



# TRAINING CATALOG

# GENERAL INFORMATION

Over twenty five years ago, Congress adopted the Indian Gaming Regulatory Act (IGRA) to provide a statutory basis for gaming by Indian tribes. The National Indian Gaming Commission (NIGC) was created by IGRA to regulate gaming activities conducted by sovereign Indian tribes on Indian lands. The mission of the NIGC is to fully realize IGRA's goals of: (1) promoting tribal economic development, self-sufficiency and strong tribal governments; (2) maintaining the integrity of the Indian gaming industry; and (3) ensuring that tribes are the primary beneficiaries of their gaming activities. One of the primary ways the NIGC does this is by providing training and technical assistance to Indian tribes and their gaming regulators.

The Commission is intently focused on (1) protecting against anything that amounts to gamesmanship on the backs of tribes, (2) developing effective rural outreach to gaming establishments in rural areas, (3) staying ahead of the technology curve, and (4) supporting a strong workforce both within NIGC and among our regulatory partners.

A properly trained and informed workforce is the most successful key to regulation and the assurance of compliance. A focused, targeted, and responsive training and technical assistance program provides the foundation to maintain the integrity and success of Indian gaming.



**Jonodev Osceola Chaudhuri**  
Chair



**Katheryn Isom-Clause**  
Vice Chair



**E. Sequoyah Simermeyer**  
Associate Commissioner

# GENERAL INFORMATION

## INTRODUCTION

Welcome to the Training Catalog for the National Indian Gaming Commission (NIGC). The NIGC serves the Indian gaming community by offering a variety of training courses and technical assistance which help build the skills of the industry's dedicated employees, regulators, and tribal governments. These skills ensure their effective functioning in gaming endeavors as they strive to maintain regulatory compliance.

The NIGC serves tribal entities in a vast number of professional disciplines, with courses designed to focus on routine and on-going needs, as well as flexible, targeted technical assistance to address critical emerging issues. Instruction is offered for the following categories: Audit, Compliance, Technology and General Counsel. Participants attend NIGC courses with the basic skills of their job or profession and learn how to apply them in the context of gaming regulatory preparedness and compliance. NIGC's approach to training is for participants to know how to apply their knowledge which is accomplished through group discussions, hands on activities and other interactive means such as electronic surveys and polling.

The NIGC Training Catalog provides valuable information about the NIGC training courses, including course structure, registering for courses, requesting technical assistance along with a list of all courses offered broken down by category which includes a separate page for each course that provides a course overview, objectives and recommended participants. As new courses become available, NIGC will update this catalog to provide the most recent information to the Indian gaming community.

## TRAINING SERVICES

Training is offered at least once a year at each of the seven regions through Regional Training Courses (RTCs) and Regulating Gaming Technology (RGT) courses. The RGTs and RTCs are open to those who work for Indian gaming in nearly any capacity and are designed with area specific offerings that also focus on regional and national issues and concerns. Each of these course offerings are generally comprised of multiple courses with RTCs providing two training tracks.

Tribes may also request Site Specific training (SST) which provides customized courses based on the individual needs of its Tribal government, gaming commission, regulators, and operators. This training may be held at the tribal facility, an NIGC regional office, or an independent facility based on the audience size. The duration and content of the courses can be customized according to the needs of the requester, including omission or expansion of topics according to the specific requirements of the participants.

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## COURSE CATEGORIES

The NIGC offers courses based on each of the major divisions which include Audit, Compliance, Information Technology and Office of General Counsel to accommodate different needs and job functions of the Indian gaming community. All of the courses are open to all gaming commission, regulators, operators, and outside individual(s) sponsored by a tribal gaming operation. A detailed description of all courses offered by NIGC and broken down into categories is provided in this catalog.

## CLASS II VS CLASS III

Although Minimum Internal Controls Standards 542 courses are not listed in the Training Catalog, the training program will provide these courses upon request.

## COURSE STRUCTURE

The majority of all training provided by NIGC is instructor-led training (ILT), and the curriculum provides foundational knowledge along with detailed and specific information to ensure compliance with the Indian Gaming Regulatory Act (IGRA). The goal of all courses is for participants to be able to apply the knowledge, workflows, processes, and resources presented to their daily tasks, duties, and assignments.

## VIRTUAL TRAINING

The NIGC also offers live virtual training through our technology platform. During each RGT and RTC, selected courses are livestreamed to allow for virtual audience participation. Please note that each virtual participant is required to register online. Upon completion of the virtual training, participants receive a certificate of attendance. Any SST may be provided using live video-conferencing as a webinar training course.

## REGISTERING FOR RTCs and RGTs

***In-person*** participants can pre-register online or in-person at the event. Online registration for the regional RTCs and RGTs opens approximately 60 days before each event and closes approximately one week prior to the event. Each event has a training announcement which is located on the [NIGC Training page](#). The training announcement includes the registration form, information about the venue, and the course agenda.

All participants who successfully pre-register online are assured a seat in the training event and a printed copy of the materials. Early registration is recommended to ensure there is sufficient space, as venues may have a limited number of seats.

Participants who register *at the event* can obtain an electronic copy of the training materials which can be downloaded from the NIGC website. The electronic versions of the training materials are available by the Friday prior to the training event.

***Virtual attendees*** may only register online. A link to each course offered virtually is also located on the training announcement. Upon successful registration for each online course, an invitation is sent via

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email that includes a personalized link. This link should only be used by the person who registered for the course, as the links are individualized based on each participant's registration information.

## **REQUESTING SST COURSES**

SST training and technical assistance can be requested through the region offices or by visiting the NIGC website at [www.nigc.gov](http://www.nigc.gov) and completing a training request form which is then submitted to the training department. Upon receipt of a training request the requestor will receive a confirmation email from the Training Program for the next steps in scheduling the SST.

## **RTC & RGT CLASS SCHEDULE**

Regional Technology Courses typically start at 9 a.m. and Regulating Gaming Technology courses start at 8:30 a.m. Registration and sign-in commences an hour before the courses start.

## **DRESS CODE**

The dress code is business casual for all training events. The temperature in meeting rooms varies; therefore, for individual comfort, it is recommended that participants bring adequate clothing.

## **NO REGISTRATION FEES**

Training is free for all attendees who work for a tribal gaming facility or tribe in some capacity of gaming and for others who are eligible to attend NIGC training. The only expenses are travel, lodging, and meals for those attending the ILT courses.

## **CERTIFICATE OF COMPLETION**

A personalized Certificate of Completion is provided to each participant who attends courses. Participants who pre-register receive their certificates the last day of the course. Most participants who register at the event receive their certificate by email after the course.

Upon completion of the virtual training, participants receive a certificate of attendance by email. Virtual participants can print the certificate or save it as an electronic file.

## **UP TO DATE/RELEVANT INFORMATION**

All NIGC training is based off of existing laws, regulations, processes and procedures, which are current and meet regulatory standards nationwide. The courses are conducted by experienced and knowledgeable staff and are updated regularly for relevancy.

## **CONTINUOUS IMPROVEMENT AND FEEDBACK**

The continued success and improvement of training offered by NIGC is strongly dependent on feedback from the participants. Course evaluations are conducted at the end of each course in the form of online surveys. These surveys provide the opportunity for participants to provide feedback on the instructor, the venue, and the training materials. Everyone who attends whether in-person or virtually is

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encouraged to complete an evaluation. The Training program strives to implement continuous improvement in all of our training events and use participant feedback to help meet that goal. We value, investigate, and work to implement participant suggestions to ensure continuous improvement of the NIGC Training Program.



