parties with respect to the submission of noncriminal justice fingerprints for key employees and primary management officials consistent with 25 C.F.R. §§ 502.14 (a-c) and 502.19 (a-c).</p>
Slide 4	 <p><b>Why should I use the guide?</b></p> <ul style="list-style-type: none"> <li>“Documentation of reason for request”</li> <li>Agencies must...be able to provide sufficient supporting information</li> </ul> <p>Next Generation Identification Audit Noncriminal Justice Access to Criminal History Record Information Policy Reference Guide</p>	<p><b>PARTICIPANT GUIDE</b></p> <p>The Next Generation Identification Audit Noncriminal Justice Access to Criminal History Record Information Policy Reference Guide requires “sufficient supporting documentation” for the reason of the request.</p> <p>The Next Generation Identification Audit Noncriminal Justice Access to Criminal History Record Information Policy Reference Guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
Slide 5	 <p><b>Key Employee Classification</b></p> <ul style="list-style-type: none"> <li>Is the employee on the gaming operation’s payroll?</li> <li>Is the employee’s compensation listed as an operating expense on the gaming operation’s general ledger?</li> <li>Does the gaming operation issue a W-2 to the employee?</li> </ul>	<p><b>PARTICIPANT GUIDE</b></p> <ul style="list-style-type: none"> <li>Is the employee on the gaming operation’s payroll?</li> <li>Is the employee’s compensation listed as an operating expense on the gaming operation’s general ledger?</li> <li>Does the gaming operation issue a W-2 to the employee?</li> </ul> <p>Source: Footnote 3, Microsoft Word - 2020.11.20_KE_PMO_classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
Slide 6	 <p><b>Key Employee Classification</b></p> <ul style="list-style-type: none"> <li>Is the employee subject to the gaming operations employee handbook, rules and leave policy?</li> <li>Does the employee and/or their supervisor report to the gaming operation’s general manager or executive officer?</li> </ul>	<p><b>PARTICIPANT GUIDE</b></p> <ul style="list-style-type: none"> <li>Is the employee subject to the gaming operations employee handbook, rules and leave policy?</li> <li>Does the employee and/or their supervisor report to the gaming operation’s general manager or executive officer?</li> </ul> <p>Source: Footnote 3, Microsoft Word - 2020.11.20_KE_PMO_classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
Slide 7	 <p><b>Key Employee Classification</b></p> <p>Does the person watch, protect, handle, use, or maintain gaming cash and/or gaming revenue?</p>	<p><b>PARTICIPANT GUIDE</b></p> <p>Does the person watch, protect, handle, use, or maintain gaming cash and/or gaming revenue?</p> <p>Source: KE Classification #5, Microsoft Word - 2020.11.20_KE_PMO_classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>

<p>Slide 8</p>	<p><b>Key Employee Classification</b></p> <ul style="list-style-type: none"> <li>• Gaming cash means money used in the operation of Class II and III gaming.</li> <li>• Cage, vault, kiosk, automated teller machines</li> <li>• Gaming machine/system bill acceptors, drop boxes</li> <li>• Change boxes, tip boxes, containers, devices used to store or retrieve cash or accounted for as a cash asset of the gaming operation.</li> </ul> 	<p><b>PARTICIPANT GUIDE?</b></p> <p>Gaming cash means money used in the operation of Class II and III gaming. This includes cash deposited or withdrawn from the gaming operation’s cage or vault, in its kiosk and atms, gaming machine/system bill acceptors, drop boxes, change boxes, tip boxes, or other locations, containers, and devices used to store or retrieve cash used for the conduct of Class II and III games or accounted for as a cash asset of the gaming operation.</p> <p>Source: KE Classification #5, Microsoft Word - 2020.11.20_KE_PMO_classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
<p>Slide 9</p>	<p><b>Key Employee Classification</b></p> <p>Is the person a custodian of gaming supplies?</p> <ul style="list-style-type: none"> <li>• Machine ticket paper</li> <li>• Chips, tokens, playing cards</li> <li>• Bingo paper, bingo balls</li> <li>• Bingo software or hardware</li> </ul> 	<p><b>PARTICIPANT GUIDE</b></p> <p>Is the person a custodian of gaming supplies?</p> <p>This may include but is not limited to a person with access to gaming systems, machine ticket paper, chips, tokens, playing cards, bingo paper, bingo balls, or hardware/software used in conjunction with the Class II/III gaming systems.</p> <p>Source: KE Classification #6, Microsoft Word - 2020.11.20_KE_PMO_classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
<p>Slide 10</p>	<p><b>Key Employee Classification</b></p> <p>Does the person have the ability to access and/or make changes to the accounting system, player tracking system, or gaming system record?</p> <ul style="list-style-type: none"> <li>• Access to cash?</li> <li>• Accounting records?</li> <li>• Records within gaming equipment and devices?</li> </ul> 	<p><b>PARTICIPANT GUIDE</b></p> <p>Does the person have the ability to access and/or make changes to the gaming operation’s accounting system, player tracking system, or gaming system record?</p> <p>This may include but is not limited to a person “with access to cash and accounting records,” including accounting records within gaming equipment and devices</p> <p>Source: KE Classification #7, Microsoft Word - 2020.11.20_KE_PMO_classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>

<p>Slide 11</p>	<p>PMO Classification</p> 	<p><b>PARTICIPANT GUIDE</b> Is the person an applicant, employee, or official/executive of a gaming operation or a management contractor?</p> <p>Source: PMO Classification #1, Microsoft Word - 2020.11.20_KE_PMO__classification_fingerprint_guide Final</p> <p>Does the person have management responsibility for a gaming operation, facility, or part of either due to a management contract?</p> <p>Source: PMO Classification #2, Microsoft Word - 2020.11.20_KE_PMO__classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
<p>Slide 12</p>	<p>PMO Classification</p> 	<p><b>PARTICIPANT GUIDE</b> Does the person have the ability “to hire or fire employees?”</p> <p>Source: PMO Classification #3, Microsoft Word - 2020.11.20_KE_PMO__classification_fingerprint_guide Final</p> <p>Does the person “set up working policy for the gaming operation?”</p> <p>Source: PMO Classification #4, Microsoft Word - 2020.11.20_KE_PMO__classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
<p>Slide 13</p>	<p>PMO Classification</p> 	<p><b>PARTICIPANT GUIDE</b> Does the person plan, organize, or coordinate the activities of gaming operation/management contractor employees at the gaming operation?</p> <p>Source: PMO Classification #5, Microsoft Word - 2020.11.20_KE_PMO__classification_fingerprint_guide Final</p> <p>Is the person “the chief financial officer or other person who has financial management responsibility for the operation?”</p> <p>Source: PMO Classification #6, Microsoft Word - 2020.11.20_KE_PMO__classification_fingerprint_guide Final</p> <p>The guide can be found at <a href="https://www.nigc.gov/compliance/CJIS-Training-Materials">https://www.nigc.gov/compliance/CJIS-Training-Materials</a></p>
<p>Slide 14</p>	<p>Questions</p> 	<p><b>PARTICIPANT GUIDE</b> If you need additional technical assistance training please contact your region office or email us at <a href="mailto:traininginfo@nigc.gov">traininginfo@nigc.gov</a></p> <p>Thank you for attending and please take the survey at the conclusion of this training.</p>