# REGIONAL CONTACT INFORMATION

## REGIONAL CONTACT INFORMATION

The NIGC is headquartered in Washington, D.C. and has regional offices in Arizona, California, Oklahoma (2), Oregon and Minnesota, with satellite locations in Rapid City, SD and Temecula, CA. The regional directors and staff are the main NIGC contacts for technical assistance and training requests.

### National Indian Gaming Commission Headquarters

**Mailing Address:** 1849 C Street NW, Mail Stop 1621, Washington, D.C. 20240

**Physical Address:** 90 K Street NE, Suite 200, Washington, D.C. 20002

**Phone:** (202) 632-7003 **Website:** [www.nigc.gov](http://www.nigc.gov)

Oklahoma City Regional Office  
215 Dean A. McGee Ave. Suite 218  
Oklahoma City, OK 73102  
Phone: (405) 609-8626  
Fax: (405) 609-8658

Sacramento Regional Office  
801 I Street, Suite 489  
Sacramento, CA 95814  
Phone: (916) 414-2300  
Fax: (916) 414-2310

Phoenix Regional Office  
3636 North Central Avenue  
One Columbus Ave, Suite 880  
Phoenix, AZ 85012  
Phone: (602) 640-2951  
Fax: (602) 640-2952

St. Paul Regional Office  
380 Jackson Street, Suite 420  
St. Paul, MN 55101  
Phone: (651) 290-4004  
Fax: (651) 290-4006

Portland Regional Office  
Gus Solomon Building, Suite 212  
620 SW Main Street  
Portland, OR 97205  
Phone: (503) 326-5095  
Fax: (503) 326-5092

Temecula Satellite Office  
27708 Jefferson Ave., Suite 202  
Temecula, CA 92590  
Phone: (951)-719-7149  
Alt. Phone: (951)-375-2153

Rapid City Satellite Office  
405 East Omaha Street, Suite A  
Rapid City, SD 57701  
Phone: (605) 718-5724  
Fax: (605) 718-5716

Tulsa Regional Office  
224 South Boulder, Room 301  
Tulsa, OK 74103  
Phone: (918) 581-7924  
Fax: (918) 581-7933

# TRAINING TEAM CONTACT INFORMATION

## TRAINING TEAM CONTACT INFORMATION

The training team provides learning opportunities for tribal gaming employee's and other partners that share in the mission of Indian gaming. In addition to conducting classroom and virtual training, workshops and presenting at national seminars, the NIGC training program monitors and compiles training information and analytics on a national level.

The training program is located at the NIGC headquarters in Washington D.C. and the Phoenix Regional Office. The team includes:

Steven Brewer - Training Manager - [Steven\\_Brewer@nigc.gov](mailto:Steven_Brewer@nigc.gov)

Kirian Fixico - Training Coordinator - [Kirian\\_Fixico@nigc.gov](mailto:Kirian_Fixico@nigc.gov)

Leslie Wallington - Instructional System Specialist - [Leslie\\_Wallington@nigc.gov](mailto:Leslie_Wallington@nigc.gov)



# COURSE OFFERINGS

## AUDIT (AUD)

Course Number	Course Name	Course Provider	Course	Page #
<b>AUD-100</b>	Value of Internal Control Systems	Audit Staff	RTC/TA	2
<b>AUD-101</b>	Agreed Upon Procedures Overview	Audit Staff	RTC/TA	3
<b>AUD-102</b>	Bingo	Audit Staff	RTC/TA	4
<b>AUD-103</b>	Card Games	Audit Staff	RTC/TA	5
<b>AUD-104</b>	Drop and Count Class II	Audit Staff	RTC/TA	6
<b>AUD-105</b>	Gaming Promotions, Player Tracking Systems and Complimentary Services	Audit Staff	RTC/TA	7
<b>AUD-106</b>	NIGC Fee Calculation	Audit Staff	RTC/TA	8
<b>AUD-107</b>	Patron Deposit Accounts, Cashless Systems and Lines of Credit	Audit Staff	RTC/TA	9
<b>AUD-108</b>	Cage, Vault, Kiosk, Cash and Cash Equivalentents Class II	Audit Staff	RTC/TA	10
<b>AUD-109</b>	Audit and Accounting Class II	Audit Staff	RTC/TA	11
<b>AUD-110</b>	Auditing Revenue Class II	Audit Staff	RTC/TA	12
<b>AUD-114</b>	Minimum Bankroll Class	Audit Staff	RTC/TA	13
<b>AUD-120</b>	Internal Audit: A to Z Approach	Audit Staff	RTC/TA	14
<b>AUD-121</b>	Game Performance	Audit Staff	RTC/TA	15
<b>AUD-122</b>	Internal Audit 2.0	Audit Staff	RTC/TA	16

# COURSE OFFERINGS

## INFORMATION TECHNOLOGY (IT)

Course Number	Course Name	Course Provider	Course	Page #
<b>IT-100</b>	Class II Gaming Systems	Training Staff	RGT	18
<b>IT-101</b>	Information Technology (IT) Overview	IT Audit Staff	RTC/TA	19
<b>IT-102</b>	NIGC Electronic Fingerprint Program	IT Fingerprint Staff	RTC/TA	20
<b>IT-103</b>	Understanding FBI Criminal History	IT Fingerprint Staff	RTC/TA	21
<b>IT-104</b>	Fresh Look at Electronic Gaming Machines (EGMs) & Progressives	Training Staff	RGT	22
<b>IT-105</b>	Class II Tech Standards (Part 547)	IT Audit Staff	RGT	23
<b>IT-106</b>	Associated Equipment and Peripherals	All Staff	RGT	24
<b>IT-107</b>	Gaming Forensics	IT Audit Staff	RGT	25
<b>IT-108</b>	IT Threats for Casinos	IT Audit Staff	RTC/TA	26
<b>IT-109</b>	Auditing 543.20	IT Audit Staff	RGT	27
<b>IT-110</b>	Refining & Enhancing IT TICS	IT Audit Staff	RGT	28
<b>IT-112</b>	System Verification & Game Authentication	IT Audit Staff	RGT	29
<b>IT-113</b>	IT Basics	IT Audit Staff	RGT	30

## OFFICE OF GENERAL COUNSEL (OGC)

Course Number	Course Name	Course Provider	Course	Page #
<b>OGC-100</b>	Introduction to the Indian Gaming Regulatory Act	OGC Staff & Region Directors	Any	32
<b>OGC-101</b>	The Model Gaming Ordinance	OGC Staff	RTC/TA	33
<b>OGC-102</b>	NIGC Enforcement Actions	OGC Staff	RTC/TA	34
<b>OGC-103</b>	Obtaining Legal Opinions from the NIGC Office of General Counsel	OGC Staff	RTC/TA	35
<b>OGC-104</b>	The Requirements of IGRA and the Pitfalls of Non-Compliance	OGC Staff	RTC/TA	36

# COURSE OFFERINGS

## COMPLIANCE (CMP)

Course Number	Course Name	Course Provider	Course	Page #
<b>CMP-100</b>	Introduction to NIGC	All Staff	Any	38
<b>CMP-101</b>	Introduction to Part 518 Self-Regulation	All Staff	RTC/TA	39
<b>CMP-102</b>	Surveillance: For Gaming Commissioners	Compliance Staff	RTC/TA	40
<b>CMP-103</b>	Resources for Tribal Gaming Regulatory Authorities	Region Staff	RGT	41
<b>CMP-104</b>	Tribal Gaming Commissioners Duties and Responsibilities	Region Staff	RTC/TA	42
<b>CMP-105</b>	Tribal Background Investigations and Licensing	Region Staff/OGC	RTC/TA	43
<b>CMP-106</b>	Detecting Gamesmanship	Region Staff	RTC/TA	44
<b>CMP-107</b>	TICS/SICS Development Workshop	Region Staff	RTC/TA	45
<b>CMP-108</b>	543.21 Surveillance	Region Staff	RTC/TA	46
<b>CMP-109</b>	Commissioner Training	Region Staff	RTC/TA	47

## TECHNICAL ASSISTANCE SERVICE (TAS)

Course Number	Course Name	Course Provider	Page #
<b>TAS-100</b>	IAR – Internal Audit Review	Audit	49
<b>TAS-101</b>	ICA – Internal Control Assessment	Compliance	49
<b>TAS-102</b>	ITVA – IT Vulnerability Assessment	IT Auditors	49

# AUDIT COURSES

<b>Value of Internal Control Systems</b>	<b>AUD-100</b> Course Length: 1.0 hour
<b>Course Provider:</b> All Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will be provided an overview of why the implementation of effective internal control systems is necessary to protect the interests of the stakeholders of a tribal gaming operation. We will discuss how internal controls help the gaming operation achieve its objectives, through preventive controls (separation of duties, passwords, authorization requirements, and physical safeguards); (detective controls (output reviews, exception reports, reconciliations, physical inventories and audits); and directive controls (policy statements, performance guidelines, and training programs). Examples will be provided of how deficient internal control systems have contributed to errors, omissions, malfunctions and the misappropriation of assets occurring and going undetected. At the conclusion of the presentation, attendees will have an enhanced appreciation for the need for effective internal control systems consistent with the best practices of the gaming industry.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Gain an understanding of a system of internal control</li><li>• Differentiate between types of internal controls</li><li>• Identify the components of an internal control system</li><li>• Understand management’s responsibilities related to internal controls</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions Operations Staff</li><li>• Tribal Leadership</li></ul>	

## Agreed Upon Procedures Overview

**AUD-101**

Course Length: 1.0 hour

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will be provided an overview of the benefits of engaging an independent Certified Public Accountant (CPA) to annually evaluate the system of internal controls. Professional standards governing attestation engagements will be generally reviewed. The MICS standards pertaining to the scope of responsibilities of the CPA in the performance of an Agreed-Upon Procedures (AUP) engagement will be highlighted, including suggested report format and cover letter. Finally, we will discuss how the NIGC uses the submitted AUP reports and analysis of the data. Attendees will better understand how the engagements are intended to benefit gaming operators and regulators.

### Course Objectives

At the end of this course, participants will be able to:

- Have an understanding of the AUP
- Have an understanding of the benefits of performing an AUP
- Have an understanding of the difference between an AUP report and a management letter (SAS 114 & SAS 115)

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

<b>Bingo</b>	<b>AUD-102</b> Course Length: 2.0 hours
<b>Course Provider:</b> Audit Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will discuss the MICS specific to the manual games of Bingo. Topics will include, but not be limited to: game play, inventory controls, fund accountability, statistical analysis of game performance, equipment standards, payouts (including promotional awards), and auditing requirements. Attendees will gain an enhanced understanding of the inherent risks associated with the games and how the MICS are intended to mitigate those risks.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Gain an understanding of 25 CFR Part 543.8, MICS for Bingo</li><li>• Achieve an understanding of storage, issuance and inventory for Bingo stock</li><li>• Gain an awareness of the auditing procedures for manual draw Bingo</li><li>• Recognize statistical reporting and how it is used to evaluate game performance</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li></ul>	



<b>Card Games</b>	<b>AUD-103</b> Course Length: 1.0 hour
<b>Course Provider:</b> Audit Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will gain an understanding of the MICS specific to card games. Topics will include, but not be limited to: game play, inventory controls, fund accountability, statistical analysis of the game performance, equipment standards, payouts (including promotional awards), and auditing requirements. Attendees will gain an enhanced understanding of the inherent risks associated with card games and how the MICS are intended to mitigate those risks.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Gain an understanding of 25 CFR Part 543.10 MICS standards</li><li>• Achieve an understanding of storage, issuance, and inventory for card game stock</li><li>• Gain an awareness of the auditing procedures for card games</li><li>• Become aware of statistical reporting and how it is used to evaluate game performance</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li></ul>	

## Drop and Count - Class II

**AUD-104**

Course Length: 2.0 hours

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will discuss 25 CFR part 543.17, MICS, specific to the drop and count process for Class II gaming. Topics will include, but not be limited to: Supervision, count room access, table games drop and count procedures, soft count personnel and count room inventory controls (including interim transfers), gaming machine drop and count procedures, key controls (including computerized systems), and emergency drop procedures. Also included is card games and player interface along with financial instrument storage. Attendees will gain an enhanced understanding of the inherent risks associated with the drop and count process and how the MICS are intended to mitigate those risks.

### Course Objectives

At the end of this course, participants will be able to:

- Gain an understanding of 25 CFR part 543.17, MICS , standards as they pertain to best industry practices around drop and count
- Achieve an understanding of the drop and count processes
- Identify recommended documentation procedures for the count
- Become aware of proper key controls for the drop and count process

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

## Gaming Promotions, Player Tracking Systems & Complimentary Services

**AUD-105**

Course Length: 2.0 hours

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will discuss 25 CFR part 543.12, MICS, specific to the gaming promotions, player tracking and complimentary services. Topics will include, but not be limited to: supervision, gaming promotions, rules of play requirements, awards and prizes and rules of promotions, as well as variances and the TGRA responsibilities within these functions.

### Course Objectives

At the end of this course, participants will be able to:

- Gain an understanding of 25 CFR part 543.12, MICS , specific to gaming promotions, player tracking and complimentary services
- Gain an understanding of the TGRA requirements
- Identify, understand, and recognize risks and mitigations with respect to gaming promotions, player tracking and complimentary services

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

<b>NIGC Fee Calculation</b>	<b>AUD-106</b> Course Length: 2.0 hours
<b>Course Provider:</b> Audit Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will discuss the requirements of 25 CFR Part 514, Fees. The course will focus on the calculation of Assessable Gross Revenues. Emphasis will be placed on the components of Assessable Gross Revenues, such as what is included and not included as an amount wagered, classification of the amounts paid out as prizes, identifying allowable and non-allowable deductions from Gross Gaming Revenue, and the calculation for the allowance for structures. Discussions will also include the reconciliation of the fee worksheet to the audited financial statements. Attendees will acquire an enhanced level of understanding of the fee regulation.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Gain an understanding of 25 CFR part 514, Fees</li><li>• Identify the components of Assessable Gross Revenues</li><li>• Understand the reconciliation requirement of the fee worksheet to the audited financial statements</li><li>• Recognize the submission requirements for NIGC Fees</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li></ul>	

## Patron Deposit Accounts, Cashless Systems and Lines of Credit

**AUD-107**

Course Length: 1.0 hour

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will discuss 25 CFR part 543.14, MICS, specific to the patron deposit accounts, cashless systems and lines of credit. Topics will include, but not be limited to: supervision, smart cards and accounting requirements, patron deposit accounts, and lines of credit, as well as variances and the TGRA's responsibilities within these functions.

### Course Objectives

At the end of this course, participants will be able to:

- Gain an understanding of 25 CFR part 543.14, MICS , specific to patron deposit accounts, cashless systems and lines of credit
- Gain an understanding of the TGRA requirements
- Identify, understand, and recognize risks and mitigations with respect to patron deposit accounts, cashless systems and lines of credit

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

## Cage, Vault, Kiosk, Cash and Cash Equivalents - Class II

**AUD-108**

Course Length: 2.0 hours

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will discuss 25 CFR part 543.18, MICS, specific to the cage, vault, kiosk, cash and cash equivalents. Topics will include, but not be limited to: supervision, check cashing, cage and vault accountability, minimum bankroll, kiosks, patron deposited funds, chip(s) and token(s) vouchers, and cage and vault access.

### Course Objectives

At the end of this course, participants will be able to:

- Gain an understanding of 25 CFR part 543.18, MICS, specific to cage, vault, kiosk, cash and cash equivalents
- Gain an understanding of the TGRA requirements
- Identify, understand, and recognize risks and mitigations with respect to cage, vault, kiosk, cash and cash equivalents

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

## **Audit and Accounting - Class II**

**AUD-109**

Course Length: 2.0 hours

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### **Course Description**

Participants will discuss 25 CFR part 543.23, MICS, specific to audit and accounting for Class II facilities. Topics will include, but not be limited to: Promulgation of nationally recognized external standards, controls and procedures to safeguard assets through the accounting function, as it relates to all gaming areas covered within the remainder of part 543, independent auditor standards, audit reports, and annual requirements.

### **Course Objectives**

At the end of this course, participants will be able to:

- Gain an understanding of 25 CFR part 543.23, MICS , specific to audit and accounting across part 543
- Gain a deeper understanding and appreciation for the audit function and capability to support and protect assets of the gaming tribe and understanding of the TGRA requirements respective to audit
- Identify, understand and recognize risks, and mitigations with respect to audit and accounting functions

### **Target Audience**

- Tribal Gaming Commissions
- Operations Staff



## Auditing Revenue - Class II

**AUD-110**

Course Length: 1.0 hour

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will discuss 25 CFR part 543.24, MICS, specific to auditing revenue for Class II facilities. Topics will include, but not be limited to: supervision, independence requirements of auditors, and documentation requirements across the various cash relevant areas of 543.

### Course Objectives

At the end of this course, participants will be able to:

- Gain an understanding of 25 CFR part 543.24, MICS , specific to auditing revenue for class II facilities
- Gain an understanding of the TGRA requirements
- Identify, understand and recognize risks, and mitigations with respect to auditing revenue

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

<b>Minimum Bankroll - Class III</b>	<b>AUD-114</b> Course Length: 1.0 hour
<b>Course Provider:</b> Audit Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will discuss MICS 543 requirements to prepare minimum bankroll calculations. Guidance will be provided based on the suggested NIGC Minimum Bankroll Formula. Consequences of an insufficient bankroll will be discussed. Attendees will gain an understanding of the need to maintain an adequate bankroll.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Gain an understanding of the MICS requirements for Minimum Bankroll</li><li>• Recognize how gaming liabilities affect their required Minimum Bankroll</li><li>• Calculate the Minimum Bankroll requirements as part of a practical exercise</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li></ul>	

## Internal Audit: A to Z Approach

**AUD-120**

Course Length: 12.0 hours

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Internal Audit is an integral component toward protecting the assets of the gaming operation by examining policies and procedures, testing internal controls and monitoring compliance with policies and regulations. The Internal Audit function can provide information to improve your operation's internal controls. This is a 2-day course that will discuss the role internal audit plays along with the Tribal Gaming Regulatory Agency (TGRA) and Gaming Operation Management in the protection of assets. Additionally, the course will cover the importance of planning, testing, documenting and reporting of the internal audit work.

### Course Objectives

At the end of this course, participants will be able to:

- Understand the fundamentals of, ethics behind, regulations for and purpose of an internal audit
- Explain the different types of audits
- Prepare an audit schedule, audit program, audit report and policies and procedures related to internal audits
- Understand the need for management response guidance, exit meetings, final reports and follow-up audits. Discuss samples and gathering data techniques, testing procedures and findings.
- Create audit procedures,

### Target Audience

- Tribal Gaming Commissions
- Operations Staff
- Tribal Leadership

## Game Performance

**AUD-121**

Course Length: 12.0 hours

**Course Provider:** Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

This course is designed to assist participants gain an understanding of game statistics. The objective is to create an interactive environment where attendees will learn how statistics serve as a benefit to identifying issues on the gaming floor. Topics will focus on the analysis of gaming machine, table game, bingo, and card game statistics. Attendees will gain an enhanced understanding of the inherent risks associated with the gaming statistics and how the MICS are intended to mitigate those risks.

### Course Objectives

At the end of this course, participants will be able to:

- Understand the fundamentals of, ethics behind, regulations for and purpose of an internal audit
- Explain the different types of audits, audit schedule, program and policies and procedures related to audits
- Participate in practical exercises to sample and gather data, perform audit procedures, testing and exceptions, report writing, exit meetings and management responses, final reports and follow-up.

### Target Audience

- Tribal Gaming Commissions
- Operations Staff
- Tribal Leadership

<b>Internal Audit 2.0</b>	<b>AUD-122</b> Course Length: 12.0 hours
<b>Course Provider:</b> Audit Staff	
<b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> <p>This course is designed to build upon the AUD-120 Internal Audit: A to Z twelve-hour workshop. The objective of this workshop is to create an interactive environment in which Internal Auditors will have the opportunity to learn from and exchange ideas with their peers about the responsibilities and challenges that Internal Auditors encounter in conducting the audit. Targeted training and instruction will be provided in completing and performing audit steps, documenting work performed, and writing the determination of compliance of a finding. Upon completion of this course the Internal Auditor will obtain techniques that can be immediately applied in conducting internal audits.</p>	
<b>Course Objectives</b> <p>At the end of this course, participants will be able to:</p> <ul style="list-style-type: none"><li>• Review concepts related to the fundamentals of, ethics behind, regulations for and purpose of an internal audit</li><li>• Explain how internal controls can be used for auditing.</li><li>• Determine what constitutes evidence and how to gather evidence and documentation.</li><li>• Understand testing requirements and how to apply them.</li><li>• Understand how to write a finding based on the minimum internal controls along with recommendations.</li><li>• Participate in practical exercises to review testing requirements, create questions related to a checklist, write findings and recommendations.</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li><li>• Tribal Leadership</li></ul>	

# **INFORMATION TECHNOLOGY COURSES**

## Class II Gaming Systems

**IT-100**

Course Length: 2.0 hours

**Course Provider:** Training Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will gain a basic understanding of the layout and specifics of Class II gaming systems, the specific focus and rules around Class II, primary differences from Class III systems, various components, and other regulatory subject matter. A brief overview of Class II PAR sheets in various formats will also be given.

### Course Objectives

At the end of this course, participants will be able to:

- Identify various Class II manufacturers
- Recall Class II Bingo specifics with respect to regulatory focus
- Understand Class II system architecture
- Review current Class II systems
- Recognize typical differences: Class II vs. EGM
- Identify Class II PAR Sheet examples

### Target Audience

- Tribal Gaming Commissions
- Operations Staff



## Information (IT) Technology Overview

**IT-101**

Course Length: 2.0 hours

**Course Provider:** IT Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will be provided an overview of the IT process in general terms. We will discuss IT terminology and processes, provide a general understanding of current IT MICS control objectives as well as common risk mitigating techniques. Additionally, we will touch on why the introduction of server based, server supported and remote gaming technologies will bring the IT process directly into the play of the games. Attendees will obtain an enhanced appreciation for the value of the IT department in today's gaming environment and the likelihood of its importance increasing materially over the next few years.

### Course Objectives

At the end of this course, participants will be able to:

- Gain an understanding of basic IT terminology
- Gain an understanding of current suggested IT MICS
- Identify and understand the differences in different server based gaming
- Gain an overall understanding of the value of IT in today's gaming

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

## **NIGC Electronic Fingerprint Program**

**IT-102**

Course Length: 1.0 hour

**Course Provider:** IT Fingerprint Staff

**Course Delivery:** Residential Training/Technical Assistance

### **Course Description**

Participants will be provided with an overview of the processes and procedures for implementation, review, and submission of electronic fingerprints through the NIGC System and agreement with the FBI. Further, attendees will be exposed to the list of live scan vendors who have compliant devices to submit electronic fingerprints to NIGC, the resubmission process, submitting hard cards for processing, name search procedures and how the billing/invoice process is done.

### **Course Objectives**

At the end of this course, participants will be able to:

- Identify the benefits of submitting electronic fingerprints
- Identify live scan vendors who have compliant devices
- Identify the process for submitting electronic fingerprints
- Identify the process for resubmitting fingerprints that were previously “invalid”
- Identify the process for submitting hard cards to NIGC to be processed
- Identify common error codes when submitting electronic fingerprints
- Identify the process for requesting a name search
- Identify the process of billing/invoice
- Identify the process for participating in submitting electronic fingerprints

### **Target Audience**

- Tribal Gaming Commissions
- Operations Staff

## Understanding FBI Criminal History

**IT-103**

Course Length: 2.0 hours

**Course Provider:** IT Fingerprint Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will be provided an overview of the processes and procedures for understanding, review, and action needed when receiving an FBI Criminal History Report for the purposes of hiring employees. Further, attendees will be exposed to types of Criminal History Record Information (CHRI) reports, the different FBI reports, how to read the information in the CHRI, expungements and sealed records and learning some abbreviations and terms.

### Course Objectives

At the end of this course, participants will be able to:

- Identify the three types of CHRI reports
- Identify how the CHRI is used not just for employment
- Identify the two types of FBI reports
- Identify the parts of a CHRI report and the content it provides
- Identify the difference between felonies, misdemeanors and infractions
- Identify the possible rulings/outcomes on a CHRI report
- Identify the difference between expungements and sealed records
- Identify the many abbreviations and terms to assist in reading a CHRI report

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

## **Fresh Look at Electronic Gaming Machines (EGMs) & Progressives**

**IT-104**

Course Length: 4.0 hours

**Course Provider:** Training Staff

**Course Delivery:** Residential Training/Technical Assistance

### **Course Description**

Participants will gain a basic understanding of Electronic Gaming Machines (EGM), various components of EGMs and other regulatory subject matter. Further, attendees will be exposed to and gain understanding of a variety of EGM specifics such as Accounting/Event Meters, EGM Report Capabilities, PAR Sheet analysis, and Random Number Generators (RNG).

### **Course Objectives**

At the end of this course, participants will be able to:

- Identify historical elements of EGM's
- Identify technological changes and impacts on EGM's
- Identify key differences in Class II and Class III machines
- Recall aspects of RNG information and machine math
- Identify key aspects of Percentage and Reel Sheets (PAR)

### **Target Audience**

- Tribal Gaming Commissions
- Operations Staff

## **Class II Tech Standards (Part 547)**

**IT-105**

Course Length: 2.0 hours

**Course Provider:** IT Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### **Course Description**

Participants will gain an understanding on the meaning and implementation of 25 CFR Part 547, Class II technical standards. Particular attention will be paid to reviewing the technology submission and certification process, procedural requirements, and significant technical issues and requirements.

### **Course Objectives**

At the end of this course, participants will be able to:

- Identify historical elements and the intent of 547
- Identify the scope and process for 547
- Identify key requirements and aspects contained within 547
- Recall aspects on issues such as Grandfathering, Variances, Data Communication and downloading

### **Target Audience**

- Tribal Gaming Commissions
- Operations Staff

<b>Associated Equipment &amp; Peripherals</b>	<b>IT-106</b> Course Length: 1.0 hour
<b>Course Provider:</b> All Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will gain an understanding and focus on common devices that are a part of the gaming floor, but generally not considered gaming devices themselves. Equipment discussed will include; computerized casino accounting systems, kiosks, bill acceptors, ticket printers, and others.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Identify equipment classified as Associated Equipment</li><li>• Identify the regulatory problems encountered with associated equipment</li><li>• Recall specific items of focus</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li></ul>	

## Gaming Forensics

**IT-107**

Course Length: 5.0 hours

**Course Provider:** IT Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will gain an understanding and focus on forensics and the very real results of a lack of efforts and controls. The course will explore various strategies, best practices, and other guidelines available for regulators and other tribal gaming personnel in dealing with equipment malfunctions and thefts, proper handling of malfunctions and system errors resulting in a forensic, proper evidence control and a variety of useful processes to help create policy. Participants will work through an exercise, in which an actual forensic is identified and proper processes discussed and worked through.

### Course Objectives

At the end of this course, participants will be able to:

- Identify potential forensics in gaming and the process for dealing with them effectively
- Identify the importance of and process for forensic investigation in gaming
- Recall the process for establishing a forensic plan of action
- Identify the elements of the first responder team and its importance

### Target Audience

- Tribal Gaming Commissions
- Operations Staff



## IT Threats for Casinos

**IT-108**

Course Length: 2.0 hours

**Course Provider:** IT Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will gain an understanding into the reality that the greatest threats to casino security are not from external game cheats, or internal theft, but from vulnerable IT systems in which determined thieves can gain access to vulnerable systems and disrupt casino operations. This workshop provides information on how these threats are gaining access to the systems, and provides detailed mechanisms to combat the threats, along with a working toolkit for identifying and responding to IT issues and concerns.

### Course Objectives

At the end of this course, participants will be able to:

- Gain an understanding of current IT threats to casino systems
- Gain an understanding of the need for protecting wireless systems
- Identify points of potential security vulnerability inside an operation
- Gain an understanding of how to prevent and combat IT threats

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

<b>Auditing 543.20</b>	<b>IT-109</b> Course Length: 3.0 hours
<b>Course Provider:</b> IT Audit Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will discuss the suggested MICS specific to the IT process. Topics will include, but not be limited to: physical access and maintenance controls, system parameters, user/service/default accounts, administrative access, backups and record keeping (including electronic storage), network security (including remote access), changes to production environment, and the IT department and in-house developed and purchased systems. Case studies will be reviewed based on the experience of the Audit Division of how deficient internal control systems have contributed to the occurrence of irregularities. Attendees will gain an enhanced understanding of the vulnerabilities associated with IT and how the MICS are intended to mitigate those risks.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Gain a deep understanding of IT functions specific to gaming systems and controls</li><li>• Gain an understanding of the suggested IT MICS and standards</li><li>• Identify, understand, and recognize different systems in server based gaming</li><li>• Recognize and expand processes to utilize the value of IT in today's gaming</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li></ul>	

## Refining & Enhancing IT TICS

**IT-110**

Course Length: 3.0 hours

**Course Provider:** IT Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will discuss the suggested MICS specific to the IT process. Topics will include, but not be limited to: physical access and maintenance controls, system parameters, user/service/default accounts, administrative access, backups and record keeping (including electronic storage), network security (including remote access), changes to production environment, and the IT department and in-house developed and purchased systems. Case studies will be reviewed based on the experience of the Audit Division of how deficient internal control systems have contributed to the occurrence of irregularities. Attendees will gain an enhanced understanding of the vulnerabilities associated with IT and how the MICS are intended to mitigate those risks.

### Course Objectives

At the end of this course, participants will be able to:

- Gain a deep understanding of IT functions specific to gaming systems and controls
- Gain an understanding of the suggested IT MICS and standards
- Identify, understand, and recognize different systems in server based gaming
- Recognize and expand processes to utilize the value of IT in today's gaming

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

## System Verification & Game Authentication

**IT-112**

Course Length: 3.0 hours

**Course Provider:** IT Audit Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

A learning block offered to tribal gaming regulators, operations and IT personnel. The course will focus on various systems verification tools and introduce attendees to game authentication methods. i.e. G2S and SAS protocols and the benefits for regulators.

### Course Objectives

At the end of this course, participants will be able to:

- Utilize the various lab verification tools and the latest techniques for authenticating gaming software.
- Learn how to utilize the various lab verification tools
- Learn about the latest software authentication software
- Understand how the current and latest verification tools are introduced into the operations.

### Target Audience

- Tribal Gaming Commissions
- Operations Staff

<b>IT Basics</b>	<b>IT-113</b> Course Length: 3.0 hours
<b>Course Provider:</b> IT Audit Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> A learning block designed for tribal gaming regulators, operations and IT personnel that desire basic gaming and Information Technology knowledge. The objective of this lesson is to gain a basic understanding of Information Technology and gaming terminology, being able to differentiate between Class II and Class III gaming machines. You will gain an understanding of gaming and Information Technology at a beginning level to set a foundation for understanding the IT courses taught at the RGT.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Utilize the various lab verification tools and the latest techniques for authenticating gaming software.</li><li>• Learn how to utilize the various lab verification tools</li><li>• Learn about the latest software authentication software</li><li>• Understand how the current and latest verification tools are introduced into the operations.</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissions</li><li>• Operations Staff</li></ul>	

**OFFICE OF GENERAL  
COUNSEL  
(OGC) COURSES**

## Introduction to the Indian Gaming Regulatory Act

**OGC-100**

Course Length: 1.0 hour

**Course Provider:** OGC Staff/Region Directors

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

The Course will give participants an overview of IGRA's requirements. It will also identify the steps a tribe must take before opening a gaming operation and the federal approvals that must be in place. Participants will learn about the history of IGRA and the respective regulatory roles it created for tribes, the NIGC and even states (Class III gaming only). They will learn about the NIGC's structure, mission, authority and responsibilities under IGRA. They will be introduced to some best practices for ensuring strong, effective regulation. They will learn that the NIGC recommends that tribes create their own gaming regulatory commissions, although not required to do so by IGRA, and also encourages tribes to adopt their own gaming regulations to address any regulatory needs not covered by IGRA.

### Course Objectives

At the end of this course, participants will be able to:

- Basic requirements of IGRA
- Steps a tribe needs to take before it can start gaming under IGRA
- Federal approvals that must be obtained before gaming can be conducted under IGRA
- History of IGRA, its three primary purposes and the regulatory role it created for tribes
- Structure and regulatory role of the NIGC under IGRA
- Recommended best regulatory practices

### Target Audience

- New Tribal Gaming Commissioners
- New Tribal Gaming Officers
- New Tribal Gaming Operations' Managers & Staff
- Tribal Attorneys
- Tribal Councils

<b>The Model Gaming Ordinance</b>	<b>OGC-101</b> Course Length: 2.0 hours
<b>Course Provider:</b> OGC Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> <p>Before a tribe can conduct gaming on its Indian lands, it must have an approved gaming ordinance in place. This Course will provide participants with a color-coded model gaming ordinance and walk them through, step-by-step, the required provisions, the recommended provisions, and other information that must either be included in the ordinance or be separately submitted to the NIGC for approval. Participants will learn about ordinance submission requirements; the NIGC's review and approval process, from start to finish; and the time limits imposed on the NIGC once the ordinance or amendment is received from a tribe.</p>	
<b>Course Objectives</b> <p>At the end of this course, participants will be able to:</p> <ul style="list-style-type: none"><li>• Requirements for submitting a gaming ordinance or amendment to the NIGC for approval</li><li>• The NIGC review and approval process for ordinances and amended ordinances</li><li>• Required gaming ordinance provisions</li><li>• Recommended gaming ordinance provisions and best practices</li><li>• Additional information that must either be included in an ordinance or submitted separately</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Attorneys</li><li>• Tribal Councils</li><li>• Tribal Gaming Commissioners &amp; Compliance Officers</li><li>• Tribal Gaming Operations' Managers &amp; Staff</li></ul>	



<b>NIGC Enforcement Actions</b>	<b>OGC-102</b> Course Length: 2.0 hours
<b>Course Provider:</b> OGC Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will learn how to avoid enforcement actions through compliance. The Course will give participants an overview of the requirements of IGRA and how non-compliance with one or more of these requirements can be a violation of IGRA. Participants will learn what happens when an IGRA violation is identified by the NIGC. The Course provides an overview of the NIGC's enforcement process; the remedies available to the NIGC for a violation of IGRA; and the steps that can be taken by a tribe or 3 <sup>rd</sup> party to overcome an IGRA violation and avoid an enforcement action.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Understand how to identify a potential IGRA violation and avoid an NIGC enforcement action</li><li>• Understand the NIGC enforcement process</li><li>• Learn about Letters of Concern and Notices of Violation</li><li>• Know the remedies available to the NIGC for an IGRA violation</li><li>• Understand the appeals process and how to challenge an enforcement action</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissioners &amp; Compliance Officers</li><li>• Tribal Gaming Commission Compliance Officers</li><li>• Tribal Gaming Operations' Managers &amp; Staff</li><li>• Tribal Attorneys</li></ul>	

## Obtaining Legal Opinions from the NIGC Office of General Counsel

**OGC-103**

Course Length: 2.0 hours

**Course Provider:** OGC Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

This Course will describe, in detail, the three most common legal opinions requested of, and issued by, the NIGC's Office of General Counsel (OGC): declination letters, Indian lands opinions and gaming opinions. Most requests are for declination letters, i.e. a legal opinion that an agreement between a tribe and a 3rd party is not a management contract requiring the approval of the NIGC Chair and does not violate IGRA's requirement that a tribe have the sole proprietary interest, and responsibility for, its gaming operation. OGC also receives requests for legal opinions about whether certain tribal lands are "Indian lands" and, therefore, eligible for gaming under IGRA, and whether a specific game qualifies as either Class II or Class III gaming under IGRA.

The Course will describe the process for obtaining a legal opinion from OGC: from submitting a written request, to receiving a written opinion, and everything that happens in between. The Course will describe which 3rd parties typically request legal opinions and why they are requested.

### Course Objectives

At the end of this course, participants will be able to:

- Understand the different kinds of legal opinions provided by OGC
- Understand why legal opinions are requested
- Know how to request a legal opinion

### Target Audience

- Tribal Attorneys
- Tribal Councils
- Tribal Gaming Commissioners
- Tribal Gaming Operations' Managers

## The Requirements of IGRA & the Pitfalls of Non-Compliance

**OGC-104**

Course Length: 2.0 hours

**Course Provider:** OGC Staff/Region Directors

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will learn how to avoid enforcement actions through compliance. The Course will give participants an overview of the requirements of IGRA and how non-compliance with one or more of these requirements can be a violation of IGRA.

Participants will learn what happens when an IGRA violation is identified by the NIGC. The Course provides an overview of the NIGC's enforcement process; the remedies available to the NIGC for a violation of IGRA; and the steps that can be taken by a tribe or 3rd party to overcome an IGRA violation and avoid an enforcement action.

### Course Objectives

At the end of this course, participants will be able to:

- Understand how to identify a potential IGRA violation and avoid an NIGC enforcement action
- Understand the NIGC enforcement process
- Learn about Letters of Concern and Notices of Violation
- Know the remedies available to the NIGC for an IGRA violation
- Understand the appeals process and how to challenge an enforcement action

### Target Audience

- Tribal Attorneys
- Tribal Gaming Commissioners & Compliance Officers
- Tribal Gaming Commission Compliance Officers
- Tribal Gaming Operations Managers & Staff

# **COMPLIANCE COURSES**

<b>Introduction to NIGC</b>	<b>CMP-100</b> Course Length: 1.0 hour
<b>Course Provider:</b> All Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will be exposed to the basic aspects of what the NIGC is, its regulatory creation and duty, make-up and responsibilities. They will discuss the implications of processes and procedures of the NIGC, as well as recent regulatory changes and those upcoming in the near future. Through interactive lecture, participants will be able to ask questions, explore areas for deeper knowledge transfer and gain opportunities for future development.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Identify key elements of NIGC</li><li>• Recall aspects of NIGC's regulatory creation</li><li>• Identify key elements of NIGC's make-up and authority</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissioners</li><li>• Operations Staff</li></ul>	

<b>Introduction to Part 518 Self-Regulation</b>	<b>CMP-101</b> Course Length: 1.0 hour
<b>Course Provider:</b> All Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> Participants will be provided an overview of the process and procedures for implementation of, review, and approval of Self-Regulation requests from tribes under the new guidelines in 25 CFR sections 518, which became effective September 1, 2013.	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Identify the reasons for applying for self-regulation of Class II Gaming</li><li>• Recall the process and procedures for applying for self-regulation</li><li>• Understand the requirements and time frames associated with 518</li><li>• Recognize the benefits of a successful process</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissioners</li><li>• Operations Staff</li></ul>	

## Surveillance for Gaming Commissioners

**CMP-102**

Course Length: 1.0 – 2.0 hours

**Course Provider:** Compliance Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will gain an understanding of the importance of implementing sound TICS/SICS, improving interdepartmental cooperation, and utilizing available reports that can be utilized to improve the gaming commission's role protecting casino assets. Attendees will also be given an overview of current crime trends in their respective jurisdictions.

### Course Objectives

At the end of this course, participants will be able to:

- Identify Surveillance MICS requirements that require TGRA action or notification
- Discuss methods to improve cooperation
- Discuss Surveillance reports for monitoring regulatory compliance and identifying potential threats to assets
- Review case studies and current crime trends that demonstrate how deficient internal controls contributed to the occurrence of irregularities

### Target Audience

- Tribal Gaming Commissioners & Staff
- Tribal Gaming Operations Managers & Staff
- Surveillance Agents

## Resources for Tribal Gaming Regulatory Authorities

**CMP-103**

Course Length: 2.0 hours

**Course Provider:** All Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will be provided information and guidance to instruct gaming commissioners (and prospective commissioners) on commission duties and responsibilities including the role of ethics, auditing, internal control standards, file security, background investigation and licensing per IGRA. The course will also focus on the relationships between the commission and the tribal council, casino management, auditing staff, local criminal justice agencies and the NIGC. Tribal Council members, other tribal government officials and casino management are highly encouraged to attend together in order for the government officials to fully understand the authority placed in the gaming commissioners and to promote successful working relationships between all entities in a tribal gaming operation.

### Course Objectives

At the end of this course, participants will be able to:

- Recognize and respond to regulatory challenges
- Understand and meet compliance requirements for game certification
- Recognize and ensure proper processes for approval of installations and modifications for games are in place
- Understand and implement processes and procedures for field inspections
- Procedures for remote access and compliance
- Recognize and use jurisdictional relationships
- Understand and benefit from peer jurisdictions in gaming
- Recognize the benefit of regulatory symposiums
- Understand the importance of manufacturer's bulletins

### Target Audience

- Tribal Gaming Commissioners
- Operations Staff



## **Tribal Gaming Commissioners Duties and Responsibilities**

**CMP-104**

Course Length: 4.0 hours

**Course Provider:** Region Staff

**Course Delivery:** Residential Training/Technical Assistance

### **Course Description**

This course is designed to instruct gaming commissioners (and prospective commissioners) on commission duties and responsibilities including the role of ethics, auditing, internal control standards, file security, background investigation and licensing per IGRA. The course will also focus on the relationships between the commission and the tribal council, casino management, auditing staff, local criminal justice agencies and the NIGC. Tribal leaders and other tribal government officials and casino management are highly encouraged to attend together in order for the government officials to fully understand the authority placed in the gaming commissioners and to promote successful working relationships between all entities in a tribal gaming operation.

### **Course Objectives**

At the end of this course, participants will be able to:

- Understand the basic tenants of the IGRA and its impact and function for Indian gaming and TGRA's
- Recognize NIGC's authority in regulatory matters
- Understand TGRA responsibilities with respect to submissions and dealings with the NIGC
- Recognize the role of the NIGC with respect to Indian gaming
- Implement best practice processes and procedures when restructuring a gaming commission
- Recognize the role of the gaming commission
- Understand and be capable of implementing the roles and responsibilities of a TGRA
- Recognize best practices in model TGRA development
- Apply effective oversight of gaming operations as a functioning TGRA

### **Target Audience**

- Tribal Gaming Commissioners
- Operations Staff
- Tribal Leaders

## Tribal Background Investigations & Licensing

**CMP-105**

Course Length: 2.0 hours

**Course Provider:** Region Staff /OGC

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

This course is offered to gaming commissioners, background investigators and other licensing staff and covers those sections of IGRA related to the background investigation and licensing processes of key employees and primary management officials.

### Course Objectives

At the end of this course, participants will be able to:

- Understand the basic tenants of the Indian Gaming Regulatory Act (IGRA) and NIGC policy with respect to background investigations and licensing
- Recognize NIGC regulatory requirements for the licensing and background investigations of key employees and primary management officials
- Understand the background and licensing process as outlined in 25 CFR parts 556 and 558
- Recognize specific requirements to be in regulatory compliance with sections requiring action in 556
- Understand specific processes for gaming license actions
- Demonstrate critical reporting capability in first and second submissions of Notice of Results (NOR)
- Recognize NIGC response mechanisms and actions
- Understand and respond to specific eligibility issues, concerns and actions

### Target Audience

- Tribal Gaming Commissioners
- Background and Licensing Staff

<b>Gamesmanship</b>	<b>CMP-106</b> Course Length: 2.0-3.0 hours
<b>Course Provider:</b> All Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> The focus of this course is to provide TGRAs with tools to determine if Gamesmanship is occurring, to identify additional steps to be taken and documents to request, and to understand what steps can be taken to prevent gamesmanship at their properties. Attendees will learn how to review their gaming ordinance and regulations to identify sections that provide the needed authority to request and review contracts and agreements for violations of the Indian Gaming Regulatory Act (IGRA).	
<b>Course Objectives</b> At the end of this course, participants will be able to: <ul style="list-style-type: none"><li>• Discuss the purpose of IGRA</li><li>• Discuss the elements of gamesmanship</li><li>• Discuss three IGRA violations linked to gamesmanship</li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissioners</li><li>• Audit and Licensing Staff</li><li>• Operations Staff</li><li>• Tribal Leaders</li></ul>	

## TICS/SICS Development Workshop

**CMP-107**

Course Length: 12.0 hours  
2 Days

**Course Provider:** Compliance Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

This course will discuss elements of control and how to recognize areas in the TICS and SICS where detailed procedures should be written so that there is a reasonable assurance that assets are protected. It includes application of the concepts through interactive activities that help participants internalize learning so they can apply what they learn upon return to their gaming facilities.

### Course Objectives

At the end of this course, participants will be able to:

- Understand fraud, recognize risks and be able to apply those concepts to gaming operations
- Recognize gaming regulations that are in place to safe guard against fraud
- Recognize commonly used acronyms for the various levels of internal controls
- Write internal controls for their specific operations

### Target Audience

- Tribal Gaming Commissioners & Compliance Officers
- Tribal Gaming Operations Managers & Staff

## 543.21 Surveillance

**CMP-108**

Course Length: 2.0 – 3.0 hours

**Course Provider:** Compliance Staff

**Course Delivery:** Residential Training/Technical Assistance

### Course Description

Participants will be provided instruction that will review surveillance requirements in a gaming environment. The instruction will cover the MICS surveillance checklist. Attendees will gain an understanding of importance of having sound SICS, and will be provided examples of how missing or deficient SICS can lead to the occurrence of irregularities.

### Course Objectives

At the end of this course, participants will be able to:

- Identify Surveillance MICS requirements for Class II and III gaming operations
- Discuss examples of § 543.21 MICS specific to the surveillance process and importance of having strong Internal Controls.
- Discuss Surveillance reports for monitoring regulatory compliance and identifying potential threats to assets.
- Review Case studies and current crime trends that demonstrate how deficient internal controls contributed to the occurrence of irregularities.

### Target Audience

- Surveillance Agents
- Tribal Gaming Commissioners, Internal Auditors & Compliance Officers
- Tribal Gaming Operations Managers & Staff

<b>Commissioner Training</b>	<b>CMP-109</b> Course Length: 12.0 hours
<b>Course Provider:</b> Compliance Staff <b>Course Delivery:</b> Residential Training/Technical Assistance	
<b>Course Description</b> This course is designed to provide an understanding of the Tribal Gaming Regulatory Authorities (TRGAs) authority and responsibilities. Group activities and discussions will result in the development of specific duties that TRGAs can perform to assist in the regulation of their gaming operations. We will take a look at the Indian Gaming Regulatory Act (IGRA) and Tribal gaming ordinances to establish TGRA authority and identify submission requirements. We will also analyze associated laws and regulations to determine specific duties TGRA's can perform to achieve their regulatory responsibilities. This course is based on real world scenarios, and will include handouts, discussions, and online polling.	
<b>Course Objectives</b> This course can be offered as a 2 day workshop or each part can be offered separately. At the end of this course, participants will be able to: <ul style="list-style-type: none"><li><b>Part 1: Duties and Responsibilities of the TGRA</b><ul style="list-style-type: none"><li>• Discuss mission statements and how they can be written and used by the TGRA</li><li>• Review California v. Cabazon Band of Mission Indians and the creation of the Indian Gaming Regulatory Act (IGRA)</li><li>• Review the TRGAs gaming ordinance and understand the authority and responsibilities of the TGRA</li></ul></li><li><b>Part 2: Tools of the Gaming Commissions</b><ul style="list-style-type: none"><li>• Discuss how a Gaming Commission regulates and what tools are available to enforce the various levels of law?</li><li>• Review the various divisions and duties of TGRA's to include background investigations and licensing, working with the Internal Audit Division, Compliance Division and the Surveillance Division</li></ul></li><li><b>Part 3: Gamesmanship 2.0</b><ul style="list-style-type: none"><li>• Review gamesmanship and an example using the Cheyenne-Arapaho Settlement Agreement</li><li>• Discuss the TGRA's authority with respect to gamesmanship along with examples of gamesmanship to include misuse of gaming revenue, management contracts and sole proprietary interest</li></ul></li></ul>	
<b>Target Audience</b> <ul style="list-style-type: none"><li>• Tribal Gaming Commissioners</li></ul>	

# **TECHNICAL ASSISTANCE SERVICES**

## **TAS – 100 Internal Audit Review**

NIGC IAR (Internal Audit Review) testing is a comprehensive review of a tribal gaming's Internal Audit function. The services will be performed by a team of NIGC auditors on-site who will conduct the IAR, in coordination with casino and tribal regulatory personnel. The assessment is an overall review to assist the Tribe in ensuring that the Internal Audit function is in compliance with the following standards.

Training and technical assistance can be provided for the Internal Audit function, or recommendations can be made to assist in achieving compliance with the MICS and also with the Tribal SICS (System of Internal Controls).

## **TAS – 101 Internal Control Assessments**

ICA testing is a comprehensive review of a tribal gaming facility's entire system of internal controls or a specific examination of a single gaming activity such as Bingo, Table Games, or Gaming Machines. The ICA can be tailored to meet the needs of the tribal gaming operation and will provide a level of assurance commensurate with industry standards.

## **TAS 102 – IT Vulnerability Assessment**

IT vulnerability assessment testing is a high level tool that assists tribes' IT security posture relative to its gaming systems and provides a solid base-line for internally mitigating any risk found or to assist in justifying funding for third-party assistance, if needed.

IT vulnerability assessment testing consists of two types of tests; external and internal. The external test provides an overview of security vulnerabilities, which are visible from outside the gaming system network. The scan takes into account all security layers on the network between the scanner machine and the target system. The internal network test provides an overview of vulnerabilities, which are visible from the local network, taking into account host-based security controls on the target system.





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